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ACTE Comments on the Senate HEA Discussion Draft

The Association for Career and Technical Education (ACTE) is pleased to submit the following comments on the Higher Education Affordability Act (HEAA) staff discussion draft. ACTE is committed to working with HELP committee members to reauthorize a bipartisan Higher Education Act to ensure every student has the opportunity to earn a postsecondary credential. The comments submitted today are divided into four categories based on ACTE's priorities for HEA reauthorization:

1. Reduce Barriers to Short-term Higher Education
2. Ensure Adequate Access to Financial Aid Programs for All Students
3. Support CTE Teacher Preparation Programs & Alternative Paths to Certification
4. Reduce Data Collection Burdens and Ensure Program Integrity

Comments made in each section are in order of importance to ACTE. Those comments marked with a page and line number reference changes to the staff discussion draft. Comments without a page or line number are recommendations for changes still needed of current law.

In addition to the comments made below, we would like to highlight concerns around the committee's alignment of provisions and language across education and workforce development programs. While this draft does take steps to utilize common terms, the included definitions are not consistent across other federal programs, especially the recently enacted Workforce Innovation and Opportunity Act (WIOA), and there remains a lack of consistent use within the draft bill itself. For example, the term 'recognized postsecondary credential' was introduced and defined in WIOA with bipartisan support in Congress and among a broad group of workforce and education stakeholders, but this bill includes a slightly altered version in Sec. 802 which is then not used outside of that section in favor of the limited term 'degree or certificate.'

ACTE and a diverse group of education and workforce stakeholder have been working in coalition with the Workforce Data Quality Campaign (WDQC) on the issues of common language and data collection. We hope the committee will engage with the WDQC as you strive to ensure outcome expectations are clear, consistent and achievable across pending reauthorizations.

Reduce Barriers to Short-term Higher Education

- 1.) **Arbitrary Penalties for Less-than-2-year Institutions and short-term programs:** Throughout HEA and this discussion draft, provisions on institutional access to federal programs have either forgotten or disregarded the student populations of less than two-year postsecondary institutions, such as public area career and technical education centers. These provisions, whether unintentional or not, have arbitrarily placed real penalties against these institutions for creating short-term, cost-effective programs for students.
 - a. **First in the World Competition [HEAA Sec. 702]:** Non-profit, less than 2-year institutions play a critical role in providing accessible, cost-effective postsecondary education to millions of students around the nation, and play a major role in the postsecondary education systems in a number of states. Due to ongoing confusion in current law in the use of the definition of

institution of higher education, less than 2-year institutions are sometimes not recognized for eligibility in HEA programs outside of Title IV.

Accordingly, ACTE recommends clarifying the definition of ‘institution of higher education’ in HEAA’s ‘First in the World’ program [page 499, line 4] to specify the entirety of section 101 or even section 101 and 102(c) ensure full inclusion during implementation.

b. First in the World Competition [HEAA Sec. 702]: As this program becomes more inclusive of less than two-year institutions, the program should also encourage such institutions to increase the transfer of their non-degree seeking students into degree programs at two- or four-year institutions.

Pg. 503, lines 13-15 should be amended to read as follows:

“(3) increase successful transfers of low-income students into programs granting higher level recognized postsecondary credentials, such as from a certificate program to an associate degree program or from an associate degree program to a bachelor’s degree program;”

2.) Postsecondary Vocational Institution [Sec. 102(c)]: Over the past 20 years, the traditional “vocational education” programs have undergone a major shift in their mission to match the needs of a growing, global workforce. Since the Carl D. Perkins Career and Technical Education Act of 2006 was enacted, federal terminology has also shifted to recognize the fundamental shift in the field to embrace a broader, more rigorous and durable set of skill preparation that creates myriad options for participants. Recognizing this shift, the Office of Vocational and Adult Education officially changed its name to the Office of Career, Technical and Adult Education in 2014.

