

Illinois Community College Board
Attn: Matt Berry
401 East Capitol Avenue
Springfield IL 62701-1711
Matt.Berry@illinois.gov

February 17, 2023

Dear Mr. Berry,

We appreciate the opportunity to review and provide input into the [proposed rules](#) for Dual Credit (Subpart C, Section 1501.313). As an organization, Education Systems Center at Northern Illinois University (EdSystems) has been deeply involved in the implementation of the Dual Credit Quality Act and aligned policy and supports, including the State Perkins Plan, the Postsecondary and Workforce Readiness (PWR) Act, and the College and Career Readiness Indicator of the State's Every Student Succeeds Act Plan. Our work has included facilitating the development and drafting of the Dual Credit Quality Act Model Partnership Agreement, as well as the Perkins Model Programs of Study Guides, which highlight strategic opportunities for Dual Credit across key pathways.

Furthermore, our team has engaged in deep partnership work with communities across Illinois on the implementation of strategic and quality Dual Credit opportunities to accelerate students to postsecondary success. Our comments are both informed by our extensive experience in State policy and local implementation, as well as extensive partnership and conversations with colleagues at the College in High School Alliance (CHSA), the National Alliance of Concurrent Enrollment Partnerships (NACEP), and the Illinois Alliance of Concurrent Enrollment Partnerships (ILACEP), including the seminal qualitative [Illinois Dual Credit Survey](#) that provided deep insight into the value of dual credit for various stakeholders.

First, we applaud ICCB for drafting rules that affirm the spirit of the Dual Credit Quality Act Amendment passed in 2022. Our comments that follow are intended to support the ICCB in implementing [Public Act 102-1077](#) with fidelity to the spirit of the legislation and an eye toward scaling equitable access and ensuring quality outcomes for Illinois students. We celebrate the opportunity to support the implementation of this Act in such a way that builds from the extensive work in Illinois to emphasize scaling of quality and strategic dual credit, including through the PWR Act, State Every Student Succeeds Act, Perkins Plans, and 2021 Education Omnibus Bill's provisions around accelerated placement.

To that end, we highlight several areas where ongoing leadership and guidance from the ICCB will ensure that the potential of this legislation is fully realized, particularly where it pertains to the Professional Development Plan and Mixed Enrollment portions of the legislation.

Professional Development Plans

The Professional Development Plans (PDPs) enabled through the Dual Credit Quality Act are essential to ensuring that high school teachers have viable pathways to upskill and serve as dual credit instructors across a broad range of relevant course areas, including Career and Technical Education.

While this opportunity has been in place since the original Dual Credit Quality Act, it has thus far been unclear the degree to which teachers have been taking advantage of this structure. The new reporting requirements of the Act will provide valuable insight into how PDPs are impacting the dual credit workforce. We encourage the Department to provide clear guidance and processes to support colleges and districts in the reporting process. We encourage the ICCB to also consider how to engage high school teachers (both pursuing PDPs and not) to learn more about the circumstances shaping the quantitative data that will emerge from this new reporting process. Thus, the ICCB can produce a more comprehensive report that not only describes the current state of PDP take-up, but also explore challenges, opportunities, and successes therein.

Mixed Enrollment

We are excited about the potential impact that the mixed enrollment provisions of the Act might have on exposing more students to early college credit opportunities, alleviating scheduling challenges, and surfacing opportunities to consider how placement policies are impacting student access and outcomes. However, we also understand how the implementation of this provision could potentially replicate inequitable patterns of student access and success, and we encourage the ICCB to offer as much guidance as possible to colleges to prevent that.

Identify, Elevate, and Formalize Opportunities for Student Advancement

While one of the core purposes of a mixed enrollment provision is to alleviate scheduling challenges for secondary districts, the reality is that it will not inherently provide a pathway for students to access quality early college credit opportunities.

We recommend ICCB immediately reconvene the institutional members of the Advisory Committee for the Model Partnership Agreement to generate a new exhibit or appendix for courses utilizing mixed enrollment. This exhibit will serve as a template from which districts can negotiate or adjust based on local context.

Utilizing this new exhibit, we recommend the ICCB require colleges and their partner districts to, in the case of mixed enrollment classrooms:

- Document and communicate opportunities for students to earn articulated credit if, over the course of their experience, they demonstrate a capacity for college-level coursework
- Provide support to students enrolled in the high school credit section of the course to address core academic skills needs and enable them to pursue dual credit in a subsequent semester
- Monitor disaggregated enrollment data by subject area and student demography to identify and address barriers to equitable enrollment and outcomes
- Examine student enrollment and outcomes alongside placement policies to identify where placement policies may be posing an undue burden on student access to dual credit

Communication with Students and Families

A core finding of the [Illinois Dual Credit Survey](#) was that robust, clear, and consistent communication with students and families about dual credit opportunities, requirements, and expectations is essential. Not only can this communication help draw more students into dual credit opportunities, but it can also help students understand how dual credit can and should serve as an acceleration opportunity for them on their secondary-to-postsecondary education trajectory.

In the case of mixed enrollment classrooms, it will be especially important for colleges and districts to communicate clearly, continuously, and through multiple channels to students and families about which credit section the student is being placed into, why, and what to expect in terms of support and opportunities to earn early college credit through other means. This communication can and should happen not only through standard channels such as counselors but also be affirmed and echoed by teachers and other administrative leaders who work with students and families to ensure the message is received and any concerns or needs can be addressed.

Again, we are excited about the potential impact of the work that lies ahead. We believe that all students across Illinois should be supported to access quality and strategic dual credit that will smooth their transition into postsecondary education and accelerate their education and career success. Thank you for the opportunity to contribute feedback on these proposed rules for Dual Credit, and we look forward to our continued collaboration with ICCB on the implementation of Dual Credit in Illinois.

Sincerely,

Emily Rusca
Director of State Policy & Strategy
Education Systems Center at Northern Illinois University