

LAUNCHING EARLY COLLEGE DISTRICTWIDE

PHARR-SAN JUAN-ALAMO'S "COLLEGE FOR ALL" STRATEGY

MARCH 2012

By Cecilia Le

**EARLY COLLEGE
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Educate Texas (formerly the Texas High School Project) is a public-private alliance dedicated to significantly improving the postsecondary readiness of low-income students, with a focus on students in low-performing schools. A public-private initiative of Communities Foundation of Texas, its partners include: the Texas Education Agency; Office of the Governor; Texas Legislature; Texas Higher Education Coordinating Board; Bill & Melinda Gates Foundation; Michael & Susan Dell Foundation; National Instruments; Greater Texas Foundation; and The Meadows Foundation.

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ABOUT THE AUTHOR

Cecilia Le develops JFF publications and products that capture the key elements behind the early college school designs that connect young people to postsecondary success. These designs include early colleges that blend high school and college coursework in an accelerated program for students underrepresented in higher education, as well as *Back on Track* models that put off-track and out-of-school youth on paths to college and career. She was the project leader for the *Hidalgo Early College District Toolkit*. Recent publications include *From Remediation to Acceleration: Early Lessons from Two Philadelphia Back on Track Schools*; *Innovations in Developmental Math: Community Colleges Enhance Support for Nontraditional Students*; and *Accelerating College Readiness: Lessons from North Carolina's Innovator Early Colleges*. Prior to coming to JFF, Le worked at Education Sector in Washington, DC, as a Thomas B. Fordham Foundation Fellow. She has also helped prepare Boston students for college through an intensive tutoring program at MATCH Charter Public High School. She spent four years as an education reporter for newspapers in upstate New York and Wilmington, Delaware.

ABOUT THIS PAPER

This paper documents critical design decisions, operational approaches, and lessons learned from the first year of the Pharr-San Juan-Alamo Independent School District's work to create college-ready, college-connected pathways for every student under a \$2 million college-readiness grant from the Texas Education Agency. It also describes the groundwork and conditions the district put in place in the years leading up to the grant work. In 2010, through this grant, Educate Texas engaged Jobs for the Future for a two-year period to help Pharr-San Juan-Alamo create a districtwide portfolio of options that enable all students to graduate high school with at least 12 college credits. This paper is based on school site visits and interviews between January and June 2011, as well as on Jobs for the Future's experiences supporting the district. Interview subjects included district administrators, principals, teachers, counselors, instructional coaches, students, and individuals from the district's partner colleges and organizations.

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TABLE OF CONTENTS

INTRODUCTION	1
LAYING THE VISION, ALIGNING THE PIECES	4
Launching College for All: Starting with Dropouts	4
“We Can’t Do What We Did Yesterday”	5
Building a Portfolio of Early College Designs	6
Developing Rigorous College and Career Pathways	9
At the Middle Level	12
An Expansive View of Counseling	12
Building Districtwide Coherence	13
COLLEGE-GOING RIGOR IN EVERY CLASSROOM	15
A Common Instructional Framework	15
Strong Instructional Leadership	16
Supportive, Continuous Coaching	18
STAYING THE COURSE	20
ENDNOTES	22

INTRODUCTION

Across the nation, early college schools are creating a path to college success for young people underrepresented in higher education. For a decade, these innovative public schools blending high school and college have proven that, with the right support, all high school students can tackle college work. Now, a Texas school district near the Texas-Mexico border is broadening the early college vision. The Pharr-San Juan-Alamo Independent School District is challenging and supporting all 32,000 young people in the school system to earn key college credits as they prepare to graduate from high school. Early college is central to the district's commitment that every high school graduate is prepared to succeed in college.

Spanning three cities, the Pharr-San Juan-Alamo Independent School District is in some ways unique, yet it also embodies challenges being encountered across the U.S. educational system. Located about 10 miles from the Rio Grande separating Texas from Mexico, 99 percent of its students are Hispanic. The region is also one of the nation's most impoverished: 88 percent of the families in Pharr, San Juan, and Alamo are considered economically disadvantaged. Very few adults in the region hold college degrees, and most of Pharr-San Juan-Alamo's students will be the first in their families to attend college. Yet through an innovative and wide-reaching set of strategies, Pharr-San Juan-Alamo is making college a reality for every young person, from top students to former dropouts.

Together with its college and community partners, Pharr-San Juan-Alamo is creating a districtwide portfolio of options that will soon enable all students to graduate from high school with at least 12 college credits and the skills to progress to a degree or credential. Some students will graduate with several college courses under their belt, confident that they can succeed in college. Some will earn industry-recognized technical certificates that can help them get jobs to work their way through college and advance their careers. Still others will graduate high school with an Associate's degree, ready to specialize in medicine, engineering, or another career path at a four-year college. Across all these options, their courses of study are being aligned with the skill needs of the local economy.

How has Pharr-San Juan-Alamo, once troubled by high dropout rates and with barriers to student success that few schools in the nation have overcome, begun the transformation toward college success for all? The district's comprehensive approach to supporting all students to and through postsecondary education centers on several major strategies:

- > College course-taking for all high school students exposes students to the rigor and expectations of college.
- > Career and technical pathways lead to high-growth, high-wage careers aligned to the local economy's needs.

- > District-sponsored counseling located on college campuses supports recent graduates in making the difficult transition from high school to college.
- > Rigorous, college-ready instruction in all middle and high schools, including schools for off-track youth and dropouts, prepares students to succeed in college coursework.

In 2010, Pharr-San Juan-Alamo adopted the slogan “All PSJA Students: College Ready, College Connected” to signal its shift toward more rigorous instruction and more relevant dual enrollment pathways for all. With the start of the school year in 2011, the district expanded that vision to “College³: Ready, Connected, Complete” to signal its commitment to and shared responsibility in helping students not only get to college but earn a certificate or degree.

A major partner in the work is Educate Texas, a public-private initiative of Communities Foundation of Texas that works statewide to increase postsecondary readiness for low-income students. Supported by a major college readiness grant from the Texas Education Agency, Educate Texas is helping the district make key strategic leadership decisions, brokering partnerships with area colleges and community partners, and providing instructional coaches to work with teachers at the district’s secondary schools.

Pharr-San Juan-Alamo’s transformation efforts come at a time when the national conversation is sharply focused on college and career readiness. States around the country are instituting standards for college and career readiness, which will require districts to increase rigor and align their academic programs. Ten years after No Child Left Behind, the federal government is grappling with the next generation of accountability for schools and states. And districts and colleges are under pressure to reduce college remediation rates and boost completion. This year, Texas put in place a new set of end-of-course tests linked to graduation that is significantly more rigorous than its previous assessments.

