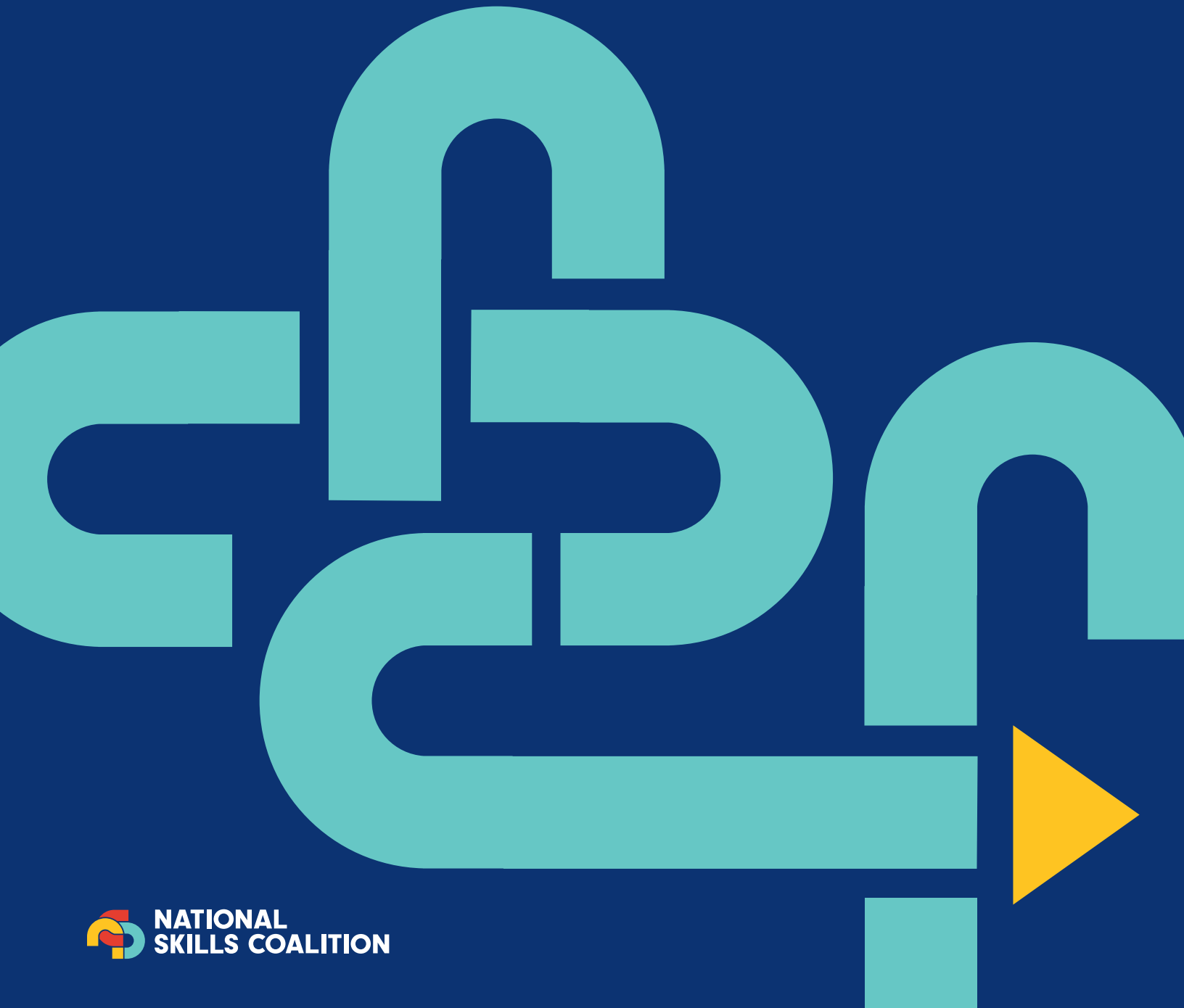
STATE FINANCIAL AID FOR NON-DEGREE CREDENTIALS:

Models and Considerations for Policy and Program Design



NATIONAL SKILLS COALITION

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EXECUTIVE SUMMARY

Increasingly, people are looking for education and training options that are more affordable, flexible, can quickly open doors to good jobs, and—ideally—pave the way for further educational attainment. Businesses also want to hire workers with the skills needed for jobs in growing industries. Non-degree credentials (NDCs) can often meet these needs, as an alternative pathway or supplement to traditional degrees, as well as provide access to quality job opportunities and economic mobility. Yet while NDCs are comparatively more affordable than degree programs, people often face financial barriers to covering costs associated with them.

