California Community Colleges Noncredit Reform

BACKGROUND: NONCREDIT STUDENTS AND PROGRAMS

For over 50 years, California Community Colleges (CCC) have provided *tuition-free* noncredit education and robust student support to underrepresented adult education learners through short-term, competency-based coursework aimed at preparing students for employment, career ladders, higher education, and lifelong learning. In 2018-19, there were almost half a million adult learners enrolled in noncredit community college programs.

Noncredit students take courses in areas as determined by Ed. Code, § 84757(a)(1-9) in 10 primary areas, including: (1) Parenting, (2) Basic Skills, high school equivalency and diploma, (3) English as a second language, (4) Citizenship, (5) Education for persons with disabilities, (6) Short-term vocational programs, (7) Education programs for older adults, (8) Education programs for home economics, (9) Health and safety education, and (10) Tutoring for select courses.

The landscape of noncredit programming is changing, with nearly all colleges now offering some noncredit programming. Still, in 2022-23, the bulk of CCC adult noncredit education (79%) was offered by 10 community college districts or stand-alone noncredit institutions (listed by FTES size):

1. San Diego College of Continuing	10,414	6. North Orange Continuing Education	3,003
Education*			
2. Mt. San Antonio	8,331	7. Sonoma County	2,848
3. Rancho Santiago	7,746	8. South Orange	2,839
4. LACCD	5,845	9. Glendale	2,160
5. San Francisco	3,261	10. Desert	1,769
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Source: California Community Colleges Chancellor's Office, 2022-23, P2 Exhibit C (Reported 320 P2 FTES). *SDCCE Source: 320 Recalc.

San Diego College of Continuing Education (SDCCE), MT. SAC, Rancho Santiago, LACCD, San Francisco are the five largest noncredit programs in terms of FTES within the state community system. Of note, SDCCE, Mt. SAC, and NOCE are recognized by accreditors as standalone institutions and qualified as post-secondary schools.

As the fifth-ranked economy in the world, the political, economic, and social health of California has implications across the globe (Starr, 2007). Now, more than ever, California needs to lead in the delivery of relevant, sustainable adult education programming that leads to higher education and job training in careers with livable wages. Colleges are also looking to develop Career Development and College Preparation (CDCP) noncredit courses for expansion of access to high quality programs for adult learners as well as enrollment growth and FTES. With increased focus on equity and workforce, many colleges are piloting academic and workforce innovations through noncredit programming. (Excerpted from The Past, Present, and Future of Noncredit Education, 2018).

Noncredit students represent a large and unique population of learners served by the California Community Colleges (CCC). Noncredit programs also offer the most vulnerable populations, such as undocumented immigrants, adults with disabilities, and older adults, with the resources and skills attainment needed to navigate and thrive in their communities and the workplace. In fact, in the academic years 2018-19 and 2019-20, the enrollment of students aged 50 and above in noncredit courses exceeded that in credit courses by 16% and 15%, respectively.

Although noncredit students are resilient and committed to learning, they frequently face significant barriers to employment. And once enrolled, these barriers typically impact student success as well. Prior to and including 2021-22, the barriers to employment for noncredit students statewide were:

Low Literacy	366,419	76%	Cultural Barriers	85,496	18%
English Language Learner	240,292	50%	Ex-Offender	6,627	1%
Low Income	214,590	45%	Foster Youth	5,457	1%

Source: Noncredit Adult Education Launchboard. All noncredit students, K-12 & CCC Note: Percentage is student count divided by 481,200 noncredit students.

The COVID-19 pandemic worsened the existing disproportionate impact on noncredit students and resulted in significant declines in noncredit enrollment. According to the Community College Datamart system, noncredit

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students dropped 43% statewide between fall 2020 and fall 2019, compared to an 11% drop for credit students statewide. Thousands of adult learners experienced unforeseen emergencies and crises during the pandemic that impacted their lives, such as an unexpected loss of job or income, displacement from homemaking roles, eviction, or homelessness, mental health challenges, loss of family members due to COVID-19, and medical emergencies. Many students did not have the financial means to meet their basic needs, such as food, gas, hygiene, or clothing.

An ongoing intentional investment in expanding the capacity of noncredit education to offer adult learners equitable access to education that leads to economic mobility is critically needed.

QUALITY ADULT EDUCATION

The CCC system stands at a crossroads in a journey to accurately reflect and elevate the essence of noncredit educational offerings to signify the value, sophistication, and inclusivity of these essential programs in post-secondary education. The CCCs must make strategic moves to align public perception with the profound contributions these courses make to individual growth, career and college advancement, and community enrichment.

