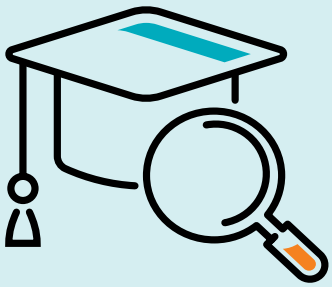


DRIVING QUALITY in Postsecondary CTE

Approval and Evaluation Policies

While many may think of Career Technical Education (CTE) as operating only at the K-12 level, postsecondary-level CTE programs and pathways are serving millions of learners at institutions across the nation. With the majority of "good jobs" that pay a family-sustaining wage requiring at least some college education — such as a technical certificate, associate degree, bachelor's degree or another credential of value — postsecondary CTE is more important than ever before in preparing learners for high-skill, high-wage and high-demand careers.[1]

However, for CTE to fully meet its promise for learners and communities, it is critical that all CTE programs are held to the highest standards of excellence, as affirmed in Putting Learner Success First: A Shared Vision for the Future of CTE.[2] Specifically, a high-quality CTE program of study should span secondary and postsecondary, include an industry-validated and state-approved course sequence and standards, lead to a credential of value, and be aligned with labor market demand.

Although postsecondary programs are typically considered to be the purview of individual institutions, supported by academic freedom and local control, states have an important role to play in ensuring that each learner has access to only high-quality and relevant programs, notably by leveraging program approval and program evaluation policies and processes. This role is especially crucial at a time when more than 75 percent of adults ages 18-25 enroll in postsecondary education, but around 50 percent of all postsecondary students end up dropping out, often leaving those learners without a credential but with a fair amount of student loan debt.[3]

Without question, states and postsecondary systems and institutions face unique challenges and opportunities in the quest to ensure program quality and relevance. These challenges include a variety of governance and delivery models, state and federal requirements, and multiple layers of program approval through regional and occupation-specific accreditors. At the same time, states, systems and institutions also have meaningful opportunities to support and fund those programs that are best serving learners and their communities' workforce needs.

This brief will explore the different roles that stakeholders play in ensuring quality in community colleges, technical colleges and postsecondary CTE centers across the country. It also will provide examples of how states are driving quality in their postsecondary CTE programs.

ADVANCE CTE
State Leaders Connecting Learning to Work

JULY 2018

THE ROLE OF THE STATE

Before diving into the roles states play in supporting high-quality and labor market-aligned programs, addressing the underlying matter of governance, which varies greatly from state to state — and even within states across postsecondary systems — is important. Governance affects not just program approval and re-approval policies but also funding systems, data reporting and student success initiatives, among other aspects of what makes a program high quality and relevant.

In some states, a single state agency or system office has oversight over all public community colleges, with the power to approve, disapprove and directly influence college programming.[4] Ivy Tech in **Indiana,** for example, operates as a single community college with 45 campuses located throughout the state. New programs are approved by the college's Board of Trustees' Planning and Education Committee before being sent to the Indiana Commission for Higher Education for final approval.[5] On the other end of the governance spectrum, some states, such as **Michigan,** do not have one state-level entity with statutory authority to influence postsecondary program quality, outside of the disbursement of federal funds under the Carl D. Perkins Career and Technical Education Act of 2006. This governance structure also means that no governmental authority can coordinate the activities of individual institutions, although in some cases, non-profit organizations and associations have stepped in to play some coordinating role. In Michigan, the non-profit Michigan Community College Association works to coordinate initiatives across institutions.[6]

Most state governance structures lie somewhere in the middle of this spectrum, with many state and system offices having statutory authority to approve some, but not all, aspects of program design and development. This situation results in a variety of program approval and re-approval processes among states, with many state and system offices having largely a support and guidance role with individual colleges.

This lack of centralization is not in itself positive or negative — how a state or system leverages its formal and informal power and influence, and how institutions leverage the autonomy available to them, has a much greater impact than the state's or system's level of statutory authority. However, there is no question that ensuring quality control without a centralized system is more complicated and requires more deliberate efforts to ensure that institutions fully understand what constitutes a high-quality and relevant program. States have a critical responsibility to ensure the consistency of quality programs, as well as the distribution of programs across the state. Yet, regardless of a state's governance structure, program design, implementation and maintenance will result in more successful outcomes if the individual institution has bought into the value of having that program and wants to implement it with support from the state or system. And individual colleges require a certain level of autonomy to develop programs that respond to regional needs and local industry partners, particularly if they are located in a region that is unique within their state in terms of economy, geography and/or population.

