Minutes of the Education Achievement Council Meeting

January 28, 2016

BE IT REMEMBERED, that the Education Achievement Council (EAC) met in the Mississippi Institutions of Higher Learning Board Room in Jackson, Mississippi at 11:00 a.m. on January 28, 2016.

Council Members Present:

Mr. Milton Anderson, President, Mississippi Association of Proprietary Schools
Dr. Jim Borsig, President, Mississippi University for Women
Dr. Glenn Boyce, Commissioner, Institutions of Higher Learning
Dr. Thomas Burke representing Dr. Rodney Bennett, President, University of Southern Mississippi
Dr. William Bynum, President, Mississippi Valley State University, via teleconference
Dr. Harold Fisher, Executive Director, Mississippi Association of Independent Colleges and Universities
Dr. Deborah Gilbert, representing Dr. Andrea Mayfield, Executive Director, Mississippi Community College Board
Dr. Jim Haffey, President, Holmes Community College
Ms. Jane Hulon, representing Dr. Ronnie Nettles, President, Copiah-Lincoln Community College
Mr. C.D. Smith, Trustee, Institutions of Higher Learning, via teleconference
Dr. Jesse Smith, President, Jones County Junior College
Dr. Billy Stewart, President, East Central Community College
Dr. Carey Wright, State Superintendent, Mississippi Department of Education

Council Members Absent:

Mr. Lee Bush, Chair, Mississippi Community College Board
Chairman Eugene Clarke, Chairman, Senate Appropriations Committee
Mr. Chip Crane, Board Member, Mississippi Community College Board
Mr. Tom Duff, Trustee, Institutions of Higher Learning
Mr. Michael Jordan, Director, Division of Professional Development Mississippi Department of Mental Health
Dr. John Kelley, Chairman, Mississippi Board of Education
Chairman Nolan Mettetal, Chairman, House of Representatives Universities and Colleges Committee
Dr. Laurie Smith, Education Policy Advisor, Office of Governor Phil Bryant
Chairman Gray Tollison, Chairman, Senate Education Committee
Ms. Vickie Powell, representing Blake Wilson, President and CEO, Mississippi Economic Council

Others Present:

Mr. Eric Atchison, Director of System Analysis and Research, Institutions of Higher Learning
Ms. Caron Blanton, Director of Communications, Institutions of Higher Learning
Dr. David Brooking, Director of Student Success Center, Mississippi University for Women
Ms. Menia Dykes, Director of Accreditation, Institutions of Higher Learning
Mr. Raul Fletes, Assistant Executive Director for Research and Effectiveness, Mississippi Community
I. Welcome

Dr. Smith welcomed attendees and invited everyone to introduce themselves.

Dr. Smith welcomed Dr. Jim Haffey, president of Holmes Community College, the newest member of the Council. He replaces Dr. Ronnie Nettles. Dr. Borsig thanked Dr. Nettles for his service as an inaugural member of the council.

II. Approval of Minutes

Dr. Borsig asked members to review the minutes. Dr. Boyce moved to accept minutes as presented. Dr. Bynum seconded the motion. The motion carried.

III. Components of Model Policy on Dual Enrollment

Dr. Carey Wright introduced the topic of dual enrollment. The cost of dual enrollment courses presents a challenge for many students and has created an equity issue. Participation has increased, but providing equal access is a priority of the State Board of Education. MDE has been studying how to do this in an equitable manner. IHL, MDE and MCCB staff had an opportunity to discuss this with national experts at ECS Convening.

Jennifer Zinth, with ECS, serves as director of high school and STEM. She is going to discuss the 13 components of a model dual enrollment policy.

ECS should be seen as an extension of state staff. Publish reports and customized reports. Convene policy makers to discuss issues and counsel states about policy issues.
ECS maintains a 50 state database comparing dual enrollment policies. It is updated annually.

Ms. Zinth discussed the policy components of model dual enrollment policies. A copy of the presentation is attached to these minutes.

Dr. Wright asked the Council for support to form a Dual Enrollment Task Force to look at existing dual enrollment policy and consider recommendations for the 2017 Legislative Session.

Dr. Smith asked that the task force’s work include looking into the sustainability of dual enrollment programs, and including how dual enrollment is paid for. Postsecondary institutions embrace dual enrollment, but most are deeply discounting the cost so that only districts pay for it. Students are not asked to pay.

Dr. Wright will organize the task force. Dr. Borsig asked that the task force give an update at each meeting until the report is completed. The council approved establishing the task force.

IV. Report on SACS Review of the Principles of Accreditation

Dr. Borsig explained that SACS is conducting its 10 year review of principles of accreditation. SACS is working to include a measure of completion in the Principles of Accreditation. Looking at full reporting to account for swirl and institutions setting their own benchmarks based on their student population and their peers.

Dr. Maurice Eftink, from UM, serves on the committee. He will be invited to address a future meeting once SACS makes progress on this work.

V. Discussion of Focus on Annual Measures of Completion

Dr. Smith discussed moving to a published annual report that includes the report cards and other relevant information. Hoping to have a draft in October.

Dr. Borsig said it may take a couple of years to finalize the report based on the work of the SACS Review of the Principles of Accreditation. The report cards may need to be refined to focus more on certificates, associates’ degrees and bachelor’s degrees. Since the time the report cards were created, other measures of completion have been developed. Some items of attainment, such as dual enrollment, are not included. Five years in, it is time to review the data to make sure the information included is showing progress on attainment.

Dr. Smith added that progress in college readiness and preparedness is another component that should be included to show the progress being made in that area. The annual report is intended to be a good measure of our progress.

Dr. Borsig moved that IHL and MCCB system staff need to meet to review the necessary data and help focus the conversation. A task force of the right stakeholders will be assembled to work on it.

Mr. Milton Anderson seconded the motion. The motion carried.

VI. Discussion of 60% Goal for two age ranges
Dr. Smith and Dr. Borsig began a discussion of defining working age population and measuring educational attainment.

Postsecondary systems have most influence on 25-34 year olds. For purposes of measurement, consider looking at attainment of the working age population, 25-65 year olds, and then drill down on 25-34.

Presented Lumina Strategy Labs report of state goals. Goal setting by sector is a challenge.

Dr. Boyce recommended study the data before revising the goal. He said the Council needs to identify the actual starting point and use the data to drive forward. Focusing on 25-34 year olds will enable institutions to make a significant difference in moving the next group of workers to a higher level of attainment than the previous generation of workers. The initial goal should be realistic goal based on data.

