



In Brief



University of Illinois at Urbana-Champaign

State Approval Policies and Procedures for Postsecondary CTE Programs

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Introduction

How states approve new or review existing postsecondary Career and Technical Education (CTE) programs is not widely known outside a given state. This lack of information is problematic. Federal policy makers develop and implement policies that impact the states, yet the specifics of state approval processes are not clearly understood. A good example of such policy is the recent passage of the Carl D. Perkins Career and Technical Education Improvement Act of 2006 (commonly known as Perkins IV). Perkins IV, like its predecessors, established educational outcomes for states. One major difference between previous CTE legislation and Perkins IV is that the latter includes sanctions and penalties for failure to meet agreed upon state- and local-level outcomes. In addition to the possibility of sanctions, state agency administrators are faced with making decisions about approval of new CTE programs with limited resources, heightening the importance of assessing feasibility and cost effectiveness. With increased pressure resulting from potential sanctions and decreasing fiscal resources, increased understanding of state approval processes is needed to make sound decisions at all levels (federal, state, local).

This brief presents the results of a national study designed to inventory state agency approval policies and procedures for postsecondary CTE programs (Merkley & Johnston, forthcoming)¹. The study was limited to the states' approval of CTE programs implemented by public, two-year degree-granting institutions and did not include policies and procedures for private or proprietary institutions, secondary CTE programs, or non-credit CTE courses and programs. The inventory resulting from this

study provides a snapshot of a broad array of policies and procedures currently used by states to review and modify existing policies and procedures. A study led by Marisa Castellano, University of Louisville, reviews secondary CTE standards and policies that may be of interest to readers who are engaged in CTE program reform.

This research was guided by four research questions:

1. What are the state standards and approval policies for approving new and reviewing existing postsecondary CTE programs?
2. What is being done in each state to help ensure consistency between postsecondary CTE programs and occupational standards?
3. What is being done in each state to help ensure postsecondary CTE programs are responsive to labor market needs?
4. What are state policies regarding articulation between secondary and postsecondary CTE programs?

Methods

Two primary sources of data were used for the study. The first source was information and policy documents located in publicly available websites of the state agency that was responsible for approving the program. We referred to these agencies as the "final approving agency" because of their role in determining the viability of postsecondary CTE programs. Of all 50 states, 47 (94%) used a final approving agency to approve postsecondary CTE programs and posted some level of information concerning postsecondary CTE program approval on a public website. Three states (Arizona, Delaware, and Pennsylvania) did not use a final approving state agency and were not included in the study.

¹ Merkley, R. J., & Johnston, G. H. (forthcoming). *State Approval Policies and Procedures for Postsecondary Career and Technical Education*. St. Paul, MN: National Research Center for Career and Technical Education (NRCCTE), University of Minnesota. This report will be posted on the NRCCTE website at <http://www.nccte.org>.

The research staff developed an instrument to document data collection from state websites, and it was reviewed by representatives of two final approving agencies (Illinois and Minnesota) to validate that key elements pertaining to the research questions were included. Websites and web-based documents were reviewed and used to complete the instrument, which comprised the preliminary data for each of the 47 states.

The second source of information emanated from follow-up telephone interviews with representatives of the final approving agencies. A total of 23 of the 47 states (49%) agreed to review the preliminary data that our research staff prepared based on websites and web-based documents and confirmed or corrected the preliminary data for their particular state. Data from these 23 states were considered to be confirmed. Data from other states were documented in the technical report, but are not considered confirmed.

Results

Postsecondary CTE Program Approval

Most of the final approving agencies for postsecondary CTE programs in the 47 states posted information concerning the process of program approval on their websites. The typical process of program approval appeared to follow a discernable pathway from conception to final approval. The process generally starts when an institution identifies a need for a new postsecondary CTE program, develops a proposal, and forwards the proposal to the final approving agency. Approval of postsecondary CTE programs was found to occur at two distinct times: initial approval of a new postsecondary CTE program and review and/or re-approval of an existing program.

The *initial CTE program approval* process follows two options: state-level approval ($n = 47$) and local options ($n = 3$ – Arizona, Delaware, and Pennsylvania). A total of 28 states utilize a two-stage approach to new program approval. *Stage one* involves statewide notification that a college is considering implementing a new program, which allows other colleges to review and comment on unnecessary duplication or other issues. *Stage two* requires the originating institution to complete a formal and standardized proposal or application with specific requirements and comprehensive description of the proposed program. States with the local option delegate most, if not all, approval processes to local colleges. As a result, these institutions act as independent entities with little or no state-level involvement in new program approval or the review of existing programs.

The most common elements in new postsecondary CTE program applications or proposals are program descriptions ($n = 45$), budget estimates ($n = 38$), accreditation/licensure ($n = 39$), and evidence the program is not an unnecessary duplication of an existing program ($n = 41$). Twenty-six states use a single process for the approval of all two-year postsecondary CTE programs. In other words, the same

process used to approve an associate of arts (AA) or science (AS) degree is used to approve an associate of applied science (AAS) degree. The average time required by the final state-level approving agency to review and approve a new postsecondary CTE program is reported to be slightly longer than three months.