To respond to these demands, states are expanding the scope of traditional postsecondary investments by building financial aid programs that support workforce oriented, short-term non-degree programs and credentials that help meet pressing workforce demands, achieve credential attainment goals, and promote multiple pathways to economic mobility for their residents. In doing so, state policymakers must make strategic choices about which policy design characteristics and models work best for supporting students enrolled in non-degree programs and pathways. These choices are integral to ensuring that state investments in NDC financial aid put people on a path to equitably achieve their employment and educational goals and contribute to the building of an inclusive economy.

This report shares features of existing state financial aid programs that support equitable access and strong outcomes connected to NDCs—particularly for students who are not eligible for federal student aid—while also supporting the needs of industry and business. It seeks to provide insight for policymakers, advocates, and other stakeholders into the types of design and policy choices associated with establishing financial aid for students pursuing non-degree programs and credentials through a review of six NDC financial aid programs in five states—Indiana, Iowa, Louisiana, Virginia, and Washington State. The report concludes with key considerations for designing inclusive, equitable, and outcomes-oriented financial aid for NDC students.

The Financial Aid Status Quo for Students Pursuing Non-Degree Credentials

Education and training programs that lead to NDCs can vary significantly in terms of length, credits conferred, cost, providers, competency assessments, learning modalities, and credential type. For these reasons, the availability of financial aid for students enrolled in NDC programs also lacks uniformity. Federal student aid, including the Pell Grant, remains inaccessible to people enrolled in many NDC programs. In many instances states have chosen to mirror federal eligibility standards for state financial aid programs, resulting in the same inaccessibility for certain cohorts of NDC students. Some states have also opted to rely on more workforce-oriented sources of state or federal financial assistance to support these NDC students in lieu of traditional student aid. While other sources of federal and state aid exist for these students, those programs generally lack the broad access, transparency, and investment that characterizes federal student aid.

Understanding the Students Who Fall through the Non-Degree Credential Financial Aid Gap

Students pursuing for-credit programs that are shorter than 600 clock hours and students in noncredit workforce education and training are typically not eligible for federal student aid. It can be hard to understand who these students are because colleges are not federally required to report information on non-Title IV eligible program enrollment. However, available research on students pursuing noncredit education suggests that noncredit students tend to be older, have lower incomes, are more likely to be students of color, and are more likely to have earned a high school diploma or equivalent as their highest level of educational attainment compared with students enrolled in a for-credit program at community colleges.

Examining State Financial Aid for Non-Degree Credentials: Key Design Choices and Models from Five States

While many of the choices facing state policymakers in developing financial aid programs to support students pursuing non-degree programs and credentials mirror those present when designing aid to support degree-seeking students, there are certain factors specific to NDCs that make this a unique process.

Designing Financial Aid to Reach the Students Who Need It

How programs define student eligibility, and the stringency of those eligibility requirements, are both essential factors for how effectively a financial aid program will reach the students a state wants to serve, and to achieving its ultimate policy goals.

- *Considering Need-Based Eligibility Rules for Financial Aid Supporting Non-Degree Credentials*
  For state financial aid programs intending to support students pursuing programs that are excluded from federal student aid eligibility, the decision to implement an income requirement should consider whether the student populations likely to be served by these programs are already predominately lower income (as

suggested by existing research and which could be established more concretely with improved noncredit data collection practices and systems). Because need-based aid requires certain application requirements, and at times verification of income, it may create unintended barriers to entry for students that states are hoping to serve.

State programs like **Indiana**'s Workforce Ready Grant and **Virginia**'s New Economy Workforce Credential Grant (also known as FastForward), do not require students enrolled in eligible noncredit programs to complete the Free Application for Federal Student Aid (FAFSA) that would provide proof of income.