Dr. Borsig advised rolling the goal into the report card discussion.

VII. Update on Community College Report Cards

Dr. Gilbert reported on Community College Report Cards on behalf of Dr. Andrea Mayfield who is out of town. Report cards are nearly complete. MCCB staff is working with nSPARC to validate workforce data. MACJC has approved having workforce data sent to MCCB first for validation before it goes to nSPARC. Goal is to have report cards complete by March in time for the next EAC meeting.

VIII. Update on EAC Legislation

Proposed changes to EAC legislation have been drafted for the 2016 Legislative Session.

Chairman Mettetal expressed appreciation for the work of the council and the important work they do for the State of Mississippi.

IX. 2016 Meeting Dates

April 28
August 25
October 27

All meetings will begin at 11:00 a.m. in the IHL Board Room

X. Other Business

XI. Adjourn

There being no further business, the meeting was adjourned.
The Landscape of Dual Enrollment Policy: Placing Mississippi in Context

Jennifer Zinth
Director, High School and STEM Education Achievement Council Meeting
January 28, 2016

Who we are

The essential, indispensable member of any team addressing education policy.
What we do

We believe in the power of learning from experience and we know informed policymakers create better education policy.

How we do it

REPORT
RESEARCH
CONVENE
COUNSEL

Your education policy team.
ECS Dual Enrollment Database

50-State Comparison: Dual / Concurrent Enrollment Policies

Education Commission of the States has researched dual/enrollment enrollment policies in all states to provide this comprehensive resource. Click on the questions below for 50-state comparisons showing how all states approach specific dual/concurrent enrollment policies. Or, choose to view a specific state’s approach by going to the individual state profiles page. For an explanation of the findings of the dual enrollment resource, click here.

Key takeaways:
- Without a requirement that eligible students may participate, schools and districts may not be inclined to promote dual/concurrent enrollment for students.
- Some express concerns that dual enrollment courses taught by high school teachers may not meet the same level of rigor as courses taught by postsecondary faculty at postsecondary campuses.
- Some critics contend that dual enrollment courses without an end-of-course assessment have no measure to ensure that the level of rigor matches that of traditional postsecondary courses.
- How funding flows to each participating school to participate or decline participation. If courses meet rigorous criteria and students are denied transfer credit at another postsecondary institution, the value of dual enrollment as an option for students to save

Programs:
- 1. Statewide policy in place
- 2. Definition or title of program
- 3. Where courses provided
- 4. Postsecondary and/or secondary credit earned
- 5. Students may take developmental/remedial coursework for dual credit
- 6. CTC component
- 7. Unique characteristics

Assess:
- 8. Offering mandatory or voluntary
- 9. College partners can be 2-year/4-year/both
- 10. Student eligibility requirements
- 11. Cap on number of credits students may earn
- 12. Students/parents must be notified of dual enrollment opportunities
- 13. Counseling/advising is made available to students

Finance:
- 14. Who is primarily responsible for paying tuition
- 15. How state funds participating high schools
- 16. How state funds participating postsecondary institutions

Ensuring program quality:
- 17. Instructor and course quality component
- 18. Program reporting requirements
- 19. Program evaluation component

Transferrability:

Your education policy team.
Model Policy Components

Increasing Student Access and Success in Dual Enrollment Programs:
13 Model State-Level Policy Components

By Jennifer Daisy Zinth
February 2014

Dual enrollment or concurrent enrollment programs allow eligible high school students to take postsecondary courses for college credit, usually, high school credit. Programs are nearly ubiquitous — in 2014, courses for dual or concurrent enrollment credit are offered in every state and the District of Columbia. State policies govern these programs in 47 states and D.C., and local policies or agreements among programs in Alabama, New Hampshire, and New York.

While programs vary in name and scope, the term “dual enrollment” will be used throughout this report. Findings are based on an ECS analysis of dual enrollment policies and a review of relevant academic research.

Among some of the findings:
- The number of U.S. public high schools offering dual enrollment programs is growing, with 62 percent providing such opportunities in 2011-12, the most recent national data available.
- Academic research and state experience highlight the benefits of dual enrollment programs for improving college completion rates, particularly for minority and low-income students.
- However, with the possible exception of Massachusetts, minority and low-income students tend to be underrepresented in statewide dual enrollment programs. Recent analyses in Illinois, Ohio, and Washington show-white and/or more affluent students are overrepresented in these programs.

ECS identified 13 model state-level policy components that may increase student participation and success in dual enrollment programs. These components fall under four broad categories: access, finance, ensuring course quality and transferability of credit, examples of state law containing these...
Database and policy brief combined can help determine if policies in a state contribute – or serve as unintentional barriers – to program access and quality.
Model Policy Components

Access
1. All eligible students are able to participate
2. Student eligibility requirements are based on ability to access college-level content
3. Caps on the maximum number of courses students may complete are not overly restrictive
4. Students earn both secondary and postsecondary credit for successful completion of approved postsecondary courses
5. All students and parents are provided with program information
6. Counseling/advising is made available to students and parents before and during program participation

1: All eligible students are able to participate


Mississippi: Policy silent

Policy approach to consider: Oklahoma: Districts prohibited from denying program participation to an eligible student; postsecondary institutions prohibited from denying enrollment to a qualified student.
2: Student Eligibility Requirements Based on Demonstration of Ability to Access College-Level Content

**Trend:** 1 state (2008) → 0 states Feb. 2015?

**Mississippi:** No. Community college board regs require student to have completed 14 HS units, minimum GPA, written recommendation from principal and/or counselor.

**Policy approach to consider: Ohio:** To participate in College Credit Plus, a student must apply to a college and meet the college’s established admissions and course placement standards.

---

3: Caps on the maximum number of courses students may complete are not overly restrictive

**Trend:** 10 states no cap (2008) → 14 states Feb. 2015

**Mississippi:** Partial. No cap in statute; regulation requires student to earn/maintain “B” average.

**Policy approach to consider: Texas:** Policy may not limit the number of courses a student may take a semester, year or during HS career.
4: Students earn secondary and postsecondary credit for successful completion of approved courses

**Trend:** 26 states (2008) → 25 states + DC Feb. 2015

**Mississippi:** Partial. “Dual credit” students earn both HS and PS credit. “Dual enrolled students” earn only PS credit.

