

Public Comment on Proposed New Rule 6.30.13

Rob Hunter <rhunter@mchsgallup.com>

Tue 4/3/2018 12:53 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

 1 attachment

Public Comment Proposed Rule 6.30.13.pdf;

Dear PED,

Please accept, on behalf of Middle College High School, the attached public comment regarding Proposed New Rule 6.30.13.

We are operating as the state's first and longest-running Early College High School and believe that the attached comment is urgently relevant to the proposed new rule.

Please let me know if there is anything more we can do to provide comment on this important matter.

Much appreciated!

--Rob

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Robert D. Hunter, PhD
Chief Executive Officer
Middle College High School
505.722.9945

Dear New Mexico Public Education Department:

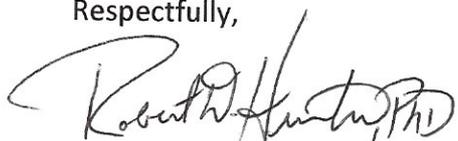
April 3, 2018

As the Chief Executive Officer of the state's very first early college high school, which began serving students in 2002, I would like to provide comment representing the interests of the Middle College High School, its students and families, and its Governing Council in Gallup, NM. I would like to offer these comments based on our operational history and all that we have learned as a pioneering institution. Our comment relates to proposed rule 6.30.13 of the NMAC, regarding general requirements for an early college high school. We believe that an established definition sets important parameters that serve to safeguard the integrity of the early college high school model. There are but two areas of potential concern in the proposed rule, both of which we hope you will take into consideration prior to approving a final definition:

- Subsection 9, Part C proposes to focus “on targeted efforts to reach youth underrepresented in higher education, striving for equitable access.” This is critically important. Yet for early college high schools that are also charter schools, this rule contradicts NMAC 6.80.4.12.D.1 and 3, as well as NMAC 6.80.4.12.L, which requires charters to “enroll students through a lottery selection process that does not discriminate against anyone on the basis of race,” etc. and forbids charters from utilizing “admission requirements.” In other words, it is not legal for charter schools to give enrollment preference. Our school can document its efforts at recruiting underrepresented youth and demonstrate significant gains that have been made in this area, but our demographics do not reflect those of our local district. Efforts aimed at recruitment alone are not enough to solve the disparity. It is good that schools making a demonstrated effort may not be penalized, but subsection 9.C. does not ultimately resolve the equity issue faced by early college high schools that must also follow the charter rules. Is it possible to also look at revisions to 6.80.4.12, so that the proposed rule does not create a double bind for charter schools?
- Subsection 9, Part B indicates that students will “follow a pathway that results in a workforce recognized credential.” This is a worthwhile aim. Yet it may compel early colleges to push some of their students into programs of study that contradict their best interests. For example, we are located on the campus of UNM, Gallup, with whom we have a MOU specifying that UNM is the primary provider of dual credit courses for our students. At present, the only credential available to our students is UNM’s Associate of Arts in Liberal Arts. In recent years, we have not been pushing this credential because it sidetracks many of our students who transition to a four-year college. Because the credential inflates credits in fine arts, humanities, and physical education, students who choose to pursue it do not have enough time to complete more credits in math and science. Since the Lottery Scholarship only funds so many credit hours, and many students have taken more electives than required for college core, they risk losing Lottery funds prior to the completion of their degree. As worded, subsection 9.B. limits students to the pursuit of a credential, rather than a more flexible completion of credits that make better sense in the transition to a four-year degree. We hope that language might be amended to state that students will follow a pathway that “leads to” or “provides a head start toward the achievement of” a “postsecondary” credential. Or perhaps the language could be amended to state that an Early College High School’s program offerings should be in alignment with students’ postsecondary goals as identified in their Next Step Plans.

For the reasons stated above, the Middle College High School requests your consideration of amending the identified sections, so that greater student flexibility may be granted in the proposed requirements of subsection 9.B and that equity may be mandated through enrollment rather than recruitment in subsection 9.C., which would also require amendment to NMAC 6.80.4.12. Thank you for your time and consideration of these important concerns.

Respectfully,

A handwritten signature in black ink that reads "Robert D. Hunter, PhD". The signature is written in a cursive style with a large initial "R".

Robert D. Hunter, PhD
Chief Executive Officer
505-722-9945
rhunter@mchsgallup.com

Response to Rulemaking Notice 6.30.13 for Early College High Schools

Tracey Bryan <tracey@thebridgeofsnm.org>

Thu 4/19/2018 7:13 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

Cc:Perea, Elaine, PED <Elaine.Perea@state.nm.us>;

 1 attachment

2018 ECHS Rulemaking Letter.docx;

Thank you for the opportunity to provide input. I hope you find our unique perspective to be helpful!