Implementing Federal Policy

States are responsible for implementing federal policies related to education, which can serve as a helpful lever when working to push quality and relevance in programs. Because Perkins allows states to fund only programs that fulfill specific state-defined criteria, two-year programs supported by Perkins may undergo a separate review process than two-year programs funded by other sources or those designed primarily to facilitate transfer to a four-year institution. These criteria often include a state definition of the terms "high skill," "high wage" and "high demand," which allows states to ensure the relevance of programs approved under Perkins. Perkins also provides a lever for states to place caps and minimums on program expenditures, which helps direct resources to state priorities.

In some states, implementation of any federal legislation is largely seen as an exercise in compliance and monitoring, but some states have taken advantage of the leverage that Perkins provides to advance their state vision for learners. In a 2017 survey of Advance CTE members focused on Perkins implementation, 11 states reported that they require all local funding to be distributed only to full programs of study, meaning that funded programs must span secondary and postsecondary, include industry-validated and state-approved course sequences and standards, lead to a credential of value, and be aligned with labor market demand.[7]

Perkins also allows states to incentivize certain initiatives and priorities through the use of state reserve funds, state

leadership dollars, and the provision of local incentive grants. Through these levers, states may advance their vision for CTE as well as build momentum, support local adoption of policy priorities, and encourage attention and focus on vexing challenges such as rural education and non-traditional occupations. States may also promote innovation, fund pilots, scale strategies or even reward success.

Perkins is not the only federal legislation that states can use to support high-quality and relevant postsecondary programs. The Higher Education Act and the Workforce Innovation and Opportunity Act also contain numerous opportunities for advancing high-quality programs.

Requiring Labor Market Justification

Another lever a number of states — and institutions — are putting in place is requiring any publicly funded CTE program to justify its existence with labor market data that use current and projected growth for the industry to show that it is a high-wage, high-skill and/or high-demand field. In **Washington,** for example, the State Board for Community and Technical Colleges requires each college not just to demonstrate labor market demand for a particular new program but also to work with other institutions to ensure that the demand is not already being met by another institution. Additionally, if a new program up for approval has placement in an industry or clinical setting as a program component, the program must submit letters of commitment from employers confirming they will provide these work-based learning opportunities.[8] This up-front commitment helps to ensure that learners do not enroll in a program that cannot obtain sometimes hard-to-find site placements. Washington also provides its community colleges with annual labor market data and employment outcomes reports so that each college can examine all of its programs for labor market relevance and make adjustments as needed.

States and systems must review labor market justifications for programs not just at the point of initial approval but also at regular intervals throughout the life of the program. If the data no longer support having a program in a particular field, state and system leaders should work with colleges to develop a plan for transforming or phasing out that program. In **North Carolina,** funding decisions are made based in part on labor market demand, using a tiered funding model. The state uses four tiers of funding, with each tier receiving about 15 percent more funding per student than the tier below it. The top tier includes credit-bearing courses that train workers for employment in high-demand, high-wage industries, while the lower tiers include credit and non-credit courses that do not lead to industry certifications. This funding change not only helped the state prioritize the use of limited resources, but it also helped change institution behaviors. In the first five years of implementation, enrollment in courses in the first funding tier, meaning the courses in the highest demand industries, increased from 29 percent of students to 41 percent.[9]

Providing Guidance and Support for Colleges

While states and systems may play a larger role in program design and initial approval, many colleges, particularly in more decentralized systems, have the authority to review and update existing programs based on industry changes and program outcomes. The support of the state is crucial to ensuring that this process happens consistently and with fidelity in all colleges. This support often comes in the form of detailed program approval and review manuals, which provide guidance on appropriate criteria and benchmarks and how to gather the appropriate data. These manuals are often developed in coordination with college administrators and faculty, as well as industry advisory groups, where appropriate. The manuals can provide important details and clarifications about state and federal laws and regulations and point colleges to further resources.

