The Path Less Taken

BARRIERS TO PROVIDING CAREER AND TECHNICAL EDUCATION AT COMMUNITY COLLEGES

Diane Auer Jones

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Executive Summary

At a time when employer demand is high for middle-skills workers and employment outcomes for individuals in those jobs are relatively strong, it seems only logical that students would be in hot pursuit of the credentials that qualify them for that work. Education policy analysts have gone to extremes to provide information on post-college earnings and other relevant outcomes to drive students toward programs and majors that result in the best outcomes.

The belief that students will choose better programs if they have access to this information assumes that they have equal access to seats in high-value programs and that the power of choice lies in their hands. For many students, neither assumption holds true. High-value programs may be unavailable to most students because their local community college does not offer them or offers them at times that do not align with a working adult’s schedule. High-value programs also typically have high admissions requirements, so most students have little chance of being accepted.

Economists have provided abundant evidence that holding a certificate or associate degree in general studies (also called liberal arts or the humanities) has little to no economic value, yet these programs are growing at community colleges at a faster rate than vocational or occupational programs with higher market value. Why is this so?

At most institutions, at least part of the answer can be found in state and local funding formulas that ignore the added cost of administering occupational or vocational programs, which can cost four or five times more to run than general studies programs cost. Funding, though, is only part of the problem. A number of structural and policy barriers make it far more difficult for community colleges to start or expand vocational programs. For example, accreditation requirements that favor terminal academic degrees make it challenging to identify qualified vocational instructors, and low wages paid to adjunct faculty make hiring them even more difficult.

In some fields, programmatic accreditation requirements are a problem because they ration the number of institutions that can offer a particular program and sometimes the number of students each program can serve. Programmatic accreditation—and its partner, professional licensure or certification—is a primary reason why, for instance, many students who enter college dreaming of a job in a high-paying field, such as nursing, end up in a lower-paying nursing assistant or patient care program by default.

Federal regulations can also dissuade institutions from expanding vocational programs. For example, the “gainful employment” (GE) regulation designed to sanction proprietary institutions applies to community college certificate programs as well. While the graduate debt-to-income ratios set by the GE rule may not be a problem for community colleges given that taxpayer subsidies keep tuition low, student tracking and reporting requirements add to the administrative cost and burden of offering these programs.

Transfer-of-credit policies also put institutions in a bind when deciding program offerings. Despite their lower market value, four-year institutions are most likely to accept general studies courses in transfer—not applied or vocational courses. Advising a student to enroll in a vocational program could be harmful if the student then decides to transfer and pursue a four-year degree.

Many factors contribute to the mismatch between information on students’ economic outcomes and the proliferation of general studies programs at community colleges. This review highlights these factors and offers suggestions for policy changes that would enable community colleges to more easily fulfill their vocational education mission.
At the same time employers lament the difficulty of finding qualified workers to fill well-paying, middle-skills jobs, opportunities to prepare for those jobs at the nation’s community colleges may be growing harder to find.1

According to the National Skills Coalition, middle-skills jobs—jobs that require education beyond high school, but below the baccalaureate level—account for 53 percent of the US labor market, while only 43 percent of the country’s workers have education and training that qualify them as a middle-skills workers.2 The argument is then that, if we could just convince more students to enroll in vocational programs at their local community colleges, employers would have the workers they need, workers would have the jobs they need, and the problem would be solved. Naturally, the situation is more complex, especially considering the steadfast emphasis that educators and policymakers have put on attaining a bachelor’s degree from a four-year college or university.

Much of the current preoccupation with bachelor’s degrees was born from research such as the 2002 US Census Bureau report The Big Payoff, which used synthetic wage projections to predict that college graduates earn an average of $1 million more over their lifetime than their high school–educated peers.3 While the report’s title captured tremendous attention among policymakers, educators, and journalists, those who cite the report as an impetus for greater investment in higher education typically ignore the qualifying information provided by the authors, including that earnings vary based on factors such as choice of major, geographic location, personal ambition, and decisions about family and work-life balance.

As Mark Schneider, former commissioner of the National Center for Educational Statistics, has pointed out in prior research,4 college majors matter a great deal to earnings after graduation, perhaps most for students who attend community colleges and are pursuing certificates or associate degrees.5 In a recent study of post-college earnings among graduates of Florida’s public colleges,6 Schneider found that those who completed an associate-level physician assistant (PA) program, on average, were the highest earners five years after graduation—even among bachelor’s degree recipients—with median wages of $112,200 per year. That said, PA programs are highly competitive and most require students to already hold a bachelor’s degree and have considerable health care experience before enrolling.7 To the student who has little chance of being admitted to a PA program, knowing about its high payoff is of little value.