- *Other Student-Centered Eligibility Considerations* States should intentionally weigh the benefits of creating a highly targeted program against the barriers such restrictions can create to access and completion. States should strive to be as inclusive as possible to effectively serve adult learners, including those who may be younger than twenty-four but may also face roadblocks to postsecondary access and completion; people who are undocumented and/or are ineligible non-citizens for the purposes of federal student aid; people with a range of prior education levels; and people who are or were involved with the justice system.

  For example, the **Washington** Opportunity Grant program has intentional linkages with its Integrated Basic Education and Skills Training program (I-BEST) to support adult learners who are concurrently receiving a postsecondary credential while earning a high school equivalency. Adult learners break the traditional mold of students enrolled in postsecondary education. They often do not go to college directly from high school, may have taken a prolonged break from enrollment, and are often balancing adult responsibilities and other obligations outside of their role as a student.

Integrating Holistic Supports into the Design of Financial Aid Programs Supporting Non-Degree Credentials

Financial aid that addresses tuition and fees for NDCs is critical to broadening access to college opportunities. It is not sufficient on its own, however, to promote access and equity, particularly for people who have faced historic and ongoing systemic barriers to education, such as Black, Indigenous, and other students of color. Considering access to the holistic supports and services that are known to promote equity in access to, affordability of, and completion of college as a quality metric and design feature of NDC financial aid would enable

states to more readily achieve goals related to equitable college attainment and employment. State programs that do this in different ways include **Iowa's** Gap Tuition Assistance Program, **Virginia's** Get Skills, Get a Job, Get Ahead (also known as G3) and FastForward programs, and **Washington's** Opportunity Grant program.

How Funding Structure Choices Affect Non-Degree Credential Affordability

While the overall cost of pursuing short-term NDCs is often comparatively lower than degree programs, additional expenses related to course materials, certification, and exam fees, and other non-tuition expenses related to a student's life outside of the classroom can dramatically increase the overall cost of attendance. State policymakers designing financial aid programs to cover NDCs should make an effort to understand their cost, including common non-tuition expenses associated with enrollment, and take these costs into account when determining how much aid and in what ways it will be distributed.

Programs reviewed for this report include a hybrid model, which uses a first-dollar model for a student's first award and a last-dollar model for subsequent awards (**Louisiana's** M.J. Foster Promise Program) and a performance-based model (**Virginia's** FastForward program). Other programs (**Iowa's** Gap Tuition Assistance Program, **Virigina's** G3 program, and **Washington's** Opportunity Grant) have assistance that covers costs beyond just tuition and fees.

Applying Quality Criteria to Program Eligibility for Financial Aid Supporting Non-Degree Credentials

A transparent approach to ensuring that state financial aid programs are directing people and public funds to high-quality credentials is necessary given the wide range of NDCs that exist, the variability in outcomes experienced by people who earn them, and the growing investment in and demand for these credentials among policymakers, employers, and learners. States should use quality assurance frameworks to inform which programs and credentials are eligible for state financial aid and are therefore expected to advance progress towards key state higher education, employment, and economic development priorities. The six state financial aid programs analyzed for this report apply a range of quality metrics to program and credential eligibility, including:

- Alignment with in-demand occupations
- Employer engagement and validation of competencies and credentials
- Ensuring quality labor market outcomes
- Stackability and portability

Systems and Practices to Help States Understand the Impact of Financial Aid for Non-Degree Credentials

Data are essential to understanding the reach and outcomes of financial aid programs to ensure they are leading to greater equity in credential attainment and labor market outcomes for students, advancing progress towards state postsecondary attainment goals, and effectively responding to employers' workforce needs. Data are also necessary for developing and implementing quality assurance frameworks that can inform how states structure financial aid programs supporting NDCs to ensure they invest funds in credentials, programs, and pathways that meet their policy goals and result in positive and equitable outcomes for students. States are working to do this in different ways:

- Implementing state financial aid data collection and disaggregation that includes noncredit programs and credentials, such as in **Iowa**, **Louisiana**, and **Virginia**.
- Using data to inform decision making related to whether financial aid and other policies are supporting equitable NDC attainment, whether and how they are producing outcomes that are meeting key state priorities, and which programs and credentials will reliably help people achieve their education and career goals, such as in **Iowa** and **Virginia**.