**Policy approach to consider:** Automatically transcript high school and college credit upon successful completion of a postsecondary course.

5: All students and parents are annually provided with program information

**Trend:** 20 states (2008) → 15 states Feb. 2015

**Mississippi:** Policy silent

**Policy approach to consider:** **Ohio:** Each public and participating postsecondary nonpublic school must provide program information to all students in grades 6-11; promote the program on the school website and schedule an informational session to allow each partnering college to meet with interested students/parents.
6: Counseling/advising is made available to students, parents before & during program participation

**Trend:** 14 states (2008) → 20 states Feb. 2015

**Mississippi:** Policy silent

**Policy approach to consider: Ohio:** Each public and participating postsecondary nonpublic school must provide program information to all students in grades 6-11; promote the program on the school website and schedule an informational session to allow each partnering college to meet with interested students/parents.

---

**Model Policy Components**

**Finance**

7. Responsibility for tuition payments does not fall to parents/students

8. Districts and institutions are fully funded or reimbursed for participating students
7: Responsibility for tuition payments does not fall to students/parents


Mississippi: No. Tuition paid by PS institution, district, parents, or other sources.

Policy approach to consider: A variety of models in other states transfer burden to parties other than students/parents.

Responsibility for tuition: Alternatives

• Identify state agency to reimburse institutions for participating students.

• Reimburse institutions directly through legislative appropriation.

• Establish formula (or parameters for formula) in legislation

• Authorize workforce development funds to support programs.
7: Responsibility for tuition payments does not fall to students/parents

Highlights funding models in:

- Florida
- Iowa
- Minnesota
- North Carolina
- Utah

8: Districts, institutions fully funded or reimbursed for participating students


For PS institutions: 38 states (2008) → 35 states + DC February 2015

Mississippi: Yes!
9. Courses have the same content and rigor regardless of where and to whom they are taught.

10. Instructors meet the same expectations as instructors of similar PS courses, and receive appropriate support and evaluation.

11. Districts, institutions publicly report on student participation and outcomes.

12. Programs undergo evaluation based on available data.
9: Courses have the same content and rigor regardless of where and to whom they are taught

**Trend:** 29 states (2008) → 37 states Feb. 2015

**Mississippi:** Yes! “All dual credit courses must meet the standards established at the postsecondary level.” (Miss. Code Ann. § 37-15-38(10))

10: Instructors meet the same expectations as instructors of similar PS courses, and receive appropriate support, evaluation

**Trend:** 29 states (2008) → 37 states Feb. 2015

**Mississippi:** Yes! Master’s degree with minimum 18 graduate semester hours in area of expertise. Must meet SACS requirements, other criteria. (Miss. Code Ann. § 37-15-38; Miss. Admin. Code 9-1-1:15.0)
11: Districts, institutions publicly report on student participation and outcomes

**Trend:** 18 states (2008) → 31 states + DC Feb. 2015

**Mississippi:** Partial. Reporting required on student participation, but not outcomes.

*Policy approach to consider: Colorado:* DHE annually reports extensive information, including student demographics, number of credit hours completed, and various PS outcomes.

---

12: Programs undergo evaluation based on available data

**Trend:** 13 states (2008) → 28 states Feb. 2015

**Mississippi:** Yes! “The universities, community and junior colleges and the State Department of Education shall periodically review their respective policies and assess the place of dual credit courses within the context of their traditional offerings.” (Miss. Code Ann. § 37-15-38(14))

*Policy approach to consider: Kentucky:* CPE must create and monitor an accountability system with metrics related to student access, quality, affordability and transferability of credit.

---
Model Policy Components

Transferability

13. Postsecondary institutions accept and apply credit earned through dual enrollment as standard transfer credit

13: Postsecondary institutions accept and apply DE credit as standard transfer credit

**Trend:** 15 states (2008) → 24 states Feb. 2015

**Mississippi:** Yes! Dual enrollment courses are covered by the Articulation Agreement between the Mississippi Board of Trustees of State Institutions of Higher Learning and the Mississippi Community College Board.
QUESTIONS?

Contact Us

Education Commission of the States
700 Broadway, Suite 810
Denver, CO 80203

www.ecs.org | ecs@ecs.org

@Edcommission
Increasing Student Access and Success in Dual Enrollment Programs: 
13 Model State-Level Policy Components

By Jennifer Dounay Zinth
February 2014

Dual enrollment or concurrent enrollment programs allow eligible high school students to take postsecondary courses for college and, usually, high school credit. Programs are nearly ubiquitous — in 2014, courses for dual or concurrent enrollment credit are offered in every state and the District of Columbia. Statewide policies govern these programs in 47 states and D.C., and local policies or agreements oversee programs in Alaska, New Hampshire and New York.

While programs have various names in different states, the term “dual enrollment” will be used throughout this report. Findings are based on an ECS analysis of state dual enrollment policies and a review of relevant academic research.

Among some of the findings:

- The number of U.S. public high schools offering dual enrollment programs is growing, with 82 percent providing such opportunities in 2011-12, the most recent national data available.
- Academic research and state experience highlight the benefits of dual enrollment programs for improving college completion rates, particularly for minority and/or low-income students.
- However, with the possible exception of Massachusetts, minority and/or low-income students tend to be underrepresented in statewide dual enrollment programs. Recent analyses in Illinois, Ohio and Washington show white and/or more affluent students are overrepresented in these programs.

ECS identified 13 model state-level policy components that may increase student participation and success in dual enrollment programs. These components fall under four broad categories: access, finance, ensuring course quality and transferability of credit. Examples of state laws containing these components are incorporated throughout this report.