Interestingly, Schneider’s paper also shows that Florida community college graduates with an associate degree in engineering technology8 earn higher median wages ($91,700) than those who hold a bachelor’s degree in aerospace or aeronautical engineering ($80,800), engineering technology ($80,000), or chemical engineering ($78,800). Yet median earnings for those with an associate degree in liberal arts is only $40,800. More generally, some estimates reveal that earning an associate degree in general studies
(also called liberal arts or arts and humanities; hereafter referred to as general studies) may have little to no market value above a high school diploma, especially if the student does not go on to earn a bachelor’s degree. Indeed, most students who enroll in community colleges expect to transfer to a four-year institution and receive a bachelor’s degree, but only 14 percent actually do.

Many benefits are associated with higher education other than higher wages—better health outcomes, increased civic participation, more advanced problem-solving capabilities—so it is hard to conclude that the general studies degree is of no value. But if a student is pursuing higher education primarily to increase lifetime earnings—and most students report getting a good job and earning higher wages as the primary impetus for going to college—perhaps admissions letters and college catalogs should include a prominently placed warning that a two-year general studies degree is unlikely to yield any financial return on investment for students who do not go on to complete a bachelor’s degree.

Recognizing that far too many community college students are earning credentials with little to no labor market value, economists Harry Holzer and Sandy Baum recommend in their recent book *Making College Work: Pathways to Success for Disadvantaged Students* that more students enroll in vocational programs in lieu of general studies to realize higher earnings premiums. The problem is that to heed their sound advice, students must have sufficient vocational programs in which to enroll. Yet these programs—especially in fields with the highest earnings, such as nursing, engineering technology, mechanical and repair technologies, and advanced manufacturing—are actually in relatively short supply.

Some observers have blamed funding mechanisms for the growing abrogation of the career and technical education mission as community colleges shift their emphasis to transfer programs, and funding has undoubtedly affected programming significantly. But a more careful examination of the higher education ecosystem reveals that the funding challenges may be secondary to other policies and practices that create barriers to developing responsive career and vocational education programs. Unintended consequences from many well-intentioned policy initiatives and quality-assurance regimes may prevent, or at least distract, community colleges from meeting the education and training needs of their students and communities.

### The Role of Community Colleges in Career and Technical Education

Community colleges serve a variety of missions, but their role in vocational education has figured prominently since the 1960s, making these institutions the nation’s primary resource for preparing workers for vocational careers. In 2015, 6.5 million (38 percent) of the 17 million students in higher education were enrolled at a two-year institution.

Community colleges often emphasize the role they play in workforce preparation and economic development. However, given the growing and disproportionate number of degrees and certificates they award in general studies, one wonders how much distance exists between their workforce preparation rhetoric and the reality of their programmatic offerings. A closer look at the numbers suggests that community colleges confer a disproportionate number of degrees in fields of study that do not lead to higher-paying, middle-skills jobs where employers claim workforce shortages exist.

As a share of associate degrees conferred by all institutions, those in general studies have increased from 25 percent in 1987 to more than 40 percent in 2013. Of the 793,180 associate degrees awarded by public institutions in 2014, 340,430 associate degrees (43 percent) were awarded to students in general studies programs. That number grows to 415,555 if other nonoccupational programs—gender studies, communication, foreign languages, philosophy, multidisciplinary studies, literature, social sciences, biological and physical sciences, mathematics, and history.

Conversely, in disciplines that typically lead to middle-skills employment in occupations with higher earnings, just 13,443 associate degrees were awarded by public colleges in mechanical and repair technology,
2,893 in precision production, 3,915 in construction trades, and 21,430 in computer and information sciences.21

Public colleges award a significant number of degrees in allied health fields (130,449) and business (87,011).22 Yet even among allied health fields, almost 30 percent of associate degrees awarded by public two-year institutions are in health sciences, a major that does not lead to a particular health care occupation.23

What Is Behind the Rise in General Studies Credentials?

At a time when there is so much concern about the mismatch between the skills of college graduates and the skills needed to fill current and projected workforce vacancies, why have nonvocational programs experienced the most robust growth among community college credentials? There are several reasons, including the recent national emphasis on college completion, the challenges students face in transferring credits to four-year colleges, the growth in enrollments during the Great Recession, and various institutional incentives, among others.