A large percentage of states ($n = 42$ or 89%) have a process to review *existing postsecondary CTE programs*. The evaluation criteria used in the review process is most often determined by the state ($n = 22$), followed by local institutions ($n = 9$), and both local and state agencies ($n = 8$). The entity responsible for review of existing CTE programs could not be determined in eight states. The most frequently used program review criteria used by the states is program enrollment rate ($n = 24$), graduation or completion rate ($n = 29$), placement rate ($n = 24$), student outcomes ($n = 25$), and cost ($n = 17$). The average period of time between review of existing postsecondary CTE programs is approximately 4 years but ranged from annually to every 10 years.

Occupational Standards

The operational use of the term *standards*, as related to occupational, business, or industry standards, is inconsistent and is interpreted differently by the persons interviewed from the final approving agencies. New program proposals in 14 states (30%) require some level of documentation describing how programs will incorporate occupational standards. When occupational standards are contained within new program applications or proposals, the requirement is typically worded similar to language appearing in guidelines of the state of Idaho: “Identify the accrediting agencies, business and industry standards, and state or federal licensing boards that apply to this program. Provide the basic criteria established by the relevant agency or board and describe how the program will meet these criteria” (Idaho Division of Professional-Technical Education, 2006, p. 2).

When representatives from the participating final approving agencies were interviewed, 20 stated that individual institutions are required to explain how applicable occupational standards are included in the program. Interestingly, six state agency representatives indicated occupational standards are a requirement despite the fact that policy and procedures posted on their websites made no reference to occupational standards. Inconsistencies between the language used in policy documents posted on websites and follow-up telephone interview data provided by state agency representatives point to different interpretations of what is meant by skill, occupational, industry, or business standards. Many interviewees perceived requirements associated with accreditation, licensing, or certification as an occupational standard and a responsibility of the individual (local) institution. What entity (e.g., state or local institution) is responsible for deciding which standards are appropriate to a CTE program is not always clear, but appears to be primarily a function of the individual institution and not the final approving agency. It

is possible that occupational standards are more widely used at the local level than a study of state-level websites can reveal. It is also possible, even likely, that such standards are being implemented and augmented under the guidance of local CTE advisory boards. Unfortunately, there is little recent research on how local advisory boards are utilized in this regard.

Labor Market Influences

All states studied except West Virginia require a description in the application or proposal to clearly illustrate the labor market need and/or demand for the postsecondary CTE program. Twenty-two states examine labor market need and/or influence in the review of existing postsecondary CTE programs.

Two additional and closely related characteristics of labor market information are commonplace: the type of labor market information required (e.g., employer surveys) and the geographical area of the need or demand. Thirty states identify specific labor market information, such as unemployment agency statistics or employer surveys. The required scope of the description of the labor market need varies and includes local ($n = 36$), state ($n = 33$), and/or national ($n = 14$).

Articulation

This study was primarily concerned with how the issue of articulation is identified in the new program approval and program review processes. (It is likely that other state websites might contain additional information on articulation, but this study was limited to websites of the final approving agency for postsecondary CTE programs only.) Articulation was mentioned in 24 state proposals for new postsecondary CTE programs and indirectly mentioned by one state (Illinois). New postsecondary CTE program proposals often request information concerning how the proposed program articulates with other postsecondary programs ($n = 17$), followed by nonspecific articulation or articulation in general terms ($n = 9$), articulation with secondary programs ($n = 7$), and articulation with postsecondary CTE programs ($n = 2$). Most proposal articulation language is applicable only if existing articulation agreements are in place. Few states appear to require that articulation agreements are in place or describe why articulation agreements are not in place when the proposal is submitted for approval.

Conclusion

There is considerable variation across states with respect to structure, policies, and procedures governing the approval of new postsecondary CTE programs and the review of existing postsecondary CTE programs. The typical contents of new program

approval applications and existing program review guidelines, including their wide variation across state agencies and community college systems, suggest that the decision making process about the establishment of new programs is largely delegated to local institutions. There is also wide variation in the application of the term *standards* across systems, and there is evidence that state agencies lack either the time or expertise necessary to determine the appropriateness of the standards suggested by local institutions. There is even wider variation across state agencies in their understanding and application of criteria related to labor market conditions as a part of program approval and review. Articulation appears to be largely outside of policies and procedures for approval of new postsecondary CTE programs and review of existing programs.

Policy Implications

States have few options when making decisions on issues related to review and approval of postsecondary CTE programs. Decisions can either be centralized at the state level, they can be delegated to local institutions, or they can balance state and local approval in some way. There is also considerable variation on how centralized state-level decisions are made. This observation is not new. McGuinness (1997) and Tollefson and Fountain (1992) have written on this topic for some time. Furthermore, states can exercise a state-level policy on one issue and utilize a local-level option on another. The question then becomes, “What impact will Perkins IV have on how states make decisions?” States that delegate decisions to local institutions will still be held accountable for meeting agreed upon outcomes. Furthermore, under Perkins IV, local institutions are subject to sanctions for failure to meet agreed upon outcomes. Due to considerable variation found in how states make these decisions, it is unlikely that a single “one size fits all” response will emerge. Therefore, it is likely that postsecondary CTE program review and approval and associated outcomes will continue to vary considerably throughout the nation.

It was beyond the scope of this study to examine exactly how the various policies and procedures identified on websites and through contacts with state agency personnel are actually implemented at the local level and what additional factors influence the local decision-making process. A study focusing on implementation of local practices would be useful in identifying promising and exemplary practices or, at the very least, help to determine variations between stated and actual practices. Finally, given the highly dynamic nature of state policies and procedures, additional research is needed on how, when, and why states make changes related to policies and procedures concerning new postsecondary CTE approval and review of existing CTE programs.

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