In 2018, Advance CTE, through a generous grant from the Joyce Foundation, began working with the **Colorado** Community College System and the **Illinois** Community College Board to examine and improve program quality at the postsecondary level. Both states used Advance CTE's Policy Benchmark Tool on CTE Program of Study Approval to examine program approval and evaluation at the state level. They also identified specific colleges that will use the tool to assess the quality of their programs and determine areas of strength and opportunities for improvement. Going forward, both states will make changes to their policies and processes to better ensure that all postsecondary CTE programs are high quality and relevant.

However, these manuals are only an element of the support needed and are ultimately useful only if they are well designed and college administrators have bought into the process of using them with fidelity. They must be clear in their guidance and easy to follow, and importantly, they must push institutions to hold themselves to high standards for quality and relevance. States and systems also try to offer virtual and in-person technical assistance and trainings for colleges, though capacity can limit the availability of these options. Additionally, the governance structure for each state influences how obligated colleges may feel to take the guidance offered by the state or system.

THE ROLE OF ACCREDITORS

For a postsecondary institution to award degrees and certificates, it must undergo an accreditation process. Each degree-granting institution belongs to one of seven non-profit regional accrediting bodies, which review and approve new institutions as well as new programs offered at those institutions. Accreditation agencies also regularly review institutions on a variety of criteria, including the quality of individual programs. Additionally, many CTE programs require approval from occupation-specific accreditors, often run through professional industry associations. For example, nursing programs must be accredited by the American Nurses Credentialing Center, a part of the American Nurses Association.[10] Both regional and occupation-specific accreditors review a variety of criteria when they consider approving programs, though they are not necessarily the same criteria or benchmarks that state and system offices may use. Additionally, approval processes at the state and accreditor levels may not always happen on the same schedule, which could add time to the process of getting new programs up and running.

While accreditors may present additional burdens and delays on the creation of new programs, several states have reported that they are often a helpful partner in maintaining quality assurance for programs. Accreditors are able to provide extra capacity for program review and the benefit of perspective from multiple states, regions, and approaches to program design and implementation. Additionally, occupation-specific accreditors are able to provide unique perspectives on their individual industries.

Non-Credit Programs

Even when accreditors and states work as swiftly as possible to approve new programs, the process inevitably takes months or even years to conduct. The delay caused by the multiple layers of approval can hinder colleges' attempts to swiftly respond to industry partner needs,