Considerations for Designing State Financial Aid towards Quality Non-Degree Credentials

Affordable pathways for people to earn ***quality*** NDCs (QNDCs) that enable them to equitably advance their educational and career goals are an important component of an accessible and equitable postsecondary system that effectively helps all people thrive. As states consider new avenues to invest in the skill attainment of their residents, policymakers should consider the lessons from, and choices illustrated by, existing state financial aid programs that support students' pursuit of QNDCs. The following considerations are aimed at helping states center students and workers who can benefit from QNDC attainment in program goals and design so that learners, employers, and states themselves can benefit.

1. Learn about the students who are already pursuing the non-degree programs and credentials in which a state intends to invest through financial aid to determine whether and which student eligibility requirements are—or are not—necessary for reaching the students a state wants to support.
2. Build inclusive financial aid programs that reach groups who may particularly benefit from affordable and accessible short-term credentialing opportunities.
3. Design NDC financial aid to cover all or most of the cost of attendance of eligible short-term programs (to the extent possible according to available funds).
4. Use assessments of program quality and student outcomes connected to NDC financial aid programs to ensure state investments improve student wellbeing, meet employers' needs, align with quality job opportunities, and advance state priorities.
5. Integrate support for key access and attainment strategies that are known to increase equity in educational enrollment and completion into the design of financial aid programs for NDCs.
6. For states that support noncredit enrollment through financial aid, create accessible opportunities for students to continue their education and gain access to holistic supports as a part of program design.
7. Consider the data collection, systems, and infrastructure capacity at community colleges (and any other eligible providers), as well as at the state level—and provide appropriate resources for capacity building—especially when crafting a financial aid program that will provide aid to students enrolling in noncredit programs.
8. Direct NDC financial aid towards education and training programs and credentials that reliably lead to quality jobs and equitable career pathways, as part of efforts to establish an inclusive economy.

Equitable access to education and training requires acknowledgement of the structural barriers to postsecondary opportunities, including the cost of and the potential for short-term programs to advance progress on a longer educational and career journey.

INTRODUCTION

Earning a quality postsecondary credential is the best route for someone to secure a good job and achieve economic mobility and security for their family. Yet the cost and time commitment of a college degree remains out of reach for many people. Increasingly, people are looking for options that are more affordable, flexible, can open doors to good jobs quickly, and—ideally—pave the way for further educational attainment. Employers also need more skilled workers who are trained for jobs in growing industries—jobs that require training beyond high school but not a college degree.

To respond to these demands, states are expanding the scope of traditional postsecondary investments by building support for workforce-oriented, short-term programs and credentials that help meet pressing workforce demands, achieve credential attainment goals, and promote multiple pathways to economic mobility for their residents. According to a 2023 study by HCM Strategists, states are investing nearly $4 billion in short-term education and training opportunities aligned with non-degree credentials (NDCs).[1] Of the fifty-nine initiatives across twenty-eight states they identified, nearly half (twenty seven programs) provide financial aid to help students with the cost of short-term, non-degree programs that lead to NDCs, with the others aimed at institutional support and capacity building.[2] These initiatives represent a growing facet of the larger suite of investments and programs states are providing to the postsecondary education and workforce systems oriented towards shared goals of increased and equitable credential attainment, employment, and economic growth.

Providing state financial aid for quality short-term education and training matters because, in many cases, students enrolled in programs leading to NDCs are not eligible for traditional federal or state financial aid.[3] Students pursuing credit-bearing programs shorter than 600 clock hours and those enrolled in the range of noncredit workforce education and training programs offered by community colleges are not eligible to receive Pell Grants or other types of federal student aid under Title IV of the Higher Education Act.[4] In addition, many people face challenges funding the full cost of attendance for these programs using just traditional workforce training dollars.[5]

While NDCs are often comparatively more affordable than traditional degree programs, students may still face financial barriers to covering costs associated with them and take on debt as a result. Equitable access to education and training requires acknowledgement of the structural barriers to postsecondary opportunities, including the cost of and the potential for short-term programs to advance progress on a longer educational and career journey.