Despite the worthy goals of the college completion agenda, it has had unintended consequences including the potential for greater incentives skewed toward churning out “completers” rather than ensuring completers actually have the qualifications and skills essential for economic mobility and security.26

In 2009, President Barack Obama encouraged every American to complete at least one year of college so that, by 2020, the US could reclaim its mantle as the best educated nation in the world.27 Less than a year earlier, the Lumina Foundation announced a similar “big, hairy audacious goal” for 60 percent of Americans to hold a college degree by 2025.28 Among the many initiatives and efforts implemented in support of the 60 percent goal is the Achieving the Dream (ATD) initiative, which focuses on boosting credential completion among community college students.29 While ATD and other initiatives recommend a number of well-proven practices to better support low-income and adult learners in enrolling and completing college, they also promote questionable tactics that may boost the number of completions but contribute little toward meeting the workforce needs of the country.30

One such practice involves awarding “reverse-transfer” degrees to students who have left an institution but complete a requisite number of credits at a subsequent partnering four-year institution.31 While it is important to recognize the positive contribution a two-year institution makes to transfer students, even if students transfer before completing an associate
degree, the reverse-transfer credential can be misleading because it is counted the same as a degree completed during a student’s regular enrollment. One problem with this practice is that some institutions have created broad general studies programs so that the reverse-transfer degree can be awarded to nearly any student who accumulates a certain number of credits at their next institution, no matter what those credits are in. This calls into question the rigor of some reverse-transfer degrees, and it may explain at least some portion of the increase in general studies degrees.32

Another problem is that reverse-transfer degrees are sometimes awarded for programs in which the student was never enrolled or that did not even exist while the student was in attendance. At some institutions, students are not even notified of their reverse-transfer degree, in which case it has no value to the student.33

In a similar vein, some community colleges are performing “forensic” analyses of student transcripts to see if any certificates or degrees could be awarded to the student based on the courses or number of credits completed.34 Again, these certificates may not have been available during the student’s enrollment and may be unrelated to the student’s major or degree program.

Nonetheless, this practice allows an institution to put another check mark in the completion column. Sometimes multiple certificates are awarded to a student who enrolled in only one program, with each certificate counted as an independent completion, and some institutions award certificates for completing just a single course or even a one-week training program. Liberal arts certificates enable institutions to award certificates to almost any student who completes a certain number of general education requirements, which may explain the growth in these nonvocational, low-value certificates.

While the concept of interim credentials may have merit, including that a student who receives one may be more likely to complete the full program, a liberal arts certificate is unlikely to be a credential of any economic value to students or employers. In fact, these practices could lead employers to conclude that certificates and interim credentials generally lack substance because this new genre of certificates does little more than promote completion agenda tomfoolery.

College credit transfer policies may also pressure community colleges to usher students into general studies programs because general education classes are more likely to be accepted by the receiving institution than courses of a more technical or applied nature.35 For a student who plans to transfer to a four-year school, the advice to complete a general studies degree could be well-reasoned since that pathway will likely yield the largest number of credits upon transfer. On the other hand, a student who does not transfer or complete the bachelor’s degree is left with a credential with far less market value than a vocational degree or certificate.

Finally, another driver of the surge in liberal arts credentials could be the rapid growth in student enrollments during the Great Recession. Postsecondary enrollments are countercyclical to local and national economic conditions, meaning that, when the economy is bad, more people enroll in college, and when the economy is good, more people opt to work.36 However, since enrollments grow during times of economic distress, community colleges are unlikely to receive additional funds to accommodate sudden and likely unsustainable student demand. The programs best positioned to quickly absorb additional enrollments are general studies programs that typically do not require specialized equipment or facilities. It is also much easier to identify adjunct faculty to teach general studies classes since the supply of humanities Ph.D.s is ample in many—although not all—parts of the country.37

Barriers to Career and Technical Educational Delivery

Despite the many reasons for the rapid growth in liberal arts and general studies graduates, there are institutions that wish to expand their vocational options to meet the needs of students and employers. Regrettably, a number of policy, structural, and
regulatory barriers make doing so a significant challenge. Instead of criticizing community colleges for their lack of responsiveness to industry demands, perhaps we should try to understand the challenges they face and remove barriers that are of little or no benefit to students.

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**Funding.** How community colleges are funded can dramatically affect the size and number of vocational programs they can offer. For example, according to the Delta Cost Project, the pressure of increased enrollments during the Great Recession drove down community college revenue per student every year between 2008 and 2013. Although the trend shifted in 2013 when enrollments dropped significantly, average per-student revenues at community colleges were still 9 percent lower than at the start of the recession and only 1 percent higher than in 2003. Since occupational and vocational education programs at community colleges can cost four or five times as much to administer as general studies or arts and humanities programs, it is unlikely that these programs will grow in times of great budget and enrollment strain.

If we want community colleges to expand the number of vocational programs they offer, state and local funding formulas must account for the higher cost of providing them. And because it may be harder to identify students interested in enrolling in these programs given the public’s enduring commitment to four-year degrees, administrators should consider allowing program directors to continue offering these courses even when enrollments drop below levels that typically required canceling the class.

Small programs can find themselves in an enrollment death spiral when low enrollments force program directors to cancel class sections, reducing the choices available to the students who remain enrolled and potentially pushing them out of the program when they cannot find a class at a time that accommodates their other obligations. One reason that proprietary institutions may provide better options for vocationally focused students is that they typically offer a limited number of majors so enrollments are high enough in most programs to support multiple sections of required courses, often offering necessary flexibility to students.