In keeping with this recognition of what and how students are learning to be career ready, we ask that the term ‘Postsecondary Vocational Institution’ be updated to ‘Postsecondary Career and Technical Education Institution’ in the following areas of current law:

Sec. 102(a)(1)(B)

Sec. 102(c)

Sec. 102(c)(2)

3.) Flexibility to Provide Innovative Student-Centric Programs and Services: ACTE is a strong advocate for increasing opportunities for competency-based education programs, stackable credentials and partnerships between K-12 and higher education to provide opportunities for secondary students to earn postsecondary credit.

a. Dual Enrollment and Early College High School Programs [HEAA Sec. 703]: The program outlined in HEAA is a great start to incentivizing postsecondary institutions to partner with K-12 schools to provide more postsecondary credit earning opportunities to students; however, ACTE is concerned that the program is too limited to select types of programs. These innovative grants could and should be utilized to incentivize credit transfer partnerships that fit the unique needs of the partners, state or students, which may be outside of the dual enrollment or early college high school models.

i. ACTE recommends including a definition for ‘credit transfer agreement’ opportunities for partners to develop other innovative types of programs that meet local needs.

Insert on page 508, line 9 a new definition for ‘Credit Transfer Agreement’ that reads as follows: The term ‘credit transfer agreements’ refers to opportunities for secondary students to be awarded transcribed postsecondary credit, supported with formal agreements among secondary and postsecondary education systems, such as dual credit or articulated credit, which may include credit awarded for performance on technical assessments.

In addition, this term should be utilized throughout this section in conjunction with dual enrollment programs and early college high school programs.

On page 11 of this document is a comprehensive list of reference updates needed to this section to add other programs with credit transfer agreements.

- ii. In creating these opportunities for innovative partnership, the program should also recognize the limitations in requiring postsecondary faculty to teach programs offered in a secondary school. The program should allow qualified secondary school teachers to teach postsecondary credit bearing courses in their schools and for grant recipients to provide any secondary school teachers with the training and professional development necessary to meet the accreditation requirements of the institution, if such an arrangement is the preferred method of both secondary and postsecondary partners at the local level.

ACTE recommends on page 527, lines 17-20 striking everything after ‘if not practicable,’ and inserting the following: ‘by a secondary school educator who meets the standards for faculty established by the participating institution of higher education; and’

ACTE recommends on page 531, line 24 inserting a new paragraph with the following text:

‘(B) for dual enrollment programs, early college high school programs, or other programs with credit transfer agreements being taught by a secondary school educator in a secondary school, professional development to ensure the instructor meets the standards established by the participating institutions of higher education for faculty; or’

- iii. Students enrolled in these programs should be provided with comprehensive guidance and counseling, not just academic support and help with applying for financial aid, but also information making them aware of the career opportunities that the program may lead to so that they may make informed decisions about their future.

ACTE recommends on page 526, lines 6-8 striking everything after ‘including’ and insert the following: ‘comprehensive guidance and counseling, such as on the financial aid process and career opportunities;’

Additionally, ACTE recommends inserting on page 530, lines 18-21 after ‘including’ the following: ‘comprehensive academic and career guidance and’

- iv. Finally, this program is a unique opportunity for states to utilize funding to develop statewide articulation agreements. Statewide development would enable LEAs to

adopt these innovative strategies in a more cost effective manner and ensure consistency in standards across the state.

ACTE recommends on page 529, line 1 amending subparagraph 3 to read 'establish statewide articulation agreements and credit transfer policies.'

- b. **Competency Based Education [HEAA Sec. 490]:** ACTE is pleased with the introduction of the competency-based education program. This type of personalized learning has long been sought after by career and technical education programs, but has been a challenge to implement due to restrictions on aid eligibility. We are concerned though that some confusion may occur in implementation of this pilot due to its language on expected end of program credential, which could leave programs at less than two-year institutions unable to participate despite being included in the definition of an eligible institution.

ACTE recommends that the credential provisions be revised to reduce confusion on the required length of study and to align with the term 'recognized postsecondary credential' introduced as part of WIOA.

On page 365, lines 8-9, strike '2-year or 4-year postsecondary degree or certificate' and replace with 'recognized postsecondary credential'.

- 4.) **Institutional Aid Limitations for Less Than 2-year Institutions:** Throughout current law there is a lack of recognition of the positive benefits of less than two-year postsecondary institutions have in creating a vibrant postsecondary education community with many pathways to success. Institutional aid programs have arbitrarily stopped at the junior and community college level, but the institutional aid program under Title III Part A should reflect the beneficial nature of these institutions for students and further incentivize their participation in a healthy postsecondary education system.

