

# No Educational Experience Should Be an Island

## How Low-Income Students' Access to and Persistence in Postsecondary Education is Restricted in the Very Programs they Need the Most

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For low-income students, particularly those who are lower-skilled and/or did not enroll in postsecondary education immediately after high school, completing a community-college based workforce development program offers a crucial opportunity to put their new skills to work and find employment in their regional labor market. The best of these programs are developed in conjunction with local employers, designed to address skills and employment gaps in the local area, and offer high-quality training that leads to careers.

Not-for-credit, or noncredit, programs have advantages: they can offer training of shorter duration and can connect very low-income individuals with employment faster; they are often created based on specific employer<sup>1</sup> needs or input, ensuring that students are learning skills applicable to jobs in their local area; and institutions can more rapidly and easily get them started, since they are usually not subject to time-consuming curriculum approval processes.

Students who enroll in noncredit training are more likely to be of a lower socioeconomic status and are also, generally, students of color, significantly older, and enrolled less than full-time. The composition of this population raises concerns about whether these students are able to persist and complete such programs (particularly those whose training fees are not highly subsidized by employer or other training funds). This is because without funding, low-income students will be required to work more hours to cover the cost of tuition, which disproportionately hampers<sup>2</sup> their ability to persist and complete the program.

These training programs are commonly offered on a not-for-credit basis, which can leave the training out of reach for the lowest-income students. In addition, designing such training programs as noncredit can disadvantage these students when they seek to use the skills or credentials they have earned as a stepping stone to further skills attainment. Even if they complete a noncredit program, students can be *stranded* on an educational island, with training that is not well-articulated to for-credit programs that would allow them to easily connect new, for-credit learning atop what they've already accrued, as part of a defined career pathway. Moreover, low-income students are also expected to pay their way for these courses since noncredit programs (which can cost as much as full associates degree programs) are generally *ineligible*,<sup>3</sup> except under very specific program structures, for student financial aid through Title IV of the Higher Education Act (HEA)—the largest source of federal education assistance to students.

Reforms can improve these opportunities for students with limited personal assets to access quality training programs. For instance, future federal funding for postsecondary institutions to design and deliver workforce

development training should be conditioned on a requirement that institutions and/or states adopt rigorous credit for prior learning (CPL) policies, to articulate a student's previous work for credit, and build bridges between new noncredit work and for-credit coursework. CPL can both shorten time to degree<sup>4</sup> and reduce cost to degree for students, if a plan is in place prior to a student completing a program.

*Other policy changes that would address this problem include:*

- A strategy for multi-layered employer engagement, beyond identification of which jobs are in-demand. This would include additional participation in curriculum/program development, career pathway development, and credit for prior learning, to help address development deficits in those areas;
- Conditioning financial incentives to employers for hiring noncredit program completers on a requirement that the employers work with the institution on articulating student noncredit learning to college credits, through the strategies listed above;
- Subsidizing student costs by allowing certain noncredit training programs to be eligible for Title IV student financial aid, or shortening program length requirements when connected to a quality career pathway, to make the costs of noncredit training affordable for the lowest-income individuals.

## Building a Bridge off the Island

Credentials offered through noncredit programs of study often enable workers to build skills in a short-term program and gain initial entry into the workforce. For credential-holders to build new or additional skills to advance their careers, they should be able to leverage the training they already have. Despite how common it is for institutions to build noncredit programs from those offering credit, a survey of postsecondary institutions<sup>5</sup> revealed that 51 percent of two-year institutions and 61 percent of all public institutions said their noncredit training programs were not applicable to a degree. Further, 37 percent of two-year institutions said their noncredit programs were not part of their academic curriculum.

Institutions commonly offer both a for-credit and noncredit program in the same subject, typically distinguished by slightly different names. For instance, a community college in the Northeast offers both a Graphic Design Certificate (for credit) as well as a noncredit Graphic Design program that awards a certificate of completion to students. The for-credit program costs almost \$6,000 to complete, while the noncredit program is about half the price (still financially out of reach for many students) but also requires 40 hours of work experience. For students with little or no postsecondary experience, this naming convention is problematic, as nearly identical names easily can be misinterpreted as a signal that there is little difference between the two programs. However, it may only be after students have registered or even started class that they understand the cost, time, and articulation trade-offs between the noncredit and for-credit programs.

