



*Sent via email only.*

December 2, 2023

Colorado State Board of Education

Re: Proposed Rules for the Administration of the Public School Finance Act of 1994

Dear Members of the Colorado State Board of Education:

We hope this letter finds you well. We are writing to express deep concerns on behalf of Colorado Early Colleges (CEC) regarding the proposed revisions to the Public School Finance Act of 1994 (Proposed Rules). As an institution committed to ensuring that "All Means All," CEC has consistently strived to provide exceptional educational opportunities to a diverse student population, irrespective of their backgrounds or skill levels.

CEC's mission is succinct and resolute: "All students, regardless of background or skill level, will have the opportunity to pursue a growth mindset that will allow them to achieve mastery and to demonstrate that they can succeed in school, in college, and in their chosen career. No Exceptions. No Excuses."

Over the years, we have worked tirelessly to uphold this mission, expanding our network to encompass eight full-service campuses along the Front Range, as well as a college direct location. Our commitment to inclusivity prompted the creation of CEC Online, allowing students from across the state to access Early College offerings online. Additionally, in response to the demand from families seeking part-time public school programming options for their homeschool students, we developed both in-person and online programs.

It is with the utmost concern that we address the potential adverse impacts of the Proposed Rules on the over 6,000 students served by CEC annually. While we acknowledge that the rules aim to capture the innovative practices adopted during the COVID-19 pandemic, they fall short in achieving this objective.

Our primary concerns revolve around two key areas: the effect on part-time programs and the hindrance to students' seamless transition to college-level courses.

Firstly, the Proposed Rules will pose significant barriers to homeschool students seeking to access our programming. CEC currently serves approximately 2,300 homeschooled students through an online program. These students have been drawn by our exceptional curriculum and the opportunity to access college-level courses. By providing supplemental homeschool programs, we have engaged with students at a younger age, offering insights into the benefits of obtaining college

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credit at no cost to their families. This results in home school students enrolling full-time in the public school system much earlier than has been our experience. While we are committed to aligning our programming with the Proposed Rules, Section 2.05 will eliminate alternative teacher-pupil instruction for grades other than six through twelve. This change lacks an empirical basis or documented concern and will eliminate public school programming used by thousands of Colorado students.

Secondly, the rules will adversely affect students concurrently taking college courses while in secondary school. As designated Early Colleges, our schools are designed to ensure that students graduate with both a high school diploma and an associate's degree or postsecondary credential. Section 5.09 of the Proposed Rules mandates that students must enroll in a full college course load to receive full-time funding. However, this approach undermines the success of students who gradually transition to college courses while benefiting from CEC's support. While about 300 students, 10% of CEC's high school students, require a course load that is less than a full college course load, this flexibility has been pivotal to the achievements of CEC's higher-needs students for the past sixteen years. Removing the option of maintaining full-time status for students enrolled in college courses within this credit range will jeopardize the prospects of lower-performing students (currently about 300 CEC students), as CEC does not graduate part-time students.

In light of these concerns, we strongly urge the State Board not to proceed with the rule-making process. Instead, we recommend instructing the Colorado Department of Education staff to develop rules that prioritize the well-being of students and are firmly grounded in research.

Thank you for your attention to this matter, and we look forward to providing detailed comments on each proposed rule change in due course.

Sincerely,



Laura Calhoun (Dec 2, 2023 14:21 MST)

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