

SHORT-TERM PROGRAMS IN THE SHADOWS

WHAT DATA SHOW ABOUT PROGRAM
LENGTH, COST, AND PAYOFF

ACKNOWLEDGEMENTS

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We would like to thank all those who generously shared their data and time with us for this project, including: Texas Higher Education Coordinating Board staff; Jeremy Kintzel of the Missouri Department of Higher Education and Tracy Otto of the Missouri Department of Economic Development, Division of Workforce Development; and Vladimir Bassis of the Iowa Department of Education, Iowa Community College Management Information System.

We thank the Joyce Foundation for their support for this project and are grateful to all of our foundation partners and individual donors whose support makes TICAS' work possible. The views expressed in this paper are solely those of TICAS and do not necessarily reflect the views of our funders.

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Introduction

The Pell Grant program helps low- and middle-income students earn degrees and certificates from a wide variety of postsecondary schools, including community colleges, vocational schools, liberal arts colleges, religious colleges, research universities, and many more. Eligible students can use their Pell dollars to finance undergraduate studies leading to four-year college degrees, two-year academic and occupational degrees, and certificates of varying lengths in a wide variety of subject areas including career programs. However, in order for students to use their Pell Grant, the programs must be offered on a for-credit basis, be approved by an accreditor and authorized by a state, and provide no less than 16 credits or 600 clock hours of instruction over the course of 15 weeks.

Currently, some stakeholders are advocating for relaxing these program eligibility requirements, suggesting that even shorter programs can provide a needed alternative to existing certificate and degree programs. Advocates also suggest these programs offer increased opportunities for meaningful employment to students who are uninterested in or unable to complete a longer program. Proponents assert that these very short programs, generally known as workforce programs and not necessarily accredited, are uniquely flexible and responsive to local industry and employer needs and meet the needs of students seeking a rapid path to improved workforce opportunities and earnings.

Existing sources of support for workforce training programs may suffer from inadequate funding.¹ Similar to students enrolled in programs already eligible for the Pell Grant, cost may be a significant barrier for low-income individuals seeking to attend very short-term training programs. In response, legislators have proposed expanding Pell Grant eligibility to programs as short as eight weeks, including workforce programs that are offered on a not-for-credit basis.² These programs may receive less scrutiny from accreditors and other overseers of quality.³

There is no national source of data on short-term programs under consideration for new Pell Grant eligibility, and little is known about the number of programs that would be affected by these proposals or how well they currently serve students. Existing research into certificate programs suggests positive but modest benefits that may last only a few years, but it fails to distinguish short-term programs from longer certificate programs that are already eligible for Pell Grants.⁴

In order to move beyond the anecdotal and shed light on the promise to students and taxpayers of programs that could become newly eligible for Pell Grants under pending legislative proposals, we analyzed data on short-term programs in three states that collect and maintain it: Texas, Missouri, and Iowa.⁵ Combined, these data are some of the most robust available for short-term programs, yet they still do not capture a potentially large segment of existing short-term programs that could be made eligible for Pell Grants. Important information gaps remain, including consistent data on program length and student outcomes. Furthermore, strengths and limitations unique to each source of data make it difficult to make fair comparisons across states.

Analysis of the state-level data we received shows that very short-term education and training programs are diverse in their length and focus. Some programs provide demonstrable value to students in immediate employment outcomes while others do not. The outcome data available demonstrate highly variable returns.

Examples of variation include:

- Short-term programs have a wide variety of lengths. In Texas, for example, the non-credit short-term programs we identified are typically 490 contact hours, but required instruction time for these programs ranges from 208 to 598 contact hours.
- These programs are offered in a wide range of fields, and while non-credit programs appear to play a major role in this space, we also identified a substantial number of short-term programs offered by colleges for academic credit. For example, 57 percent of short-term programs identified in Texas are offered for credit.
- Post-enrollment employment outcomes for students in short-term programs also vary widely. In Iowa, for example, more than half of students attended programs where graduates earned an average of about \$35,100. However, 44 percent of students attended health-related programs where they went on to earn about \$17,200.

This report begins with an overview of the Pell Grant program's current standards, followed by our methodology and brief discussion of our findings. Turning to each state, we proceed to ask what each data source shows about the short-term program landscape, including:

- How many short-term programs currently exist, and how long are they?
- How much do these programs cost, and how do students currently pay for them?
- What kinds of industries do they aim to prepare students for?
- Who currently enrolls in short-term programs, and how well do they fare after enrolling?

We highlight throughout the key methodological challenges we encountered, which underscore the need for better data and data systems capable of assessing the quality and payoff of programs not currently eligible for the Pell Grant.

Current Federal Aid Eligibility, Existing Proposals, and a History Meriting Caution

Each year, the Federal Pell Grant allows 7.5 million students to pursue postsecondary education. Students, schools, and programs must each meet eligibility requirements. Students must demonstrate significant financial need through the federal financial aid application and meet a small number of other, limited requirements. The vast majority of Pell recipients have incomes below \$40,000.

Schools must be accredited, authorized by at least one state, and meet other requirements established by federal law. However, a school's eligibility does not necessarily extend to all of its programs. Programs must be included within the scope of the school's accreditation and state authorization. In addition, among other requirements, programs must be offered for a minimum of 16 semester credits or 600 clock hours over the course of 15 weeks to be eligible for Pell Grants.

Students enrolled in programs too short to qualify for Pell Grants may borrow federal loans, as long as those programs provide at least 300 clock hours of instruction over no less than 10 weeks, have been

in existence for at least one year, and have verified graduation and job placement rates of 70 percent, among other standards.⁶ These requirements were established under the George H. W. Bush Administration in 1992 after high-profile cases of fraud and abuse of federal aid funds and years of high student loan default rates.⁷ While other provisions in the 1992 Amendments to the Higher Education Act were aimed at all programs offered by for-profit institutions, Congress applied these requirements to all short-term vocational programs, regardless of the institution offering them. However, it is not clear that many institutions offer loans to students enrolling in shorter programs.

Several existing legislative proposals would extend the Pell Grant to programs as short as 150 clock hours over as few as eight weeks, including non-credit programs that meet the reduced length requirements. None set any specific standards for completion or labor market outcomes, though some do include additional requirements that programs be aligned with guidelines established under the Workforce Investment Opportunities Act (WIOA).

Our analysis focuses on programs too short under current Pell Grant eligibility rules that provide at least 150 clock hours of instruction over no less than eight weeks. Importantly, because this report focuses on what existing data show about these short-term programs already being offered, we cannot take into account how the short-term program landscape may change in response to an influx of newly available federal funding. New providers may enter the space, and existing providers could create or alter programs to make them Pell eligible under new rules. The history of abuse of federal student aid, including the altering of program length to evade accountability, underscores the need to carefully approach potential changes to current program eligibility standards.⁸

Methodology and Data

We received data on programs in Texas, Missouri, and Iowa, each of which we identified from research and conversations with experts as having relatively robust postsecondary data systems that include at least some information on short-term programs specifically.⁹

Each of our sources of data include a different universe of programs:

- Texas data include programs in all of the state's community and technical colleges;
- Missouri data include all education and training programs registered with the state's Department of Higher Education, the Division of Workforce Development, or both; and
- Iowa data include only those programs in the state's community college system.

We limited our interest to short-term programs offered either for credit or on a non-credit basis by an accredited institution eligible for federal financial aid. We sought information about the programs themselves (for example, program length, industry focus, cost), their students (earnings before enrollment, demographic data), and student outcomes (completion, attainment of industry-recognized credentials, post-enrollment employment and earnings). Each data source included different variables, and where similar variables were tracked, metrics were calculated differently across different sources. This is particularly true for outcome data, which was not widely available. For a complete table of outcome information available by source, see Appendix A.

Each of our three data sources has strengths and weaknesses.¹⁰ For example, Missouri data include programs offered by all institutions in the state regardless of whether the institution is public, private, or for-profit, and has robust data on direct program costs. However, Missouri was unable to provide any student demographic or enrollment data. And while Missouri does calculate wage and employment outcomes for the mostly public programs with participant and completion data, the state's data processing systems were not yet at the stage to facilitate inclusion of these measures in the data we received. Both Iowa and Texas data include state-calculated labor market outcomes. No demographic, completion or credential attainment rate data were available from any of the three data states.¹¹

TABLE 1: Programs and Notable Variables Included in Each Data Source

State	Programs Included	Notable Variables						
		Program Cost	Student Information			Outcome Information		
			Demographics	Pre-Enrollment Earnings/Employment	Prior Credit Award Attainment	Completion Rate	Industry-Recognized Credential Attainment Rate	Post-Enrollment Earnings/Employment
Texas	Certificate programs in all of the state's community and technical colleges (credit and non-credit)	✗	✗	✗	✗	✗	✗	✓*
Missouri	All programs offered by a Title IV eligible provider (credit and non-credit)	✓	✗	✗	✗	✗	✗**	✗
Iowa	All programs offered in the Iowa Community College System (credit and non-credit)	✗	✗	✓	✓	✗	✗	✓

*Available for only a subset of programs

**Available for too few programs to be included in the analysis

Challenges of Identifying Program Length

None of our three data sources currently tracks short-term programs in a way that allows a simple determination of whether their length falls within the range proposed by the legislative proposals. Program length determinations for Pell Grant eligibility hinge on both a minimum amount of instruction time (either credit hour or clock hours) and a minimum period of time over which that instruction is received (typically weeks). Both thresholds stem from the need for objective standards in program substance, and measures for both are well established for traditional for-credit programs.