Often, institutions will pare down existing for-credit curriculum and offer it on the noncredit side. Highline College, a two-year institution that participated in HPOG through its local Workforce Investment Board, did this with its nursing assistant certification program, in order to concentrate the noncredit program on a more specific set of skills (see information box at right). As a result, the noncredit program could be completed in as few as five weeks for a much lower cost, and was more responsive to the high number of students trying to enter and complete their Nursing prerequisites. These students are learning largely the same material, in less time. However, they aren't able to obtain student financial aid to pay for it. Frequently, leaders at postsecondary institutions expressed the view that noncredit programs were preferred by employers, likely a result of the short time it takes to get them from concept to operationalization. These programs don't need the same level of faculty, institutional, and accreditor approvals that a for-credit program would require. A community college in a large city in the Deep South noted that all of its industry-based certificate programs were noncredit at the request of local businesses, likely for one or several of these reasons. Officials at an urban institution in the Northeast described an approval process that took as long as three years to create a new occupationally focused department that could provide credit-bearing programs—so instead the institution built its occupational (noncredit) programs out from existing offerings. Other research has echoed these experiences: 41 percent<sup>6</sup> of two-year institutions created their noncredit programs as a result of a contract with employers, which often requires new programs to be established within a very short timeframe.

### HIGHLINE COLLEGE (KING COUNTY, WASHINGTON)

In response to local workforce and student needs, Highline College developed a 7-credit, 5-week shortened Certified Nursing Assistant (CNA) program offered through the college's Continuing Education department. The program is an accelerated alternative to the traditional CNA program and, since it is in the continuing education department, can be provided at a lower cost while offering college credits. Students also have the option to supplement this credential with specializations in dementia care and mental health. Although the program is not eligible for federal student aid, tuition costs are sometimes covered by TANF and other workforce funding sources, an important benefit for the high-poverty communities Highline serves. This model has proven to be successful in accommodating and training students who may not have had the scheduling flexibility to pursue the credential through the previous, longer-term model. The program is also part of an Associate of Applied Science degree in Community Health and Wellness for students who want to continue on that career pathway.

In applying for federal TAACCCT funding, many institutions described well-intentioned plans to establish credit for prior learning (CPL) policies in order to remediate the issue of their noncredit training being disconnected from their for-credit education. Short of directly offering credit for these training programs, such CPL policies would at least shine some light at the end of the tunnel, by showing students what coursework or credentials could subsequently apply to credit-bearing classes. In many cases, however, these CPL plans were held up by state activity, inter- or intra-institutional bureaucracy, faculty skepticism, or other issues. Unfortunately, too often, TAACCCT plans optimistically assumed that infusion of new grant funding would sweep away the barriers to developing robust credit for prior learning structures.

Developing CPL policies is a good practice above and beyond the articulation of noncredit to credit. This applies even with for-credit coursework. In an extreme case, an HPOG grantee in the Mid-Atlantic told us about an institution it works with that has a stand-alone nursing school (which is common in the state) overseen by the institution. Students who complete their Licensed Practical Nurse training (a for-credit program) at the nursing school are not able to transfer *any* credits to the overseeing institution.

#### **No Educational Experience Should Be an Island**

As mentioned earlier, offering credit for prior learning can reduce time and cost to degree, which most significantly helps low-income and non-traditional students, who often are managing a number of personal obligations in addition to their education. Noncredit credentials regularly provide individuals entry to a good job, which for many students can be a stable foundation for economic and career success. But for those who subsequently lose that job, or who want to augment their skills to progress to higher-level jobs or change careers within that industry, it is far better to be able to build on credentials through further education, even if the credentials were initially earned in a noncredit program.

In many cases, the good intentions to develop comprehensive CPL policies ultimately were lost among other grant and institutional priorities, leaving students no better off than with an institution that had no plans to provide CPL. In the future, policymakers should require, as a condition of funding, that any federally funded training program have a thought-out and formalized policy (including articulation of noncredit to credit) already on the books. As institutions offer ever-more varied types of credentials, it is important to help students make sense of how they connect.

Ideally, formalized policies would extend beyond the institution to the state level. Statewide policies are important because they benefit students who attend more than one institution, which is believed to be the case with more than one-third<sup>7</sup> of all students in higher education. One positive outcome from the TAACCCT program is that several states adopted or made changes to their CPL policies as a result of the program. In one state, institutional efforts to implement their own CPL policies were put on hold pending final state legislation for a significant period of time. Progress has been slow nationally, where 12 states<sup>8</sup> do not have any prior learning assessment policies, and another 10 have policies limited solely to awarding veterans credit for their experiences in the military.