Map of Six Regions of Accreditation

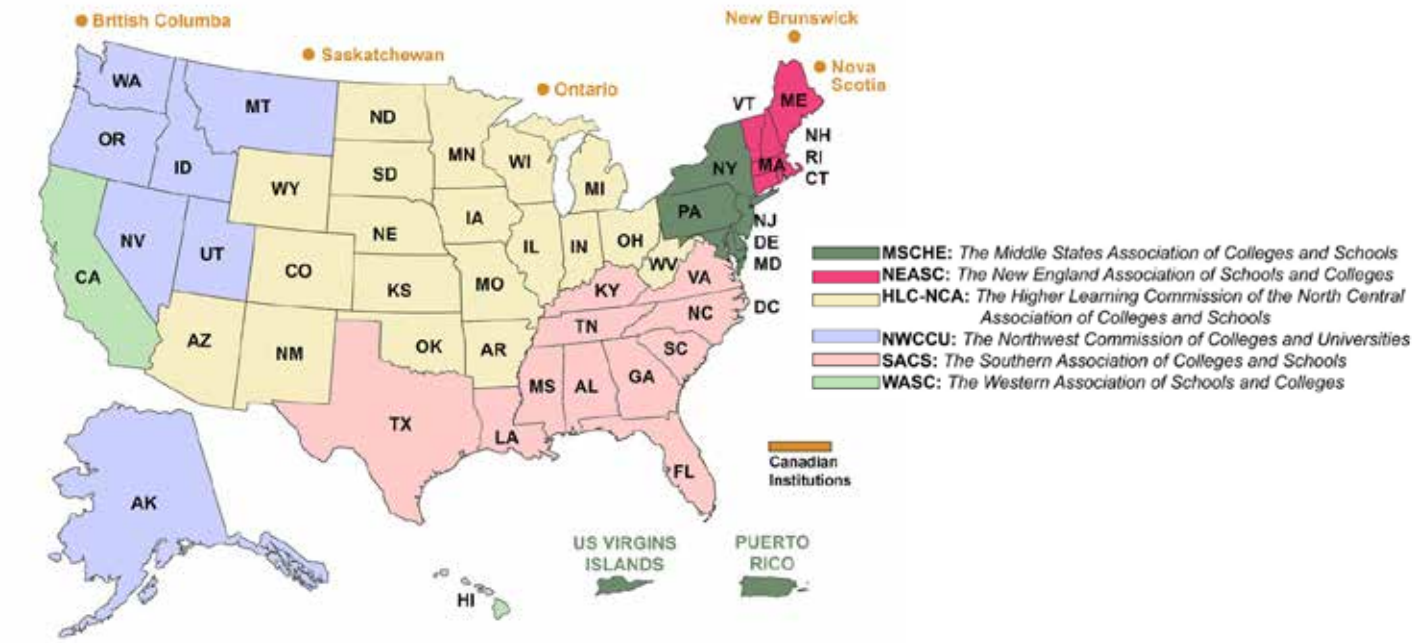


Figure 1. Image from https://www.franklinvirtualschools.com/images/Map-regions-Accreditation-1.jpg

The Role of the Institution

While this report focuses on the vital role that states can and should play in postsecondary CTE quality, the role of individual institutions and their faculty cannot be overlooked. Often, policies and processes related to program review happen at the institutional level, rather than at the state level. This situation occurs in both centralized and decentralized systems. Additionally, the decision to first offer a new program is made at the institutional level. Programs naturally evolve and change over time and should keep up with industry changes as well. Consistent and intentional program reviews and updates can ensure that programs maintain their high level of quality and relevance. Meeting this goal requires consistent guidance from the state, as well as access to accurate and robust labor market information and data on learner outcomes by program.

Faculty as Drivers of Quality

Faculty are key players in institutional decisionmaking processes, particularly when it comes to their having primary responsibility around curriculum and standards. While trustees, states and/or accreditors may have the final power of program approval and re-approval, the process begins with the faculty who create and implement new programs. The faculty generally exercise this role through bodies such as academic or faculty senates and/or through curriculum committees that may or may not be part of such bodies.

particularly in fields in which the technology is advancing rapidly. Meeting these needs has led to an increase in the development of workforce programs that do not provide credit or lead to degrees. These programs are typically housed within Continuing Education divisions at community colleges and operate outside the accreditation process. In fall 2015, 41 percent of headcount enrollment in community colleges was in non-credit courses.[11]

Non-credit programming includes several categories of courses and programs that serve different purposes: In general, students tend to be adult learners seeking to quickly upgrade their skills; prepare for a certification examination, such as a realtor's license; or pursue a personal interest, such as art. Colleges also offer non-credit courses in Adult Basic Education and English as a Second Language and to help prepare for the General Equivalency Diploma.

Workforce development courses tend to be clearly tied to occupations within specific industries, such as information technology, construction and the protective services.

Since these courses lack a lengthy approval process and can be launched quickly, they can be used to address urgent regional labor market needs. Some portion of the total programming, called contract or customized training, is developed for specific employers. Unfortunately, the research base on non-credit students and offerings is thin, and there is no national record-keeping, so the impact is unknown. The courses tend to be of lower cost than for-credit courses, but they are not eligible for financial aid. They are also not transferable to other institutions, although at least one institution allows students who have completed non-credit courses to request to apply their non-credit work toward similar for-credit courses.[12] While some promote the role of non-credit as an entry point for working adults to for-credit programs, a study of nine community colleges in one state found that the vast majority of students enrolled in non-credit courses do not transition to or persist in any for-credit courses or programs.[13]

EXPLORING STATE APPROACHES

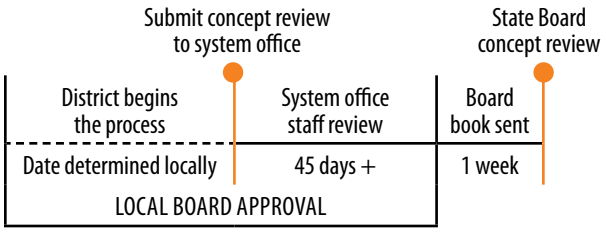
Wisconsin

The Board of the Wisconsin Technical College System (WTCS) has statutory authority for the "initiation, development, maintenance and supervision of programs with specific occupational orientation below the baccalaureate level."[14] Using this authority, the system operates a two-phase approval process for all technical college programs.