Sec. 312(b)(1)(C) of current law should be modified to include the following additional provision: "(iv) a postsecondary career and technical education institution;"

Ensure Adequate Access to Financial Aid Programs for All Students

- 1.) **Eliminate Federal Aid Penalties for Students in Non-Degree Programs:** Forty-three percent of young workers with licenses and certificates earn more than those with associate's degree and 27 percent earn more than those with a bachelor's degree. Right now there is a huge disconnect between federal student aid requirements and the credentials being sought after by employers for jobs in many skilled trades. These jobs are some of the hardest to fill in the U.S., with most jobs in this "skills gap" at the technician level requiring an associate's degree or less. Title IV aid programs must be more open to non-degree granting programs and their students.

- a. **Aid Eligibility for Short-Term Programs:** Under current law, aid-eligible students enrolled in short-term postsecondary education programs leading to in-demand, industry-recognized credentials are ineligible for Title IV aid due to the length of the program. While these programs are generally low-cost, offer valuable technical skills and are connected to regional employment demand, for low-income individuals the tuition is too often still out of reach.

ACTE strongly recommends incorporating Senator Mary Landrieu's JOBS Act of 2014 (S. 2033) to allow students who enroll in short-term technical training programs to access a limited Pell grant for the necessary cost of tuition.

Additionally, ACTE recommends reviewing the eligible program requirements for student assistance programs to ensure all students in short-term programs have access to these successful programs.

In section 481(b) of current law, add an eligibility provision for programs leading to a recognized postsecondary credential based on at least 250 clock hours of instruction over a minimum of 5 weeks.

b. Lift Ban on CTE Distance Education: Current law places an arbitrary ban on area career and technical education schools defined under the Carl D. Perkins Career and Technical Education Act from offering student aid to its students who utilize distance learning for a portion of their program. This arbitrary ban contradicts recent efforts by Democrat and Republican policymakers to make higher education more affordable and student-centric. These public, non-profit institutions provide proven programs for non-traditional students to attain technical skills to find employment and continue their education.

In current law, section 484(l)(1), ACTE strongly recommends eliminating subparagraph (B) which contains the exception barring area CTE schools.

2.) **Year-round Pell Grant Accessibility [HEAA Sec. 411]:** Reinstatement of the year-round Pell grant eligibility has been a policy priority for ACTE since it was eliminated in 2010. We are pleased that the committee chose to reinstate this program to help students speed time to program completion; however, we are disappointed that the opportunity was not extended to the majority of the student population – who attend school on a part-time basis. ACTE strongly recommends that this program be open to all students, both traditional and non-traditional, who have shown a commitment to their education.

Eligibility requirements for year-round Pell grants on page 223, lines 13-18 should be struck and replaced with the following text:

(i) be enrolled at least part-time in an institution of higher education; and
(ii) have successfully completed at least the equivalent of one full-time semester course load (as determined by the institution) prior to receiving an additional Federal Pell Grant award as described in subparagraph (B).

3.) **Community College and Industry Partnerships Program [HEAA Sec. 802]:** Career and technical education programs have long been building strong partnerships with business and industry to enhance their programs. ACTE applauds the committee’s efforts to better incentivize the development education programs linked to the needs of their regional economy; however, we are disappointed that HEAA does not permit postsecondary career and technical education institutions to participate in this program.

Non-profit, postsecondary career and technical education institutions in many areas offer the majority of opportunities for career training for the skills and education needed by the regional economy. They should be allowed to participate in this program in order to strengthen their partnerships and alignment with business needs.

On page 578, line 20 insert a new subparagraph that reads as follows:

‘(ii) a postsecondary vocational institution that will use funds provided under this section for activities below the associate degree level;’

Additionally, the program needs to be better aligned with programs elsewhere in current law and this discussion draft.

The definition of 'Recognized Postsecondary Credential' on page 577 of HEAA should be linked to the definition utilized in WIOA section 3(52).