In this report

- Summary of 13 model state-level policy components  p.2
- Who participates in dual enrollment programs?  p.3
- Research findings on the benefits of dual enrollment  p.3
- Descriptions of the 13 components, including state examples  pp.4-15
- Breakout: Is dual enrollment “paying twice” for one course?  p.7
Model Components of State-Level Policies on Dual Enrollment

Access
Components to increase the likelihood underserved students will participate

1. All eligible students are able to participate. To ensure program access, state law must be unequivocal on this point. ... p. 4
2. Student eligibility requirements are based on the demonstration of ability to access college-level content, not bureaucratic procedures or non-cognitive factors. ... p. 5
3. Caps on the maximum number of courses students may complete are not overly restrictive. Cost should not be a driving factor for states to establish caps. ... p. 5
4. Students earn both secondary and postsecondary credit for successful completion of approved postsecondary courses. While it may sound obvious, such policies are not universal. ... p. 6
5. All students and parents are annually provided with program information. Less-advantaged parents are typically less likely to be aware of dual enrollment opportunities. ... p. 7
6. Counseling is made available to students and parents before and during program participation. State policies should promote the availability of counseling. ... p. 8

Finance
Components to lessen financial barriers for students and financial disincentives for districts and colleges

7. Responsibility for tuition payments does not fall to parents. Requiring parents to pay tuition up front and receive reimbursement later may preclude participation by some students. ... p. 9
8. Districts and postsecondary institutions are fully funded or reimbursed for participating students. At least one state is tying full funding to course quality. ... p. 10

Ensuring Course Quality
Components to maintain consistent academic rigor across all course delivery options

9. Courses meet the same level of rigor as the course taught to traditional students at the partner postsecondary institution. Nearly 40 states have embedded instructor and/or course quality in state law. ... p. 10
10. Instructors meet the same expectations as instructors of similar traditional postsecondary courses, and receive appropriate support and evaluation. This is particularly important when dual enrollment courses are taught by high school instructors. ... p. 11
11. Districts and institutions publicly report on student participation and outcomes. Only 30 of the 47 states with state-level dual enrollment programs require such reporting. ... p. 12
12. Programs undergo evaluation based on available data. Nearly 30 states require dual enrollment programs to undergo internal or external evaluation. ... p. 14

Transferability of Credit
Component to ensure dual enrollment credit is treated equitably

13. Postsecondary institutions accept dual enrollment credit as transfer credit, provided measures of quality are ensured. More than 20 states require dual enrollment credits to be treated for transfer credit in the same manner as credits earned at the receiving institution. ... p. 15
Who participates in dual enrollment programs?

National data show increasing numbers of U.S. public high schools are offering dual enrollment opportunities – from just under seven out of 10 (69.3 percent) in the 2007-08 school year to 82 percent in 2010-11. However, these data can mask low statewide participation or wide variability in participation rates among certain high schools within a state.

For example, a December 2013 Ohio report notes that only 5 percent of the state’s roughly 560,000 public high school students participate in dual enrollment opportunities. The percentage of Florida’s 2007 high school graduates who had dually enrolled ranged by district from 5 percent to 52 percent, with the state average across districts at 14 percent. A 2013 Illinois study of the Class of 2003 identified lower participation rates in Chicago and other northeastern high schools than in other areas of the state.

Massachusetts data show low-income and minority students are well-represented in the state’s modest dual enrollment program, but data from other states suggest this is not universally the case. For instance:

- In fall and spring of the 2013 fiscal year, 78 percent of Ohio’s dually enrolled students were white; black and Hispanic students made up 7 percent and 2.6 percent of dually enrolled students, respectively.
- A 2012 Washington state analysis found, “All racial/ethnic categories are underrepresented in the Running Start (dual enrollment) program except for Asian and White.” Hispanic students, 18.9 percent of the Washington student population, made up 6.8 percent of Running Start participants. While low-income students comprise 43.7 percent of the student population, these students comprised just 25.4 percent of Running Start participants.
- The 2013 Illinois analysis found, “high schools in the lowest dual-credit participation quartile have the highest proportion of racial/ethnic minorities and lowest proportion of White students, on average, and high schools in the highest quartile have the lowest proportion of racial/ethnic minorities and highest proportion of White students, on average.” The researchers also noted a similar inverse relationship between a high school’s dual credit participation quartile and the proportion of low-income students.

What are the benefits of dual enrollment?

A preponderance of academic research and state data underscore the benefits of dual enrollment programs, particularly for students traditionally underrepresented in higher education in the United States.

Data suggest that dually enrolled students share the following characteristics:

- More likely to meet college-readiness benchmarks
- More likely to enter college, and enter shortly after high school graduation
- Lower likelihood of placement into remedial English or math
- Higher first-year grade point average (GPA)
- Higher second-year retention rates
- Higher four- and six-year college completion rates
- Shorter average time to bachelor’s degree completion for those completing in six years or less.
Model policy components

Research and state experience suggest that 13 policy components related to access, finance, ensuring course quality and transferability of credit may increase the likelihood that a more diverse group of students successfully participates in high-quality dual enrollment courses and receives credit that will be transferable to other public postsecondary institutions in the same state. Each essential policy element falling under these umbrellas of access, finance, ensuring course quality and transferability of credit will be identified individually below.

However, the set of policies described in this report should be viewed as a complete whole rather than a menu from which states may choose. All four policy areas are interrelated. For example, access and participation are compromised if funding strategies create disincentives for students or districts. Moreover, the transfer and articulation of college credits earned in high school can be constrained if academic quality is not vigorously maintained.

Nonetheless, there is no single cookie-cutter policy incorporating all 13 elements that all states should adopt. As will be presented in this report, diverse examples exist that accomplish the goals set forth in each policy element.

Access

As the research suggests, students participating in dual enrollment programs tend to be nonminority and more affluent than nonparticipating students. To increase the likelihood that underserved students will participate, state policies should incorporate the following policy components:

Component 1: All eligible students are able to participate

Many state policies are unclear as to whether a district must offer dual enrollment opportunities. Ohio provides, “Each city, local, exempted village, and joint vocational school district and each chartered nonpublic high school shall provide students enrolled in grades nine through twelve with the opportunity to participate in a dual enrollment program. For this purpose, each school district and chartered nonpublic high school shall offer at least one dual enrollment program”.

And regardless of whether a district or postsecondary institution is required to offer a dual enrollment program, many state policies are ambiguous as to whether a district must allow an otherwise eligible student to participate, and whether a postsecondary institution, space permitting, must accept an otherwise eligible high school student. To ensure program access, state policies must be unequivocal on this point. Oklahoma statute prohibits districts from denying program participation to a student who
meets dual enrollment requirements, and prohibits public postsecondary institutions from denying enrollment in any course to an otherwise qualified high school or home-schooled student.  

Broadening program access also means that state policies should ideally allow both two- and four-year public postsecondary institutions to participate in dual enrollment programs. While dual enrollment students (particularly where parents and students pay tuition and fees) will oftentimes elect to enroll in courses at community colleges, where costs are typically lower, state policies should not prohibit public four-year institutions from participating. To further expand opportunities for students, a number of states have extended program eligibility to accredited private institutions, and a few explicitly allow tribal colleges to offer dual enrollment courses.