A second financial challenge that institutions face when trying to establish or expand vocational education programs relates to the salaries paid to college instructors, which may be insufficient to attract highly skilled technical experts. Instructors hired to teach in vocational programs typically work full-time in their specialty field and then bring their expertise to the classroom through part-time and adjunct teaching positions. These low-paying positions may be attractive to arts and humanities graduates who do not necessarily have higher-paying options readily available, but individuals with technical expertise need not settle for low-wage work—and often will not. With the additional challenge of finding technical instructors who have the advanced academic degrees required by most accreditors (discussed later) and requisite teaching experience and acumen, institutions may be unable to sufficiently staff their technical programs.

A third challenge that community colleges face related to budget pressure is the lack of funds to
invest in marketing, an important part of educating potential students about programs and careers they might otherwise not know exist. At a recent convening of higher education and workforce leaders, one community college official complained that most students think health care careers consist of only doctors and nurses, and without marketing funding, the institution cannot reach and educate potential students about the many other well-paying allied health career options. Despite the negative attention that proprietary institutions have received for their marketing expenditures, community college leaders lament the lack of funds to actively market their lesser-known programs that yield strong student outcomes.

If we want community colleges to expand the number of vocational programs they offer, state and local funding formulas must account for the higher cost of providing them.

**Employer Engagement.** Employer engagement is necessary for vocational programs to function well, yet relationships between firms and community colleges can be nonexistent or ineffectual. For community colleges to offer programs that meet the needs of local employers, they need to better understand what those needs are, and educators and employers sometimes speak different languages.

Employers may feel like institutions move too slowly to update their programs or respond to industry needs, which in many cases may be true. What employers may not understand is that community colleges are beholden to the standards and criteria set by their accreditors (discussed later), which include a faculty governance model and other standards that inherently slow the process of change and favor the status quo.

At the same time, community colleges often do not receive necessary information from employers to ensure their programs are making the grade. Although industry advisory boards guide most vocational programs, it can be challenging to engage advisory board members in meaningful conversations or even persuade them to attend a few short meetings each year. Employer advisory boards sometimes have unrealistic expectations of institutions, including solving a wide swath of societal challenges that these institutions inherit rather than create.

Sometimes business leaders ask program directors to do the impossible, either because the requests are outside the realm of accepted educational practice or because they violate state authorization, accreditation, or federal financial aid rules and regulations.

At other times, business leaders make requests that may not be in the best interest of students or employers. For example, in minutes of the Northern Virginia Community College Curriculum Committee for May 5, 2016, it was decided to remove the English composition requirement from the Land Planning, Survey and Development Career Studies Certificate at the Alexandria campus because employers were unwilling to pay for it and students were reluctant to take it. That decision received the support of the external advisory group and was approved by the faculty, but since employers commonly complain that workers have underdeveloped communication skills that impede their success in the workforce, one wonders if this decision was wise. The college conceded to the employers’ request, but will those same employers remember this when they next criticize program graduates for poor writing or communication skills?

Employers need to engage actively in curriculum discussions, faculty need to listen carefully, and both need to emphasize the importance of appropriate workplace behaviors and attitudes to achieving career
success. Sometimes employers can communicate the tough messages that college instructors may be reluctant to deliver because an instructor’s future may depend on good end-of-course surveys and students may respond negatively to being held accountable.

**Federal Gainful Employment (GE) Regulations.** A number of regulatory requirements, including the Department of Education’s recently promulgated GE regulations, make offering certificate-level career and occupational programs unattractive to many community colleges.

Federal regulations that expressly target or disproportionately affect vocational education programs may make community colleges more reticent to offer them.

In 2011 and 2014, the US Department of Education promulgated regulations that assigned a new meaning to the term “gainful employment”—a term that first appeared in Title IV of the Higher Education Act more than 40 years ago with the obvious and simple meaning of a job that pays wages. The Obama administration redefined the term, adding onerous reporting requirements and establishing bright-line standards for debt-to-earnings ratios for graduates of vocational programs. Although the regulation was designed to sanction proprietary institutions seen as charging too much for programs that pay too little, it also applies to certificate programs at community colleges.

Because of the taxpayer subsidies these institutions receive and state and local mandates to keep tuition low, community college certificate programs are unlikely to fail the financial test. However, GE imposes a number of burdensome reporting requirements on community college certificate programs that soak up considerable administrative time and do not accurately reflect actual program outcomes since only students who participate in Title IV (federal student aid programs) are included in official measures.

GE outcomes reports require institutions to track, among other things, graduate job-placement rates. Because there is no single definition for what constitutes a job placement, institutions are required to rely on the definitions of their accreditors or their state authorizers to calculate this rate, and these definitions can vary widely. Definitional issues aside, there are myriad other problems with the process of gathering information from students and employers for job-placement rates, an area ripe for reform for all postsecondary education, not just community colleges.