While the hope is that employers would be supportive of articulating prior learning for credit, we heard unfavorable reactions from leaders at two institutions, one in the Midwest and one in the South. Their perception was the employers were engaged when they developed their partnership, got the program running, and built a specific set of skills among current and potential employees. However, these institutions felt employers were not interested in getting their current employees evaluated for CPL. Officials from an agency working on a Workforce Innovation Fund (WIF) grant in the Midwest also plainly stated their perception that employers don't care if a student took credit or noncredit courses, but are interested in pure skills attainment alone. Employer resistance matters, because very often students in training programs are already working. Research on noncredit<sup>9</sup> training programs at a large community college in Iowa found that among program completers, 88 percent were employed at the start of the training.

## ROADBLOCK FOR LOW-INCOME STUDENTS

Some institutions perceive that employers are focused on specific skills in the short-term, with little concern for the potential to build on those skills in the future or for evaluating current skills.

## SOLUTIONS

1. Employers should participate in multiple levels of development through a program-wide strategy.
2. Outreach and education should show employers what's in it for them, such as protecting their investment by cooperating with the development of programs and career pathways, so they know they are getting employees with needed skills.
3. Employer financial incentives should be conditioned on actively working with institutions to ensure that the employees hired from these programs receive academic credit for their noncredit work.

Finding and building employer partnerships is a critical key to success in training programs, beyond merely identifying skills that are in demand for jobs in the region. Employer-institution partnerships that engage on a deeper level than this—to work on career pathway development, curriculum design, and awarding credit for prior learning — should be a priority of future federal funding for occupational training programs at postsecondary institutions.

Outreach and education could help employers to better understand why these changes would matter to them. For instance, institutions could encourage employers to protect their investment by staying engaged to help the institution develop a plan to make the program a full career pathway, with stackable credentials.<sup>10</sup> Such ongoing employer involvement should also include articulation of that learning for credit, if it is not a part of the program already. This way, the program’s career pathway can follow the career progression that is actually viable within the industry and more flexibly adjust to increases in demand for skilled workers. Such an agreement would benefit not only employers, but also students, who would see the potential for job growth with greater clarity. This strategy also makes it easier for employers to upskill and promote current employees and then back-fill the resulting vacancies with newer program completers.

Further, credit for prior learning involves examining the students’ knowledge and previous experiences, along with evaluating and quantifying their skills attainment, which offers employers additional certainty that the students have mastered critical skills. It also supports employers’ implementation of lean enterprise<sup>11</sup> systems by eliminating the duplication of effort by the student and institution, making students’ accrual of new skills more efficient.

For employers that receive a financial incentive, the federal government or states should also adopt policies to spur employer engagement in this area. For instance, the Community College Partnership Tax Credit<sup>12</sup> proposed by President Obama in his Fiscal Year 2017 budget and the Community College to Career Fund Act introduced by Senator Al Franken (D-MN) and Representative Tammy Duckworth (D-IL) , would offer a \$5,000 tax credit to employers that participate in curriculum development, donate materials, offer job-based learning opportunities, and hire program graduates. Any program that offers employers a tax credit or other financial benefit for hiring program graduates should also condition that payment on the employer actively working with the institution to articulate as much as possible of that noncredit work to academic credit. This would establish a principle of fairness: no tax credit for the employer without academic credit for the student/worker.

### ROADBLOCKS FOR LOW-INCOME STUDENTS

1. While institutions had goals to increase the development and formalization of credit for prior learning (CPL) policies, plans have not progressed as hoped.
2. Students can’t build on already mastered skills and credentials that document this learning.

### SOLUTION

Institutions must be required to have a formal CPL policy in place (including articulation of noncredit to credit) before receiving grant funds for future training programs. Ideally, a state-level policy would also be adopted.