**Component 2: Student eligibility requirements are based on demonstration of ability to access college-level content (i.e., college placement exams)**

Eligibility for dual enrollment should hinge on demonstrated academic abilities, not bureaucratic procedures or information that is not directly related to a student’s academic abilities or plan of study. Moreover, districts should not depend on difficult-to-measure student attributes determined by school, district or postsecondary staff, such as “ability to benefit,” “maturity” or “motivation.”

States should also be wary of predicating student eligibility entirely on local board or institutional policies, as local variations in expectations may create barriers in one community that do not exist in another one. Access is improved when policies are easy to understand, minimize bureaucratic procedures and are consistently implemented.

Eligibility requirements should be based on quantifiable, reliable and valid indicators of a student’s ability to succeed in a postsecondary course. Also, eligibility criteria should mirror those criteria otherwise expected for students who are not in high school. Why would the prerequisite requirements for College Algebra differ for high school students and adult students? Similarly, eligibility requirements should be the same regardless of whether a student is accessing the course at the postsecondary campus or at his/her high school. Eligibility criteria should not have their basis in non-cognitive factors such as a student’s age or academic standing.

**Ohio legislation** enacted in 2013 makes clear that local programs should not establish unnecessary barriers to program participation. The amendment mandates that state board rules for the Postsecondary Enrollment Options program include a requirement that student program participation be based solely on a college’s established placement standards for credit-bearing courses.

**Component 3: Caps on the maximum number of courses students may complete are not overly restrictive**

Some states worried about potential costs or other concerns such as transportation have set caps on the number of dual enrollment courses students may complete. However, states with caps on the lowest end of the spectrum (for example, two credits per semester and only for grades 11-12) may wish to reconsider these caps. Cost should not be a driving factor for states to establish caps. As discussed in further detail later in this report, in funding dual enrollment courses, states are not paying twice for the
same course, provided the course is recognized for transfer credit at the institution in which the student eventually matriculates.

*Eleven states explicitly allow high school students to enroll in college programs as part- or full-time students: California, Florida, Georgia, Idaho, Indiana, Massachusetts, Minnesota, Ohio, Oregon, Rhode Island and Wisconsin.*

In addition, the growing availability of online postsecondary classes potentially makes dual enrollment courses available to a wider audience of students without incurring the corresponding costs of a traditional course in a bricks-and-mortar classroom. A 2010 report by the California Legislative Analyst’s Office (LAO) notes that while the instructional costs are similar for traditional and distance-learning courses (because student-faculty ratios do not change by delivery method) and some one-time and ongoing costs are incurred for technology, online courses can result in “potentially significant cost savings” as a result of reduced facilities requirements (i.e., classrooms and parking lots) and increased collaboration in course development within and across campuses.

According to the LAO report, “Research at the University of Texas found that lower infrastructure-related costs resulted in average per-unit savings of $90 a year for the delivery of online instruction relative to campus-based instruction — or roughly $2,500 per FTE student in general operating, bond and other funding sources. A 2009 report to the Board of Trustees by CSU East Bay suggests a comparable level of savings from distance education.”

An Inside Higher Ed article about the LAO report notes that Christopher Edley, co-chair of the University of California Commission on the Future, “has been evangelizing about online education as a way to reach more students while cutting costs for a system that is running a $5 billion deficit.”

**Component 4: Students earn both secondary and postsecondary credit for successful completion of approved postsecondary courses**

While it may sound obvious that dual enrollment students should receive both high school and postsecondary credit for successful completion of dual enrollment courses, 2013 ECS data suggest such policies are not universal.

Only 24 states specify that both secondary and postsecondary credit must be awarded. In 13 states, the type of credit awarded depends on which of two or more state programs a student is participating in or other mitigating factors. Policies requiring students to “apply” for credit they are not automatically awarded give an unfair advantage to students aided by adults to shepherd them through the application system and create unnecessary bureaucracy for schools, districts and institutions. In 10 states, policy is either silent on the type of credit that must be awarded or requires the level of credit awarded to be specified in local agreements between K-12 and higher education partners.

Awarding both types of credit incentivizes student participation and has the potential to reduce time-to-degree. And many would argue that it simply makes sense. Some policies awarding only secondary credit (or requiring students to apply to receive postsecondary credit) may reflect concern that dual
enrollment courses do not truly reflect postsecondary content. Subsequent sections of this report, “Ensuring Course Quality” and “Transferability of Credit,” identify policy approaches to ensure that dual enrollment students are truly held to postsecondary expectations.

Component 5: All students and parents are provided with program information

Students with the best-connected (oftentimes most affluent and educated) parents are most likely to know about dual enrollment options and the potential benefits. Less-advantaged parents, on the other hand, are typically less likely to be aware of dual enrollment opportunities or their potential benefits. Although providing program information to all students and their parents is a relatively low-cost approach, with the potential to increase program participation among eligible traditionally-underserved youth, ECS has identified only 18 states with such a requirement in state policy.

All high schools should provide program information (including eligibility criteria and costs information) to all students and their families the term before students are eligible to participate, and each academic year thereafter. Such information should describe student eligibility requirements, participating institutions and types of courses available; who pays tuition and other fees (and reimbursement procedures where applicable); processes for awarding of secondary and/or postsecondary credit; and support services available to students, among others. New Mexico requires information about dual credit programs to be provided during student advisement, academic support and formulation of each student’s annual next step plan (first developed in grade 8, identifying the courses a student will take each year in grades 9-12 to achieve the student’s stated postsecondary or workforce goal).21

Does dual enrollment mean states pay twice for one course?

There is a common perception that dual enrollment courses require a state to “pay twice” for a student to take a single course. However, if the dual enrollment opportunity is strong, rather than paying twice, states are paying earlier.

To illustrate: Joe is a high school student taking Calculus 101 at his local community college. If he were not a dual enrollment student, the state would already be paying for him to take a math course in high school. It also would be paying in a year or two for Joe to take Calculus 101 after he entered college.

Now the state is making those payments for the high school course and the college course at the same time. And in fact, the state may be reducing its cost on remedial education costs. That’s if Joe takes rigorous academic courses his senior year of high school that help him perform well enough on college placement exams that he avoids placement into remedial courses in college.