Tracey

Tracey Bryan
President/CEO
The Bridge of Southern New Mexico
575-644-6453/575-541-7325



April 20, 2018

The Honorable Christopher Ruskowski
New Mexico Secretary of Public Education
300 Don Gaspar Avenue
Santa Fe, NM 87501

Dear Mr. Secretary:

On behalf of The Bridge of Southern New Mexico, I appreciate the opportunity to respond to proposed rule change 6.30.13 for Early College High Schools.

As you know, The Bridge is the cross-sector partnership that identified this innovative model as an intervention to increase high school graduation rates and equip students for future workforce success. Arrowhead Park Early College High School is a direct result of The Bridge's early work, and it has set a high standard for the early college models that have subsequently advanced across the state.

We are pleased that the Public Education Department has done significant work to ensure the power of this model for the long-term by defining the characteristics that make an "early college high school."

In that vein, however, we wish to share our input on one piece of the rule that we see as vital to the ongoing success of the model. The stated goal reads: *The goals for a department-approved ECHS are for all enrolled students to simultaneously earn a New Mexico high school diploma and to earn no fewer than 12 credits toward a workforce recognized credential through the postsecondary partner.*

Frankly, this threshold can already be achieved in any traditional high school. Therefore, to preserve the integrity and effectiveness of the model, we request the minimum be changed to 45 credit hours, which would guarantee that the students are either earning two-year degrees or can do so in one semester after completing high school.

From our practical experience in the early college environments and in the voices of students, we know that this minimum designation is far too small and will undermine the power of these schools to be significant academic and economic contributors to the wellbeing of New Mexico. From our first cohort of Trailblazers at Arrowhead Park, we know that the ability to earn a diploma and degree was a powerful motivator.

During Arrowhead Park ECHS's first years, we interviewed the students to learn how the model was working for them, why they chose it, and gather their perceptions of their experience. In their own voices, I would like to share how important it was these students to earn post-secondary credentials while in high school:

"I think it will help me finish my goals a whole lot quicker and make it easier."

"Helps me prepare for college and gives me the tools I need."

"It's going to give me a head start and help me know what to expect in college, rather than just going as a graduate and not knowing what to expect. It will prepare me for work because there are high expectations of you...not just get through doing the minimum. You need to do everything you can do to be successful in your work."

"When college looks at your transcripts and sees, when you graduate, you have all this stuff from high school and all these college credits for an associate's degree, they are going to say, "Wow! This girl's intelligent. She knows what she's doing. She's got her priorities straight. And this school is helping you set these priorities right, so that when you graduate, you're going to outshine some people."

"This is one of the best choices I've made. I'm going to get somewhere – not saying I'm going to do something and then not doing it. It's going to help everybody, once they all get their diplomas, they are all going to be "succeeders" who actually do things in life."

*"I'll be graduating not only high school, but college early. And the occupation I want to get in takes a long time. I can use as much time as I can get. I want to be a child psychologist. I'm way ahead of the game of most of my peers I went to middle school with.
I will be the first in my family to graduate college."*

*"It challenges me. In life, you're going to be challenged.
It's not going to come easy what you're going to do.
You're going to get used to it because you've been challenged."*

We do realize that the intensity of dual credit courses has placed a financial burden on their higher education partners. The Bridge of Southern New Mexico has done ground-breaking work to understand the current funding and are working to support implementation of House Memorial 46 from the 2018 New Mexico Legislative Session. The workgroup called for this the memorial will be able to identify how to get dual credit funded in a way that ensures continued access for New Mexico's students, as well as expansion to create a stronger, more connected system between public and higher education.

While we take strides to work alongside policymakers in identifying how to best fund dual credit moving forward, we don't want to see this funding challenge undermine the early college model.

Our support for the ECHS model is steadfast. It has far exceeded our initial expectations, graduating students at near 100%. The significance of this is profound. When all students graduate:

- It eliminates gaps in demographic groups:
 - Low income children
 - Children of color
 - First generation college attenders
- Most students earn associates degrees and/or certifications along with their diploma
- Students earning college-level certifications and degrees places them at an average \$5,000-\$14,000 economic advantage over their non-ECHS peers

The Early College High School model has surfaced best practices that can be, and are being, replicated in and outside of an early college high school:

- Finding out students CAN do college as early as 9th grade is life-changing
- Pathways connected to career destinations promote academic advancement
- Students learn responsibility and self-motivation early

As the pioneers in this work, we are more committed to New Mexico's early college high schools than ever! And we are grateful to see that what has worked for our students here is having similar positive outcomes for students across the state.

Thank you for the opportunity to voice our support for one of the great stories in education in New Mexico.

Respectfully yours,

Wanda Mattiace, Board Chair

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