## Expanding Low-Income Students' Opportunity through Financial Aid

There is a cost associated with both evaluating a student's prior learning, and enrolling in the noncredit courses being evaluated. Because it is rare for either the evaluation of prior learning or noncredit course to be eligible for HEA Title IV student financial aid, low-income students can be subject to a double financial hit. Low-income students have limited options for assistance in paying for such training programs: they must rely on personal resources; hope to find a program subsidized by an employer, an institutional, or some other funding source; or enroll in a longer-term, more expensive for-credit program of study in the same occupational field. The latter option is, for many, an impossible choice. For instance, the population served by a large institution in a certain Midwest state was so low-income that the students couldn't maintain long-term enrollment—they needed jobs, and only stayed enrolled in the training program developed using TAACCCT funds up until their partial education was sufficient for them to get hired in the field.<sup>13</sup>

But that state was unique in another way: while program rules require that TAACCCT funds not be used to pay tuition and related expenses, institutions in this state used program funds for allowable expenses, and then charged students zero tuition. This no-cost model meant the state was able to serve a larger pool of low-income and jobless individuals than many other states. Conversely, the HPOG program expressly allows institutions to use program funds to cover students' tuition and fees (and many other costs of attendance, including support services such as child care, emergency expenses, and licensing fees). The population HPOG has been able to serve was similar: 57 percent<sup>14</sup> had a high school diploma/equivalency or less, and 76 percent had annual household incomes below \$20,000.

After their first term, more students<sup>15</sup> in noncredit courses drop out than remain enrolled; training costs borne by students are likely a factor in this decision. Future federal funding for occupational training programs at postsecondary institutions must enable the lowest-skilled and lowest-income individuals to build skills and qualify for family-sustaining employment opportunities. Without a subsidy for these training costs, those students will not be reached. One solution would be to simply allow students in all types of workforce training programs to access HEA Title IV financial aid. The HEA currently limits eligibility for financial aid to courses of study offered for-credit, and those less than one year in length must be at least 600 clock hours, 16 semester or trimester hours, or 24 quarter hours; and must be offered for at least 15 weeks of instruction. A program of this type must prepare students for gainful employment and be designed for students with less than an associate's degree. An exemption is required for shorter-term training programs to be eligible for aid. At the least, Congress should consider allowing courses of

### ROADBLOCK FOR LOW-INCOME STUDENTS

Low-income students often must pay for their noncredit training from their own pocket, or enroll in a longer-term for-credit program, if they can't find a program that is subsidized through an employer, institution, or other entity.

### SOLUTIONS

In order to serve the lowest-skilled and lowest-income individuals, training programs must be subsidized.

There are three alternative approaches that could be taken to address these inequities:

1. Allow all types of workforce training would get full access to Title IV student aid.
2. Allow training programs (built out of federal initiatives like the current TAACCCT program) to get full access to Title IV student aid.
3. Allow for short-term training programs to have access to Title IV student aid when part of a larger career pathway.

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study that are specifically created at postsecondary institutions through federal training initiatives to be eligible for Title IV aid. In the past, grantees of these initiatives have been required to participate in an evaluation process report on data, which could help reduce concerns about the potential for abuse.

Instead of exempting programs from the current rules, Congress could change the rules to reflect the way today's workforce training is carried out at postsecondary institutions. This could be done by shortening the length of the program requirements as proposed in the JOBS Act,<sup>16</sup> introduced by Senator Tim Kaine (D-VA). This bill proposes reducing length to 150 clock hours and eight weeks for programs that are shown to align with the local economy and are part of an eligible career pathway program, which is defined in both the Workforce Innovation and Opportunity Act (WIOA) and the HEA. Examples from our research are programs in the Wisconsin Technical College System (see information box at right), which have fostered and created short-term embedded credentials within larger career pathways. These credentials could lead to one- or two-year diplomas but award interim credentials at points as short as 10 weeks and designed more specifically for the industry being served.

While adoption of the JOBS Act, for instance, would assist with students' federal aid eligibility, program length limits are consequential for low-income students' access to state aid as well. For instance, in New York, state aid is not available for certificate programs that are less than one academic year, which means at least 24 semester hours.

Congress recently implemented a similar change to the federal financial aid programs, allowing students without a high school diploma or equivalency—who are generally ineligible for financial aid—to receive Title IV financial aid through the Ability to Benefit (ATB) provision that is part of an eligible career pathway. This option is currently underutilized by many institutions, not just those receiving TAACCCT funding. Officials at a TAACCCT grantee institution from a small town in the Deep South told us how they leveraged additional private funding to serve students without a high school equivalency, and are coordinating with the state to get their career pathway programs formalized. Once the state agrees, the institution will begin offering Pell grant funding through the ATB provision to help students pay the tuition for some of the training in this career pathway. ATB offers an additional strategy under current law that institutions can leverage to increase access for low-skilled, low-income individuals hours.<sup>17</sup>