Although the GE rule will likely be revised after additional rulemaking in 2017 and 2018, it illustrates the potential unintended consequences of complicated regulations. On one hand, the GE rule encourages institutions to eliminate low-value programs, thus saving students from unwise investments. On the other hand, it can discourage institutions from offering certificate programs that may help individuals build skills and improve their employability, but that by themselves may not qualify an individual for a higher-paying job. The regulation may encourage institutions to keep programs small to avoid reporting requirements or even to exclude these programs from Title IV participation, preventing students from using federal student loans to pay for their education, but these strategies may not serve students or employers well. The regulation also ignores that a number of high-demand fields pay relatively low starting wages but serve as a point of entry to a career path that has promising longer-term outcomes.

In sum, federal regulations that expressly target or disproportionately affect vocational education
programs may make community colleges more reticent to offer them. While consumer protection is certainly important, the unintended consequences of some regulations can make the cure worse than the disease.

**Accreditation.** Many of the activities occurring at community colleges are shaped or restricted by the requirements of higher education accreditors, whose standards are largely dictated by the US Department of Education. It is important to understand how the rules of accreditation, despite their importance to maintaining educational quality, can make it difficult for institutions to add or expand vocational education programs.

Accrediting bodies are membership organizations that establish standards and criteria for evaluating the quality of academic institutions or programs. Although accreditation is voluntary, institutions that wish to participate in federal student aid programs and that want their students to be able to transfer credits to or have their degrees recognized by other institutions must be accredited by an accrediting body recognized by the US Department of Education.

The Department of Education recognizes two main types of accreditors: institutional accreditors and specialized or programmatic accreditors. Institutional accreditors assess and affirm the quality of an entire institution, including its financial viability, academic quality, student services, facilities, and compliance with a variety of financial and contractual obligations. Specialized or programmatic accreditors focus more narrowly on a single or small subset of academic programs, such as music, nursing, or psychology programs, but they may also serve as an institutional accreditor for schools that offer only those programs that the programmatic accreditor accredits.

**Institutional Accreditation.** There are two kinds of institutional accreditors: regional and national. Regional accreditors accredit institutions in a specific geographic region. There are seven active regional accreditors that operate in six regions. For the most part, public community colleges are accredited by the same accreditor that accredits four-year and graduate research institutions.

Regional accreditors particularly emphasize faculty governance and faculty credentials, the mainstay of traditional higher education. However, the faculty governance process can delay changes in curricula or programs for months or years, preventing community college from keeping pace with evolving industries and rapidly changing employer needs.

Institutional accreditors often have stringent advanced degree requirements for faculty. Since the instructors who teach in vocational education programs may not have college or graduate degrees—but have valuable workplace experience and relevant industry credentials—their employment by the college could violate accreditor requirements and lead to sanctions or even, in extreme cases, the loss of accreditation.

National accreditors, on the other hand, are not restricted by geographic borders; they instead support institutions that share a common mission or academic focus. Among the nine active national accreditors (accredited by the Department of Education), four focus primarily on career and technical colleges. National accreditors, like regional accreditors, must ensure that institutions have strong faculty governance models in place, faculty are appropriately credentialed, and facilities support the educational programs offered. Yet national accreditors focused on career and occupational education programs recognize that vocational programs differ from traditional academic programs in important ways. For instance, while these accreditors may still require an instructor to hold a college degree one level higher than what they are teaching, terminal degrees may not be required. These accreditors may also require that instructors have relevant and recent experience in the field in which they are teaching, as opposed to just holding an academic credential.

Regrettably, because of long-standing biases within academic communities, regionally accredited institutions sometimes refuse to accept credits or recognize degrees earned at nationally accredited institutions, even though both go through the same recognition process following the same rules and regulations of the Department of Education. This compels community colleges to seek regional accreditation,
even though the standards and criteria of national accreditors may be more appropriate and relevant for their vocational programs. Still, even holding regional accreditation does not guarantee that students’ credits will transfer because the receiving institution can accept or deny transfer credits, even if doing so is related more to their business model than rigorous evaluations of transfer course content or outcomes.

To avoid accreditation requirements that can interfere with the institution’s ability to respond quickly and effectively to employer needs, community colleges may move certain vocational education programs to the continuing education division of the institution where accreditation rules typically do not apply. However, students in noncredit courses are unlikely to have access to federal student aid, which may prevent them from enrolling or force them to rely on more expensive forms of credit, such as credit cards or payday loans. Also, since noncredit courses do not count toward a degree, students who complete them may be at a tremendous disadvantage if they later seek a more traditional college credential.

