The Steering Committee of the College and High School Alliance appreciates the opportunity to comment on the “Agency Information Collection Activities; Comment Request; Experimental Sites Initiative Reporting Tool 2017.” The College in High School Alliance is a coalition of leading national, state, and local organizations committed to policies that support high-quality dual or concurrent enrollment and early college high school programs. The CHSA believes that greater support for these models at the federal, state, and local levels will significantly improve the secondary and postsecondary outcomes of students, particularly those from low-income or middle-class backgrounds and underserved populations. Our comments specifically address the experimental site for dual enrollment.

Dual enrollment and early college high schools are effective tools for improving college access, affordability, and completion, particularly for low-income and middle-class students. Their strong results in terms of college enrollment and completion has been validated by numerous rigorous research studies. The dual enrollment experimental site is both important and timely, because it provides an opportunity to learn what the return-on-investment is of providing Pell grants to younger students enrolled in college. There are numerous questions that research on this experiment can answer to inform a policy solution to reduce college costs and improve outcomes.

We strongly encourage the Department to move forward with a rigorous evaluation of the dual enrollment experimental site, in order to learn valuable lessons about the impact of expanding financial aid eligibility to younger students. Even in the absence of such a rigorous evaluation, there is important information that can be gleaned from descriptive statistics, and we recommend that the Department include such questions in its information collection activities.

ICR Data Collection Item - Institutional

We propose the following additional questions, developed in collaboration with the New America Foundation, that should be included for the dual enrollment experimental site:

- What are the credentials of teachers in the dual enrollment program under this experiment?
- What professional development opportunities are offered to dual enrollment educators participating in the program, if any?
- Is the program offered at the high school or at the college?
- What process did the accreditor follow in approving the program under this experiment?
- What, if any, articulation agreements does the college providing credit under this experiment have with other colleges and universities?
- What, if any, admissions standards did the college establish for students to participate in the dual enrollment program?
- Are students who do not meet academic readiness standards in a particular area of study given access to remediation opportunities not funded by federal Pell Grants? If so, how are students identified for remediation, and how and by whom is remediation delivered?
- What systems did the participating institution have to implement to administer federal financial aid for students in the experiment?
▪ What strategies did the college need in order to offer the required student advising and supports to students in the experiment?
▪ What dual enrollment degree pathways did the college provide to students in the experiment?
▪ What STEM and/or workforce alignment programs for students did the college include in the experiment?

ICR Data Collection Item – Student

We propose the following additional descriptive questions that should be included for the dual enrollment experimental site:

▪ What is the student’s date of entry to the program?
▪ What is the student’s date of completion from the program?
▪ How many transferable credits/hours did the student attempt in the most recent award year?
▪ How many transferable credits/hours did the student complete in the most recent award year?
▪ What is the retention rate for participation in the experiment?
▪ What is the percentage of students earning degrees or credentials in the experiment?
▪ What is the per student and total amount of Pell funding used in the experiment?