One caveat: The state is consolidating two payments into one only if that Calculus 101 course Joe took at his community college is transferable to the postsecondary institution where he later enrolls. Transferability is discussed in greater depth at the end of this report.
Some states go the extra mile, hoping to entice dropouts to return to high school to participate in the dual enrollment program. Oregon makes it a priority for districts to provide information about the state’s dual enrollment program (the Expanded Options Program) to dropouts, and requires districts to establish a process to identify dropouts and send program information to the last known address of the student’s family. 

**Component 6: Counseling is made available to students and parents before and during program participation**

It is likely that a single information sheet or brochure is not going to answer every question parents and students have before signing on the dotted line to participate in a dual enrollment program. State policies should promote the availability of counseling. Currently, 19 states specify that current or prospective dual enrollment students be provided with counseling about program participation. Idaho, Michigan, Minnesota and Ohio all have similar comprehensive student/parent advising policies.

Generally, in these four states, required information includes:

- Who may enroll
- What institutions and sources are available under the program
- The process for granting academic credits
- Financial arrangements for tuition, books and materials
- Eligibility criteria for transportation
- Availability of support services
- Scheduling and registration arrangements
- Consequences of failing or not completing a course in which the student enrolls
- The effect of enrolling in the program on the student's ability to complete the required high school graduation requirements
- The academic and social responsibilities that must be assumed by the student and parents

Laws in these four states direct counselors to encourage students and their parents to use available counseling services at the postsecondary institutions prior to the semester of enrollment to ensure that anticipated plans are appropriate. After receiving such counseling but prior to enrolling, the student and parents must sign a form indicating that they have received all of the aforementioned information and that they understand the responsibilities associated with enrolling in this program. Statutes in Idaho, Michigan and Minnesota also require the department of education or superintendent of public instruction to provide technical assistance upon request to a district (or postsecondary institution, in Michigan) in developing appropriate forms and counseling guidelines.

States such as Iowa, Missouri, New Mexico and Texas even make clear that dually enrolled students can access the same or comparable support services afforded traditional college students, including academic advising/counseling.

States can also encourage or require advisement to prevent students from taking courses that may duplicate courses they’ve already completed toward the general academic core or a major — thus also saving the state money. Utah directs the state board of regents and the state board of education to coordinate advising to students participating in the state’s dual enrollment program. This advising must
include information on general education requirements at higher education institutions and how the student can choose dual enrollment courses to avoid duplication or excess credit hours.  

Finance

Mechanisms for funding dual enrollment programs vary significantly. Not surprisingly, financial policies can create barriers for middle- and low-income student participation and/or disincentives for district or institutional participation. Research and state experience show the following components can help lessen those potential obstacles:

Component 7: Responsibility for tuition payments does not fall to parents

According to ECS data, nine states require students or their parents to cover tuition costs. In 18 states and the District of Columbia, local agreements between a district and postsecondary institution determine the entity/entities responsible for tuition. In 10 more states, the entity responsible for paying tuition depends on which of two or more state programs a student is enrolled in.

Programs that require parents to pay tuition up front and receive reimbursement later may preclude participation among low-income students, and may reduce participation even among youth from middle-income families. Alternatives to these models include transferring tuition responsibility to:

- State-level entity. For example, in Georgia, dual credit/dual enrollment tuition is covered by either the Georgia Department of Education or the Georgia Student Finance Commission, depending on the participating program. Students and parents are responsible for some of the costs, which may vary depending on the type of dual enrollment program. In New Mexico, the higher education institution is reimbursed for the waived tuition and general fees by a legislative allocation the following year, based on the number of completed credit hours reported to the higher education department.

Some states provide scholarships or tuition waivers to partially or fully cover tuition and other course costs, either for all students up to a certain credit cap or for low-income students.

Washington state institutions must make fee waivers available for low-income students. Institutions must make every effort to communicate to students and their families the benefits of the waivers and provide assistance on how to apply. ...

Institutions also must, to the greatest extent possible, use all means of communications, including websites, online catalogues, admission and registration forms, mass e-mail messaging, social media and outside marketing to ensure that information about waivers is visible, compelling and reaches the maximum number of eligible students and families.
Component 8: Districts and postsecondary institutions are fully funded or reimbursed for participating students

States should reconsider policies that fund districts for dually enrolled students as less than a 1.0 FTE if the student is enrolled in high school courses at least a certain number of hours a day or a certain percentage of the day. If the dual enrollment course is offered at the high school and taught by a high school teacher, the high school should be reimbursed for the costs associated with providing that course in the same manner that it would be reimbursed for the costs of providing a traditional high school course. The postsecondary institution should receive some reimbursement for any costs (administrative, etc.) associated with student data collection, approving the teacher qualifications and any course materials.

Minnesota, for example, stipulates that if a dual enrollment course is offered at a high school and taught by a high school teacher, the postsecondary institution must not require a payment from the district that exceeds the cost to the postsecondary institution that is directly attributable to providing that course.29

Interestingly, states have begun to specify that districts and institutions will be fully funded for dual enrollment students only if students are enrolled in programs that meet measures of quality. Minnesota makes districts eligible for aid for the costs of providing postsecondary courses at the high school only if the courses offered are accredited by the National Alliance of Concurrent Enrollment Partnerships, in the process of being accredited, are shown by clear evidence to be of comparable standard to accredited courses, or are technical courses within a recognized career and technical education program of study approved by the commissioner of education and the chancellor of the Minnesota State Colleges and Universities.30

Ensuring course quality

Maintaining consistent academic rigor across all course delivery options is of paramount importance. The most accessible, financially-viable dual enrollment programs will ultimately fail if academic integrity is compromised. Inclusion of the following components in state-level policies raises the chances that a dual enrollment course will ensure that enrolled students meet postsecondary expectations by providing the same level of rigor as a traditional postsecondary course. The ECS 50-state dual enrollment database shows 37 states have embedded instructor/course quality components into state policy, a 28 percent increase from the 29 states with policies in place in 2008.

