Higher Learning Advocates

MULTIPLE PATHWAYS & QUALITY ASSURANCE:
Navigating the new higher learning landscape

Author: Emily Bouck West, Deputy Executive Director
I December 2018

In our 21st century global economy, continued education and training is now required to ensure Americans are upwardly mobile and economically successful. Younger workers are changing jobs as many as four times by age 32, and lifelong learning has quickly become the norm for most adults. More Americans are living outside city centers and away from traditional learning, and more people are learning skills in nontraditional settings that could translate directly to educational credentials. Many of these students are pursuing learning beyond the confines of our traditional understanding of a “college education.” One in four Americans has a non-degree credential or certificate. More than thirty percent transfer courses between institutions. One in three take at least one course online.

Today’s students themselves are also more diverse in age, race, and income level than any previous generation. And their demographic diversity is matched in the diversity of pathways that they take through postsecondary education and employment — from work-based training, apprenticeships, and other non-degree programs. These multiple pathways make up a wide-ranging and integrated set of programs designed to meet today’s students where they are and provide numerous entry and exit points to and through education and the workforce.

Federal policy should ensure it reflects the experiences of today’s students who follow an enormous number of varied pathways into and through the American system of postsecondary education. But despite the emerging archetype of today’s students and the wide variety of models that serve them, a mismatch exists between the realities of this landscape and the federal policies in place designed to finance, support and assure the quality of postsecondary learning in the United States. By taking a more comprehensive view of the multiple pathways today’s students take, new federal policies can help create equitable access to high-quality learning opportunities that set today’s students up for success in college, employment, and lifetime learning.
Contrasted with the traditional two- or four-year college model, today’s learners intersect with learning many times throughout their lives. They follow a multiplicity of different pathways to and through education and employment.

**MULTIPLE PATHWAYS**: a diverse and integrated set of postsecondary education programs that lead to employment and/or further education

But too often, certain pathways may be out of reach without access to some federal financial aid. For example, to be eligible to accept federal student aid as a form of tuition, including student loans and Pell grants, postsecondary education programs and institutions must meet a series of requirements: approval from the U.S. Department of Education (ED), authorization to operate by their state, and approval from an accreditation agency recognized by ED. These three set of mechanisms is known as the higher education “Triad.”

The federal government also supports postsecondary learning in other ways — such as through the Workforce Investment Opportunity Act (WIOA), which supports postsecondary programs through the Department of Labor (DOL), and through G.I. Bill benefits, which allows military-connected students to help pay for postsecondary education programs. Too often, these programs make up separate puzzle pieces that don’t fit neatly together in terms of interoperability, credit transfer, and aid requirements.
THE PROBLEM:

Students, employers, and policymakers are demanding more direct pathways between education and employment, and sometimes back into education. And while some of these pathways already exist, not all are eligible for students to use federal aid to attend. For example:

- Coding bootcamps provide students with internet technology skills, like computer engineering and programming, and offer certifications in-demand by large and small technology companies.

- Some online providers of low-cost general education courses have linked with four-year institutions to ensure transfer of the education and skills gained through their programs to credits at these institutions.

- Apprenticeships and on-the-job training can take place at the same time a student works toward their degree or credential, leaving them with classroom knowledge and practical experience.

- Community colleges often work with employers to build programs that match local workforce needs, but some programs still have to undergo a lengthy and burdensome accreditation review to ensure their courses are credit bearing and eligible for federal student aid.

These pathways do not uniformly qualify for access to Title IV federal student aid, meaning some students may have to pay out-of-pocket for cost of attendance and related expenses or rely on an employer to underwrite or offset the cost. This leaves many of today’s students unable to afford programs that could connect them to the next rung on the career ladder, higher wages, and greater economic stability.

A CASE STUDY: THE DISTANCE EDUCATION DEMONSTRATION PROGRAM

The distance education demonstration program model was implemented by the U.S. Department
of Education (ED) in July 1999. The purpose of the program was to “test the quality and viability of expanded distance education programs currently restricted under the Higher Education Act,” increase student access to postsecondary education through distance education, and determine what defines high-quality distance education programs.