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### WISCONSIN'S TECHNICAL COLLEGES

The plan set forth by the Wisconsin Technical College System was to have its institutions increase the development of short-term programs – leading to embedded technical diplomas and career pathway certificates – from existing Associate degrees and one- or two-year technical diplomas. To do this, the office developed a standard implementation and approval process to facilitate implementation by the colleges, and used performance funding to further incentivize this activity. Institutions were required to make any new credentials part of the parent program, articulating them exactly to the existing curriculum. When institutions seek approval of the new programs, they must also include information on the labor market need for the credential, the target job or skills it seeks to teach, the median salary of the job, and the ability for the credential to be eligible for federal financial aid. Through these requirements, for instance, the northern Wisconsin region is now training more than 1,200 students in machining and welding to meet employers' demands.

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## Conclusion

As we've demonstrated, noncredit training programs offered by community colleges are important—but potentially elusive—for the lowest-income students. Today's students need more flexible and affordable training options in order to accommodate their employment, parenting, and other responsibilities while they earn the credentials needed to advance in their career and earn wages that lift them out of poverty. Current policies limit their ability to achieve those goals, because stand-alone programs of study too often do not offer credit for students' previous learning or training, and they can be unaffordable when students can't access sufficient financial aid.

Solutions to mitigate these restrictions on education access lie in an increased emphasis on program services like requiring CPL policies, more deeply engaging employers beyond simply workforce needs, and investing in programs that lead to employment. Using more strategies like these, which can save students and employers both time and money, are essential for increasing the United States' economic potential.



**Building Skills**  
*Remodeling the HEA*

## Why We Wrote This Series of Papers

Well-designed workforce development or occupational training programs at postsecondary institutions allow individuals who earn credentials to connect their academic achievements directly with local employers in that field. Such training programs ideally provide a pipeline directly to employers, or teach skills that are in demand in the regional labor market. These programs are most often found at community colleges, which often serve as workforce training centers for people to build their skills to enter the workforce: in the most recent academic year, 86 percent<sup>19</sup> of all certificates to graduates with no prior credentials were awarded at these institutions. Community colleges generally, and their workforce training programs in particular, are a critical part of the college completion agenda.

When employers are engaged as partners in designing such training, whether by informing the creation of new programs or modifying existing programs, low-income individuals have a better chance of gaining employment in the specific field for which they are trained. One of the best opportunities for these workers to advance economically is to gain the skills vital to family-supporting jobs that can be found in the local economy. Such job-driven training programs should also ensure low-income students can seamlessly connect their work and credentials to further their education and training in the postsecondary setting at a later date. Those responsible for creating these programs—at the local, state, and federal levels—must not only respond to employer demand but also help workers advance along a career pathway. Today's students<sup>20</sup> are increasingly older and juggling work, family, and school, not supported financially by their parents, and often are enrolled in training programs to build skills or change career paths<sup>21</sup>. The challenges these students (in particular) have in navigating training programs are not just concerns around the periphery; as this series of papers underscores, they are at the heart of the issues both institutions and students struggle with while attempting to implement and participate in these programs.

For the past several decades, the federal government has offered a series of competitive grant-funded workforce training programs at postsecondary institutions: from those supported by the Job Training Partnership Act of 1982, to the High-Growth Job Training Initiative that began in 2002, to the multiple rounds of Community-Based Job Training Grants awarded to community colleges between 2005 and 2008, and more recently through programs like Health Profession Opportunity Grants (HPOG) and Trade Adjustment Assistance Community College and Career Training (TAACCCT) grants. With the concluding round of TAACCCT grants now awarded, we anticipate that policymakers will seek in the future to continue this bipartisan trend of dedicating funding to focused investments in postsecondary education institutions (especially community colleges) as providers of job training. CLASP has identified best practices for the design of any successor program along these lines, which are applicable both to address real barriers to student success and to consider changes in the next reauthorization of the Higher Education Act that would better coordinate federal higher education policy with occupational training programs at postsecondary institutions.

These training programs offer great promise: employers can recruit and build a skilled workforce, institutions can strengthen relationships and relevance to the labor market in their communities, and low-income students can learn skills that will get them a job. But have training programs been able to keep up with the changing demographic and attendance patterns of today's students? If not, what can we learn from how are they failing to do so and, particularly, how can they better lift low-income people out of poverty?