Component 9: Courses have the same content and rigor regardless of where and to whom they are taught

Arkansas, for instance, specifies that an “endorsed concurrent enrollment course” is a course that is approved through the institution’s normal process and listed in the institution’s catalog. The course content and instruction must meet the same standards and adopt the same learning outcomes as those developed for a course taught on the institution’s campus, including the administration of any departmental exams applicable to the course and the use of the same book and syllabus as used at the college level.31 North Dakota eliminates the guesswork, stating that “To ensure that college course standards are adhered to, the [North Dakota University System] college/university course syllabus will be
provided to the instructor and be used as the criteria and model for all such dual-credit college courses taught in the high school.\textsuperscript{32}

**Arizona** has established other parameters for community college courses taught at high schools during the school day. In addition to requiring courses offered at high schools to use the same syllabi, textbooks, course outlines and grading standards as the course if taught at the community college, policy also requires the chief executive officer of each community college to establish an advisory committee of full-time faculty to assist in dual enrollment course selection and implementation at high schools. The committee must meet at least three times each school year and review and report at least annually to the chief executive officer of the community college whether the course goals and standards are understood, the course guidelines are followed and the same standards of expectation and assessment are applied to these courses as though they were being offered at the community college.\textsuperscript{33}

Some states are ensuring course rigor by integrating the National Alliance of Concurrent Enrollment Partnerships (NACEP) standards into state policy. These standards address curriculum and student assessment, as well as faculty, student selection and rights, and program evaluation.

For example, **Indiana** requires a state institution or campus that offers dual enrollment college courses to be either accredited by the National Alliance of Concurrent Enrollment Partnerships or approved by the commission for higher education.\textsuperscript{34} **Minnesota** encourages postsecondary institutions to apply for NACEP accreditation and, as mentioned above, districts are eligible for state aid for providing postsecondary courses only if the courses are accredited by NACEP or are in the process of being accredited, are shown by clear evidence to be of comparable standard to accredited courses, or are technical courses within a recognized CTE program of study approved by the commissioner of education and the chancellor of the Minnesota State Colleges and Universities.\textsuperscript{35}

**Component 10: Instructors meet the same expectations as instructors of similar traditional postsecondary courses, and receive appropriate support and evaluation**

This is particularly important when dual enrollment courses are taught by high school instructors. Teachers of dual enrollment courses must meet the college's hiring standards and demonstrate readiness. Some states require that any high school teacher designated to teach a dual enrollment course be appointed an adjunct faculty member by the participating postsecondary institution, or that the teacher meet the requirements of a faculty or adjunct faculty member at the participating postsecondary institution.

**Arkansas** stipulates that the instructor of an endorsed dual enrollment course have no less than a master's degree with at least 18 hours of completed coursework in the subject area of the course, as well as the relevant credentials and experience necessary to teach from the syllabus approved by the institution of higher education granting the course credit. The instructor's credentials must be approved by the academic unit or chief academic officer of the institution of higher education offering the endorsed dual enrollment course.\textsuperscript{36}

Some states also specify that institutions not only appoint appropriate staff to teach dual enrollment courses, but that institutions support course instructors with appropriate orientation and staff development. The **Missouri** Department of Higher Education's Dual Credit Policy seeks to provide a one-to-one connection for dual credit instructors, requiring that they be designated an “on-campus faculty
member to serve as a liaison.” New dual credit instructors must participate in orientation activities provided by the college and/or academic department. Continuing dual credit instructors must participate in the same professional development and evaluation activities as adjunct faculty on the college campus.\textsuperscript{37} \textbf{Nebraska’s Dual Enrollment Standards}, which serve as guidelines but do not have the force of law, propose that “High school and postsecondary faculty maintain contact throughout the program. In some instances, this contact is facilitated by technology.”\textsuperscript{38}

It is also important that dual enrollment teachers be supervised and evaluated in the same manner as regular postsecondary instructors. In just one example, Missouri’s Dual Credit Policy requires that the postsecondary institution “provide on-site supervision and evaluation of the dual credit faculty,” and that dual-credit instructors be evaluated “according to the college’s evaluation policies for other part-time/adjunct faculty.” The campus academic department is responsible for making the recommendation for continuation of the instructor’s role. The policy adds, “This process is best served when the instructional site is within a reasonable commuting distance from the institution of higher education.”\textsuperscript{39}

The NACEP “faculty” standards can provide further guidance for state-level policy.

\textbf{Component 11: Districts and institutions publicly report on student participation and outcomes}

States should look not just at “inputs” (course expectations and instructor qualifications) to determine program quality but also at outputs, such as student participation and outcomes data.

Perhaps surprisingly, while dual enrollment programs are active in every state and 47 states have state-level policies governing such programs, just \textbf{30 states and the District of Columbia} require any entity — either a high school, postsecondary institution, school district, a statewide postsecondary system or postsecondary governing board, department of education or department of higher education, or longitudinal data system center — to report on dual enrollment participation. These reporting requirements vary widely across states, both on the type of data to be reported and the entities to which data are reported.

Program data can answer critical questions: Are diverse students accessing and succeeding in dual enrollment courses? Are dually enrolled students ultimately graduating from high school, enrolling in postsecondary institutions in the state and completing postsecondary credentials or degrees in a timely manner? States should require districts, postsecondary institutions or systems, or state K-12 or higher education agencies, as appropriate, to report annual and trend participation and outcome data on dual enrollment students and programs. Ideally, such data would include:

\textbf{Student characteristics}

Beyond the number of students dual enrolled at each postsecondary institution, states should consider collecting and reporting comprehensive information about the characteristics and performance of enrolled students. In particular, state should collect and report the following kinds of information:

- Gender
- High school GPA
- Composite ACT or SAT (if available)
• District, high school, including student’s high school and/or district accountability rating, and the percentage of students participating in dual enrollment programs in comparison to their representation in the district/high school student body
• Low-income status
• Race/ethnicity
• Special education status
• ELL status
• Institution and institution type (for example, are certain institutions serving disproportionate numbers of minority or nonminority students?)

Course/high school completion
• Number of dual enrollment credits attempted vs. credits earned
• The number or percentage of courses completed by the average or median student each year as well as the highest number of courses completed by all students by year. Are there very many high school juniors and seniors who are completing 50 percent or more of their coursework through college courses — and who are these students (by geography, other subgroup data described above)?
• Subject areas of courses completed, by postsecondary institution
• High school graduation rates among dual enrollment participants, disaggregated by student and institutional indicators

Postsecondary enrollment and postsecondary readiness
• Subsequent enrollment in various types of postsecondary institutions (two- vs. four-year, selective versus less-selective) by dual enrollment students, disaggregated by student data
• Postsecondary remediation rates of dual enrollment students (disaggregated by various student and postsecondary institution indicators). What percentage of students who took dual enrollment English find themselves in a remedial writing course? Are students who took dual enrollment English still taking remedial English (or any other remedial course) at the same rates as college freshmen who did not take a dual enrollment course?