However, data on both hours and weeks are not routinely available. All our data sources include programs of varying lengths, requiring us to identify the actual program length in order to isolate only short-term programs falling within the length of interest. At the same time, none of the data we received included both contact or credit hours and the number of weeks over which those instruction hours are delivered. For example, data from both Texas and Iowa include information on a program's credit or contact hours but not the number of weeks of a program. Required program length in Missouri data are reported in either credits, contact hours, days, or months. In Iowa, the contact hour data for non-credit programs represent contact hours accumulated, rather than required, for program completion, and these data are furthermore reported differently across different reports (for example, with precise hours in one file and grouped into three categories in another). For more information on the program length data available by source, see Appendix B.

Moreover, because the existing short-term programs are not currently governed by clear standards regarding minimum time over which instruction is received, the same short-term program might be offered at the same school with similar hours of instruction delivered over different periods of time. A student in a single program requiring 150 contact hours could be attending a ten-hour session held once a week for 15 weeks, a ten-hour session that runs Monday through Friday for three weeks, or an eight-hour session every Saturday and Sunday for just over nine weeks. Short-term programs' unique potential strength of flexible scheduling may itself play a role in complicating program-length eligibility determinations that align with current standards.

The federal student aid program furthermore measures instructional time in either credit hours or "clock hours," which are defined by regulation.¹² However, our data sources use either credit hours or "contact hours," which could mean different things in different states. For the purposes of our analysis, we assume the terms "clock hour" and "contact hour" are equivalent.

Discussion of Key Findings

There is no national source of data on short-term programs under consideration for new Pell Grant eligibility. Even among the states that collect useful data on such programs, gaps in the available information on duration, providers, fields of study, industry alignment, and student outcomes remain. Policy-makers, advocates, and schools exploring an expansion of the federal Pell Grant program to types of instructional activity that remain beyond the scope of current federal data systems needed to administer the program will need to address this challenge head on.

The best available data show that short-term programs vary tremendously in occupational focus, duration, enrollment, and student outcomes. Some short-term programs provide value to students, at least in terms of short-term employment outcomes. However, results are highly diverse, and some programs achieve poor results.

How Many Short-Term Programs Are There?

The data we received offer more detail on short-term programs than is available from any federal data source. Yet, the true number of short-term programs offered in the systems and states for which we have data remains out of reach because required program length data for programs included in established data systems are reported inconsistently across (and sometimes within) different sources.

Because of variations in state-level data reporting requirements and data systems, the number of short-term programs identified in each state are not directly comparable. Moreover, short-term program counts may not be complete within a state or system. For example, we identified 343 short-term programs in Texas, but an unknown number of additional short-term workforce training programs designed to fulfill the customized needs of a specific local employer or industry are not overseen by the state and do not appear in the Texas data. Similarly, programs leading to Occupational Skills Awards, which are a set of sequenced workforce courses designed to meet the WIOA requirements of the Texas Workforce Commission, may appear in the state's public labor market outcomes reports but are not captured in the data set that tracks program length.¹³

Short-term programs can operate without any state or system-wide reporting requirements, leading to a potentially significant but unknown number of short-term programs not captured in data.

What Do Short-Term Programs Look Like?

Our research suggests a very diverse landscape of short-term programs. These programs are offered in a wide range of fields. The data suggest that the focus of short-term programs may vary by state. Health-related professions are the most common short-term program focus in Missouri, and in Texas, a plurality of short-term programs are associated with education, training, and library occupations.

At the same time, inconsistencies in how data are reported and the different universes of programs included in each data source complicate direct comparisons of program focus across sources. Both Standard Occupational Classification (SOC) and Classification of Instructional Programs (CIP) codes can be used to shed light on types of short-term program activity. Where SOC codes describe and classify *occupational* categories and can identify the career or job for which a program is designed to train a student,¹⁴ CIP codes describe categories of *educational* activity.¹⁵ None of our three data sources

included each program's associated SOC code, but all had a program's CIP code, which can be linked to one or more SOC codes to shed light on which occupational groups are associated with a program's educational focus.¹⁶

While non-credit programs appear to play a major role in this space, we also identified a substantial number of short-term programs offered for academic credit.¹⁷ While all of our data sources include at least some non-credit programs, the true share of short-term programs that are non-credit remains unknowable using data provided by two of our three states. In Missouri, whose data are inclusive of all programs (both credit and non-credit) offered in the state, 32 percent of short-term programs were offered for credit. Where data include both for-credit and non-credit short-term programs, the breakdown of programs by credit status varies tremendously.

How Long Are Short-Term Programs?

Available data suggest that the length of programs falling within the range proposed for new Pell Grant eligibility can vary widely, particularly among non-credit programs. For example, while the non-credit short-term programs identified in the Texas data are typically 490 contact hours, required instruction time for these programs ranges from 208 to 598 contact hours.

Short-Term Program Structure and Flexible Scheduling

In Missouri, non-traditional program schedules are common: 61 percent of short-term programs identified in the Missouri data are offered during the evening and 31 percent are offered on the weekend. Scheduling data were not provided by the other states. Schools can and do offer programs that train students for the same credential over different periods of time. Other insight about program structure, such as whether or not the program is part of a pathway or offered as a stackable credential, remains out of reach in the data we received. While such program structure may be common, single programs offering a sequence of certifications, or which are part of a broader combination of potential certifications, can also present challenges to data reporting. In the same way that a program offering training in Microsoft Office Suite may provide students an opportunity to receive certifications in each product within the Suite, a program training students for an industry recognized certification may include bundled credentials that allow or require a student to accumulate multiple certifications along the way to completing a single program. Bundled credentialing can complicate the interpretation of reported outcomes, especially where bundled credentials are not clearly distinguishable by award size in the same way credit awards can be counted by “highest award.”

Furthermore, depending on the credential or credentials for which a program trains students, a distinct program with a distinct credential offered at one school can be offered as part of a longer pathway or bundled with other credentials at another school. This complicates fair comparisons across different institutions.

Program-level data may mask what is part of an individualized, cafeteria style, or guided pathway structure that offers students multiple options to the same credential or multiple but connected programs to continue training or upskilling. Where data reporting requires a static definition of a program, tying an identifiable industry-recognized credential to a program may be one option for ensuring quality.

Similarly, a single program can lead to a standalone credential, be a sequential step in a specific industry pathway, or both. For example, a student may complete a Certified Medical Assistant credential and never pursue further training, and another may continue training with a Phlebotomy credential.¹⁸ Such flexibility in the short-term program space, which may be a unique strength of short-term programs, makes it difficult to distinguish in the data we received how different programs and credentials may relate to each other. It also makes it difficult to understand how the path on which students pursue various credential opportunities relates to their economic outcomes following credential attainment.

How Are Programs Currently Funded?

Our data do not clarify what federal, state, institutional, and local funding short-term programs currently receive. Particularly unfortunate are the absence of data on program-specific levels of funding, from either employers or through Workforce Innovation and Opportunity Act (WIOA).

The goal of short-term programs aligns with the purpose of WIOA, which seeks to “help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.”¹⁹ The Center for Law and Social Policy (CLASP) notes that Title I of WIOA is “the primary source of federal workforce development funding to prepare low-income adults, youth, and dislocated workers for employment and to help them continue to build skills once they are employed.”²⁰ Existing legislative proposals to expand Pell Grants to short-term programs may refer to WIOA standards and encourage alignment with existing data reporting and quality assurance mechanisms provided by WIOA.

Only data from Missouri include an indication of which short-term programs have requested WIOA eligibility. These data show that 89 percent of the 199 short-term programs identified in the state are registered on the state’s eligible training provider list.²¹

A number of programs are also directly supported through donations of equipment from local industries and employers, but the number of these programs or employers directly benefiting from these arrangements could not be included in any of the data we received.

Who Enrolls in Short-Term Programs?