As NDC financial aid investments flourish, state policymakers, education and training providers, researchers,

and advocates need to examine their outcomes to know whether they are investing in ***quality*** NDCs (QNDCs) that lead to good jobs with family sustaining wages that also provide a good return on investment for students, workers, and employers. In other words: ***do state investments in NDC financial aid put people on a path to equitably achieve their employment and educational goals and contribute to the building of an inclusive economy—one in which workers and businesses most impacted by economic shifts, as well as workers who face structural barriers to opportunity, are empowered to equitably participate?***

As states seek to understand the return on their NDC investments, they must also identify and make choices about which design characteristics and models work best for supporting students pursuing non-degree programs and pathways—and which will achieve their goals and vision for success. Financial aid programs supporting NDC attainment should aim to reach the diverse population of students who need financial support to access postsecondary opportunities, help those students successfully complete programs and earn quality credentials, and ensure they see meaningful and equitable outcomes in the labor market, including employment in quality jobs. Applying appropriate student eligibility rules and robust quality assurance frameworks to determine which programs and credentials will qualify can help states accomplish these outcomes by articulating what quality means in the context of NDC financial aid and creating accountability mechanisms, increasing the chances that these investments help states, workers, and businesses achieve their goals.[6]

While no one state financial aid program for students pursuing NDCs represents a perfect gold standard, this report shares features of existing programs that support equitable access and strong outcomes connected to NDCs—particularly for students that are not eligible for federal student aid—while also supporting the needs of industry and business (for an overview of research methods informing this report, see the Appendix). It seeks to provide insight for policymakers, advocates, and other stakeholders into the types of policy design choices associated with establishing financial aid for NDC students through a review of six financial aid programs in five states—**Indiana**, **Iowa**, **Louisiana**, **Virginia**, and **Washington State**. Throughout, the report also provides snapshots from NSC's 2022-23 technical assistance academy, *Expanding State Financial Aid for Quality Non-Degree Credentials*, during which NSC worked with **Arkansas**, **Michigan**, and **Minnesota** to take steps towards making financial aid for students in QNDC pathways a reality.

The report concludes with key considerations for designing inclusive, equitable, and outcomes-oriented financial aid for NDC students, taking into account the existing state models featured here and NSC's years of work alongside state leaders and advocates to expand support for

Financial aid programs supporting NDC attainment should aim to reach the diverse population of students who need financial support to access postsecondary opportunities, help those students successfully complete programs and earn quality credentials, and ensure they see meaningful and equitable outcomes in the labor market, including employment in quality jobs.

learners in the NDC ecosystem and the quality of the credentials they earn. State policymakers looking to invest in financial aid for students pursuing QNDCs should:

1. Build inclusive financial aid programs that reach groups who may particularly benefit from affordable and accessible short-term credentialing opportunities.
2. Learn about the students who are already pursuing the non-degree programs and credentials in which a state intends to invest through financial aid to determine whether and which student eligibility requirements are—or are not—necessary for reaching the students a state wants to support.
3. Design NDC financial aid to cover all or most of the cost of attendance of eligible short-term programs (to the extent possible according to available funds).
4. Use assessments of program quality and student outcomes connected to NDC financial aid programs to ensure state investments improve student wellbeing, meet employers' needs, align with quality job opportunities, and advance state priorities.
5. Integrate support for key access and attainment strategies that are known to increase equity in educational enrollment and completion into the design of financial aid programs for NDCs.
6. For states that support noncredit enrollment through financial aid, create accessible opportunities for students to continue their education and gain access to holistic supports as a part of program design.
7. Consider the data collection, systems, and infrastructure capacity at community colleges (and any other eligible providers), as well as at the state level—and provide appropriate resources for capacity building—especially when crafting a financial aid program that will provide aid to students enrolling in noncredit programs.
8. Direct NDC financial aid towards education and training programs and credentials that reliably lead to quality jobs and equitable career pathways, as part of efforts to establish an inclusive economy.

The Pell Grant remains inaccessible to people enrolled in many NDC programs. In states where the main financial aid programs are based on or mirror federal student aid rules, these programs are also out of reach for NDC students.