Thus, while community colleges typically pursue regional accreditation to support their transfer mission, this could interfere with their ability to sustain or expand their efforts to meet vocational education needs. While the noncredit side of the institutional house provides the relief valve for institutions that want to keep both their accreditors and employers happy, students may be on the losing end of such a compromise.

**Programmatic or Specialized Accreditation.** Programmatic or specialized accreditors focus more narrowly on specific programs of study within institutions rather than institutions as a whole, although programmatic accreditors can serve as institutional accreditors for single-program institutions. Just like their institutional accreditor counterparts, programmatic accreditors can inhibit or prevent community colleges from adding or expanding vocational offerings.

To qualify for recognition by the Department of Education, programmatic accreditors must serve as the gatekeeper to federal funds for at least one of its member institutions. Since most institutions rely on their institutional accreditor as the Title IV gatekeeper, programmatic accreditors look to other federal agencies such as Health and Human Services or National Endowment for the Arts to meet the federal gatekeeper test. This may be why the majority of programmatic accreditors recognized by the Department of Education focus on programs in health care and the arts. Programmatic accreditors that do not serve in the funding gatekeeping role may instead look to the Council on Higher Education Accreditors for recognition.

Institutions or programs may pursue specialized accreditation either to signal quality to external parties (students and employers) or satisfy industry and/or licensure standards, among other reasons. The relationship between programmatic accreditors and professional credentialing organizations can be rather cozy, sometimes to the detriment of students. These entities, which are sometimes separate entities within a single professional association, may set policies in tandem that reduce competition among institutions by limiting which and how many programs they will accredit. Programmatic accreditation may also impede new program startup—it can take years to earn initial recognition—and prevent individuals who prepared for the occupation through work-based learning programs from taking the credentialing exam.

One example of the latter involves medical assistant education and certification. In the 1990s, the American Association of Medical Assistants (AAMA), a professional association and certification body, formed an alliance with the Council on Accreditation of Allied Health Education Programs (CAAHEP), a specialized accreditor. Shortly thereafter, AAMA changed eligibility requirements for taking the certified medical assistant (CMA) exam, limiting access to medical assistants who graduated from a CAAHEP-accredited program. Before this, AAMA had a dual pathway to credentialing that recognized the value of on-the-job learning and provided open access to their credentialing exam, regardless of whether the medical assistant trained on the job or in a classroom.

Most state licensing boards do not require medical assistants to be certified. Yet the CMA credential...
became very valuable when the Department of Health and Human Services established higher reimbursement rates for care providers willing to transition “meaningfully” to electronic health records (EHR). In order for an EHR entry to count toward the meaningful-use requirement, it must be entered by an individual with a professional credential. Thus, to count toward the meaningful-use quota, which increases the care provider reimbursement rates, medical assistants entering data into electronic medical records must be credentialed. Although other organizations offer medical assistant credentials, some see the CMA as the premium credential because it limits eligibility to those who graduated from an accredited medical assistant program. While this serves graduates of accredited programs well, it puts other students at a disadvantage.

Programmatic accreditation can slow down program startup by years given the many steps involved in the accreditation process.

Programmatic accreditation can certainly ensure programs are high quality. At the same time, it can also complicate and delay new program startup, especially when professional licensing is linked to occupational licensing or certification. Programmatic accreditation can slow down program startup by years given the many steps involved in the accreditation process—including an application for candidacy status, the completion of a self-study, a site visit and response period, and a vote by the accreditor’s approving board. Accreditation requirements may require the institution to hire a program director and faculty, sometimes on a full-time basis, before students are enrolled. Self-studies, site visit fees, and accreditation dues also raise the administrative costs.

Some programmatic accreditors may require an institution to graduate its first cohort of students from the program before making a final accreditation decision, but that creates the chicken-and-egg problem of recruiting students into a program that is not accredited and that cannot guarantee it will become accredited (which could prevent graduates from practicing in the field) in order for it to become accredited.

Programmatic accreditors may also limit the number of institutions in a particular geographic region that can offer the program and may limit the number of students a program is allowed to enroll. Sometimes these limits are applied directly to a program, while other times they are the indirect result of requirements that an institution have a signed agreement with an internship, externship, or clinical site host for every student it enrolls. The competition for clinical sites is steep, and it can be hard for a new program without a track record to win in that competition.

Programmatic accreditors may also require programs to meet student outcome thresholds, a reason why many allied health programs have such high entrance requirements, even when offered in an open-enrollment institution. Nursing programs, for example, are likely to screen applicants by scoring their performance in prerequisite math and science courses or establishing minimum GPA requirements. Physical therapy assistant programs typically expand upon academic requirements and require applicants to complete hundreds of—and in some cases more than a thousand—volunteer hours in the field before applying for admission.