When a college wants to launch a new program, it must start by obtaining "concept approval" from the system. This process begins with the college demonstrating local need for this new program, which it does through a few different mechanisms. First, the college must submit to the system an analysis of labor market data from a state-approved source that shows the need for this new program in the state. The college must also engage with other colleges that offer similar programs and gather information on the outcomes of those existing programs, recruitment or retention challenges, expenses, and any barriers posed by accreditation or other regulations. This step is when the college must obtain local board approval. During these conversations, the college works with system staff to develop a tentative program title and description, including course codes and completion requirements. This first phase is also when the college begins to assemble its industry advisory committee and gain commitments for industry support. Employers are involved in the process from the beginning, and advisory committees are required to meet at least three times a year throughout the lifetime of the program to provide input on program structure and curriculum.

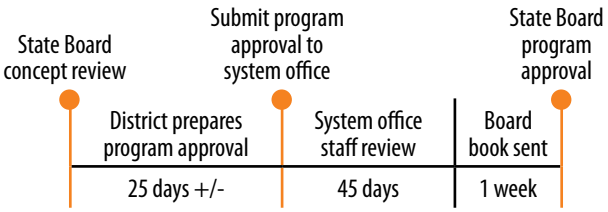
Once these steps have been completed, the college will submit relevant materials to the system office for a review. System staff may follow up with the college to ask for clarification or more information before the application is submitted to the State Board for review. Once materials are submitted to the WTCS office, this first phase of program approval may take about one and a half to two months.

Concept Approval Timeline



Once the State Board approves the concept, the college submits the program for approval. In this phase, the college takes about one month to decide on the curriculum for the program, explore the potential for integration into other career pathways, and answer any questions raised by the State Board during concept approval. Once again, materials are submitted to WTCS staff, who take around 45 days to review the materials; ask for clarification and more information; and decide to submit to the State Board, which can then ask further questions, suggest modifications, and potentially approve the program for implementation.

Program Approval Timeline



While colleges can take more time to conduct more thorough revisions to program structure and curriculum, WTCS sets a stop date for program consideration to ensure that programs are developed in a timely manner. In 2017, WTCS approved 27 new associate degree programs, 28 technical diploma programs, and one new apprenticeship program, distributed across all of the Career Clusters®. Notably, WTCS also suspended 27 other programs in 2017 based on program outcomes and/or labor market justification. A suspension, generally requested by college staff, lasts between one and three years and provides the college with time to either close the program or modify its scope and/or content to increase relevance and quality, at which point it can be reactivated. Students who are currently enrolled in programs that have been suspended are counseled on their options for enrolling in another program at the college or finding other ways to complete the program using the credits they have already earned.

For a program to be discontinued, it must have been suspended for one year and have no learners currently enrolled. All program suspensions and discontinuances are reviewed and approved by the WTCS Board. Additionally, if local administrators modify more than 20 percent of an existing program during a single academic year, including adding and deleting courses, changing course numbers or changing credit hours, the WTCS education director is required to review the changes and approve them to ensure that the changes maintain the quality and relevance of the program.

California

The California Community Colleges system is the largest system of higher education in the nation, with 114 colleges serving 2.1 million students.[15] The system's Board of Governors has statutory authority to approve all new instructional programs in community colleges. Until recently, the system's Chancellor's Office approved all new community college programs and all new courses, as well as substantial changes to any existing programs and courses. Because of the size of the system and limited capacity within the Chancellor's Office, this level of centralization created bottlenecks for colleges attempting to develop new courses and programs, which hindered the system's ability to respond and adapt to labor market needs.

To streamline these processes and avoid adding undue burden on and delays for the colleges, in 2004 the Chancellor's Office developed what is now called the California Community Colleges Curriculum Committee (CCCCC) to coordinate efforts between local and statewide curriculum processes. CCCCC members include faculty, academic affairs administrators, curriculum deans and the Statewide Academic Senate, and they work closely with the Chancellor's Office to provide support and guidance to colleges in the development of new courses and programs. Recently, the Chancellor's Office and CCCCC began a multi-year process to transition some approval authorities to each college, but in a way that ensures that colleges still receive the appropriate supports from the system and still have to meet accountability requirements.