THE FINANCIAL AID STATUS QUO FOR STUDENTS PURSUING NON-DEGREE CREDENTIALS

Postsecondary students who pursue NDCs at public community and technical colleges generally fall into two categories: those pursuing for-credit certificates or other credit-bearing sub-associate-degree credentials, such as career and technical education programs, and students who enroll in noncredit workforce education and training that leads to industry recognized credentials, certifications, and other types of NDCs.[7] Education and training programs that lead to NDCs can vary significantly in length, credits conferred, cost, providers, assessment of competencies learned, learning modalities, and type of credential earned (such as college certificates, industry certifications, and licenses).[8] For all these reasons, the NDC ecosystem is not a monolithic space and therefore the availability of financial aid for students enrolled in NDC programs also lacks uniformity.

Over the years, policymakers have had to come up with parameters to determine which programs should be supported by traditional student financial aid, and which programs should be excluded. At the federal level, programmatic eligibility for Title IV federal student aid has been largely tied to clock or credit hours (with some exceptions for competency-based programs). Often, states have mirrored these eligibility standards in determining how to structure their own student aid programs. However, the expansion of less traditional postsecondary education and training pathways necessitates a better understanding of the value of NDCs and how to modernize student financial assistance to provide access to high quality short-term credentials.

Federal Student Aid for Short-Term Credentials

Federal student aid programs are comprised of grants, work-study, and loans. The largest grant program, by far, is the federal Pell Grant program, which provides roughly $30 billion in assistance to approximately six million students annually.[9] The program is over fifty years old and has provided need-based aid to millions of students who otherwise may not have been able to enroll in college. In addition to student eligibility requirements for Pell Grants

(assessed via the Free Application for Federal Student Aid, or FAFSA, form), there are also institutional and program eligibility requirements. Program eligibility is largely tied to four factors: the program must be offered by an eligible institution; be at least 600 clock hours (or its credit hour equivalent) and fifteen weeks in length; admit undergraduate students; and lead to gainful employment in a recognized profession (as defined by regulation).[10] Some competency-based programs may qualify as well.[11] The vast majority of students receiving Title IV aid are those enrolled in credit-bearing undergraduate degree or certificate programs.

In recent years, there have been efforts to expand Pell Grant eligibility for additional non-degree programs by lowering the clock hour threshold to 150 hours, while implementing additional guardrails to ensure program quality.[12] Yet in lieu of successful legislation modifying program eligibility rules, the Pell Grant remains inaccessible to people enrolled in many NDC programs. In states where the main financial aid programs are based on or mirror federal student aid rules, these programs are also out of reach for NDC students.

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Other Federal Assistance for Students Pursuing Non-Degree Credentials Who are Not Eligible for Federal Student Aid

Additional opportunities for financial assistance exist for NDC students beyond just Pell Grants and other forms of Title IV aid. Most of these financial assistance programs are need-based or are targeted at populations that typically earn lower incomes. These programs include Individual Training Accounts under the Workforce Innovation and Opportunity Act (WIOA) and assistance under the Supplemental Nutrition Assistance Program (SNAP) Employment and Training. However, some programs, such as the Post-9/11 GI Bill and certain tax credits, are earned or do not have an income component.[13] Overall, this type of assistance lacks the broad access and investment that characterizes Title IV financial aid. For example, the Pell Grant program is currently funded at around $30 billion annually while adult, dislocated worker, and youth activities under Title I of the Workforce Innovation and Opportunity Act are funded at $3.2 billion.[14]

Oftentimes, funds from different financial assistance programs at the federal, state, and even local level are blended and braided together to support non-degree students. For example, the Arkansas Career Pathways Initiative provides financial assistance to student parents who are eligible for certain public assistance programs and/or have incomes below 250 percent of the Federal Poverty Guidelines and pursuing noncredit or credit-bearing NDCs and associate degrees.[15] Aid is provided for a range of costs, including tuition, textbooks, child care, and transportation. To do so, the state combines funding from the Arkansas Department of Workforce Services, the Arkansas Department of Higher Education, as well as federal funding supporting workforce training SNAP, TANF, and WIOA.[16] The program also assists students in applying for student grant aid where available. The need to blend and braid funding is complex and generally conducted by individuals that are part of the workforce system or a college financial aid office.