Transferability of credit
• The percentage of students’ dual enrollment credits recognized at the postsecondary institution in which they matriculate as freshmen
• The number of courses taken through dual enrollment that students ultimately retake because the matriculating institution did not recognize the dual enrollment course (this figure may differ from that in the bullet above, given student decisions not to retake the course for which they were denied transfer credit)
• The total cost for the state and school district for students having to retake courses for which dual enrollment credit was previously awarded (cost of course plus tuition)

Persistence and success
• Second-year retention data for former dual enrollment students (disaggregated by various student and institution indicators, both for the dual enrollment institution and the matriculating institution)
• Six-year postsecondary completion rate of former dual enrollment students (disaggregated by the same student and institution indicators)
- College GPA of dual enrollment students (including and not including courses they took while still high school students). To what degree do these GPAs differ from students who did not complete dual enrollment courses?
- Degrees that former dual enrollment students complete

Reporting requirements could also take a state’s geography or unique program characteristics into account: For example, are there large rural areas in the state with limited physical access to postsecondary campuses? Are dual enrollment programs geared in part toward serving special populations, such as former dropouts?

States must also consider the appropriate audiences to receive such reported information, such as policymakers, district officials or school/district accountability report cards, as well as appropriate avenues for audiences to access information, including publicly available online. And if so, are data published on district and institution websites or only on agency websites?

**Component 12: Programs undergo evaluation based on available data**

The number of states with policies requiring dual enrollment programs to undergo internal or external evaluation doubled from 2008 to 2013, from 13 to 26 states. As with state policies on the reporting of dual enrollment data, evaluation policies vary widely — some policies simply require programs to establish an evaluation process or be evaluated based on local criteria, while others go farther.

*Twenty-six states require dual enrollment programs to be evaluated. Twenty-four states and the District of Columbia do not have state-level policies requiring dual enrollment programs to undergo evaluation.*

**North Carolina**, for example, requires the North Carolina Community College System and the department of public instruction to jointly develop and implement a program accountability plan to evaluate short-term and long-term outcomes for Career and College Promise. Outcomes to be measured must include:

- The impact of dual enrollment on high school completion
- The academic achievement and performance of dually enrolled high school students
- The number of students who successfully complete college certificates while dually enrolled
- The impact of dual enrollment and certificate completion on enrollment in college
- The persistence and completion rates of students who continue into college programs after high school graduation
- The academic achievement and performance of students who continue into college programs after high school graduation.

**Colorado** statute creates a dual enrollment advisory board tasked with making recommendations to the general assembly, the state board and the commission concerning the improvement or updating of state policies relating to dual enrollment programs, including policy recommendations that would allow every local education provider in the state to have adequate resources to enter into at least one cooperative
agreement. The board must annually submit a report to the state board and the commission on higher education that includes guidelines for the administration of the ASCENT program and board recommendations for state policy changes.  

Transferability of credit

Component 13: Postsecondary institutions should accept and apply credit earned through dual enrollment as standard transfer credit

An increasing number of states – (22 states in 2014, up from 15 states in 2008) – require dual enrollment credits to be treated for transfer credit in the same manner as credits earned at the receiving institution, or include dual enrollment courses in a statewide guaranteed transfer list recognized by all public two- and four-year institutions. In adopting these transfer policies, some states have taken steps to assuage postsecondary institutions’ fears that dual enrollment courses for transfer credit do not reflect quality postsecondary coursework.

In Florida, any course that has a statewide-numbering system number must be accepted by Florida public institutions as if the course were taken at their institution. ...

The department of education must develop a statement on transfer guarantees to inform students and their parents, prior to enrollment in a dual enrollment course, of the potential for that course to be “counted” as an elective or a general education course in a postsecondary degree program.

In one example, Minnesota requires the Board of Trustees of the Minnesota State Colleges and Universities and the Board of Regents of the University of Minnesota (and requests private and nonprofit and proprietary postsecondary institutions in the state) to award postsecondary credit for any course offered through a program certified by the National Alliance of Concurrent Enrollment Partnerships.

Florida not only provides for the transferability of courses, it makes sure to get the word out. Statute directs the department of education to develop a statement on transfer guarantees to inform students and their parents, prior to enrollment in a dual enrollment course, of the potential for the dual enrollment course to articulate as an elective or a general education course into a postsecondary education certificate or degree program. The statement must be provided to each district school superintendent, for inclusion in the information provided to all secondary students and their parents as required above. The statement may also include additional information, including dual enrollment options, guarantees, privileges and responsibilities.

Jennifer Dounay Zinth, senior policy analyst for the Education Commission of the States, can be reached at jdounay@ecs.org.
Endnotes


2. Ohio Board of Regents, *College Credit Plus: Chancellor John Carey’s recommendations for Ohio’s dual credit program* (December 2013).

3. Office of Program Policy Analysis & Government Accountability (OPPAGA), *Student Participation in Acceleration Programs Has Increased; Legislation Has Taken Steps to Reduce Program Costs* (Report No. 08-70) (Tallahassee: OPPAGA, December 2008).


8. Taylor and Lichtenberger, pp. 10-11.


11. South Dakota Board of Regents, p. 5;


15. South Dakota Board of Regents, p. 5.

16. R.C. § 3301.03

17. 70 Okl.St.Ann. § 628.13(C)

18. R.C. § 3365.02


21. N.M. ADMIN. CODE tit. 6, § 30.7.8(H)(5)

22. OR. REV. STAT. § 340.020

23. IDAHO CODE § 33-5104; M.C.L.A. 388.519 and 388.1909; M.S.A. § 124D.09, subd. 6; OAC 3301-44-03

24. I.C.A. § 261E.3(3)(b); Missouri Department of Higher Education Dual Credit Policy; N.M. Admin. Code 630.7.8(l)(10(b); 19 TEX. ADMIN. CODE § 4.85[g][2]
The Education Commission of the States was created by state, for states, in 1965 to work with governors, legislators, chief state school officers, higher education officials and other leaders across all areas of education, from pre-K to college and the workforce. We track policy, translate research, provide unbiased advice and create opportunities for state policymakers to learn from one another.

The conclusions presented in this report are those of ECS, which receives the majority of its funding from the member states it serves. State policymakers seeking additional information on this topic should contact author Jennifer Dounay Zinth at jdounay@ecs.org. As part of the services ECS provides to states, staff members are available for consultation and to serve as third-party experts in legislative hearings.

© 2014 by the Education Commission of the States (ECS). All rights reserved.