Robust ongoing state investments in noncredit program expansion must be supported to embrace comprehensive, flexible, and student-centered education that is responsive to the evolving needs of students and the job market. Evolving educational technology and pandemic- and post-pandemic flexible, distance learning options (fully online, partially online, HyFlex) have proven to be effective modes of education delivery, increasing accessibility for students balancing work, family, or other commitments. Noncredit programming is a natural fit for the CCC's competency-based education model because there is built-in flexibility, inclusiveness, student support, and high-quality programs leading to college and work. Relevant work experience opportunities ensure noncredit student learning is aligned with the needs of employers and the community and complements their education.

INEQUITABLE FUNDING AND REPORTING SYSTEMS

During the 1950s, funding for adult education came from the federal government for designated vocational and basic skills programs; from the state in the form of apportionment based on average daily attendance, and from local school districts through property taxes. Since the 1960s, more than a dozen major congressional policies have been enacted to support the expansion of adult basic education and literacy programs. (Excerpted from The Past, Present, and Future of Noncredit Education, 2018). California has offered state-supported adult education since 1856 through the K-12 system; preceding the emergence of the community colleges over a decade later and locally determined shifts of adult education to the community colleges.

There remain significant deficits and inequities in funding structures that place a lower value on specific noncredit programs. Non-CDCP noncredit courses remain funded at a lower rate per FTES, and FTES calculation formulas are not aligned. Census-based reporting is limited to one modality although it is awkward, complex, and subtracts student attendance for some courses. Antiquated positive attendance accounting requires faculty to count 15-minute increments of student attendance.

While AB86 led to the establishment of 70 Adult Education Regional Consortia, providing a structure for Adult Education Block Grant funding, challenges in funding allocation persist. The CCC State Chancellor's Office's inclusion of noncredit students in emergency assistance funding during the pandemic was a positive step, acknowledging the unique challenges faced by noncredit students. However, noncredit adult education often remains marginalized in the allocation of categorical funding and as a secondary consideration in the CCC infrastructure development and educational funding streams. This oversight, largely attributable to a lack of comprehensive systemwide data and reporting infrastructure, risks further sidelining vulnerable noncredit adult students. If this trend continues, the opportunities and support for these students will be increasingly compromised, and the true value of noncredit programs may remain unknown to the public and policy makers.

CCC NONCREDIT ADULT EDUCATION REFORM

This section presents a series of recommendations aimed at reforming Noncredit Adult Education. Building on the acknowledgment of its vital role in lifelong learning and community development, this section delves into specific challenges that have hindered the progress and recognition of noncredit programs. These recommendations are fundamental shifts proposed to elevate the status, funding, and overall efficacy of noncredit adult education, ensuring it is positioned as an integral component of the CCC system. The recommendations focus on actionable changes that address long-standing issues like funding inequities, program accessibility, and the broader recognition of noncredit education in the realm of postsecondary learning.

1. 'Noncredit' adult education name and importance in CCC Mission (Ed Code).

Issue: Throughout Ed Code, the name noncredit marginalizes adult postsecondary education compared to credit education as counterparts.

Impact: In 2018-19, there were almost half a million adult learners enrolled in noncredit community college programs. Based on recent strong enrollment trends, growth in noncredit enrollments will likely reach prepandemic levels within a few years. These students strive to achieve noncredit state certificates, as many similarly do in credit programs, but are often de-valued. Their achievements are often not considered as important to those of credit students, likely impacting, funding opportunities and opportunities for growth in noncredit programs and services.,

Recommended Resolution: Change the "noncredit" name to "Continuing Education" to properly frame the importance of the programs offered through continuing education.

Education Code Title 3, sections 66010.4, 84756, and 847567.

2. Learning-Aligned Employment Program (LAEP) - Unmet Need - Exclusion of noncredit students (Ed Code).

Issue: LAEP offers valuable opportunities for students at community colleges to access paid work-based learning. While many noncredit students fit the LAEP student eligibility requirements and seek employment from eligible employers, noncredit certificate programs are not eligible to benefit from this program.

<u>Title 3 Division 5 Part 42 Chapter 2 Article 18</u> - 69960 sub-section F and <u>CSAC Learning-Aligned Employment</u> <u>Program (LAEP) Handbook</u> implementation interpretations have been identified as obstacles to student-centered administration of LAEP, one of which fully impacts noncredit students:

The method to determine the unmet need is based on the students' eligibility for financial aid, which limits access to LAEP funding for all students enrolled exclusively in noncredit programs.

Impact: This exclusion means a large population of noncredit students miss opportunities for education-aligned, career-related employment that could enhance their learning and career prospects.

The CA Community College System has two fully noncredit institutions serving approximately thirty-five thousand noncredit students per year. During the 2022-23 program year, there were over 800,000 enrollments in noncredit courses statewide. All students enrolling exclusively in noncredit programs have been excluded from participation in LAEP. Now that noncredit programs are approved to generate apportionment for, we will see an increase in noncredit students formally pursing internships. Under current LAEP guidance, these students will be unable to participate in LAEP and, therefore, be compensated for work-based learning like their credit counterparts.