None of our three data sources included information on the demographics of students enrolling in short-term programs. Iowa is the only data source that captures pre-enrollment educational attainment or employment of students in short-term programs. Nine percent of students enrolled in non-credit short-term programs in the Iowa Community College System had earned a credit award prior to enrollment. A majority of students enrolled in these programs are employed both prior to and during enrollment.

How Do Students Typically Cover Tuition Costs?

Missouri data offer tremendous insights into the direct costs of short-term programs. However, none of our data sources offered any information about the typical amounts students actually pay out of pocket or the amount covered by any particular source, including federal or private loans. The lack of data on borrowing is a particular shortcoming given that students in some of the programs identified could be eligible for federal student loans.

How Do Students Fare After Short-Term Program Enrollment?

Information on how students attending short-term programs typically fare are not consistently available across our three data sources. The available data suggest that some programs produce good post-enrollment employment and earnings outcomes. Others do not.

Earning the industry-recognized credential associated with a single program can involve requirements beyond program completion, such as a test or a required number of hours of practice. Short-term programs' promise of a fast path to employment in a specific industry makes credential attainment rates particularly relevant to assessing program quality, but no such data were available.

Likewise, post-enrollment and earnings measures are particularly critical for assessing claims about the labor market value offered by short-term programs. Where labor market outcome data are available, they tell an inconsistent story. In Iowa, for example, the 90 percent of students who were employed following enrollment in non-credit short-term programs typically earned \$27,000 a year after leaving their program. At the same time, health-related programs account for 44 percent of non-credit short-term program enrollment, and employed students leaving these programs typically earned about \$17,200, while the remaining 56 percent of employed students earned about \$35,100.

Challenges of Identifying Outcomes Specific to Short-Term Programs, Part 1

Sources reporting outcome metrics did so in ways that required us to use additional data provided to isolate which of the outcomes reflected only short-term programs. Outcomes were generally able to be isolated for only a very small share of programs identified in the sources for which any outcome data were available. For example, Missouri credential attainment rate data were reported for all programs sharing a four-digit CIP code, which grouped together six-digit CIP programs of different lengths. Credential attainment rates were able to be isolated for only 10 short-term programs. Due to this very small sample size, we do not report these data. Texas labor market outcome data similarly reflect groups of programs of different lengths, and just 7 percent of these program groups included only short-term programs.

The fact that labor market outcomes specific to short-term programs, when available, can reflect only a small share of short-term programs identified, calls for caution in generalizing outcomes of these programs to the full landscape of short-term programs.

Only data from Texas and Iowa include any labor market outcome data, and the metrics available are not consistently defined across sources. For example, Texas' employment rate is calculated as the share of graduates found working during the fourth quarter of the calendar year in which a student completed the program, and Iowa Community Colleges' employment rate is calculated as the share of students no longer enrolled and found working in at least one of the four quarters following the student's program exit. Small cohort sizes for non-credit programs furthermore lead to the suppression of outcomes for a significant number of short-term programs; for example, earnings and employment data are not reported for a third of the short-term programs in the Iowa non-credit outcome report and 28 percent of the short-term program groups in Texas, as a result of small cohort size.

Some short-term programs can pay off for graduates, but available labor market outcome data tell an inconsistent story.

The available employment and earnings data show that some short-term programs can produce labor market benefits for graduates, but typical post-enrollment earnings vary widely. Variable labor market outcomes are not unique to the short-term program space.²² However, they do underscore the need for quality assurance should additional programs be made eligible for the Pell Grant in order to prevent the proliferation of low-quality programs. At the same time, available data are not able to identify consistent characteristics of high-quality short-term programs that are needed to inform the development of quality guardrails appropriate for ensuring short-term programs achieve their specific goals.

For a full table of the outcome data available by source, see Appendix Table A.

To What Extent Are Employers Engaged with Program Development?

Recognizing that short-term programs may offer unique value in allowing nimble responsiveness to changing local labor markets and specific local employer needs, legislative proposals seek to require some degree of engagement with local industry.

Employers themselves may play a key role in supporting short-term programs, including through engagement with curriculum development as well as financial support. Yet our data cannot speak to the extent to which local industries or employers support either the development or funding of specific programs nor whether providing federal funds could supplant rather than supplement these local investments.

Short-Term Programs in Texas

About the Data

Our Texas data consist of a program inventory provided by Texas Higher Education Coordinating Board,²³ and the Texas state Gainful Employment (GE) outcome data available online.²⁴ Both of these data include non-credit (continuing education (CE))²⁵ and for-credit (non-CE) Level 1 certificate programs offered at Texas public community, state, and technical colleges.²⁶ The program inventory data were merged with the 2016 GE data file to identify outcomes specific to short-term programs isolated in the inventory file.

Program Characteristics

College/Division

Texas inventory data show 343 short-term programs offered at 70 institutions, over half (57%) of which are offered for credit.

Program Length

The 149 identified short-term non-credit continuing education programs in Texas are typically offered for 490 contact hours, ranging from 208 to 598 contact hours. All but one of the 194 short-term for-credit programs in Texas are offered for the equivalent of 563 contact hours (15 credits).

Industry Focus

One-third (34%) of the short-term programs in the Texas program inventory are associated with education, training, and library occupations, according to an analysis of the SOC codes associated with the CIP codes included in the Texas data. Another 21 percent are associated with management occupations.²⁷

The table on the following page shows Texas program length information by occupational focus, with for-credit programs' credit hours converted to contact hours.²⁸ For-credit programs are typically longer than non-credit programs, and their program length across occupational focus does not vary anywhere near as much as non-credit programs. While for-credit programs are all typically the same length (the equivalent of 563 contact hours), non-credit Texas programs range from an average of 336 contact hours among arts, design, entertainment, and sports programs to 534 among protective service programs. Program length also varies widely within non-credit programs sharing an occupational focus. For example, the 46 non-credit installation, maintenance, and repair programs range from 296 to 576 contact hours.

Short-term programs offered for credit in Texas are typically longer than non-credit programs, with less variation across and within industry focus.

TABLE 2: Texas Program Length by Industry Focus and Credit Status

Industry Focus (SOC)*	Total Program Count	Non-Credit Programs				For-Credit Programs (Credit Hours** Converted to Contact Hours)			
		# Programs	Min	Max	Avg	# Programs	Min	Max	Avg
Education, Training, & Library	117	42	208	598	495	75	450	563	561
Management	72	16	336	592	463	56	450	563	560
Business and Finance Operations	52	12	336	576	456	40	563	563	563
Production	49	28	368	579	483	21	563	563	563
Architecture and Engineering	46	18	336	560	449	28	563	563	563
Installation, Maintenance, and Repair	46	20	296	576	460	26	563	563	563
Computer and Mathematical	34	10	384	576	482	24	450	563	558
Healthcare Support	29	23	368	584	496	6	563	563	563
Protective Service	25	17	400	576	534	8	563	563	563
Healthcare Practice and Technology	21	12	354	598	470	9	563	563	563
Office and Administrative Support	19	5	368	592	445	14	563	563	563
Construction and Extraction	16	14	296	576	427	2	563	563	563
Arts, Design, Entertainment, and Sports	9	2	208	464	336	7	563	563	563
Personal Care and Service	8	2	464	500	482	6	563	563	563
Food Preparation and Serving Related	7	3	384	432	411	4	563	563	563
Life, Physical, and Social Science	6	2	376	592	484	4	563	563	563
Sales and Related	5	0	N/A	N/A	N/A	5	563	563	563
Farming, Fishing, and Forestry	3	2	366	376	371	1	563	563	563
Community and Social Service	2	2	400	573	487	0	N/A	N/A	N/A
Building Grounds Cleaning & Maintenance	2	2	398	448	423	0	N/A	N/A	N/A
Transportation and Material Moving	2	1	366	366	366	1	563	563	563
Legal	1	0	N/A	N/A	N/A	1	563	563	563

*Texas programs were matched to 2-digit SOC occupational codes using a crosswalk between 2-digit "major" SOC codes and 6-digit CIP codes. A single CIP can match to multiple SOC codes, so the same program may be included in more than one industry focus category.

**Figures are rounded to the nearest 1.

Program Outcomes

Labor Market Outcomes

Outcome data specific to short-term programs in Texas were limited to 29 groups of similar short-term programs at a single institution.²⁹ The outcomes identified for the 29 short-term program groups reflect a total of 1,433 graduates (1,300 non-credit graduates, and 133 for-credit graduates). Employment counts were available for 19 of 29 short-term program groups, allowing us to derive an overall post-completion employment rate of 79 percent.³⁰

Challenges of Identifying Outcomes Specific to Short-Term Programs, Part 2

Our Texas data come from two different sources that we merge in order to isolate outcomes of short-term programs specifically. Unfortunately, the way programs are reported in each of these sources means that we were able to identify outcomes for only a very small share of short-term programs.