These are the questions we set out to answer as part of this series of papers, of which this is the first. CLASP conducted extensive conversations with two dozen federal officials, program evaluators, and grantees (which included institutions, consortia of institutions, workforce investment boards, tribal entities, and state-level government agencies) involved in four discretionary grant programs: TAACCCT, HPOG, Workforce Innovation Fund (WIF), and First In The World (FITW). This project was made possible through funding from the Bill and Melinda Gates Foundation.

## *General summary of programs discussed in this series*

### **Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grant Program**

TAACCCT is administered by the Employment and Training Administration (ETA) in the U.S. Department of Labor (DOL). Grants are provided to community colleges (and other institutions) to help them partner with local employers to provide education and training to participants—TAA-eligible workers, in particular—for employment in high-wage, high-skill occupations. The program was funded at \$500 million annually in 2011, 2012, 2013, and 2014. In the first three rounds of grants, more than 800 institutions were awarded funds either as individual institutions or as part of consortia.<sup>22</sup>

### **Health Profession Opportunity Grant (HPOG)**

HPOG is administered by the Office of the Administration for Children and Families in the U.S. Department of Health and Human Services (HHS). This program provides education and training to low-income individuals to prepare them for jobs in health care fields that are expected to be in high demand or experience labor shortages. Grants go to postsecondary institutions, community-based organizations, local workforce investment boards, state or local government agencies, and tribal organizations. The program has been appropriated \$85 million each year from 2010 through 2017. HPOG has 32 grantees, which, over the program's first four years, have enrolled more than 32,000 individuals.<sup>23</sup>

### **First in the World (FITW)**

FITW is administered by the Office of Postsecondary Education at the U.S. Department of Education (ED). It is designed to support the development and dissemination of ideas that work to address common challenges in postsecondary education for many populations of students, such as adult learners, students of color, first-generation students, and working students. To support the development of best practices, grants go to institutions, combinations of institutions, public and private non-profit institutions, and agencies. ED awarded \$74.6 million in development grants in 2014 to 24 grantees, and an additional \$60 million in development and validation grants to 18 grantees in 2015.<sup>24</sup>

### **Workforce Innovation Fund (WIF)**

WIF is also administered by the ETA office at DOL. Grants were provided to state workforce agencies, local workforce investment boards, and tribal entities to improve service delivery and evaluate the improvements. The intent was to better align programs in the fields of education, workforce development, human services, and economic development. In Round 1 (2012), DOL awarded \$146.9 million in grants; in Round 2 (2014), DOL awarded \$50.7 million; and in Round 3 (2015) the Department awarded \$35.6 million. In all, there have been nearly 50 grantee recipients.<sup>25</sup>

## Endnotes

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- <sup>2</sup> Anthony P. Carnevale, Nicole Smith, Michelle Melton, and Eric W. Price, *Learning While Earning: The New Normal*, Georgetown Center on Education and the Workforce, 2015, <https://cew.georgetown.edu/wp-content/uploads/Working-Learners-Report.pdf>.
- <sup>3</sup> Noncredit coursework is eligible for Title IV aid if students take remedial coursework as part of their enrollment in a larger, eligible program of study. This paper does not address remedial coursework. Additionally, a noncredit clock hour program can be eligible for aid if an institution takes steps such as establishing terms, meeting minimum program length requirements, and getting the requisite federal approvals for such program. A recent example of this is at Mott Community College in Michigan. A description of how Mott successfully got student financial aid eligibility for noncredit training is available at <http://www.aspenwsi.org/wordpress/wp-content/uploads/Promising-Practices-The-Power-of-Pell.pdf>.
- <sup>4</sup> The Council for Adult and Experiential Learning, *Fueling the Race to Postsecondary Success: A 48-Institution Study of Prior Learning Assessment and Adult Student Outcomes*, March 2010, [http://www.cael.org/pdfs/pla\\_fueling-the-race](http://www.cael.org/pdfs/pla_fueling-the-race).
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- <sup>10</sup> Evelyn Ganzglass, *Scaling "Stackable Credentials"*, CLASP, March 2014, <http://www.clasp.org/resources-and-publications/files/2014-03-21-Stackable-Credentials-Paper-FINAL.pdf>.
- <sup>11</sup> Investopedia, "Lean Enterprise," <http://www.investopedia.com/terms/l/lean-enterprise.asp>.
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