- 4.) **Ability to Benefit Reinstatement [HEAA Sec. 486]:** ACTE is extremely pleased with the reinstatement of the ability-to-benefit provisions under Title IV. Allowing students to earn their GED and postsecondary credits simultaneously is a proven and effective method to help students complete a postsecondary credential in an expedited timeframe. ACTE's only concern with the new provision is the misalignment of the term 'career pathway' with how the term is utilized in the recently enacted WIOA.

The 'career pathway' provisions beginning on page 328, line 17 should be aligned with or linked to the definition in section 3 of WIOA.

Support CTE Teacher Preparation Programs & Alternative Pathways to Certification

- 1.) **Improving Educator Preparation:** A hallmark of strong career and technical education programs, especially those in technical STEM fields, is an educator with industry experience, knowledge of industry standards and the ability to apply those in a classroom setting. Unfortunately, all too often teacher preparation programs focus most of their attention on general education teachers in core academic subjects. If we are to prepare a strong workforce to fill the skills gap, our teacher preparation programs must instill these practices into educators.

- a. **STEM as a High-Need Subject [HEAA Sec. 201]:** Often times in federal programs STEM subjects are written into programs as core-academic subjects. At the school district level however, many hands-on STEM courses are typically classified as CTE. In order to avoid any confusion in implementation and interpretation on the ground, ACTE recommends clarifying STEM as both academic and CTE in the definition of 'teacher in a high-need subject or field'.

On page 113, line 9 insert the following after 'mathematics': ', both core academic and career and technical education'

- b. **Technical Training for Educators [HEAA Sec. 201]:** With increased pressure to provide hands-on technical education to students, especially in STEM fields, traditionally trained educators without industry experience need training to learn and be able to properly teach those technical skills to industry standards in a classroom setting.

On page 123, line 8 insert an additional subparagraph that reads as follows:

"(C) as appropriate, provide training for educators to teach technical skills to industry standards in a classroom setting."

On page 173, line 9 insert an additional subparagraph that reads as follows:

"(D) Develop partnerships between high-need local educational agencies with a demonstrated need for educators with technical skills and educator preparation entities that can provide training to aid teachers in effectively teaching technical skills to industry standards in a classroom setting."

- 2.) **Alternative Pathways to the Classroom:** With increased pressures for school districts to offer career and technical education programs, a shortage of qualified educators has hampered state and local officials' abilities to implement new programs based on the needs of the regional economy. Federal

law should empower local districts to hire qualified mid-career professionals and provide states with opportunities to create alternative pathways to licensure for mid-career professionals with industry experience in these fields.

HEA teacher preparation programs should incentivize higher education institutions to develop alternative programs for mid-career professionals to undergo rigorous pedagogical training for licensure without onerous requirements for additional postsecondary credentials.

HEA programs should also recognize high-need subject areas where mid-career professionals with extensive experience in economically in-demand industries may be able to fill teacher shortage positions, even without a bachelor's degree. Teacher preparation programs in these instances should be exempt from 'Highly Qualified Teacher' provisions if completers undergo rigorous pedagogical training, are able to pass standard licensure exams and receive ongoing mentoring and professional development upon entering the classroom.

- 3.) **Cross-subject Professional Development [HEAA Sec. 201]:** In order to prepare students to be truly college- and career-ready, educators must work to break down the "tracks" of college going and non-college going students. One step in accomplishing this is to provide all educators training to be able to incorporate other subject areas into their lesson plans and curricula. This training would allow cross planning between subjects such as geometry and construction or physics and manufacturing courses, giving students opportunities to apply their knowledge across academic and non-core courses.

On page 168, line 21 insert the following additional provision:

"(vii) ensure that all participants can effectively integrate curricula across subject areas, including between core academic and non-core academic subjects."

Evaluate Data Collection Requirements and Ensure Program Integrity

- 1.) **Common Language and Measures Across Federal Programs:** With the recent reauthorization of the Workforce Investment Act and the pending reauthorization of several other major federal education programs, there is a unique opportunity to begin aligning language and data measures across programs. Utilizing common terminology and data measures will ensure a smoother implementation process, more efficient data collection, higher-quality data, and the ability to compare program types and data outcomes.

- a. **Career Pathways:** The term career pathway was defined through the reauthorization of WIOA, but was given a slightly altered definition in HEAA. ACTE recommends aligning the HEAA term and other similar language with the WIOA definition.