Both the Texas program inventory and the state's Gainful Employment (GE) outcome data include a six-digit CIP code, credit status, and institution name for each program.³¹ However, only the inventory file includes the program's length. In other words, the GE file reports outcomes for all certificate programs sharing a six-digit CIP and credit status at a single institution regardless of their length ("program groups").

For example, Texas' program inventory report shows two for-credit Administrative Assistant and Secretarial Science, General Certificate programs (CIP 520401) at Coastal Bend College, one of which is classified as a short-term program (15 semester credit hours) and one that is not (39 semester credit hours). Meanwhile, the GE report includes only one for-credit certificate offering under CIP 520401 at Coastal Bend College.

Similarly, the program inventory report shows two non-credit Culinary Arts/Chef Training Certificate program (CIP 120503) at Alvin Community College – one of which is a short-term program (416 contact hours) and another that is not (768 contact hours). The GE report shows only one.

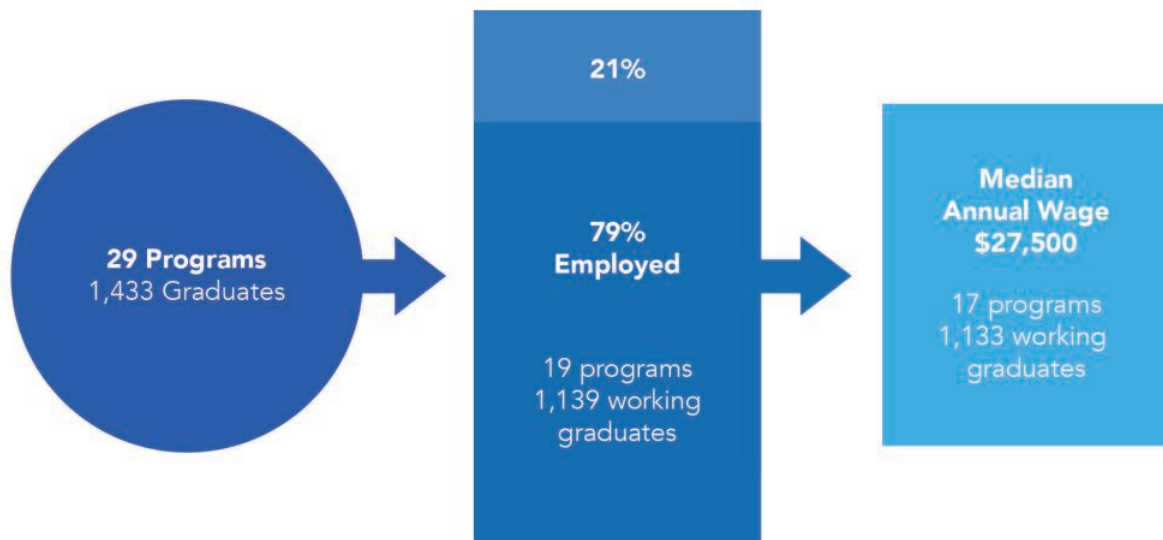
Because labor market outcomes in the GE report are reported for program groups that include programs of varying lengths, rather than by programs of unique length, isolating outcomes for the 343 short-term programs identified in the inventory data required us to group together programs in the inventory file to align with how the data are reported in the GE file.³²

After creating program groups that allowed us to match the inventory programs to the GE file, we subsequently identified which of those groups contained only short-term programs in order to isolate outcomes that reflect only short-term programs. Most (85%) of the program groups created from the inventory file contained no short-term programs and 7 percent of the groups included a mix of programs with variable lengths. Only program groups that consisted exclusively of short-term programs were included in our outcomes analysis.³³

Ultimately, just 7 percent (140) of the program groups in the inventory file consist exclusively of short-term programs, and outcomes were available for just 29 (21%) of those 140 groups, because most of the program groups in the inventory were not found in the corresponding GE file, and other outcomes were privacy-suppressed due to small cohort sizes.

Wage data specific to short-term programs in Texas were even more elusive than employment rates, and reflect even fewer programs and students: The \$27,500 median annual wage for short-term programs reflects just 17 program groups and 1,133 working graduates.³⁴

GRAPH 1: Labor Market Outcomes of Texas Programs



Job Trajectories and Goals of Short-Term Programs

Short-term programs can be aimed at a number of different goals such as helping an employed student increase earnings in the same career, moving an unemployed student into the workforce, or facilitating a career switch. None of the data we received can identify each program's particular career trajectory goal. This lack of context, coupled with limited data on pre-enrollment employment and earnings, makes assessing any available earnings outcomes of short-term program graduates difficult. For example, high post-enrollment earnings may be a function of already skilled students enrolling to further advance their career, and low post-enrollment earnings may reflect a successful outcome for students with few other options.

The 1,056 graduates of the non-credit programs earned \$28,890 and the 77 graduates of the for-credit programs earned \$25,940. Wages for both non-credit and credit graduates furthermore vary widely, from \$9,540 (Fire Science/Firefighting program at Tyler Junior College) to \$49,920 (Criminal Justice/Police Science program at Alamo Community College-San Antonio College) among for-credit programs, and from \$16,650 (Culinary Arts/Chef Training program at Texarkana College) to \$43,710 (EMT Paramedic program at Lamar Institute of Technology) among non-credit programs.

Short-Term Programs in Missouri

About the Data

Our Missouri data come from the state's single inventory of all programs registered with its Department of Higher Education, the Division of Workforce Development, or both, including both credit and non-credit programs. The \$5 million data collection and reporting effort to bridge the gap between data on both kinds of programs was supported by a 2014 federal grant that ended in September 2018.³⁵

The state's data collection effort also resulted in the creation of MoSCORES, a searchable online inventory of all credit and non-credit programs offered at an institution of higher education or an eligible training provider in the state.³⁶ On MoSCORES, users can find and compare individual programs, or download employment and wage information reports for a selection of programs. Our Missouri data are an inventory of all programs on this website, as of December 2018. We received many of the metrics displayed on the website, including program cost. Other information displayed for some programs on the website, such as state-calculated completion and earnings metrics, as well as demographic information, were not available for enough programs such that those data could be included in what we received.³⁷ Data from Missouri did include some credential attainment rate data, but it was only possible to match credential rates to 10 of the 199 short-term programs identified in the inventory.

Program Characteristics

College/Division

We identified 199 programs in Missouri that were offered by an institution eligible for federal financial aid.³⁸ Sixty-nine percent of these programs are offered at a public two-year college and another 22 percent (44) are offered at a public four-year college, while 6 percent (12) are offered at a non-profit institution and 3 percent (six) at for-profit colleges. About two-thirds (68%) of the short-term programs are non-credit and 32 percent are offered for-credit.

Program Length

Missouri program data include one measure of program length, expressed in either number of contact hours, credit hours, days, weeks, or months.³⁹ Two-thirds (117) of the 199 short-term programs identified are non-credit programs with program length measured in contact hours;⁴⁰ these programs are typically offered for 210 contact hours, ranging from 150 to 588. About a quarter (23% or 41 programs) of the short-term programs are for-credit programs with length measured in credit hours. These programs are typically 12 credit hours, ranging from nine to 15 credit hours.

Eleven percent (19) of short-term programs have a program length measured in weeks. These programs, all of which are non-credit, are typically 10 weeks long and range from eight to 14 weeks.

TABLE 3: Missouri Program Length⁴¹

	Non-Credit Programs	For-Credit Programs
Number of Programs	117	41
Range	150-588 contact hours	338-563 contact hours (9-15 credits)
Median	210 contact hours	338-563 contact hours (9-15 credits)

One-quarter of the short-term programs in Missouri lead to state licensure, 57 percent lead to an industry-recognized credential, and 4 percent lead to federal licensure.

Industry Focus

CIP codes in the Missouri data indicate that 30 percent of the short-term programs identified in Missouri data are health professions. Another 17 percent of Missouri programs focus on business, management, marketing, and related support.

Missouri data also include indications of whether the program leads to state licensure, federal licensure, or an industry-recognized credential. However, they include no information on the specific associated license or credential. These data show that one-quarter of the short-term programs identified in the Missouri data lead to state licensure, 57 percent lead to an industry-recognized credential, and 4 percent lead to federal licensure.⁴² Four programs lead to all three, and 49 programs do not lead to either state licensure, federal licensure, or an industry-recognized credential.⁴³

Program Cost

The typical short-term program in Missouri costs students \$3,000 (including in-state tuition, fees, books, tools, supplies, and other costs paid to the institution).⁴⁴ Typical direct costs vary widely by the type of institution offering the program, from \$2,550 at for-profit colleges (six programs) and \$2,950 at public colleges (161 programs), to \$5,020 at non-profit colleges (ten programs). Total Missouri direct program cost also varies by program focus, from \$1,770 (for ten engineering technologies and engineering-related fields programs) to \$3,910 (four homeland security, law enforcement, firefighting, and related Protective Services programs).