The process started with the development of a thorough and robust Program and Course Approval Handbook, which outlines the criteria for developing high-quality courses and programs.[16] Individual colleges have recently been able to use this manual to approve new courses through their chief information officers and college boards of governors, who determine whether the courses meet the appropriate standards and curriculum requirements. The Chancellor's Office provides support and technical assistance as requested, in addition to offering yearly curriculum institutes and trainings on use of the Approval Handbook. CCCCC is in the process of developing a method for evaluating these courses over time.

California Program and Course Approval Handbook

DISCUSSION POINTS FOR LABOR MARKET ANALYSIS

NET JOB MARKET

- Given the number of enrollments that are projected for the program and that are necessary to support the program, are there enough openings locally to permit placement of the expected number of graduates?
- Has the job market been declining slowly? Holding steady? Growing slowly? Growing rapidly? Recently emerging?

EARNING POTENTIAL

- What is the average initial salary?
- What is the average percentage of salary increase in two years? Five years?

PROGRAM CREDIBILITY/CAREER POTENTIAL

- If advanced degrees are typically needed for career advancement, will the courses required for this program count toward completion of the requirements for those degrees?
- Will this preparation permit students to remain current in their field? Does the program teach basic principles and theory, as well as application? Is it current and of sufficient rigor? Does it allow for later shifts in career?
- Does this preparation meet the needs of those already employed for upward mobility, entrepreneurship or a career upgrade?
- Does the program prepare students to work in an ethnically diverse workforce and in an ethnically diverse, global market?

While *course* approval has been delegated to individual colleges, *program* approval for all community college programs, including Perkins-funded programs, associate degrees for transfer and non-credit programs, still falls to the Chancellor's Office. Colleges that want to develop new programs still use the Approval Handbook to guide program development, starting with a regional analysis of labor market demand for the new program. The Approval Handbook offers guidance on different sources and types of data to collect, research questions on earning and career potential, and specifics related to small businesses and emerging occupations that may not yet have specific data to back up their relevance. The college would then work to develop the program structure and course outlines.

The Chancellor's Office uses five main criteria to approve new programs, with detailed descriptions of these criteria found in the Approval Handbook:

Appropriateness to mission: The stated goals and objectives of the proposed program must be consistent with the mission of the community. For courses or programs to be mission appropriate, they must provide instruction in a body of content or skills whose mastery forms the basis of student achievement and learning.

Regional need: The proposal must demonstrate a need for a program or course in the region and must not cause harmful competition with an existing program at another college.

Curriculum standards: All credit and non-credit curricula must be approved by the college curriculum committee and district governing board, as well as CTE Regional Consortia and accrediting agencies, as appropriate.

Adequate resources: The college must demonstrate that it has the resources to realistically maintain the program or course at the level of quality described in the proposal. These resources include funding for faculty compensation, facilities and equipment, and library or learning resources. Additionally, the college must demonstrate that faculty are available to sustain the proposed required course(s) and to facilitate student success.

Compliance: The design of the program or the course may not conflict with any state or federal laws, statutes or regulations.[17]

While changes are still underway for how the Chancellor's Office and colleges create and review courses and programs, these changes are happening with deliberation and coordination from numerous stakeholders and partners within the colleges and in broader regional communities.

Florida

The Florida State Board of Education (SBOE) provides general oversight for the development of curriculum frameworks for CTE programs at the secondary, postsecondary clock-hour and postsecondary college-credit levels through the rule-making process. The curriculum frameworks for secondary and postsecondary clock-hour programs designate the specific courses required. At the college-credit level, the frameworks designate required standards containing benchmarks for knowledge and skills that should be provided by a program and are submitted to the SBOE for review. From there, Florida College System (FCS) institutions must develop courses designed around the standards and benchmarks.

While the courses can vary across the system, they must all be able to demonstrate how they deliver the standards and benchmarks and meet other framework requirements. The state is able to achieve this delegation because it is one of 15 states and territories to have postsecondary-level statewide CTE standards. Florida delivers CTE programs and courses through three different systems — secondary, postsecondary/adult vocational and postsecondary degree/certificate programs. The state maintains a separate set of industry-driven CTE standards (i.e., curriculum frameworks) for each of its delivery systems; however, the three sets of CTE standards are developed concurrently by the same committee of business/industry, secondary and postsecondary representatives.[18]

Once a program framework has been approved by the SBOE, other FCS institutions may apply the framework and are not required to undergo an approval process. Most FCS institutions start programs by using an existing framework, allowing them to start their program more quickly and avoid a lengthy approval process. Per state statute, the Department of Education is responsible for conducting program reviews every three years to ensure that the programs are providing high-quality and relevant content and are producing good outcomes for learners.

