



August 5, 2021

Amy Barmer
IPEDS Technical Review Panel
Task Leader at RTI International
701 13th St NW #750
Washington, DC 20005

Dear Ms. Barmer,

On behalf of the undersigned members of the [College in High School Alliance](#), we write to support the expansion of data collection on dual enrollment in IPEDS and the requests of panelists as part of the recently released ***Report and Suggestions from IPEDS Technical Review Panel #63: Capturing and Clarifying Dual Enrollment Data (Part II)***.

Dual enrollment [provides significant benefits](#) to students, including increased rates of college access and success. As a cornerstone of establishing the policy environment necessary to support increased college access and success for students through dual enrollment, more national data collecting on these issues is vital.

[National and state research studies](#) have consistently shown that these programs improve rates of college access and completion, particularly for low income students, students of color, first generation college students, and other populations of students who are under-represented in higher education. Students with disabilities may also find considerable value in participating in dual enrollment opportunities.

However, existing national and state data also point to [consistent equity gaps](#) across multiple student demographics. The first step to closing these gaps is understanding which populations of students are underserved and where, in order to begin to develop targeted policy solutions to improve their access and success.

Policy cannot be deployed to address equity gaps in dual enrollment access and success until those gaps are properly understood and tracked. Disaggregated data regarding access and completion of dual enrollment programs is critical for equity goals to be meaningful and for specific policy solutions to be targeted towards student populations in need.

The imperative to collect and deploy dual enrollment data on access and success has never been greater, given declining postsecondary enrollments and the need to accelerate student learning to

address the impacts of the COVID-19 pandemic. Dual enrollment is an effective tool to address many of these challenges, but only when it is thoughtfully targeted at the students with the greatest need.

Unfortunately, available national data on dual enrollment participation is lacking, which makes the need for improved data collection and reporting on dual enrollment through IPEDS even more important.

What national data we do have is currently:

- **Old** - Much of the Institute of Education Sciences' national dual enrollment data is drawn from the [High School Longitudinal Study of 2009](#) (HSL:09), which is now over a decade old and does not reflect the significant changes to dual enrollment access in the last ten years.
- **Inconsistent** - Though dual enrollment participation has been a required data element for the US Department of Education's Office for Civil Rights biannual [Civil Rights Data Collection](#) (CRDC) since school year 2015-2016, there are a number of important discrepancies between data contained within CRDC and existing state-level reporting for a number of states.
- **Too General** - The [National Student Clearinghouse](#)'s enrollment reports track students under 18 who are enrolled in college nationally, which is largely considered a proxy for dual enrollment participation. While this data is very useful for understanding national enrollment trends by institution type, it is not disaggregated by student demographics.
- **Lacking Success Data** - National data on dual enrollment is largely limited to looking at questions around who is accessing dual enrollment opportunities, rather than reflecting whether those students are succeeding in the classes that they have access to.

For these reasons, we strongly support the suggestions to increase data collection of dual enrollment access and success through IPEDS, as a critical lever to continuing to deepen our understanding of this expanding model. We strongly encourage that the panel's discussions be incorporated into a robust set of recommendations for expanding dual enrollment data collection in IPEDS, and that the suggested follow up discussions on questions around finance and human resources take place in a timely manner.

IPEDS has an important role to play in helping the community of dual enrollment practitioners, policymakers and advocates understand more about this important group of programs. We encourage you to seize the moment and help us fill gaps in our national understanding of dual enrollment access and success.

For additional information or to ask questions about any information presented in this comment letter, please reach out to Alex Perry, Coordinator of the College in High School Alliance at alex.perry@flpadvisors.com or (202) 431-7221.

Sincerely,

- A+ Schools, PA
- Achieving the Dream
- Advance CTE
- Advance Illinois

- Alliance for Excellent Education
- American Association of Collegiate Registrars and Admissions
- Association for Career and Technical Education
- Bard College
- Be Foundation
- The Bridge of Southern New Mexico
- Capital Region BOCES, NY
- Career Ladders Project
- Center of Excellence in Leadership of Learning (CELL), University of Indianapolis
- Community College Research Center at Teachers College, Columbia University
- Complete College America
- Delaware Department of Education
- East Central College, MO
- EdAllies
- Educate Texas
- Education Reform Now
- Education Reform Now, New York
- The Education Trust--West
- Education Systems Center (EdSystems) at Northern Illinois University
- Higher Learning Advocates
- Grayson College, TX
- Highland Community College, IL
- IBM
- Illinois P-20 Network
- Illinois Alliance of Concurrent Enrollment Partnerships (ILACEP)
- Indiana Commission for Higher Education
- JFF
- JackBeNimble, Special Ed Accountability Project
- KnowledgeWorks
- Lamar State College Port Arthur, TX
- Michigan College Access Network
- Middle College National Consortium
- National Association for College Admission Counseling (NACAC)
- National Alliance of Concurrent Enrollment Partnerships (NACEP)
- National Education Equity Lab
- Norwalk ACTS, CT
- Oakton Community College, IL
- Richard and Susan Smith Family Foundation
- Santa Barbara City College, CA
- Stand for Children
- Undergraduate Studies Collaborative for Early Enrollment (USCEE)
- University of Maine System
- University of Pittsburgh, PA