Missouri program cost data also include breakouts for different types of direct costs. Books typically account for another 5 percent of total program cost (ranging from zero to 41%), and fees 4 percent (ranging from zero to 29%). Across all short-term programs, supplies typically make up 2 percent of program cost (ranging from zero to 9%). The typical Missouri program's tuition cost makes up 86 percent of the total direct program cost, ranging from a low of 40 percent for three types of programs to a high of 100 percent for another three program areas.

Program Outcomes

Our Missouri data do not include any completion rates or labor market outcomes.

Short-Term Programs in Iowa

About the Data

Similar to Missouri, Iowa has prioritized improving the quality and transparency of data on non-credit programs and outcomes through a partnership between the Iowa Department of Education and Iowa Workforce Development.⁴⁵ The Iowa data we use come almost exclusively from publicly available reports on programs offered by the state's community college system, and they include outcomes for both credit and non-credit programs.⁴⁶ Data reflect one-year outcomes for the 2015-2016 academic year cohort.

Program Characteristics

College/Division

The precise number of non-credit short-term programs in the state's community college system remains out of reach with the available data. (See Challenges of Identifying a Unique Short-Term Program on the following page.)

Current Pell eligibility determinations for for-credit programs were provided by Iowa Community College System, based on both credit hours and linkages to other programs. Due to the way Iowa has structured many of its for-credit short-term programs as part of a larger program, 145 programs with fewer than 16 credit hours are already eligible to receive Pell Grants. In fact, just four for-credit short-term programs are not currently eligible for the Pell Grant.

Challenges of Identifying a Unique Short-Term Program

Both credit and non-credit programs are classified with CIP codes, which provide a shared structure for tracking and reporting programs by field of study. While a CIP code can effectively categorize programs by substantive category, programs at the same institution reported under the same CIP code can still vary in award level, instruction time, length, and credit status. These variations make a CIP code alone insufficient to identify unique programs at a single college.

Contact hours can be helpful in distinguishing non-credit short-term programs sharing a CIP from longer programs, but existing data systems may not track required contact hours. Where contact hour data are available, they can represent accumulated, as opposed to expected or required, enrollment time. And they can furthermore be reported differently depending on the purpose of a report.

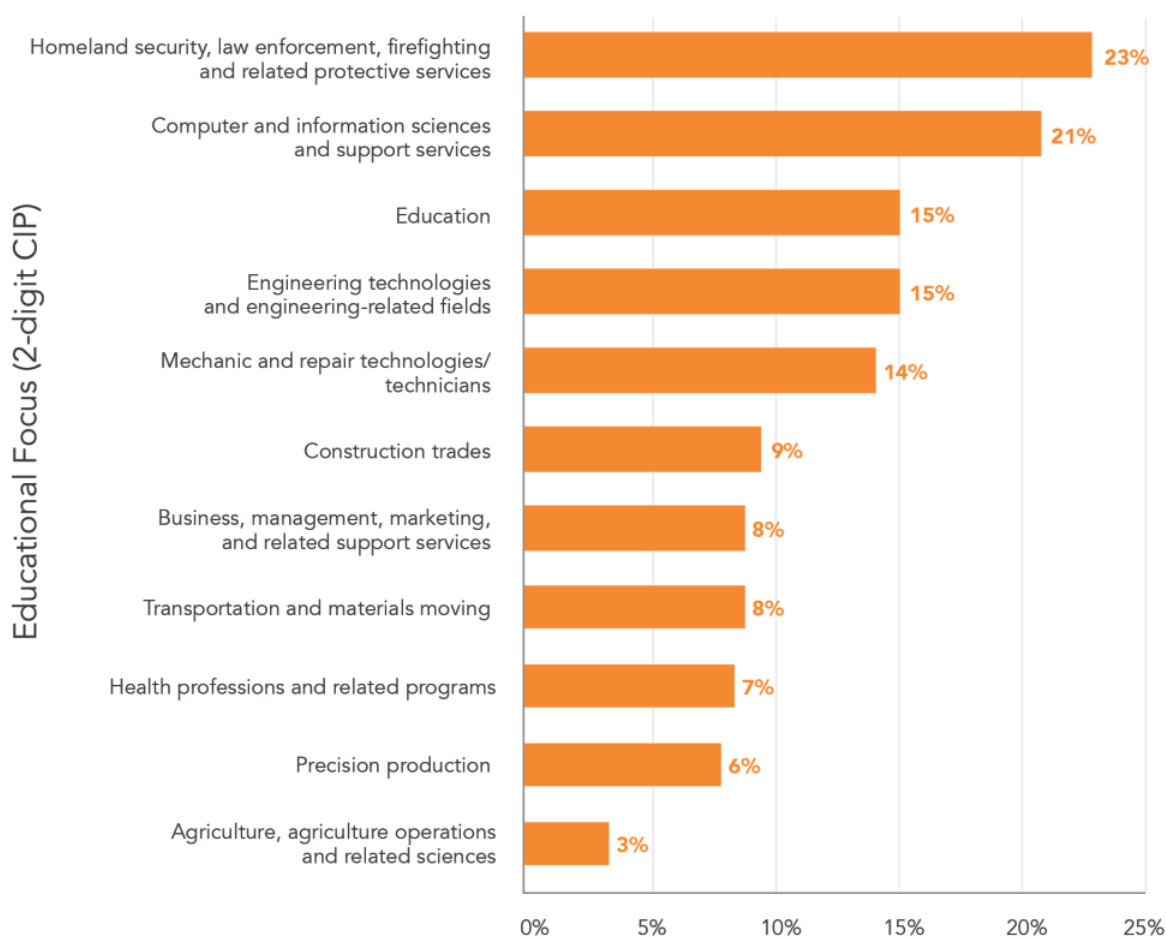
Moreover, an effort to derive a school's non-credit program count based on a unique combination of CIP and program length remains complicated and may not reflect how colleges categorize their own programs. For example, while Iowa tracks all non-credit programs by CIP code and reports program outcome data by different ranges of contact hours for the same CIP, individual CIP numbers may or may not represent "individual programs" because a non-credit program can consist of sets of courses reported under different CIP numbers.

In order to shed light on patterns of enrollment and outcomes in non-credit programs, Iowa assigns all contact hours accumulated by a student to an identified primary CIP code, even if the student takes a course or courses outside the CIP, and reports enrollment and outcomes under that primary CIP code. Iowa further breaks out these data within each CIP code by groups of contact hours (32-99 contact hours, 100-200 contact hours, and over 200 contact hours). This reporting structure creates reliably sized cohorts for non-credit program outcomes and enables comparisons between credit and non-credit programs. But as a result, the Iowa data cannot provide any reliable proxy of the number of unique non-credit programs represented by a CIP code and associated award level at a single school. Iowa is currently working to establish a data infrastructure and reporting system to identify and track unique programs at each school.

Student Enrollment

No demographic data specific to short-term programs were available from Iowa.⁴⁷ However, the data do provide some insight into the general employment and education patterns of students enrolled in the community college system's non-credit short-term programs.⁴⁸ Nine percent of students accumulating between 150 and 599 contact hours had earned a credit award prior to enrollment. Programs focused on homeland security, law enforcement, firefighting and related protective services; and computer and information sciences and support services have the highest shares of students with prior credit awards.

GRAPH 2: Share of Students in Iowa Non-Credit Programs with Prior Credit Award, by Educational Focus



While most students in short-term programs in the Iowa Community College System enroll with no prior credit award, the majority of them are employed both prior to and during enrollment.

Across all non-credit short-term program areas in the Iowa data, 70 percent of students were employed prior to enrollment; this figure ranged from 21 percent among short-term programs focused on agriculture, agriculture operations, and related sciences to 86 percent among homeland security, law enforce-

ment, firefighting and related protective services programs. Three-quarters of students were employed during their enrollment, ranging from no students enrolled in agriculture, agriculture operations, and related sciences programs to 90 percent among students enrolled in programs related to engineering technologies and engineering-related fields.