The SBOE also works with and encourages the 28 FCS institutions and the state's 49 school district career centers to develop articulation and transfer agreements to provide seamless transitions for Florida learners. FCS institutions and school district career centers create articulation agreements that allow clock-hour credit programs to be articulated into relevant college credits. Many FCS institutions have agreements with their local school district career centers to allow learners to build on skills gained at the career centers and use the credit earned toward an associate degree. FCS institutions also have articulation agreements with four-year colleges and universities so that a learner could start his or her education at a school district career center, transfer to an FCS institution, and then transfer to a four-year college or university, all on a clearly articulated path. Similarly, community colleges have articulation agreements with four-year colleges so that a learner could start his or her education at a postsecondary career center, transfer to a community college, and then transfer to a four-year college, all on a clearly articulated path. All postsecondary institutions also share common course codes, which allows the process to be even more straightforward for both learners and institutions.

Revising Program Approval Processes in Oregon

Oregon's Higher Education Coordinating Commission (HECC) has authority for approval of new CTE programs at all of Oregon's 17 community colleges. HECC's Office of Community Colleges and Workforce Development staff work individually with community colleges on the standards and processes for program approval, and proposed programs are then considered by the Commission at regularly scheduled public meetings. Guidance and support are also provided through a detailed online handbook, which explains the requirements for different types of degree programs.[19] Though the process is fairly centralized and examines data such as labor market justification in a lot of detail, HECC recently partnered with the Oregon Department of Education, individual community colleges and regional K-12 coordinators to undertake a thorough review of the state's full CTE program approval and review system.

The cross-sector Policy Review Team used the Policy Benchmark Tool on CTE Program of Study Approval developed by Advance CTE to guide its review.[20] The Policy Benchmark Tool was developed with input from numerous state and national CTE leaders from both secondary and postsecondary and consists of a rubric that uses six core elements of program quality to help state leaders assess how well current policy is ensuring that each learner has access to high-quality CTE programs:

1. Rigorous course standards and progressive, sequenced courses;
2. Secondary and postsecondary alignment and early postsecondary offerings;
3. Industry involvement;
4. Labor market demand;
5. High-quality instruction; and
6. Experiential learning.

This process prompted important discussions between secondary and postsecondary leaders about alignment between the two systems, as well as how to ensure that partnerships between secondary, postsecondary and industry are truly meaningful and beneficial to those involved, rather than a compliance exercise. Going forward, the agencies are working to implement an action plan to update policies and processes based on the findings from their self-assessment.

ENSURING QUALITY IN MULTIPLE CONTEXTS

While the systems described in Wisconsin, California, Florida and Oregon operate in different governance contexts, and each state works with a different regional accreditor, they all share a focus on ensuring that high-quality and relevant programs are approved at the postsecondary level. Each state relies heavily on labor market information to inform relevance, as well as on key stakeholders, including faculty, administration and industry partners, to monitor and maintain quality program elements. Leaders in California realized that such a large system of community colleges could not function well if every decision on program quality had to go through one system office, so they designed a process in which institutions have certain flexibilities but in a way that allows the Chancellor's Office to still maintain an emphasis on quality and relevance.

Likewise in Florida, the state set up a system in which institutions do not have to design every program from scratch but can design and implement programs based on pre-existing high-quality frameworks. In Wisconsin, the state works closely with institutions and local districts to build and update programs as they go through the approval process and works with those same college staff to suspend and discontinue programs when appropriate. In each case, the state found a way to work within its context to promote quality programs and, by working as a partner with institutions, to provide learners with the best experience possible.

Whether a state postsecondary system is set up in a way that allows for centralized governance, decentralized indirect support or something in between, each system has levers it can use to ensure program quality and labor market relevance. Systems should support colleges in their program development through handbooks and virtual and in-person technical assistance, as well as provide other tools and supports. A culture of continuous improvement is crucial both for the system, as it examines policies and processes and adapts to new situations, and for colleges and programs, as they regularly review program quality and relevance and take steps to ensure both.

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ENDNOTES

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20. For more information, see https://careertech.org/resource/program-approval-policy-benchmark-tool