Page 504, lines 21-22 should be amended to read as follows: "(B) are offered in fields that focus on the education and skill needs of the needs of the regional economy; and"

The program application for the Community College and Industry Partnerships program should also be amended to align with the WIOA career pathway definition. On page 581, lines 7-8 strike the text after 'the skill needs of' and insert 'the regional economy;'

- b. **Recognized Postsecondary Credential:** Education and workforce stakeholders in conjunction with business and industry representatives have been strong advocates for a comprehensive term for all postsecondary credentials. Through WIOA reauthorization a lot of work from

those stakeholders and policymakers went into developing the term ‘recognized postsecondary credential’. Adopting common terminology such as this is critical to breaking down the silos between education and workforce programs.

ACTE strongly recommends that HEAA replace all references to ‘certificates or degrees’ with the recently enacted term ‘recognized postsecondary credentials’, especially for the purposes of data collection and reporting. In addition to developing a stronger connection between our postsecondary and workforce systems, these terms will also make our postsecondary system more inclusive of the varying types of existing institutions of higher education.

On page 13 of this document is a list of notable areas in HEAA that ‘recognized postsecondary credential’ should be inserted.

- 2.) **Availability of Program Outcome Data:** Some of the most critical outcomes of higher education are employment related; however, there are currently no sufficiently high-quality ways to collect that information across institutions or across the country. While these outcomes data could be a vital tool in ensuring that postsecondary programs are of sufficient quality and meet the skill needs of the regional economy, legislative restrictions on their collection and utilization prevent the postsecondary system from being able to conduct an objective evaluation of its practices and programs for improvement. In addition, even information on tracking students that transfer from one postsecondary institution to another can be difficult to obtain, leaving information on outcomes very incomplete.

ACTE recommends repealing the ban on creating a student unit record system in order to accurately track postsecondary student outcomes, including transfers to other institutions of higher education and into employment.

Strike section 134 of current law.

HEA programs should also provide institutions with the ability to share data within and among states and local areas to effectively track outcomes.

HEA must incentivize and be conducive to the development of comprehensive longitudinal data systems to track student education and employment progress across K-12, higher education and into the workforce.

- 3.) **Reduce burdensome reporting requirements:** While ACTE is supportive of transparency in higher education, the increased disclosure requirements that have been promulgated in the past few years and are proposed to be legislated through HEAA have not proven to be an effective means to help students in making informed decisions. By equating all types of institutions as having the same students with the same goals, the college scorecard developed by the administration and proposed in HEAA does not present information relevant to all students.

- a. **College scorecard [HEAA Sec. 109]:** While the entire college scorecard should be reevaluated with serious input from community college and less than two-year institutions, the debt information it does include is particularly misleading for students entering institutions or programs that are low-cost and have naturally low levels of borrowing. Typically, short-term programs have only a small number of students taking on student loans, so, when data is collected only on students who have borrowed, it creates an inaccurate portrait of the student body and the likelihood of completing debt free.

ACTE recommends inserting on page 47, line 9 a provision for data on debt levels across the entire student body in addition to that of just the borrowers.

“(B) The mean and median student loan debt, including private education loan debt, incurred by all students who have earned a recognized postsecondary credential from the institution in the most recent year for which data is available.

- b. **Reevaluation of Reporting and Disclosure Requirements:** Throughout current law, there is a glut of reporting and disclosure requirements imposed on institutions in an effort to improve program quality and provide transparency to prospective students, and the proposed HEAA draft proposes additional requirements in the same effort. There has not however been serious consideration for the effectiveness of current or proposed requirements in achieving their goals. ACTE has serious concerns about the costs that inefficient measures have for institutions and their relevancy to the majority of students in the decision-making process.

Disclosures included in the ‘college scorecard’ and ‘net price calculator’ are particularly problematic for the majority of students to identify with because different disclosures are based on different sets of students, including Title IV recipients, Title IV completers and first-time, full-time. A reevaluation of more relevant and comparable measures will better serve current and prospective students in the most efficient manner, particularly non-traditional students that don’t often follow average attendance patterns.

ACTE recommends that the committee take into consideration the recommendations of the American Association of Community Colleges and the Association of Community College Trustees to reduce administrative burdens, provide meaningful information for students and ensure programs are of high-quality.