Program Outcomes

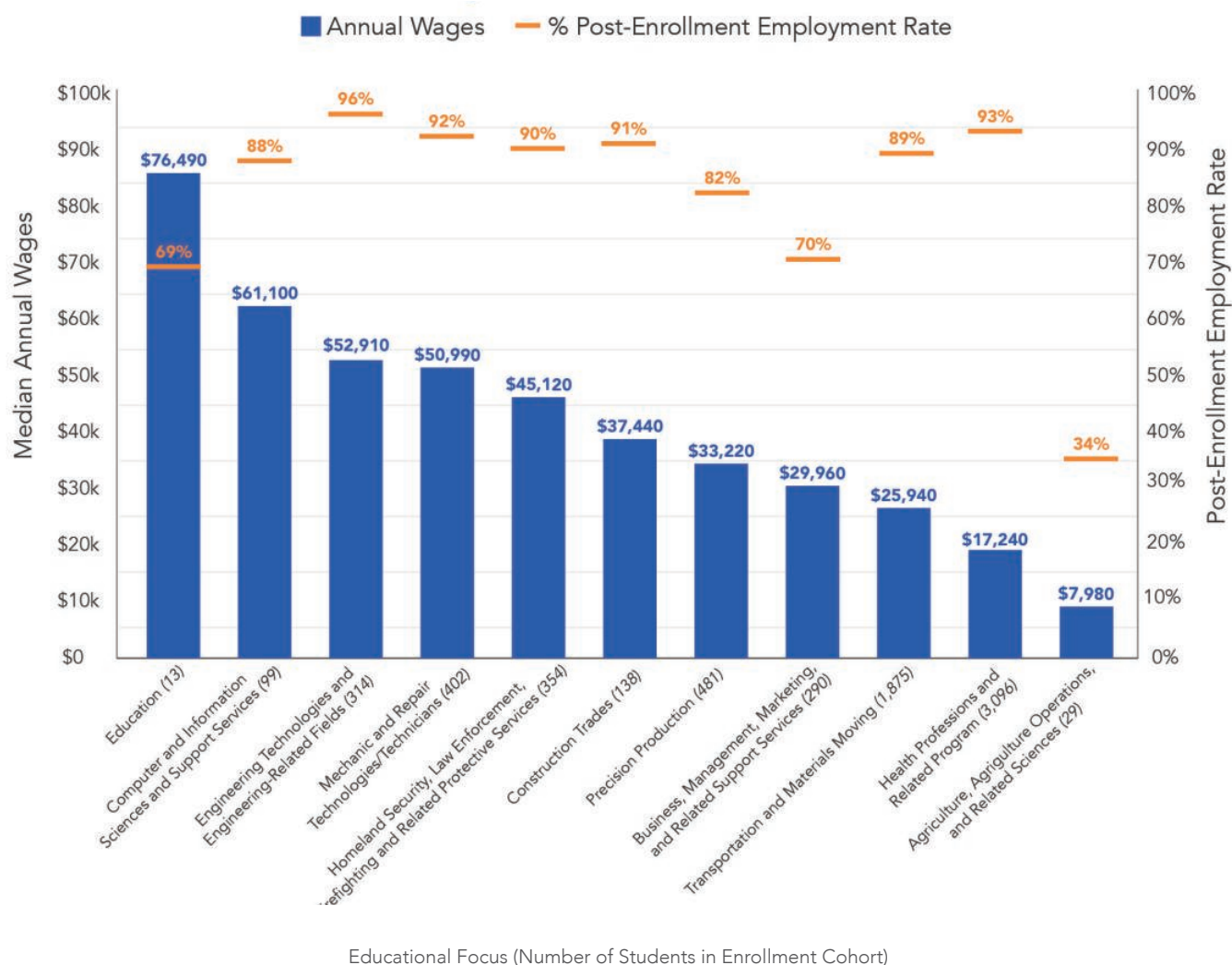
Labor Market Outcomes

Iowa is one of two data sources that include some reporting on employment and earnings outcomes. Iowa data include employment rate and median post enrollment earnings for for-credit programs, and employment rate and median earnings for non-credit programs.

Students who enrolled in non-credit short-term programs identified in the Iowa Community College data collectively have an employment rate of 90 percent one year after leaving their program, which is 20 percentage points higher than their collective pre-enrollment employment rate of 70 percent. Programs focused on engineering technologies and engineering-related, and health professions and health-related fields had the highest post-enrollment employment rates (96% and 93% respectively).

Employed students in non-credit short-term programs in Iowa typically earn \$27,000 in the year following their enrollment, an average increase of \$4,350 (19%) over their pre-enrollment annual earnings.⁴⁹ At the same time, typical post-enrollment wages range dramatically. The very few students leaving education-related programs had the highest earnings (\$76,490 among an enrollment cohort of 13), followed by those leaving computer and information sciences and support service programs (\$61,100 among an enrollment cohort of 99 students). Programs focused on health-related professions account for 44 percent of all non-credit short-term program enrollment (3,096 students), and the 93 percent of students employed following enrollment in these programs typically earned \$17,240.

GRAPH 3: Iowa Non-Credit Program Labor Market Outcomes by Educational Focus



Average annual wage changes following enrollment range widely from 2 percent among transportation programs to a 44 percent increase among health-related professions. In several program areas with particularly high post-enrollment wages, wage gains were small because students earned high wages prior to enrollment. For instance, students who graduated from education programs earned \$76,490 after enrollment but had pre-enrollment earnings over \$70,000 already. Programs focused on education related fields were the only group to show a *decline* in the share of students employed after enrollment (from 77% prior to enrollment to 69% post-enrollment), and students in programs focused on transportation and materials moving saw the greatest gains in employment rates (from 49% to 89%).

Typical post-enrollment wage gains range widely. In several program areas with particularly high post-enrollment wages, gains were small because students earned high wages prior to enrollment.

TABLE 4: Labor Market Outcomes for Non-Credit Short-Term Programs in Iowa Community College System

Program Focus, in Descending Order of Post-Enrollment Wages

Educational Focus (2-Digit CIP)	Number of Students in Cohort*	Post Enrollment Employment Rate	Pre-Post Employment Rate Gain (percentage point increase)	Average Median Annual Wage Post Enrollment**	Average Median Annual Pre-Post Wage Gain	Percent Wage Increase
Education	13	69%	-8%	\$76,490	\$3,670	5%
Computer and Information Sciences and Support Services	99	88%	6%	\$61,100	\$4,980	9%
Engineering Technologies and Engineering-Related Fields	314	96%	14%	\$52,910	\$2,820	6%
Mechanic and Repair Technologies /Technicians	402	92%	11%	\$50,990	\$5,840	13%
Homeland Security, Law Enforcement, Firefighting and Related Protective Services	354	90%	4%	\$45,120	\$7,650	20%
Construction Trades	138	91%	10%	\$37,440	\$8,910	31%
Precision Production	481	82%	12%	\$33,220	\$9,660	41%
Business, Management, Marketing, and Related Support Services	290	70%	9%	\$29,960	\$2,480	9%
Transportation and Materials Moving	1,875	89%	40%	\$25,940	\$540	2%
Health Professions and Related Programs	3,096	93%	14%	\$17,240	\$5,290	44%
Agriculture, Agriculture Operations, and Related Sciences	29	34%	14%	\$7,980	\$1,210	18%
Total	7,105	90%	20%	\$27,000	\$4,350	19%

*Cohort sizes refer to program enrollment. Fewer students may be included in employment and earnings cohorts.

**Wages are rounded to the nearest \$10 and are weighted by cohort size (# employed) to reflect wide ranges in number of students in different program cohorts. Annual wages are derived by multiplying the weighted median quarterly wages by four.

Outcome data are available for just two of the four short-term for-credit programs that are not currently eligible for the Pell Grant: the Truck and Bus Driver/Commercial Vehicle Operator and Instructor and Emergency Medical Technology/Technician (EMT Paramedic) programs have one year post-enrollment

employment rates of 93 percent and 87 percent, respectively. Employed students from these programs typically earned \$38,654 and \$31,625, respectively, one year following their enrollment.

Conclusion

To inform legislative debates over the potential Pell eligibility of short-term programs, we set out to identify what state- and system-level data show about these programs, including who enrolls in them and how well they serve their students. Using data from three states, it was difficult to identify the number of programs operating today that could become newly eligible for Pell Grants under legislative proposals to reduce the current minimum program length requirement and extend eligibility to non-credit programs. The absence of consistently collected data on existing length requirements of short-term programs presents a particular and considerable challenge to understanding the scope and scale of programs being considered for expanded Pell Grant eligibility. Moreover, other key pieces of information – such as student demographics, completion rates, and labor market outcomes – are also inconsistently collected across states and systems that track short-term programs, underscoring not only how little is known about short-term programs, but how little is knowable with the existing data.

Nonetheless, the data show a diverse landscape of short-term programs focused on a wide range of fields with different program costs and a range of success rates for students. Some short-term programs offer students pathways to employment, some of which provide significant earnings. At the same time, these data demonstrate a very wide range of actual post-enrollment earnings. And while this variability suggests the need for some quality assurance should Pell Grant eligibility be extended to these programs, available data are not capable of identifying consistent characteristics of programs with relatively high payoff.