Pharr-San Juan-Alamo is at the beginning of its reform, and its leaders acknowledge many steps are still to be implemented or improved. But in laying the groundwork for success and launching the reform, outcomes for students have steadily risen. The district has become a state and national model for dropout recovery, having graduated nearly 900 former dropouts and off-track students—and connected them to college—since 2007. All three comprehensive high schools that were formerly labeled “dropout factories” have raised graduation rates and improved their federal accountability standings. Pharr-San Juan-Alamo has substantially raised its four-year graduation rates—from 62 percent in 2007 to 87 percent in 2010—and in June 2011 graduated a record 1,885 students, compared to only 966 in 2007. Additionally, about 1,700 of the district’s high school students took college courses in the 2010-11 school year, a number projected to rise to 3,500 once every high school fully implements early college pathways. And between 2007 and 2009, the district doubled its number of students enrolling in college after graduation.¹

Especially significant is the progress that the district has been making in narrowing achievement gaps for traditionally underserved student groups. Only a third of students from the class of 2007 with limited English proficiency graduated in four years. By 2010, the four-year graduation rate for limited English proficiency students was 72 percent, well exceeding state and regional averages. Pharr-San Juan-Alamo made similar progress with special education students, raising their four-year graduation rate from 54 percent for the class of 2007 to 81 percent for the class of 2010.

This is the story of one district leading the way—a mid-sized, economically disadvantaged school district determined to offer every student the postsecondary opportunities that begin the pathway to family-sustaining wages. The first section of this paper describes the groundwork district leaders laid to enable successful reform and documents how the district created rigorous career pathways and a range of early college options for all. The second section explores the work Pharr-San Juan-Alamo has undertaken in the classroom so students have the academic preparation required to meet the challenges of college.

PHARR-SAN JUAN-ALAMO INDEPENDENT SCHOOL DISTRICT

Pharr-San Juan-Alamo has 43 schools, including four comprehensive high schools, four alternative schools, eight middle schools, 26 elementary schools, and one early childhood partnership with the local Head Start. Of the district's 32,000 students:

- > 99 percent are Hispanic
- > 88 percent come from economically disadvantaged families (eligible for free or reduced-price lunch)
- > 41 percent are English language learners

Among its achievements, the district has:

- > Become a state and national model for dropout recovery, having graduated more than 800 former dropouts ages 18 to 26 since 2007 and connected them to college
- > Raised four-year graduation rates from 62 percent to 87 percent in three years
- > Enrolled about 1,700 of its 8,000 high school students in college courses during the 2010-11 school year—a number expected to rise to 3,500
- > Doubled the number of students enrolling in college after graduation between 2007 and 2009

SOURCES: Texas Education Agency Public Education Information Management System; Pharr-San Juan-Alamo ISD



LAYING THE VISION, ALIGNING THE PIECES

When Dr. Daniel P. King arrived in Pharr-San Juan-Alamo in 2007, he came with experience in creating college-connected pathways for every student. As superintendent in nearby Hidalgo, Texas, a small community a few miles to the south, he had led the expansion of early college for all to the district's 3,600 students. Under his leadership, Hidalgo became nationally known for innovation and results: Along with their high school diplomas, nearly all of the graduates of Hidalgo's early college have earned transferrable college credits. Two-thirds of the class of 2010—the first crop of Hidalgo early college students to graduate—had earned a semester or more of credit.

King often spoke with other superintendents about Hidalgo's transformation, but many were skeptical that its successes could be replicated in large, complex districts. King was intent on showing that such school systems could achieve college readiness for all. When he took the helm at Pharr-San Juan-Alamo, he took strategic steps to build the credibility and support needed for districtwide reform.

LAUNCHING COLLEGE FOR ALL: STARTING WITH DROPOUTS

Pharr-San Juan-Alamo began sowing the seeds for this ambitious work as soon as King arrived. He immediately launched a novel dropout reengagement strategy that has doubled the number of annual high school graduates—and that puts former dropouts on the path to college.

King's priority was to address an urgent, highly visible problem: the district's dropout rate was double the state average. Almost 500 students were being lost each year. "The number one thing that jumped out and hit me in the face was the dropout situation," King said. "The dropout rate was horrendous. That struck me as something to be addressed immediately." What's more, about half of the dropouts had made it all the way to the senior year but had failed graduation exit exams or not met other graduation requirements. King felt a moral obligation to find and reengage the 237 seniors who had not graduated the previous spring.

The key to his response came in partnership with South Texas College and its president, Dr. Shirley Reed. With South Texas College, Pharr-San Juan-Alamo created the College, Career, and Technology Academy, a school where former dropouts complete their high school diploma and seamlessly transition into college courses when they are ready. Students focus only on what they need for graduation and for college-readiness, and they begin college courses while finishing their high school requirements. In designing CCTA, the district took advantage of Texas state policies that encourage districts to recover dropouts, provide state funding for students who are over compulsory school age, and promote connections to college for students still in high school.²

To recruit dropouts for CCTA's opening in fall 2007, Pharr-San Juan-Alamo launched an intensive recovery campaign, anchored by the slogan: "You didn't graduate from high school? Start college today!" Mayors, school leaders and staff, and other community leaders knocked on the doors of students who had not returned to school that fall. Young people who did not respond to one visit got two; King also personally visited homes. In CCTA's first month, the district enrolled 223 of those 237 dropouts. Within a year, 210 students had graduated. To date, the school has graduated nearly 900 former dropouts and worked to connect them to college.

The district has followed this intensive recruiting strategy every year since, and has expanded its strategy to capture off-track students before they ever officially drop out. Students who are close to graduation but lack enough credits are given the chance to go to CCTA the summer or fall immediately following what should have been their four-year graduation date. And beyond CCTA, the district's comprehensive dropout prevention efforts include transition communities at each high school, composed of teams of teachers who give intensive academic support, make home visits, and employ other prevention strategies with students who have failed courses or are otherwise at risk of not succeeding academically.

CCTA has become a national model for dropout recovery. In 2011, the Texas legislature enacted a bill, authored by State Senator Juan "Chuy" Hinojosa, to encourage replication of the district's dropout recovery program across the state. Jobs for the Future, a national organization helping the district implement college pathways for all, has featured Pharr-San Juan-Alamo's innovative use of state policy to create this effective school. (CCTA now serves as the anchor site for Jobs for the Future's regional work to develop *Back on Track* schools that put former dropouts and other off-track youth on a path to postsecondary success.)

King paved the way for districtwide reform by addressing a clear crisis first: the high number of dropouts. His strategy—putting a priority on the college-going agenda by focusing first on dropouts—was counterintuitive, but it was effective. By reengaging large numbers of dropouts who were close to graduation, the district achieved a quick, substantial win that allowed it to begin to make the case for college for all.

"The groundwork was being laid as we were connecting the dropouts to college," King said. "Here's Julio, who we got at 26 years old and he dropped out eight or nine years earlier. Now he's got his high school diploma, he earned his Associate's degree, and he's working on his Bachelor's degree. If we can do that with that kind of student, why shouldn't all of our A and B and C students who are at least progressing and earning their credits and they're hanging in there—why can't any one of them do what Julio is doing?"

