The undersigned members of the College in High School Alliance (CHSA) appreciate the opportunity to provide comment on the “Secretary’s Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs.” 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.

**Regarding Proposed Priority One – Empowering Families to Choose a High-Quality Education that Meets Their Child’s Unique Needs:**

We are encouraged by the Secretary’s inclusion of dual or concurrent enrollment and early college high schools as part of the Department’s priorities for discretionary grant programs. These models provide students with course and school options so they can tailor their academic experience to their specific college and career plans. In addition, we recommend that the Department tighten the language on “developing, increasing access to, and building evidence of effectiveness of innovative models of educational choice” to ensure that greater priority is provided for models with a strong evidence base for improving student success.

Numerous rigorous, multi-institution, federal, and statewide research studies in more than a dozen states have proven that early college high schools and dual and concurrent enrollment programs significantly increase high school graduation rates, college readiness, and college access, persistence, and completion. At the same time, these models lower the cost of college for families, and reduce the time needed for students to complete degrees and enter the workforce. Across the country, these models are saving money for students, families, and taxpayers while improving efficiencies in transitions between high school and higher education. As a result, we believe that these models are suitable candidates for the Department’s priorities, and demonstrate an evidence base sufficient to justify federal investment.

**Regarding Proposed Priority Eight – Promoting Effective Instruction in Classrooms and Schools:**

We recommend that the Administration strengthen its proposed Priority for Promoting Effective Instruction in Classrooms and Schools by incorporating a priority area for projects that are designed to expand the pool of teachers who can effectively teach college courses in early college and dual or concurrent enrollment settings.

Two of the chief barriers to expanding dual enrollment options for students are the lack of high school instructors with the advanced degrees necessary to teach college courses, and the hurdles that can prevent college instructors from securing the certification necessary to teach high school students. As a

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1 More information on the studies in this area can be accessed on the College in High School Alliance website, under the “Evidence of Success” tab: http://www.collegeinhighschool.org
result, prioritization of projects that address these challenges would help states, tribes, and districts expand educational choice, particularly in rural school districts. Additionally, projects that explain how their proposed approach will promote high-quality, effective instruction, and the evidence behind that rationale, should be prioritized in order to ensure that the approach does not sacrifice teaching quality in the pursuit of broadening access.

The following members of the College in High School Alliance endorse these recommendations:

ACT, Inc.
Alliance for Excellent Education
America Forward
American Indian Higher Education Consortium (AIHEC)
Bard College
Be Foundation
Career Ladders Project
Center of Excellence in Leadership and Learning – University of Indianapolis, IN
Eastern Washington University/Outreach and Engagement, WA
Illinois Alliance of Concurrent Enrollment Partnerships (ILACEP)
Jobs for the Future
Joliet Junior College, IL
KnowledgeWorks Foundation
Middle College National Consortium
National Alliance of Concurrent Enrollment Partnerships
New America
University of Missouri – Saint Louis
Western Interstate Commission for Higher Education (WICHE)