The Pell Grant serves as the federal government's most important investment in higher education, yet it has long suffered from inadequate funding, resulting in a historically low purchasing power that already leaves current recipients more likely to borrow student loans, and more likely to graduate with higher student debt.⁵⁰ The grant also suffers from prior cuts to student eligibility, only some of which have been restored. Congress has more reason than ever to take care in protecting and strengthening this critical program by meeting the program's current urgent needs and ensuring it is not put at new risk of abuse.

Ultimately, available outcome data specific to short-term programs tell an inconsistent story. Given that the current program length eligibility standards for federal aid are grounded in the history of the abuse of federal funds, more work is needed for institutions and states to improve their ability to accurately track information critical to ensuring that students are well served by these programs.

APPENDIX

TABLE A: Outcomes Variables Available for Analysis by Source

	Missouri	Texas	Iowa
Number of completers	Not available	Available for 29 of 140 program groups	Not available
Number of non-completers	Not available	Not available	Not available
Completion rate	Not available	Not available	Not available
On-time completion rate	Not available	Not available	Not available
Number of successful credential attainment attempts	Not available	Not available	Not available
Number of unsuccessful credential attainment attempts	Not available	Not available	Not available
Credential attainment rate	Available for 10 of 199 programs	Not available	Not available
Number employed	Not available	Number working 4th quarter	<i>Non-credit programs:</i> Number in cohort matched to UI records for at least one of the four quarters following the individual's exit from the last credit or non-credit course <i>For-credit programs:</i> Number in cohort not enrolled and matched to UI records for tax year
Employment rate	Not available	Share of completer cohort employed in 4th quarter	Share of enrolled cohort not enrolled and matched to UI wage records in at least one of the quarters in tax year
Job placement rate	Not available	Not available	Not available
Mean or Median Earnings	Not available	4th quarter mean and median wage, mean annual wage	<i>Non-credit programs:</i> Adjusted and unadjusted quarterly median wages for individuals in cohort matched to UI wages records in at least one of the four quarters following the individual's exit from the last non-credit course. <i>For-credit programs:</i> Adjusted and unadjusted annual median wages for graduates with wages covered by UI tax during that year.
Earnings gains	Not available	Not available	Can be calculated using reported pre- and post-enrollment median wages
Subsequent enrollment in a postsecondary or workforce training program	Not available	Not available	Number in non-credit cohort enrolled in a credit program in an IA community college during the year following enrollment in non-credit program
Subsequent degree attainment	Not available	Not available	Not available
Student loan default	Not available	Not available	Not available

TABLE B: Available Program Length Variables by Data Source

Available Data	Missouri	Texas	Iowa
Both contact or credit hours and weeks of instruction	No	No	No
Required weeks or days	19 of 136 non-credit programs	No	No
Required contact hours for non-credit programs	117 of 136 non-credit programs	Availability varies by source	No
Required credit hours for credit programs	41 of 63 for-credit programs*	Availability varies by source	Level of precision varies by source
Typical contact hours accumulated in non-credit programs	No	No	Level of precision varies by source

**Another 21 for-credit programs were identified as short-term based on the associated award type but have no associated program length. One for-credit program had program length measured in contact hours.*

Endnotes

- ¹ National Skills Coalition. Fact Sheet. March 2019. <https://www.nationalskillscoalition.org/resources/publications/file/Funding-Cuts-Fact-Sheet-March2019.pdf>.
- ² The U.S. Department of Education defines a non-credit program as one in which “a student does not earn college credit and the course is not applicable towards a college degree.” U.S. Department of Education, Office of Career, Technical, and Adult Education, “Availability of Data on Noncredit Education and Postsecondary Certifications: An Analysis of Selected State-Level Data Systems.” 2014. <https://files.eric.ed.gov/fulltext/ED555237.pdf>. Non-credit courses are generally not graded or recorded in a transcript, but in some cases students can acquire continuing education units, certification, or information to sit for a certification exam. Boeke, Marianne, and Jeannie Yockey-Fine. “State Authorization and Non-Credit Courses and Programs.” April 2014. <https://wcet.wiche.edu/documents/talking-points/state-auth-non-credit-courses>.
- ³ Xu, Di, and Xiaotao Ran. September 2015. “Noncredit Education in Community College: Students, Course Enrollments, and Academic Outcomes.” Community College Research Center. <https://files.eric.ed.gov/fulltext/ED560759.pdf>.
- ⁴ Belfield, Clive and Thomas Bailey. March 2017. “The Labor Market Returns to Sub-Baccalaureate College: A Review.” Center for Analysis of Postsecondary Education and Employment. <https://capseeenter.org/labor-market-returns-sub-baccalaureate-college-review/>.
- ⁵ We received and analyzed comparatively robust data from a fourth state, including details on program-level demographics, completion rates, and credential attainment rates, but removed all references to these analyses at the request of program administrators. Our analyses from the fourth state do not alter the conclusions presented in this paper.
- ⁶ For a complete description of program eligibility rules, see: 2018-2019 FSA Handbook Volume 2: School Eligibility and Operations. <https://ifap.ed.gov/fsahandbook/attachments/1819FSAHbkVol2Ch2.pdf>.
- ⁷ Whitman, David. February 13, 2017. “The Reagan Administration’s Campaign to Rein In Predatory For-Profit Colleges.” The Century Foundation. <https://tcf.org/content/report/reagan-administrations-campaign-rein-predatory-profit-colleges/>.
- ⁸ Whitman, David. March 9, 2017. “When President George H.W. Bush ‘Cracked Down’ on Abuses at For-Profit Colleges.” The Century Foundation. <https://tcf.org/content/report/president-george-h-w-bush-cracked-abuses-profit-colleges/>; see also Richard W. Moore, “Proprietary Schools and Direct Loans,” in Selected Issues in the Federal Direct Loan Program: A Collection of Commissioned Papers, U.S. Department of Education, Office of Postsecondary Education, Report No. ED/OUS-94-11, 1994, p. 18. <https://files.eric.ed.gov/fulltext/ED368302.pdf>.
- ⁹ We received and analyzed comparatively robust data from a fourth state, including details on program-level demographics, completion rates, and credential attainment rates, but removed all references to these analyses at the request of program administrators. Our analyses from the fourth state do not alter the conclusions presented in this paper.
- ¹⁰ We rely almost exclusively on the data provided; the absence of a particular data point does not mean that it might not be available from another source, but rather cannot be known using the available data alone.
- ¹¹ Missouri did provide some credential attainment rate data, but they included only 10 short-term programs. Due to this very small sample size, we do not report these data.
- ¹² 2018-2019 FSA Handbook Volume 2: School Eligibility and Operations. February 2019. P 2-39. <https://ifap.ed.gov/fsahandbook/attachments/1819FSAHbkVol2Master.pdf>.
- ¹³ Institutional awards are those requiring fewer than 15 Semester Credit Hours (SCH) or 360 continuing education contact hours for completion of a course or series of courses that represent achievement of an identifiable skill proficiency. Occupational Skills Awards (formerly known as Marketable Skills Achievement Awards) require 9 to 14 semester credit hours for for-credit courses or 144-359 contact hours for workforce continuing education courses. See Texas Higher Education Coordinating Board. 2015. Guidelines for Instructional Programs in Workforce Education, p. 21, <http://www.thecb.state.tx.us/reports/pdf/3378.pdf>.
- ¹⁴ Bureau of Labor Statistics. “Standard Occupational Classification.” <https://www.bls.gov/soc/>. Institutions are not required to report Occupational Skills Awards, and data that are available are voluntarily reported and may not be complete.
- ¹⁵ National Center for Education Statistics. “CIP 2010.” <https://nces.ed.gov/ipeds/cipcode/Default.aspx?y=55>.
- ¹⁶ CIP codes can be mapped to SOC codes using an established data crosswalk in order to shed light on what types of occupations programs of a certain focus typically relate to (in other words, describing potential labor supply, but not actual expected workforce outcomes). The relationship between the two codes allows for a single CIP code to link to multiple SOCs, which reflects the reality that a single program major or focus can lead to multiple types of occupations. Where we add a SOC code mapped to CIP codes included in our data, we use the 2010 SOC codes.
- ¹⁷ As defined by the U.S. Department of Education, “Credit is recognition of attendance at or performance in an instructional activity that can be applied toward the requirements for a postsecondary degree, certificate, or other formal award, irrespective of the activity’s unit of measurement.” <https://files.eric.ed.gov/fulltext/ED555237.pdf>.
- ¹⁸ Research suggests that few students stack awards. See Bailey, Thomas, and Clive R. Belfield. 2017. “Stackable Credentials: Do they have labor market value?” Community College Research Center (CCRC), Working Paper No. 97. <https://ccrc.tc.columbia.edu/media/k2/attachments/stackable-credentials-do-they-have-labor-market-value.pdf>.
- ¹⁹ U.S. Department of Labor, Employment & Training Administration (ETA). “Workforce Innovation & Opportunity Act: WIOA Overview.” <https://www.doleta.gov/wioa/about/overview/>.