"WE CAN'T DO WHAT WE DID YESTERDAY"

The success of the College, Career, and Technology Academy brought King the credibility to expand college-readiness efforts. At the same time, he tackled another pressing issue—building much-needed morale among teachers—by listening to and addressing their concerns.

Before King had arrived in Pharr-San Juan-Alamo, the district had begun to create small learning communities at each high school as part of a districtwide effort to personalize education and learning. Still, many details needed to be ironed out, such as scheduling problems that resulted from the reform. Throughout 2007, King spent time at each high school, inviting every teacher to share concerns and frustrations. He analyzed teachers' concerns, returning to each school within a month of visiting it. And when he did so, he came with solutions and options to make the reform initiative run smoothly, such as offering to engage consultants to rework master schedules. King then established a superintendent's advisory council of teachers to return ownership of the reform to the school community—a council that later helped inform King and the district's development of college-ready pathways.

“If we give up on this reform, they’re never going to want to do another reform,” he explained. “My message to them was, ‘We’ve got 500 dropouts a year, we’ve got all three high schools in serious AYP [Adequate Yearly Progress] trouble. We can’t do what we did yesterday.’”

Teachers and administrators across the district speak of the appetite for improvement that King’s leadership has brought to Pharr-San Juan-Alamo. “It has to start at the top, or else it doesn’t work at all,” said high school science teacher Hector Sandoval, who has taught in the district for 30 years. “He is a good motivator. . . . He does think out of the box, but when we use that term, we literally mean things we’ve never done before. We finally had a leader who knew what he wanted to do and said, ‘This is the message and this is what we are going to do whether you like me or not.’ And most of us said, ‘Yes, we do like you, so yes, we’ll follow.’”

BUILDING A PORTFOLIO OF EARLY COLLEGE DESIGNS

King and his team were focused on increasing dual enrollment opportunities so that all students could be exposed to college experiences while still in high school. In April 2008, Educate Texas and South Texas College approached King about opening an early college in Pharr-San Juan-Alamo. As in Hidalgo, he was attracted to the early college concept because it could bring a unifying vision and structure to the many college and career readiness efforts already underway at the district. The more challenging question was how to leverage the early college concept to achieve systemic transformation.

Most early colleges have 400 or fewer students, a design that reaps the benefits of small schools. In Hidalgo, King had gained approval to expand early college to all 800 high school students, but creating early colleges all at once for the 8,000 high schoolers in Pharr-San Juan-Alamo seemed less feasible. Still, King did not want to limit early college opportunity to 400 high school students.

“In my way of thinking, if you don’t get systemic transformation, you really haven’t done anything,” he said. “Pilots are nice, magnet schools are nice, all these things are nice, but if you don’t get systemic transformation, you really haven’t solved the issues that we have in education.”



The solution: the district would create one early college and use it as an incubator for the idea of connecting all students to college. The PSJA Thomas Jefferson T-STEM Early College High School opened in fall 2008 with 115 ninth graders; 100 of which would be the first in their family to go to college.

A NATIONAL LEADER IN EARLY COLLEGE

Texas is a pioneer in opening early college schools and expanding college-going opportunities to low-income students. With the Texas Education Agency, Educate Texas, Jobs for the Future, and college partners, school districts in Texas have opened 49 early colleges and 5 T-STEM early colleges since 2004. Early college students in Texas:

- > Are 66 percent Hispanic, 63 percent low-income, and 74 percent first-generation college goers.
- > Have accumulated an average of 24 college credits, which represents more than a semester of full-time credit.
- > Are twice as likely to pass state exams in all four subject areas as peers in comparison schools, and are more than twice as likely to pass Algebra II or geometry by the end of the tenth grade, according to a 2010 quasi-experimental study by SRI International.

Texas state policies that support early college and dual enrollment for all include:

- > Since 2003, districts can claim ADA funding for dual enrollment students. Schools that deliver college courses through high school faculty designated as adjunct faculty by the college can use ADA to pay for this college-level coursework.
- > Colleges may partially or fully waive tuition for dual enrollment students.
- > HB 1, a comprehensive effort to improve college readiness in Texas, authorized a \$275 per-student allotment that districts may use to promote dual enrollment and other college success strategies in high school.

One of five blended T-STEM early college high schools in Texas, the school was designed to increase the number of students entering science, technology, engineering and mathematics fields—so they are prepared for good jobs in the region, many of which require significant STEM preparation. Staff hired at the new early college worked closely with South Texas College, meeting weekly with department chairs to align curricula and articulate sequences of early college courses leading toward Associate’s degrees in STEM fields. All students enroll in college classes by sophomore year, and they receive intensive support from their early college teachers to ensure they succeed in those classes. Through a summer bridge program and throughout the school year, students prepare for college placement tests and learn college skills. Through this blended model of high school and college, students make a seamless transition between the two systems and graduate with the knowledge and confidence to succeed in further postsecondary study.

PSJA Thomas Jefferson T-STEM has become a model for preparing students to excel in rigorous high school and college courses. From there, King and the district began thinking about how to use the early college model to transform the whole district. One lesson that King learned in Hidalgo was that one path does not fit all. In Hidalgo, University of Texas-Pan American initially served as the primary postsecondary partner for early college, but as the district quickly found, to offer students a range of rigorous courses, career-focused and otherwise, it also needed to partner with technical and community colleges.

A range of pathways was just as crucial in Pharr-San Juan-Alamo, a school district 10 times Hidalgo's size. To provide college-going options for every student, whatever their skills and aspirations, the district needed a diverse portfolio of school designs and college options. Some students would earn 60 credits by graduation, others 12, and others perhaps just a few. King was especially sensitive to the needs of students with learning disabilities and students who start high school far from college-ready.

"We're talking about connecting all of them to a useful future," he said.

We can teach them what they can do and what they can become, and the fact that they start [at community college] doesn't mean that they can't get their Ph.D. someday if that's what they want to do. So I think we learned that when you really commit to all students, you've really got to look at how you are going to support [early college for all] with all different kinds of students. I think that transferred very well [from Hidalgo].

In May 2010, the district received a \$2 million college-readiness grant from the Texas Education Agency to make King's vision of college readiness for all a reality. In 2010, the district opened a provisionally designated early college within PSJA North High School, designed to act as a lever to drive change throughout the comprehensive high school.³ Teachers from PSJA North Early College work closely with their colleagues throughout North High School to share practices.

Based on its experience with PSJA Thomas Jefferson T-STEM Early College and PSJA North Early College, the district applied to the Texas Education Agency in 2011 to open an early college on each of its comprehensive high school campuses. In the fall, PSJA Southwest High School, then only one year old, reopened as PSJA Southwest Early College High School—taking the concept of early college from the exception to the norm. PSJA Southwest had opened the previous year to accommodate the district's growing enrollment, serving students from some of the poorest sections of the district. The school, which opened with 350 ninth graders, eventually will serve 1,800 students. Unlike the district's first two early colleges, each a small school of choice designed for about 400 students, PSJA Southwest is a large, comprehensive, provisionally designated early college serving all students living within its boundaries.