One result of this practice is that many students who enter community colleges to pursue a credential in one of the higher-paying health care occupations may end up in a lower-wage allied health program, a general studies program, an applied health care program (which typically does not qualify a person to practice in an allied health profession), dropping out altogether, or enrolling in a proprietary institution with more available seats (but likely at a higher
In other words, even when students make an informed decision about which career to pursue and which program will get them there, the community college often decides whether the student may enroll in that program, putting many career decisions ultimately in the hands of institutions.

The intense pressure on institutions and accrediters to produce quantifiable outcomes has yielded innovative approaches to delivering education that have, in some cases, effectively increased credential completion among higher-risk students. The college completion agenda has encouraged institutions and the accreditors that accredit them to be more thoughtful about how their programs and services meet the needs of their students.

However, this pressure has also led to intense competition among institutions for the most able students, thus reducing opportunities for high-risk students who need a credential but might not do well on exams or graduate on time due to outside demands on their time and attention. Also, as institutions rely on programmatic accreditation to distinguish themselves and their graduates from the rest of the pack, they may fan the flames of credential creep and expand licensure and certification requirements—which are often associated with programmatic accreditation—putting good jobs out of the reach of our most disadvantaged citizens.

Funding. States that want their community colleges to expand vocational education programs must provide additional funds to account for the higher costs of running these programs. States must also find creative ways to enable institutions to pay the higher wages that high-skilled vocational instructors often command and to provide the training and support necessary to help a highly skilled technical worker become a highly skilled and qualified instructor.

Employer Engagement. As noted above, employer engagement is crucial to occupational education, yet community colleges and firms often speak entirely different languages. Processes such as DACUM (Designing A Curriculum) analysis and Functional Analysis—in which subject matter experts, employers, and educators come together to map out the key job tasks and requirements so that curriculum designers can do their jobs well—can help in forging a shared understanding between employers and the faculty about the critical elements of instructional programs. However, these analyses require the input of expert workers over a period of one or more days, and employers must be willing to make those individuals available for the process to work. Federal and state grants may support faculty time to engage in these workshops, but they typically preclude grantees from compensating private-sector employees. Perhaps there are times when issuing small stipends to expert workers or compensating the employer for the expert worker’s time is warranted.

Completion Agenda. On one hand, we must commend the foot soldiers of the college completion agenda for their positive influence in encouraging institutions to evaluate their programs and services to ensure they meet student needs. On the other hand, we must be sure to use the right measures to evaluate college outcomes so that the race to some arbitrary completion goal is not accomplished at the expense of academic rigor and so that the increasing supply of college graduates does not result in widespread underemployment. We must also ensure that the college credential serves as an appropriate proxy for work readiness, taking responsibility for
one’s self and others, acting ethically and honestly, respecting others and their opinions, and demonstrating resilience.

It is critical that we apply the well-accepted scientific principle of controlling or suppressing confounding variables when calculating and interpreting institutional outcomes to ensure that “quality measures” provide a valid assessment of an institution’s contribution rather than its ability to compete for the lowest-risk students. Institutions must maintain rigor to ensure that the degree continues to hold value, and students must be held accountable for their role in learning since education is not manufactured by an institution but instead is accomplished by the student through the regular application of good habits and discipline. The college degree cannot become the adult version of a participation trophy.

Federal Regulation. Federal regulations are necessary to protect consumers and taxpayers, but they also can restrict access, drive up the cost of education, and perhaps make institutions reticent to offer certain programs that could benefit students. Regulations such as GE regulations that purport to inform consumer decision-making must be applied to all programs and institutions so that comparisons between institutions are possible.

Similarly, if we want institutions to measure and report outcomes such as job-placement rates, then the Department of Education should fulfill its mandate from Congress to create a single, standardized definition for an in-field job placement and hold every institution to the same standard. This definition must also allow job-placement rates to be determined using federal data sources so that employment rates are accurate, consistent, complete, and reliable and not reliant on the willingness of graduates and employers to provide this information and the faith that they will do so accurately.

Accreditation. Regional accreditors need to develop supplemental or alternative standards for evaluating vocational education programs. These standards should recognize that years of workplace experience for vocational instructors may be more important than terminal academic credentials. In addition, outcomes assessments must account for inputs such as student demographics and institutional characteristics that are well known to influence student success. Accreditors must resist adopting arbitrary bright-line institutional outcomes standards and instead derive evidence-based institutional outcomes targets that take into account the institution’s mission, level of funding, and student population.

Licensing and certification requirements should be revisited to ensure that we are not just enabling credential creep and promoting institutional monopolies that reduce access and drive up the costs of vocational programs, especially in allied health fields. In addition, the relationships between credentialing bodies and programmatic accreditors must be examined, and credentialing pathways must be required to include an alternative route for those who train on the job or learn through a work-based education and training program. What individuals know is far more important than how they came to know it.