- 4.) **Ensure Accurate Data Reporting & Disclosure:** As more and more importance is placed on transparency and outcomes data of postsecondary programs, it is important that the Higher Education Act be cognizant of the realities of student populations and institutional missions. The majority of postsecondary students are not the ‘traditional’ full-time, on-campus, 18-22 year olds that the law has previously targeted. Data should reflect the accomplishments of ‘non-traditional’ students especially for those institutions most likely to serve them, community colleges and postsecondary career and technical education institutions.

- a. **Extended Year Graduation Rate:** ACTE is supportive of providing transparency to students and potential students entering higher education; however, we strongly believe that the legislation must accurately reflect institutions, their missions and the students they serve. In doing so, a reauthorized HEA must recognize that the typical community college and less than two-year student do not follow the same graduation trajectory of a first-time, full-time student.

ACTE recommends that the committee utilize an extended graduation rate of 300 percent of normal time in reporting and disclosure metric to better capture the path of two year, less than two-year and non-traditional students. In doing so, HEA should also provide adequate technical assistance to institutions to report such information.

- b. **Default Rate Disclosure:** While ACTE has no comment on the changes HEAA makes to the cohort default rate, we are concerned about the use of the rate to determine quality or success rates of programs. For many short-term programs at postsecondary career and

technical education institutions, the majority of students do not borrow student loans. For the few students who do borrow, their loan size or default rates are not indicative of the entire student body at an institution or in a certain program.

ACTE recommends that the committee take into consideration the recommendations of the American Association of Community Colleges for improving the use of the cohort default rate and its application to institution disclosure requirements.

*The Association for Career and Technical Education (ACTE) is the nation's largest education association dedicated to the advancement of education that prepares youth and adults for successful careers.
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Programs with Credit Transfer Agreements

Dual Enrollment and Early College High School Program [HEAA Sec. 703] recommendations for including opportunities for other innovative programs with credit transfer agreements:

- Pg. 514, line 17 – insert after ‘school programs’ the following:
‘and other credit transfer agreements.’
- Pg. 517, line 6 – insert after ‘programs,’ the following:
‘increasing the number of credit transfer agreements,’
- Pg. 517, line 16 – insert after ‘programs’ the following:
‘and programs with credit transfer agreements’
- Pg. 517, line 20 – insert after ‘school programs’ the following:
‘and programs with credit transfer agreements’
- Pg. 518, line 17 – insert after ‘school programs’ the following:
‘and programs with credit transfer agreements’
- Pg. 519, line 13 – insert after ‘program’ the following:
‘or other program with a credit transfer agreement’
- Pg. 520, line 2 – insert after ‘program’ the following:
‘or other program with a credit transfer agreement’
- Pg. 521, line 3 – insert after ‘early college program’ the following:
‘or other program with a credit transfer agreement’
- Pg. 522, line 2 – insert after ‘school program’ the following:
‘or other program with a credit transfer agreement’
- Pg. 522, line 7 – insert after ‘college high school program’ the following:
‘and other programs with credit transfer agreements’
- Pg. 522, line 18 – insert after ‘program’ the following:
‘and other programs with credit transfer agreements’
- Pg. 522, line 24 – insert after ‘program’ the following:
‘and other programs with credit transfer agreements’
- Pg. 523, line 12 – insert after ‘programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 523, line 16 – insert after ‘school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 524, line 16 – insert after ‘dual enrollment programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 524, line 7 – insert after ‘enrollment program’ the following:
‘or program with a credit transfer agreement’
- Pg. 524, line 17 – insert after ‘programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 524, line 23 – insert after ‘program’ the following:
‘or program with a credit transfer agreement’
- Pg. 525, line 4 – insert after ‘dual enrollment program’ the following:
‘or program with a credit transfer agreement’