PHARR-SAN JUAN-ALAMO HIGH SCHOOLS

The Pharr-San Juan-Alamo Independent School District has four comprehensive high schools, all with early college pathways that offer students the opportunity to earn college credits while in high school.

- > In 2010, PSJA North High School opened a small early college high school within its building that will eventually serve about 400 students.
- > PSJA Southwest Early College High School, which opened in 2010, is a comprehensive early college high school that will eventually serve about 1,800 students.
- > PSJA High School and PSJA Memorial High School, each large, comprehensive high schools, are going through a planning year to prepare to apply for state designation to open early colleges within their schools in fall 2012.

In addition, the PSJA Thomas Jefferson T-STEM Early College High School opened in 2008, serves 400 students, and is developing into a demonstration site to spread effective instructional practices across and beyond the district.

The district also has four alternative high schools focused on connecting students to college before graduation.

Now in its fourth year, PSJA Thomas Jefferson T-STEM Early College serves as a learning lab that displays college-ready instructional practices and culture. Structured, cross-school visits spread effective practices to educators across and beyond the district.

“We’re working on being a strong learning community, and it’s trickling out to our entire district,” said Ana Gonzalez, the school’s founding principal, now overseeing instructional reform as the district’s director of the Common Instructional Framework. “What we’re doing is really transformational.”

DEVELOPING RIGOROUS COLLEGE AND CAREER PATHWAYS

Across its new portfolio of schools based on early college designs, the district needed to align its career and technology course offerings with the mission of college readiness for all. It was not clear that the schools’ career and technology programs were leading to postsecondary education or high-wage careers in the Rio Grande Valley. Working with Jobs for the Future, Pharr-San Juan-Alamo conducted an audit of its career and technology course offerings as a step toward aligning them with current and projected opportunities in the local labor market.

This work involved compiling publicly available labor market data and gathering information from local employers about the entry-level jobs and advancement prospects in their industries. At the same time, Jobs for the Future worked with the district to review its course documents, class registration files, textbooks, and other materials, as well as to conduct classroom interviews. Through this process, the district gained the information it needed to move away from obsolete programs, while expanding or creating programs that put students on trajectories to college and career success. For example, knowing health care is a prominent and quickly growing industry in the region, the district identified specific courses and career pathways—such as pharmacy technician, certified medical assistant, health informatics, and emergency medical technician—that would lead toward high-paying, high-growth health care positions. District staff also relied on the earlier experiences of its Thomas Jefferson T-STEM Early College, which had done significant work with South Texas College to develop a range of degree plans for early college students to work toward Associate’s degrees in their areas of interest.

Pharr-San Juan-Alamo and JFF recommended a plan to offer six broad career clusters; each contained two or three specific career pathways, giving the schools flexibility to choose which to implement. From there, district staff working with JFF developed a plan to place every student on a pathway to earning 12 or more college credits by graduation:

- > All ninth graders take a college-readiness course that explores the available career clusters, emphasizes technical reading, writing, presenting, and project work, and teaches specific college-ready behaviors, such as taking notes and managing time.
- > With help from a counselor, students choose a career cluster by the end of the ninth grade.
- > Each tenth grader takes a course introducing the principles of her or his chosen career cluster, providing the foundation to choose a more specialized career pathway in that cluster as upperclassmen.
- > The district’s goal is to support all juniors and seniors to pass introductory English and math at the college level, getting them ready to enter college with no need for remediation.
- > Through the district’s partner colleges, juniors and seniors will pursue six or more transferrable college credits in their career pathways.

Over the next two years, the district will finish putting its early college pathways in place, while phasing out programs and courses that do not lead to postsecondary education. The district is creating online maps of

This is a sample of the sequence of career and technical courses a student in the health sciences cluster/ pharmacy technician career pathway might take in addition to core academic courses. Courses for college credit have an (). By graduation, the student will be on his or her way to a pharmacy tech certification and have a solid foundation to pursue additional higher education in health sciences.*

9TH GRADE	Principles of Information Technology
10TH GRADE	Principles of Health Science Professional Communications
11TH GRADE	Health Science Medical Terminology* Lifetime Wellness and Nutrition
12TH GRADE	Anatomy and Physiology* Health Science Practicum, Pharmacy Tech*

the career pathways so students and families can see how the college courses they take in high school lead to concrete certificate and degree programs. In addition, all career and technology teachers are receiving professional development in college-ready instructional strategies.

“We need to offer these kids that opportunity [for career-focused college coursework] so when they graduate, they already have an impetus or a catalyst—they already have hours and they’ll continue,” said Nick Gonzalez, South Texas College’s associate dean of high school programs and services, who has worked closely with the district as it expands its dual enrollment offerings. “Whether for a doctorate degree or for a Bachelor’s or for a career and technology course of their choosing, they need to think they’re going to go to college so that high school becomes like a platform, like a conveyor belt to go on to college rather than a staging area.”



BRINGING KEY PARTNERS TOGETHER

To support college-going opportunities for all, districts need a network of local, regional, and state relationships. Partners strategically provide support, expertise, and external pressure, even as the district develops its capacity to sustain reform. Pharr-San Juan-Alamo's range of partners includes colleges, state and local agencies, public officials, local business partners, foundations, educational councils and networks, and local charter schools.

Working with the district to coordinate all the partners is Educate Texas, a public-private initiative of Communities Foundation of Texas to advance college readiness across the state. "I think one key thing I would put to anybody starting to do something like this is have outside partners [like Educate Texas]," Superintendent King said. "Not even so much for money or anything like that, but having outside people challenge you: 'Tell me what that would look like. Tell me what that means.' I think brings a lot of discipline and rigor and urgency to what you're doing."

The Texas Education Agency, which gave the district a \$2 million college-readiness grant in 2010, has been closely involved in supporting and monitoring the scale-up of Pharr-San Juan-Alamo's college pathways. The district is taking part in a major pilot project with the Texas Education Agency and the Michael & Susan Dell Foundation to build a next-generation data system that makes real-time data available to inform district and classroom decision making and empowers parents and students to track their own academic progress. The Region One Education Service Center has provided technical assistance to the district and supported its data collection. And with the local charter school network IDEA Public Schools, the district has a \$5 million federal Investing in Innovation grant to work with Teach for America on strengthening the pipeline of highly effective teachers and leaders that can serve the region's high-need students.

To be able to offer college courses to all high school students, the district has built robust partnerships with local colleges, as well as with the Texas Higher Education Coordinating Board. In Pharr-San Juan-Alamo, students take college classes through South Texas College, University of Texas-Pan American, and other college partners. Through Educate Texas, presidents from five Rio Grande Valley colleges—South Texas College, Texas State Technical College, UT-Pan American, UT-Brownsville, and Texas Southmost College—recently came together to discuss expansion of dual enrollment opportunities for students in the Rio Grande Valley.