The issue of credit transfer has been a perennial problem, especially since the accepting institution, not the sending institution, decides which credits it will accept. Recognizing that regional and national accreditors are held to the same standards by the Department of Education, we must disallow institutions to deny credits or refuse to recognize degrees simply because they are earned at a nationally accredited institution. We should also require receiving institutions to set clear parameters for transfer of credit, including credits earned in applied degree and certificate programs that have higher workplace value than theory-based programs and courses.

Equivalency pathways must also be established to enable individuals who have completed noncredit or continuing education courses or programs to earn college credit for bona fide learning that resulted in demonstrable knowledge and skills. In addition, states must provide adequate support to noncredit programs to serve the needs of students and employers, especially when programs offered for credit fail to be responsive.
We can no longer pretend that, if given enough information, students will select higher-value degree and certificate programs if we do not ensure that those programs are actually accessible to students. Expanding accessibility requires carefully considering policies and practices that serve as barriers to establishing or expanding these programs, that dissuade or disallow institutions from taking a chance on higher-risk students, that contribute to credential creep, or that could reduce the value of a post-secondary credential by forcing more individuals to pursue higher-cost graduate education.

About the Author

Diane Auer Jones is a senior fellow in the Center on Labor, Human Services, and Population at the Urban Institute.

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Notes


8. Full title of the major is “engineering technology/technician, electronics and communications technology.”


18. These numbers represent associate degrees conferred by all institutions, including public nonprofits, private nonprofits, and

19. This number represents all public institutions that award associate degrees. Because some community colleges award bachelor’s degrees in a limited number of fields, such as education and nursing, they are considered to be four-year institutions even though in every other way they are more like community colleges than four-year universities. For that reason, this table includes all public institutions that award two-year degrees. See US Department of Education, 2015 Digest of Education Statistics, Table 321.12.

20. Ibid.

21. Ibid.

22. Ibid.


26. Miller et al., Collecting and Disseminating Data on Certificate Awards.


31. Miller et al., Collecting and Disseminating Data on Certificate Awards.


33. Ibid.

34. Ibid.


40. For example, if multiple sections of courses are available, students have more certainty that they can attend classes on the same days at the same time throughout their program, thus helping them account for other work-related or familial responsibilities.

42. Employers frequently point to generalized generational attitudes and dispositions as the reason that college graduates are not work ready, but colleges can only do so much to alter the priorities, behaviors, and affectations of an entire generation. That so many new workers grew up in the “everyone gets a trophy” environment is a greater societal problem and something that colleges alone cannot solve.


44. For reporting and disclosure requirements for programs that prepare students for gainful employment in a recognized occupation, see 34 USC § 688.6 (2014).


47. The Western Association maintains separate entities to accredited community and junior colleges and to accredit senior colleges and universities. There are also four state agencies or boards of regents that are recognized as regional accreditors for the purpose of accrediting vocational and technical institutions in their state.


49. Programmatic accreditors may serve as gatekeepers to federal financial aid when they function as institutional accreditors—that is, when an entire institution has only one program of study. However, to be recognized by the Department of Education, the programmatic or specialized accreditor must serve as the designated gatekeeper to funding from at least one federal agency for at least one member program or institution. Other agencies that provide federal funding to institutions of higher education and enable a programmatic accreditor to meet the gatekeeper requirement include the Department of Health and Human Services (for medical and health education and reimbursement of health care providers through Medicaid and Medicare) and the National Endowment for the Arts. Among the 40 active programmatic accreditors, 30 accredit occupational programs within the health care domain with the other 10 focused on teacher education, religious studies, and the visual and performing arts. Another independent organization, the Council for Higher Education Accreditation (CHEA), also recognizes regional, national, and programmatic accreditors, and this organization does not require, nor qualify its members to serve as gatekeepers to federal funds. CHEA was established in 1996 as a successor to earlier nongovernmental associations created to support the self-regulation of higher education quality through accreditation. Programmatic accreditors that serve in a quality assurance role but not a federal funding gatekeeper role may be recognized by CHEA, but not the Department of Education.

50. Later, a second programmatic accreditor, the Accrediting Bureau of Health Education Schools, was added to the approved list.

51. In addition to the certified medical assistant credential offered by AAMA, there are registered medical assistant, national certified medical assistant, and certified clinical medical assistant credentials offered by other organizations.


53. Interestingly, in many cases, shortages of health care workers do not indicate a lack of interest by would-be students or institutions, but a lack of clinical or externship sites provided by the entities that also complain about shortages. Performance-based health care funding may discourage providers from making clinical sites available to students who are more likely to make mistakes and whose need for supervision may reduce efficiencies and increase the cost of care delivery. See US Department of Health and Human Services, Pioneering Allied Health Clinical Education Reform: A National Consensus Conference Proceedings, July 1999, https://permanent.access.gpo.gov/w.../cerpdf.pdf.