Recommended Resolution: Revise eligibility criteria for Learning-Aligned Employment Program (LAEP) funds to include noncredit students.

Commit to exploring eligibility revisions that enable fully noncredit students of low-income to participate in LAEP. Leverage existing student information collected regularly by noncredit institutions and programs to confirm low-income status and membership in student groups prioritized by current LAEP legislation.

Consider the use of noncredit student enrollment with an educational goal of "earn a career technical certificate," "prepare for a new career (acquire job skills)," "advance in current job (update job skills)," or "maintain certificate or license" to meet eligibility requirements.

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3. Noncredit FTES Rate (Ed Code).

Issue: There remain significant deficits and inequities in funding structures that place higher value on certain noncredit programs. Non-CDCP noncredit courses remain funded at a lower rate per FTES making it difficult to serve such student populations as adults with disabilities, older adults, and parents., which presents a funding disparity. Last year's FTES rates were:

Credit:	4840.49 + Incentives
Incarcerated Credit:	6787.96
Special Admit Credit:	6787.96
CDCP:	6787.96
Noncredit:	4081.79

Impact: Last year (as of P2), systemwide there was 29,095.69 funded noncredit FTES at \$4,081.79, for a total of \$118,762,487 in noncredit apportionment funding. If noncredit was equally funded at \$6,787.96 per FTES, the total would have been \$197.5 million, or a \$78.7 million increase.

Recommended Resolution: Adjust the noncredit FTES rate to be equal to CDCP. Fund all 10 noncredit instruction areas at the same apportionment rate.

Education Code Title 3, sections 84750.5 and 84750.4

4. Fair access to noncredit-relevant funding streams and enhanced reporting infrastructure.

Issue: Noncredit adult education is frequently excluded or treated as a secondary consideration to CCC infrastructure development and educational funding streams. Even when students meet funding regulations, and are taking high quality, valuable courses and programs, noncredit education is often left out of critical initiatives, frequently often due to a lack of systemwide noncredit data and reporting infrastructure or the design of the eligibility criteria to access funding.

Impact: If noncredit data and reporting structure continue to be ignored or put on hold secondary to credit infrastructure, the CCC system will increasingly sideline vulnerable noncredit adult student opportunities and supports. The examples are numerous.

Basic Needs Funding and LGBTQ+ funding. While noncredit is allocated Equal Base funding, and enrollment funding, it is not eligible for funding for low-income students, despite a disproportionate number of students of low-income status enrolled in noncredit programs. This is because the funding is partially based on the eligibility for Pell eligibility. Fifty percent of Basic Needs funding and 25% of LGBTQ+ funding is apportioned based on Pell. This leaves noncredit students attending solely noncredit courses, inequitably unsupported and unfunded compared to their credit student counterparts.

Student Equity and Achievement Funding. The SEA Program requires colleges to implement the Guided Pathways framework offering a clear path to a stated goal, to provide all students with an education plan based on that goal, and to toss aside outdated and inaccurate placement policies that are keeping far too many from completing their goals in a timely manner. Colleges must also maintain a student equity plan that is focused on boosting achievement as measured by specific "success indicators" (access; course completion; ESL and basic skills completion; degrees and certificates awarded; and transfer rates) and require each college to develop detailed goals and measures addressing disparities that are discovered. Noncredit programs are eligible for funding, but colleges are not incentivized to allocate funding for noncredit students because noncredit metrics are not included and, in college student equity plans, colleges often do not include noncredit students in their data and reporting; thus, limiting the identification of disproportionately impacted (DI) noncredit populations.

Guided Pathways. Noncredit education serves as a crucial entry point for students embarking on their educational journeys through a "guided pathway." However, the current distribution of guided pathways funding in California has overlooked relevant student outcomes for institutions offering noncredit programs, instead focusing exclusively on colleges' credit student outcomes. This exclusion stems from a systemic exclusion in the allocation formula, which fails to account for the substantial headcount contributed by noncredit programs to the district. Furthermore, the allocation formula's reliance on Pell Grants and credit financial aid as a measure for student need automatically excludes students enrolled solely in noncredit institutions and programs, given that they do not

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provide federal financial aid. The disparity is exacerbated when specific initiatives, such as Veterans Resource Center Funding or Dreamer Center Funding, allocate funds exclusively to credit colleges, leaving noncredit programs void of vital financial support. This imbalance underscores the need for a more inclusive funding approach that recognizes and addresses the significant contributions of noncredit education in the broader educational landscape.