Jobs for the Future, a national organization working with Educate Texas, delivers intensive professional development to Pharr-San Juan-Alamo to support college-ready instruction across the middle and high schools. JFF also advises on the development of early college pathways in every school, works continuously with the central office to build district capacity to support its mission, documents promising practices and lessons learned, and leads policy and advocacy work to support early college.

Spreading the word about a college-for-all expectation has been critical to gaining the buy-in of the community. Elected officials, such as Congressman Ruben Hinojosa and the cities' mayors and commissioners, have bolstered the district's efforts by regularly talking to constituents about the importance of college readiness. King, who is the current president of the South Texas Association of Schools and serves on the State P-16 Council, also shares this message and the lessons emerging from the work at Pharr-San Juan-Alamo to district leaders in these networks. "You've got to sell one message," said Alma Garcia, Educate Texas's program officer for early college. "You can't go all over the place."

To spread this work beyond Pharr-San Juan-Alamo, Educate Texas is leading a wide-reaching effort to take early college for all to regional spread and scale in the Rio Grande Valley. This includes spreading the vision and lessons learned, coaching other superintendents, advising on the design of college-connected school models, working with area colleges to increase their capacity for dual enrollment, and more.

AT THE MIDDLE SCHOOL LEVEL

For students to graduate from high school prepared to succeed in college, districts need to align their curricula and instruction—from college down through high school, middle school, and even elementary school. Pharr-San Juan-Alamo has begun making progress at the middle school level.

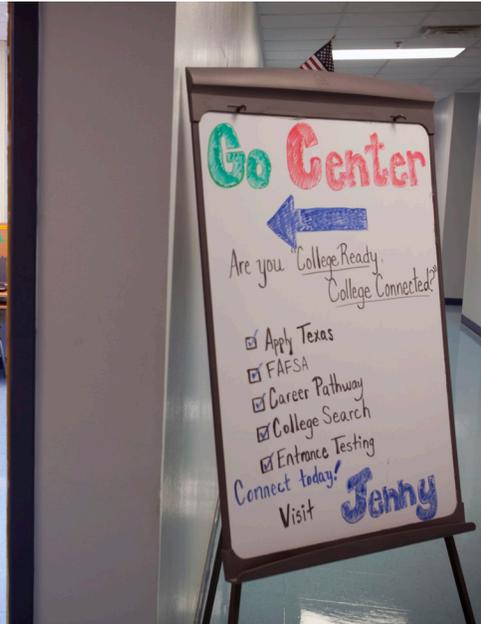
With its college-readiness grant, Pharr-San Juan-Alamo instituted college-ready instructional coaching in all middle schools, not just high schools. In 2011, a new Texas Title I Priority Schools grant enabled the district to significantly intensify the dosage of coaching at four middle schools. The middle schools are putting more rigorous pre-Advanced Placement courses in place so that students are prepared for AP and college courses in high school. And students begin exploring colleges and career paths at the middle schools, which build a college-going culture in a variety of ways.

At Escalante Middle School, which feeds into the new PSJA Southwest Early College High School, 98 percent of students are low-income. The two schools share a building, and their leaders formed a plan to work together to align their curricula. Escalante students research the costs and admissions requirements of colleges locally and across the nation, and they explore online the courses of study offered. Escalante also gives every student an introduction to—and preparation for—college placement tests such as the SAT and ACT, and the school plans to take all eighth graders on a college visit this year. At Kennedy Middle School, which also feeds into Southwest, Principal Norma Garza makes a point of mentioning college each morning in her school-wide announcements.

“It’s something very exciting for our parents and our families that we’re getting out that communication to them,” said former Escalante Principal Iris Guajardo, now the district’s Title I director. “It has been a big eye opener. Parents are saying, ‘My kids are starting to do this as early as this grade level, and they’re going to go to college.’”

AN EXPANSIVE VIEW OF COUNSELING

The district has taken strides to revamp and align its college and career counseling, another activity that had been primarily governed at the school level. In the past, students who attended different high schools may have received different information; students who moved from one high school to another could miss



steps in the college preparation process. Counselors from the district's secondary schools worked together during 2011 to create standardized counseling documents that give students clear, timely information about college and career options, as well as a standard schedule of college-focused events such as fairs and financial aid sessions.

"The financial aid advisors, the counseling department, and the career and technology department were basically programs that were on their own," said Nelda Cantu, the district's administrator for college readiness. "So what I've done is, for example, I brought in the financial-aid advisors, the middle school counselors, and the high school counselors to work together. I'm trying to align all three programs so that they can support each other, and they can work together and communicate."

An innovation of particular note is that Pharr-San Juan-Alamo's counseling program does not end when its graduates go to college. The district wants to see its graduates earn a college degree or other credential. With its college-readiness grant, Pharr-San Juan-Alamo hired three college transition counselors to support the college persistence of graduates, particularly through the first year. At South Texas College and UT-Pan American, each school has a dedicated office where a counselor can give Pharr-San Juan-Alamo students advice on course options, assistance with financial aid, and answers to other questions. The third counselor helps graduates of the district's alternative campuses make a smooth transition into college and overcome life challenges, such as child care needs and work responsibilities.

These transitional counselors work to create a seamless support system from the high school counseling program to the college advisory program. They begin coordinating their work with the high school counselors during students' senior year of high school, then take the lead over the summer to get students enrolled and "in the seat" at college. The transitional counselors gradually phase into a support role as college advisory services take over and act as a resource to students until they have successfully begun their second year of college. For graduates of the district's alternative campuses, who are more highly at risk, Pharr-San Juan-Alamo plans to provide support until they earn a degree or certificate. The district and the two partner colleges, after a months-long process, reached agreements to provide the counselors with access to student data so they can better track and support their progress.

Because so many of the district's college students are first-generation college goers, the counselors play a crucial role in this first year of college in helping students develop "college knowledge," such as how to read their course schedules and which campus offices to submit paperwork to. As a new semester began in January 2011, counselors called each student who had graduated in 2010 to learn whether they were enrolled in college and if they were facing any barriers to college, such as tight finances, poor transportation, or failing grades. Because young people often move and change phone numbers, the counselors make special efforts to maintain contact, linking to students on social networks such as Facebook and keeping in touch through younger siblings still enrolled in the district.

"In the past, once they graduated, that was it. There were no supports," said Rosie Robles, the district's college transition specialist based at South Texas College. "Now for the first time, this resource is available to them. We are here solely to serve students from the district. We're making them feel like it's possible and there's someone to hold their hand along the way. We've gotten to know them, started to form these relationships with them so that next time they need help, they will come back."

BUILDING DISTRICTWIDE COHERENCE

In any reform, the district's central office must be able to signal, support, and sustain change, and to ensure it spreads to every school and classroom. To carry out reform effectively, Pharr-San Juan-Alamo is moving from a decentralized school district to a unified system aligned with the priorities of college readiness. The central office and the district have restructured in a variety of ways.