- Pg. 526, line 1 – insert after ‘programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 526, line 15 – insert after ‘school program’ the following:
‘and other credit transfer agreement program’
- Pg. 526, line 19 – insert after ‘college high school program’ the following:
‘and other credit transfer agreement program’
- Pg. 526, line 24 – insert after ‘early college high school program’ the following:
‘or other credit transfer agreement program’
- Pg. 527, line 3 – insert after ‘early college high school program’ the following:
‘or other credit transfer agreement program’
- Pg. 527, line 23 – insert after ‘early college high school program’ the following:
‘or other credit transfer agreement program’
- Pg. 528, line 18 – insert after ‘school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 528, line 21 – insert after ‘early college high school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 529, line 7 – insert after ‘high school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 529, line 13 – insert after ‘high school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 529, line 21 – insert after ‘early college high school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 530, line 2 – insert after ‘high school program’ the following:
‘or other program with a credit transfer agreement’
- Pg. 530, line 11 – insert after ‘early college high school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 531, line 13 – insert after ‘college high school programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 531, line 23 – insert after ‘school program’ the following:
‘or program with a credit transfer agreement’
- Pg. 532, line 18 – insert after ‘high school program’ the following:
‘or program with a credit transfer agreement’
- Pg. 532, line 24 – insert after ‘programs’ the following:
‘and other programs with credit transfer agreements’
- Pg. 533, line 6 – insert after ‘programs’ the following:
‘or other programs with credit transfer agreements’
- Pg. 534, line 10 – insert after ‘high school programs’ the following:
‘or other programs with credit transfer agreements’
- Pg. 535, line 10 – insert after ‘school programs’ the following:
‘and other programs with credit transfer agreements’

Recognized Postsecondary Credential

Further recommendations for replacing 'certificate or degree' with recognized postsecondary credential – a term recently legislated in the Workforce Innovation and Opportunity Act.

- Pg. 42, line 18 – Replace 'certificate or degree' with 'recognized postsecondary credential'
- Pg. 45, line 2 – Replace 'certificate- or degree-seeking' with 'recognized postsecondary credential seeking'
- Pg. 45, line 4 – Replace 'certificate or degree' with 'recognized postsecondary credential'
- Pg. 45, line 12 – Replace 'certificate- or degree-seeking' with 'recognized postsecondary credential seeking'
- Pg. 46, line 11-12 – Replace 'certificate or degree' with 'recognized postsecondary credential'
- Pg. 47, line 4-5 – Replace 'certificate or degree' with 'recognized postsecondary credential'
- Pg. 47, line 7 – Replace 'certificate or degree' with 'recognized postsecondary credential'
- Pg. 48, line 6 – replace 'degree type' with 'type of recognized postsecondary credential'
- Pg. 328, line 11 – Replace 'degree or certificate' with 'recognized postsecondary credential'
- Pg. 341, line 18 – Replace 'degree or certificate' with 'recognized postsecondary credential'
- Pg. 341, line 20 – Replace 'degree or certificate' with 'recognized postsecondary credential'
- Pg. 364, line 11 – Replace 'postsecondary degree' with 'recognized postsecondary credential'
- Pg. 365, lines 8-9 – Replace '2-year or 4-year postsecondary degree or certificate' with 'recognized postsecondary credential'
- Pg. 369, line 11 – Replace 'degrees or certificates' with 'recognized postsecondary credential'
- Pg. 369, line 13 – Replace 'degrees or certificates' with 'recognized postsecondary credential'
- Pg. 378, line 8 – Replace 'degree or credential' with 'recognized postsecondary credential'
- Pg. 378, line 9 – Replace 'degree or credential' with 'recognized postsecondary credential'
- Pg. 379, line 7 – Replace 'degree' with 'postsecondary credential'
- Pg. 381, line 5 – Replace 'degree or credential' with 'recognized postsecondary credential'
- Pg. 381, line 6 – Replace 'degree or credential' with 'recognized postsecondary credential'
- Pg. 503, lines 9-10 – Replace 'postsecondary degree or certificate' with 'recognized postsecondary credential'
- Pg. 503, line 17 – Replace 'degrees or certificates with 'recognized postsecondary credentials'
- Pg. 504, lines 1-2 – Replace 'postsecondary degree or certificate' with 'recognized postsecondary credential'
- Pg. 520, line 20 – Replace 'degree or certificate' with 'recognized postsecondary credential'
- Pg. 535, line 25 – Replace 'degree or certificate' with 'recognized postsecondary credential'

Note: This is not a comprehensive list, but notable places in need of change