²⁰ Bird, Kisha, Marcie Foster, and Evelyn Ganzglass. September 2014. "New Opportunities to Improve Economic and Career Success for Low-Income Youth and Adults." CLASP. <https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/KeyProvisionsofWIOA-Final.pdf>.

²¹ WIOA eligibility is not indicated one way or another for an additional 21 programs.

²² Schneider, Mark and Rooney Columbus. October 20, 2017. "Degrees of opportunity: Lessons learned from state-level data on postsecondary earnings outcomes." American Enterprise Institute. <http://www.aei.org/publication/degrees-of-opportunity-lessons-learned-from-state-level-data-on-postsecondary-earnings-outcomes/>; Baum, Sandy. February 2014. "Higher Education Earnings Premium: Value, Variation, and Trends." The Urban Institute. <https://www.urban.org/sites/default/files/publication/22316/413033-Higher-Education-Earnings-Premium-Value-Variation-and-Trends.PDF>.

²³ Individual school inventory data are available for download online <http://www.theccb.state.tx.us/apps/programinventory/InvSearch.cfm>. Upon request, we received a single report for all schools.

²⁴ The Texas Gainful Employment reports are a state effort, independent of the federal Gainful Employment data calculation and reporting requirements under the federal Gainful Employment regulation. Separate Texas GE reports are available for non-credit continuing education (CE) and credit (non-CE) programs. <http://www.txhighereddata.org/reports/performance/ctcasalf/gainful.cfm>.

²⁵ A continuing education course is "a Coordinating Board-approved higher education technical course offered for continuing education units and conducted in a competency-based format. Such a course provides a quick and flexible response to business, industry, and student needs for intensive preparatory, supplemental or upgrade training and education and has specific occupational and/or apprenticeship training objectives," See Texas Higher Education Coordinating Board. August 14, 2017. "Glossary of Terms." <http://www.theccb.state.tx.us/reports/PDF/1316.PDF>.

²⁶ Level 1 Certificate programs ("CERT1 programs") offered for credit must have at least 15 but no more than 42 Semester Credit Hours (SCH) and be designed to be completed in a year or less. See Texas Higher Education Coordinating Board. 2015. Texas Guidelines for Instructional Programs in Workforce Education, p. 19. <http://www.theccb.state.tx.us/reports/pdf/3378.pdf>.

²⁷ Programs related to occupations in Community and Social Service; Legal; Building and Grounds Cleaning and Maintenance; Sales and Related; Farming, Fishing, and Forestry; and Transportation and Material Moving each make up just 1 percent of all short-term programs in the Texas data. Occupational focus is not mutually exclusive because program CIP codes can match to multiple SOC codes.

²⁸ We use the clock:credit hour conversion of 37.5:1. For more information on this conversion, see 2018-2019 FSA Handbook Volume 2: School Eligibility and Operations. <https://ifap.ed.gov/fsahandbook/attachments/1819FSAHbkVol2Ch2.pdf>, P 2-39.

²⁹ Program groups are a set of programs sharing a six-digit CIP code and credit status at a unique institution. See "Challenges of Identifying Outcomes Specific to Short-Term Programs, Part 2" for more information.

³⁰ Employment rate represents the share of graduates identified as employed using UI records in Texas, which excludes out-of-state employment and employment exempt from reporting UI wage data.

³¹ For list of data available in the Texas Gainful Employment report, and their definition and methodology, see <http://www.txhighereddata.org/reports/performance/ctcasalf/gainfuldef.pdf>.

³² The program inventory includes a total of 3,555 unique Level 1 Certificate programs at 82 institutions. A total of 343 of these unique programs at 70 institutions have credit hours less than 16 or contact hours less than 600; none are below 9 credit hours or 150 contact hours. Collapsing the unique programs in the inventory files into groups aligned with the GE file reduces the total program count from 3,555 programs to 1,941 program groups.

³³ Mixed length program groups were excluded from the analysis of short-term program outcomes because over half of the programs in each mixed length group typically exceeded the maximum length of a short-term program, leading to a high degree of uncertainty that the program group's outcome data only represent short-term programs.

³⁴ Annual median wages are derived by annualizing (multiplying by four) the 4th quarter median wages, and rounded to nearest \$10. This calculation may differ from actual median wages, in particular for programs with small cohort sizes. Median wages include graduates working while enrolled in subsequent programs as well as those not subsequently enrolled (i.e. only working).

³⁵ Coordinating Board for Higher Education. September 12, 2018. "MoSCORES Update." <https://dhe.mo.gov/cbhe/boardbook/documents/Tab28-0912.pdf>.

³⁶ MoSCORES. "Education and Training Program Search." <https://scorecard.mo.gov/scorecard/Search>.

³⁷ While the MoSCORES website displays state-calculated completion and earnings metrics for the mostly public programs with enrollment data, as well as some demographic information, Missouri had only been collecting non-credit student data since mid-2016, so most programs still did not display employment outcomes at the time the data were extracted for this report. Furthermore, to alleviate issues related to small cell sizes, e.g. few students and completers in any one program at any one institution, Missouri also uses multi-year cohorts for all public-facing employment and wage outcomes in MoSCORES, and results for smaller programs will take longer to become available.

³⁸ These programs are between 150 and 599 contact hours, four to 15 semester credit hours, or eight to 14 weeks.

³⁹ None of the programs identified as short-term included a length measure in months.

⁴⁰ One for-credit program had program length measured in contact hours.

⁴¹ A total of 19 programs with length measured in weeks, and another 21 programs identified as short-term based on the associated award

type but missing program length, are not included in this table. We use the clock:credit hour conversion of 37.5:1. For more information on this conversion, see 2018-2019 FSA Handbook Volume 2: School Eligibility and Operations. <https://ifap.ed.gov/fsahandbook/attachments/1819F-SAHBkVol2Ch2.pdf>, P 2-39.

⁴² Calculations include only programs with non-missing values for the respective program licensure and credential variable.

⁴³ Of the 199 Missouri programs, a total of 105 (53% of 199) programs have non-missing values for each of the three variables related to licensure or industry recognized credentials. Of these 105 programs, four had 'yes' in each of the three fields and 49 had 'no' in each field.

⁴⁴ Cost can be calculated for 177 of the 199 short-term programs in Missouri. All costs are rounded to the nearest \$10.

⁴⁵ Community Colleges & Workforce Preparation Division of the Iowa Department of Education. September 2018. Iowa Community Colleges Employment Outcomes: Noncredit Career and Technical Education (CTE) Programs: Academic Year 2015-2016. https://educateiowa.gov/sites/files/ed/documents/Noncredit%20outcomes%20report%20final%20web_0.pdf.

⁴⁶ Reports on both credit and non-credit program outcomes are available online, see <https://www.educateiowa.gov/iowa-community-college-program-outcomes>. To identify which among the programs in these public reports fall within the proposed program length limits for expanded Pell Grant eligibility, we received supplemental information from Iowa Community College administrators.

⁴⁷ Publicly available outcome data for non-credit programs include age, gender, and race/ethnicity, but small cell sizes at breakouts for programs of different lengths trigger suppression due to privacy concerns and so are not available for short-term programs specifically.

⁴⁸ The Iowa non-credit program outcomes report includes shares of students in the program cohort who had a prior degree, as well as the share employed in the year prior to enrollment and during enrollment. These, and labor market outcome data, are reported by three different program lengths (32-99 contact hours, 100-200 contact hours, and over 200 contact hours), and are reported here only for programs identified with separate program inventory data as being between 150 and 599 contact hours.

⁴⁹ Annual post-enrollment earnings figures are derived from quarterly unadjusted median wages during the year following program enrollment during the 2015-16 academic year. While quarterly earnings are reported at the program level in the data, quarterly median earnings and median earnings by educational focus summarized here have been weighted by the number of students employed to account for the wide ranges in program cohort sizes in the data. Quarterly earnings are annualized (multiplied by four) and rounded to the nearest \$10. Cohort sizes included for the share employed and the median annual wages may be different, and may be less than the total enrolled. Cohort size reported in the accompanying graph refer to total enrolled.

⁵⁰ TICAS. 2018. Pell Grants Keep College Affordable for Millions of Americans. https://ticas.org/sites/default/files/pub_files/overall_pell_one-pager.pdf.

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