One key action by King was to create an Office of College Readiness, funded by the college-readiness grant from the state. The administrator for college readiness reports directly to the superintendent, a structure that helps ensure that college-readiness initiatives have a high priority and can get done quickly. The district placed the Career and Technical Education and counseling departments under the Office of College Readiness to ensure that all roads lead to college.

In the past, most decisions about course offerings, professional development, curricula, counseling, and other matters were made at the school level. Now, to support the common mission, the district is standardizing many operations to focus curricula and instruction and build toward college readiness. For example, to ensure Pharr-San Juan-Alamo aligns its instructional resources toward college readiness, the district engaged Jobs for the Future to conduct an audit of the district's professional development. Through this audit, JFF helped the district pinpoint where it was spending time and resources on non-priority areas. With this knowledge, the district can focus on professional development activities that align directly with college-ready instruction.

Pharr-San Juan-Alamo is also in the process of aligning curricula across the district in support of college readiness. Although the whole district uses the CSCOPE curriculum system, different schools have used different aspects of it and in different ways. The district learned that nearby Brownsville Independent School District had identified specific aspects of CSCOPE to use districtwide as a systematic effort to increase curricular rigor. So in spring 2011, Educate Texas facilitated a visit to Brownsville for a team of about 15 Pharr-San Juan-Alamo administrators to learn how Brownsville accomplished curriculum alignment and to apply those lessons in Pharr-San Juan-Alamo.

"We don't say, 'This kid isn't going to college so we only prepare him to this skill level,'" said Jose Garza, the district's assistant superintendent for curriculum and instruction. "Our message, in everything we do, is that every kid will leave high school with the skill to go into college with."

FINANCING COLLEGE FOR ALL

To fund college for all, Pharr-San Juan-Alamo has used a mixed strategy of raising money to support its mission, capitalizing on state policies, and creating innovative cost efficiencies. A \$2 million college-readiness grant from the Texas Education Agency pays for key college readiness activities such as professional development for teachers and leaders and the development of college pathways. Beyond that, the district has taken advantage of additional grant opportunities to support its mission.

Texas allows Pharr-San Juan-Alamo and other districts to enroll students in college courses tuition-free through early college and dual enrollment options. Other key considerations in financing college-going opportunities for all include the cost of transporting students to the college campus and paying professors to teach courses at the high school.

To make the costs of a college for all strategy sustainable, Pharr-San Juan-Alamo offers salary incentives for teachers to earn Master's degrees and become adjunct instructors through one of the local colleges. That way, they can teach college courses on the high school campus, increasing the district's capacity to deliver college courses and reducing the costs of transporting students to the college campus.

In addition, the district and its partner, South Texas College, have agreed on creative space-sharing arrangements that save money. For example, the college has plans to use the district's new T-STEM Early College building at night to hold classes for its growing student body.

"There will be people that will say, 'Well, I don't have a grant. I can't do this,'" King said. "What I will tell you is we were going to do this with or without the grant. What I tell people when we talk about grants is the grant will help us get further faster, but the grant is not what's going to make a difference between whether we're going to do this or not."

COLLEGE-GOING RIGOR IN EVERY CLASSROOM

For structural reform to succeed, the district knew it also needed to accelerate instructional reform. Putting students in college courses would not benefit them without the solid academic preparation needed to succeed in those courses. While pushing reform forward at the district and school levels, Pharr-San Juan-Alamo recognized that the foundation for change must be in the classroom.

With research indicating that teacher quality matters most for student achievement, policymakers across the nation are focusing on teacher effectiveness. While many districts and states are experimenting with systems that reward the best teachers while weeding out ineffective ones, Pharr-San Juan-Alamo emphasizes the need to concentrate on improving the effectiveness of the entire teaching force. To accelerate student learning so every student can tackle college courses in high school, Pharr-San Juan-Alamo's strategy is to ramp up the teaching force it has, empowering teachers with college-ready instructional strategies that, with practice, any teacher can use.

A COMMON INSTRUCTIONAL FRAMEWORK

To support the success of college for all, every one of the district's secondary schools has adopted Jobs for the Future's Common Instructional Framework, which prepares all students, regardless of incoming skill level, for college-level work. The instructional strategies that make up this framework foster high-level intellectual discussion and inquiry, make challenging material engaging and accessible, and encourage students to take ownership of the learning process. Through consistent exposure to these instructional strategies, students develop the key knowledge, skills, and habits of mind shown to lead to success in college. Particularly important in Pharr-San Juan-Alamo, where 41 percent of students are English language learners, the Common Instructional Framework gives students with limited English proficiency constant opportunities to practice academic conversation and writing. In this way, the strategies support the district's dual language program and its goal of graduating college-ready students biliterate in English and Spanish.

These strategies, used in early colleges and other schools across the nation, are deeply rooted in pedagogical research and have a strong record of success in practice. The JFF Common Instructional Framework was developed at University Park Campus School, a nationally recognized, nonselective public school serving one of the lowest-income neighborhoods in Worcester, Massachusetts. Despite students' low entering skill levels, every student has graduated from the high school in five years or less, and 85 percent of graduates since the school's founding in 1997 are enrolled in college or have earned a postsecondary credential. JFF brings teachers and school leaders from around the country to University Park for a multi-day residency that demonstrates the strategies in action and shows why and how to implement the framework across grades and content

areas. After the residency, instructional coaches working with the district offer intensive, ongoing support to help teachers implement the strategies in their own classrooms.

“Even though [University Park] was a small school, I could relate to it,” said Nora Rivas-Garza, the principal at PSJA Southwest Early College, who visited the school in fall 2010 as part of a team from Pharr-San Juan-Alamo. “The teachers had a very good attitude of what needed to happen in the classroom with the kids. It was good instruction. When I came back, I told the teachers, ‘You know what? This is exactly what we need—we have the same thing here. The kids look the same.’”

To adopt the Common Instructional Framework system-wide, Pharr-San Juan-Alamo relied on instructional coaching and comprehensive professional development from Educate Texas and Jobs for the Future. For all middle and high school teachers across the district to buy into the college-ready instructional strategies and use them consistently requires strong, continuous instructional leadership and focused work, supported by continuous coaching and professional development.

JFF COMMON INSTRUCTIONAL FRAMEWORK

The JFF Common Instructional Framework is a set of six research-based instructional strategies that prepares all students, regardless of incoming skill level, for college-level work.

Collaborative Group Work brings students together in small groups to engage in learning, with each student accountable for her or his contribution. Activities are designed so that students with diverse skill levels are both supported and challenged by their peers.

Writing to Learn helps students, including English language learners, develop their ideas, critical thinking, and fluency of expression in all subjects. Students experiment with written language in every class every day.