Recommended Resolutions: Ensure noncredit students have fair access to all relevant funding streams, including categorical programs aimed at promoting student equity, assisting with basic needs, mental health services, programs, and services to support students with disabilities, and access to technology. Work with noncredit practitioners on developing eligibility criteria and success metrics for the students enrolled exclusively in noncredit programs. Ensure equitable funding of stand-alone noncredit institutions.

Ensure noncredit programs are eligible for new funding streams focused on closing equity-gaps (i.e., ZTC Program funds and Guided Pathways).

5. Noncredit attendance collecting funding models.

Issue: There remain significant deficits and inequities in funding structures that place higher value on certain programs. Non-CDCP noncredit courses remain funded at a lower rate per FTES, and FTES calculation formulas are not aligned. Census-based reporting is limited to distance education courses and includes two census dates and other components making it difficult to implement.

Impact: Antiquated positive attendance accounting requires faculty to monitor attendance every 15 minutes students attend class. Alternative attendance accounting model used for distance education classes is cumbersome to implement.

Recommended Resolution: Make additional attendance collection and funding models, such as census-based attendance available for noncredit classes offered in person and online.

6. Related and Supplemental Instruction (RSI) funds (Ed Code).

Issue: The RSI fund for pre-apprenticeship programs serves as an example of a funding initiative that inadvertently overlooked noncredit programs and institutions, placing the onus on these institutions to rely solely on district funding for financial support. The RSI Hourly Reimbursement program uses prop 98 funding to reimburse apprenticeship programs for the hours of RSI they provide to apprentices, governed by the California Education Code sections, <u>79149 through 79149.7</u> for Community Colleges. It is one of multiple options for apprenticeship programs to receive reimbursement for RSI provided; yet there are stipulations that exclude allowability, particularly related to noncredit apprenticeship program allowability.

Impact: While noncredit has registered pre-apprenticeship programs, no RSI funding is awarded by the state for pre-apprenticeship programming. Noncredit is not officially recognized in formally receiving allocated funds, yet they are active in this work and providing programming to noncredit students.

RSI hours earned this year inform next year's apprenticeship apportionment funds. For the annual RSI apprenticeship apportionment funds, each college receives the RSI funds earned (known as the base funding) plus a percentage of the additional apprenticeship funds (known as "additional funding"). These funds accrue annually to more than what was earned in base funding.

There are registered apprenticeship programs within the state, such as the Metropolitan Transit System program for which noncredit students are involved in delivering apprenticeship programming. The two large stand-alone institutions, San Diego College of Continuing Education (SDCCE) and North Orange Continuing Education (NOCE), can receive RSI funding for these apprentices; however, it is indirectly through college partnership within the District and no RSI funding is awarded by the state for pre-apprenticeship programming.

Recommended Resolution: Allow pre-apprenticeship programs to receive Related and Supplemental Instruction (RSI) funds.

Education Code Title 3, Division 7, Part 48, Chapter 9, 79149 through 79149.7.

7. California Virtual Campus (CVC) -Online E – Landing Page and Home College Status.

Issue: In 2021, there was a promise that noncredit CCCs would be included in the CVC.edu website, but the CVC-OEI scope of work changed in 2022.

Highlights of key dates and activities:

- 2021 Fall: Bob Nash, former Dean of Academic Affairs & Professional Development, coordinated and chaired a meeting of the CVC.edu Noncredit Advisory Group.
- 2022 Spring: CVC.edu Noncredit Advisory Group was notified CVC.edu noncredit landing page was in a "holding pattern."
- 2022 Fall: CVC.edu noncredit landing page was "removed from scope of work." Dean Nash offered that he would "propose that we include a page for noncredit online programs (as we do for online credit programs)."

Impact: Lack of support for student success. Student Outcomes are impacted by OIE use, per RP Group <u>CCC Online</u> <u>Education Landscape Report</u>: "Examining outcomes across the last three years of the first OEI grant; preliminary analysis suggests the OEI has had positive impacts on students' success in online courses – success and retention rates in a sample of OEI pilot sections, where students and faculty had access to a suite of resources/tools offered by the OEI, showed higher overall rates than in comparable online courses across the OEI pilot colleges and statewide."

Fully online noncredit programs may not receive access to CVC-OEI supports, such as:

- Participation in the CVC Exchange, as Home and Teaching Colleges.
- Access to data and enrollment dashboards through the Exchange.
- Resources such as the Online Course Design Rubric, CVC@ONE online educator certification, adoptable courses, webinars, and other professional development opportunities.
- Shared technology such as Canvas, the state's common course management system, and other tools including Canvas Studio, Impact, NetTutor, and Pisces.

Recommended Resolution: Integrate noncredit institutions and noncredit course offerings fully in the California Virtual Campus (CVC) initiative by developing a noncredit landing page and granting the home-college status to Noncredit Colleges with large number of FTES.