Around this time, institutions of higher education were beginning to experiment with changing their delivery model to take advantage of technological advances — namely, the Internet. The distance education demonstration program enabled students to use federal student aid to pay for these new, different distance education programs. A total of 24 institutions participated in the program, and the success of the demonstration led to changes in the Higher Education Act reauthorization of 2008 in order to treat distance and online education as eligible for federal student aid in the same manner as other programs and, importantly, set guardrails about what constitutes a “high-quality” distance education program. Further, the Secretary of Education provided recommendations to Congress based on the demonstration program on ways to expand access to the innovation of online learning while ensuring quality for students.

**ANOTHER EXPERIMENT: EQUIP**

The Department of Education’s (ED) pilot program called Educational Quality through Innovative Partnerships (EQUIP) enables an institution of higher education to partner with a non-institution of higher education and a quality assurance entity (QAE) to provide innovative postsecondary education delivery models, while still working to ensure high-quality outcomes. The EQUIP program, because it is a pilot program at ED, must operate under certain statutory limitations that have presented challenges, but also opportunities to learn from the pilot to design another demonstration program under different parameters.

**A NEW DEMONSTRATION PROGRAM FOR MULTIPLE PATHWAYS**

As with the distance education demonstration program, postsecondary providers are already experimenting with different ways to educate and serve students and help them obtain meaningful employment or further their education. Stakeholders including industry associations, employer-led consortia, and workforce boards have valuable insight and expertise about different modalities that can be used to serve students beyond the traditional higher education models. Such entities, including examples like the National Association of Manufacturers, have shown great success at developing industry standards and processes to evaluate skills and competencies. Utilizing these different strengths, a demonstration program could create a process to certify quality and expand access and the use of federal student aid for multiple pathways of learning, including programs that aren’t currently eligible for federal aid.

As long as programs and partnerships offer transparent, high-quality outcomes, demonstrate financial stability, and result in a credential that leads to employment or further education, there should be a pathway for them to gain eligibility for students to use federal aid. However, federal policy should learn from the past and test the best approach to both allow for innovation and diversity of approaches while ensuring that the student and taxpayer investment is protected. This pathway would facilitate more equitable learning opportunities at high-quality programs, and must include checks and guardrails to protect students and taxpayers.

A “multiple pathways” demonstration program would allow federal student aid to be used at currently non-eligible programs that are connected with employers and produce strong student outcomes.
A NEW APPROACH:

A multiple pathways demonstration program would allow the Secretary of Education to use prescribed criteria to give accrediting authority to quality assurance entities (QAEs) that meet certain criteria and agree to monitor and evaluate student outcomes at programs of higher learning. Then, a program that is not currently eligible for title IV federal student aid would partner with an employer or other workforce-aligned entity and apply to a QAE through the multiple pathways demonstration program in order for students to be allowed to use federal aid at such program.

SECRETARY OF EDUCATION APPROVAL

QUALITY ASSURANCE ENTITIES WHO APPROVE FEDERAL STUDENT AID

PROGRAMS PARTNERED WITH EMPLOYERS THAT PRODUCE CONSISTENT, HIGH-QUALITY OUTCOMES

CRITICAL QUESTIONS AND CONSIDERATIONS:

Expansion of access to Title IV aid should only be considered to expand and improve opportunities for students. A new approach should include the following components:

A quality assurance entity that can demonstrate ability to assess and evaluate criteria, such as:

- Equitable success;
- Workforce value;
- Program operations, including fiscal health and governance.

- Access for new programs that meet criteria, such as:
  - An education or training program that results in meaningful employment in a related industry or sector; results in attainment of a postsecondary industry-recognized credential; or leads to credit that is accepted at an accredited institution of higher education that is in good standing with their accreditor;
  - Meeting or exceeding QAE-established thresholds for specified student outcomes and other criteria;
  - Demonstration of a meaningful and valuable partnership with an employer or workforce-aligned entity in a related field of study;
  - Make all student and program outcomes transparent;
  - Release transparent information on their business and governance models; and
  - Testing of pay-for-performance financing models for new and startup programs and providers with little track record of success.

A new demonstration program for multiple pathways would offer the opportunity for policymakers to consider the proper guardrails and quality assurance mechanisms necessary to ensure today’s students use federal student aid at programs that offer them career and economic opportunity while ensuring they are the highest-quality. As our workforce and learning models continue to evolve, meaningful reforms to facilitate multiple pathways to employment and further education are essential to equip today’s students with the tools they need to be successful.