Literacy Groups, a form of Collaborative Group Work, provide students a supportive structure for accessing challenging texts, broadly defined, and engaging in high-level discourse. Using roles that have an explicit purpose, students deconstruct text and scaffold one another’s learning.

Questioning challenges students and teachers to use deep, probing questions to foster purposeful conversations and stimulate intellectual inquiry.

Classroom Talk encourages all students to develop their thinking, listening, and speaking skills and promotes active learning. Classroom Talk takes place in pairs, in groups, and with whole classes.

Scaffolding encompasses a broad range of techniques (such as pre-reading activities and graphic organizers) that help students connect prior knowledge—from an earlier grade, different content area, or personal experience—to challenging new concepts.

STRONG INSTRUCTIONAL LEADERSHIP

Pharr-San Juan-Alamo principals lead instructional redesign. They make the case for change, structure school schedules to enable common planning time, and act as strong, highly visible instructional leaders who model the use of college-ready teaching strategies.

At PSJA North High School, former Principal Narciso Garcia—now expanding early college as superintendent of neighboring district La Villa—used student data to convince teachers they needed to change their classroom practice. As teachers recall, Garcia called them all together at the beginning of the year and

showed each their students' benchmark test data. Failure rates were unacceptably high. "He showed us our data, then he said, 'Let's try something else.' And that's when he introduced the Common Instructional Framework," recalled science teacher Hector Sandoval. "You have to be able to communicate with your kids. Standing there for an hour and lecturing, you did your job, but if they didn't get the connection, then it was a wasted hour."

At Escalante Middle, nearly six in ten students are in programs that support English language learners, and many others have only recently exited the program. During the summer before Escalante opened, teachers had strongly voiced the need to incorporate vocabulary and language development across all content areas. In August, as the district adopted the Common Instructional Framework, JFF held professional development sessions to introduce it to groups of teachers. One of these sessions targeted Southwest and Escalante.

"We brought in all of our teachers, and when they began to see the similarities of language development in the Common Instructional Framework, they bought in," said former Escalante principal Iris Guajardo. "They said, 'Yes, this is what we need. We need to get students talking.'"

Leaders at several district schools speak of modeling the Common Instructional Framework by using the strategies in faculty meetings. Because student-centered lessons require careful planning, school leaders structure their schedules to create common planning time within each department. Principals say they have stepped outside their managerial positions to take a more hands-on role as instructional leaders, observing each classroom several times a week. And the district has standardized its classroom walk-through tools so that across every school, leaders are looking for the same college-readiness strategies in action. These observations are not for evaluation purposes, school leaders emphasize, but to gain a better understanding of college-ready instruction, encourage a culture of peer learning, and coach teachers to implement the strategies in a coherent way across all classrooms.

"I hear everybody—from state senators to the president to our superintendent—talking about college ready," said Rivas-Garza, the leader at Southwest. "But if we're not willing to change the way our classrooms look, then we're lying to the kids, we're lying to the parents, we're lying to everybody. So I told the teachers, 'We can receive all this training, but if you close the door and you do the same thing, then we're wasting our time.'"



SUPPORTIVE, CONTINUOUS COACHING

With the college-readiness grant from the Texas Education Agency, the district initially planned to pilot college-ready instruction with a small group of teachers, administrators, and students—in one small learning community within each high school. Each coach would work intensively with teachers in one learning community of several hundred students, and this pilot would drive the type of rigorous instruction necessary for college readiness through the rest of the district. However, that would have left some students out initially. In the summer of 2010, King announced that all the secondary schools would embark on instructional reform, expanding the scope of the work to five high schools and eight middle schools.

Through the grant, the district was to receive professional development from Jobs for the Future and college-readiness coaches from Educate Texas, which has long coached the state's early colleges in implementing the Common Instructional Framework. With the change of plans, each of the three full-time instructional coaches and one part-time coach were spread thin, each with four schools to cover. What Pharr-San Juan-Alamo did next illustrates how districts might achieve ambitious goals in this era of highly constrained resources. The district and its partners developed an instructional reform strategy designed to achieve the most possible impact, given the limits: go broad, go deep. The district would go broad with professional development sessions open to all teachers in the district. At the same time, it would go deep, with intensive coaching for key teams of teachers within certain grades and content areas, who would then model college-ready instruction to their peers throughout the school.

Coaches observe the classrooms of key teachers, then discuss with the teachers what they saw and help them think ahead to their next lessons. To structure these observations and discussions, teachers establish questions in advance that they would like the coach to focus on. For example, a teacher might want to know whether students were going to the text for evidence. Above all, coaches emphasize to teachers that they are not supervisors or evaluators.

"The term 'coach' in education is still fairly new," said Scott Hollinger, a retired principal hired by Educate Texas to coach teachers at PSJA Southwest Early College and its feeder schools, as well as PSJA Thomas Jefferson T-STEM Early College:

So I introduce myself to the faculty as personal trainer of education. If you went to a gym and you had a personal trainer, they would tell you how you're doing. You wouldn't be happy if they lied and said you were doing great. They would tell you here are some things to try for your next step, and you can do it or not do it, but you know that if you really want to get stronger, you'll do what they encourage you to do.

But the personal trainer's not going to go tell anybody else how you're doing or not doing it. So that's me. You can tell me anything, like, "I tried this and it didn't work," or "I thought this would be so exciting but the kids were totally disengaged," and we can just talk about it and think together about the best ways to do that, how it went, and what we might like to do differently next time.

Although the district is still working toward instructional coherence across all classrooms, Pharr-San Juan-Alamo secondary schools demonstrate these teaching strategies in action daily. In one biology classroom at PSJA Southwest Early College in February 2011, students collaborated in groups to construct a graphic organizer comparing meiosis and mitosis. Students then used beads and string to visually represent chromatin and spindle fibers as they demonstrated what happens during each phase. When explaining terms such as "centromere," the teacher provided context in Spanish before switching back to English, demonstrating the districtwide emphasis on dual-language instruction.

On one day at PSJA Thomas Jefferson T-STEM Early College, a teacher scaffolded student learning by asking her class to create Venn diagrams showing the commonalities and differences of two articles. Later, when the students were asked to write a “compare and contrast” essay, they would be able to draw on this graphic organizer. In a geography classroom, student groups each compiled information about a religion, then re-formed groups and taught their new group members about the religion they had researched. A science class practiced the strategy of Writing to Learn by writing creative stories about “fight or flight” reactions that incorporated three bodily reactions—an example of writing across the curriculum. Student-created brochures on surviving college and managing time and stress hang on the classroom walls.

“It’s kind of like a constant thing they explain to us, that they’re getting us ready for college,” said Karina, a student at PSJA Southwest Early College. “We learn about what you need to do to be able to get into college.”

“The teachers are very helpful,” said Devany, a student at PSJA North Early College who wants to study speech therapy and nursing in college. “You really do understand. We do a lot of group work and I think that’s very good. Instead of them telling us to do this, we’re the ones doing the questions and I really like that. It’s kind of like we’re taking the lead.”

Teacher Mike Tcheyan would agree that, through the use of the college-ready instructional strategies, students are taking the lead in many more learning situations. In his chemistry classroom at PSJA Thomas Jefferson T-STEM one day, he asked students to solve problems and post their answers on the wall. Next, he gave sticky notes to the rest of the class and had them read the answers, then post notes stating whether they agreed or disagreed and why. Tcheyan’s students also studied the solubility of gases at different temperatures, drawing conclusions about why warm soda tastes flat.

“The Common Instructional Framework makes the learning self-directed,” he said:

I’m not standing up there telling them. They’re reading, they’re talking with each other, and they’re exposing themselves to the material and seeing what they know about it before we analyze it and come to a conclusion about it. That’s really, really helpful both on the teaching front and on the kids’ understanding and then being self-directed.

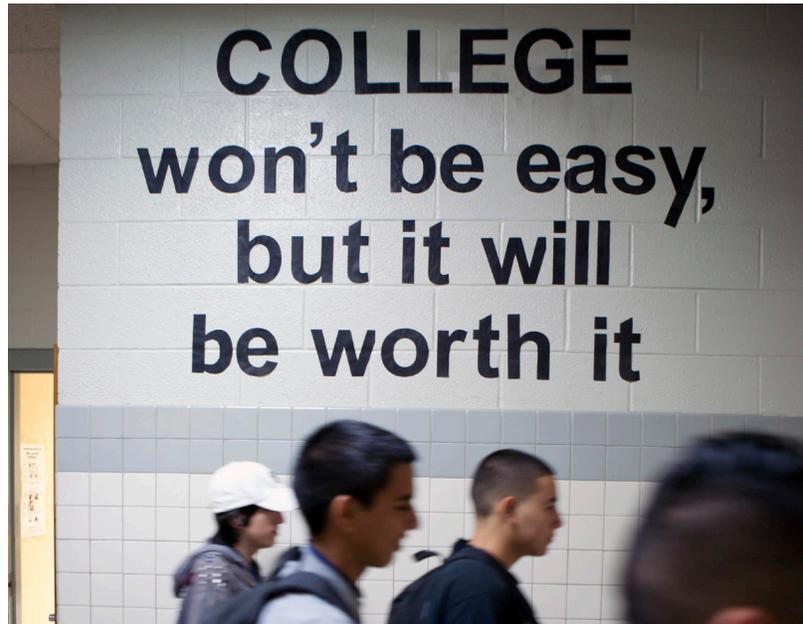


STAYING THE COURSE

From the system level to the student level, Pharr-San Juan-Alamo's strategies are rooted in visionary leadership, school designs that support early college, and intensive coaching and support for teachers. College for all continues to spread in Pharr-San Juan-Alamo. Two traditional high schools are engaged in a planning year to apply to open early colleges within their buildings in fall 2012, so that all high schools incorporate the early college concept. In each case, the specifics of the design may vary, but across all of them, the district's primary goal is to achieve systemic transformation, making college pathways the expectation and reality for every student.

Now in its second year of adopting the JFF Common Instructional Framework, the district is focused on spreading instructional rigor to more schools, and on building internal capacity so professional development continues after funding for external coaches is gone. The district is beginning to train elementary school teachers in the Common Instructional Framework, with plans to spread the model to all 43 schools by summer. Educate Texas coaches are working with the district to train in-house coaches, some based at the central office level and others at individual schools. By fall 2012, the district hopes to have more than 70 internal coaches to help teachers implement strong and coherent instruction. Through systemic implementation, in which all teachers use a common language and approach, the vision is to develop students themselves as leaders of learning who are highly skilled in transferring these college-ready instructional strategies into learning strategies they can use independently in college.

"Part of this whole strategy is that [King is] always looking at sustainability and scaling," said Alma Garcia, Educate Texas's program officer for early college. "So this is a cost-effective way of spreading the lessons learned from the schools that were within the funding source that they had, and how they've taken that to a school that has none of the major funding."

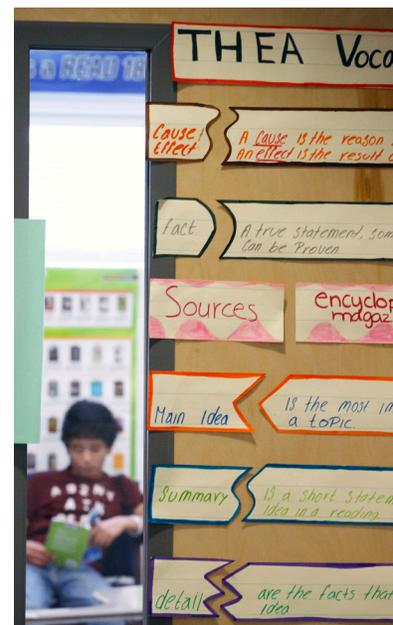


In addition, Pharr-San Juan-Alamo is starting to leverage and align its districtwide Advanced Placement initiative, funded by the College Board, with its dual enrollment efforts. If high school students enrolled in college classes take Advanced Placement exams at the end of the course, they increase their chances of being able to transfer their college credits earned through South Texas College to private and out-of-state universities. To that end, the district is piloting an “AP/DC” project at PSJA North that incorporates aspects of the AP curriculum into dual credit courses.

The district’s next steps in measuring success are to determine the number of students who are on track to an on-time graduation and the number of students enrolling in college immediately after graduation. Eventually the district strives to measure college persistence by counting the number of graduates still enrolled in college after a year, and it also will track the rates of students needing remediation in college. Finally, the district aspires to build the capacity to track students to the completion of a postsecondary certificate, Associate’s degree, or Bachelor’s degree.

All these changes, Pharr-San Juan-Alamo’s leaders say, are transforming the culture of the community and students’ perceptions of what is possible for their future. At Southwest Early College last year, teachers ran a contest in which groups of ninth graders researched an assigned college. The students reported on programs of study, admissions requirements, and location and then decorated their classroom door with that college’s colors. In addition, students filled out sample college applications and learned what goes in a letter of recommendation.

“You see every door and you’re like, ‘Wow, this college offers you so many things,’” said Sandro, a student at PSJA Southwest. “It really makes you feel like you want to go to college. I can’t wait.”



ENDNOTES

- ¹ SOURCE: Texas Education Agency Public Education Information Management System
- ² For more information, see Allen, Lili and Rebecca E. Wolfe, 2010. **Back on Track to College: A Texas School District Leverages State Policy to Put Dropouts on the Path to Success.** Boston, MA: Jobs for the Future.
- ³ The Texas Education Agency has developed an early college designation process to ensure that districts operating early colleges maintain the integrity of the model. This process includes two levels of designation: designated and provisionally designated. Schools at least two years old that have addressed all the required design elements are eligible for designation. Schools that have been operating for less than two years, or schools that are in the process of fulfilling all the required design elements, are eligible for provisional designation.



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