Comparatively, federal student aid is more transparent and operates as an entitlement, while limitations on workforce-oriented financial assistance can create both real and perceived barriers. Despite the challenges some students face in filing a FAFSA, it does provide a clear and relatively consistent pathway for accessing financial aid across states and institutions.[17] Financial aid administrators are then able to provide an aid offer or award letter to students that delineates net price along with the availability of grants, scholarships, work study, or loans.[18] The practice of blending and braiding of workforce related financial assistance across programs is far less transparent for students and lacks the same type of consistency in available aid.

Compounding this issue is the lack of consistent information on the costs of NDC programs, particularly if they are not offered for credit. While calculations of cost of attendance (COA) are commonplace for credit-bearing pathways, noncredit program cost information is not easily compiled nor are the costs of supplies and equipment students may need to purchase for their coursework. Better information on NDC program costs would help states gauge financial aid award amounts to help fill the gap.

Understanding the Students Who Fall through the Non-Degree Credential Financial Aid Gap

While students pursuing credit-bearing NDCs are generally eligible for Title IV aid, including Pell Grants, those enrolled in for-credit programs that are shorter than 600 clock hours and students in noncredit workforce education and training are not. There are few datasets that adequately describe non-Title IV-eligible students

Knowing that employment and earnings outcomes are improved for people who earn postsecondary credentials, this evidence suggests that state investments in financial aid to support people's pursuit and attainment of high-quality, career-oriented noncredit credentials could potentially remove roadblocks to students' ability to complete credentials that help them advance in the labor market.

at community colleges since colleges are not required to report information on non-Title IV eligible program enrollment.[19]

The American Association of Community Colleges estimates that forty percent of community college students are enrolled in noncredit programming, for a total of roughly four million people.[20] Of these students, the majority (fifty-seven percent) are pursing noncredit career-oriented programs and pathways, representing one in five of all community college students, and another nineteen percent of noncredit students are enrolled in developmental education, such as English as a second language courses.[21]

Studies using institutional data and/or qualitative interviews with community college staff and leaders shed light on the characteristics of students enrolled in noncredit workforce and education. These studies have generally found that noncredit students tend to be older, have lower incomes, are more likely to be students of color, and are more likely to have earned a high school diploma or equivalent as their highest level of educational attainment compared with students enrolled in a for-credit program at community colleges.[22]

A 2023 study using data on 24,000 recipients of Virginia's New Economy Workforce Credential Grant (commonly known as FastForward) finds, for example, that working-age people pursuing eligible noncredit programs and credentials are more likely to have never before enrolled in a credit-bearing college program and be Black, male, and older than students enrolled in credit-bearing community college workforce programs in the Virginia Community College System (VCCS).[23] The same study finds that students receiving FastForward grants to pursue eligible noncredit programs saw high rates of completion and attainment of industry-recognized credentials (ninety percent and seventy percent, respectively), and an increase in quarterly earnings of roughly $1,000 for those who earned an industry credential.

Knowing that employment and earnings outcomes are improved for people who earn postsecondary credentials,

this evidence suggests that state investments in financial aid to support people's pursuit and attainment of high-quality, career-oriented noncredit credentials could potentially remove roadblocks to students' ability to complete credentials that help them advance in the labor market.[24] However, more attention is needed around how to build effective bridges between noncredit education and further educational opportunities that may lead to even stronger economic outcomes for learners. Research shows that noncredit students are unlikely to transition to for-credit education within two years of enrolling in community college.[25]

WHAT RESEARCH SAYS ABOUT EQUITABLE AID DESIGN

When designing financial aid programs, states must make tough choices about how best to target a limited amount of funding to address students' needs while ensuring a strong return on investment. There will always be a give-and-take in terms of which students get access to aid, award coverage and amounts, which programs are eligible, and the structure of awards. Policymakers should take a student-centered, evidence-informed approach to these decisions, aiming to address access, retention, outcomes, and equity, with a goal of building equitable and debt-free pathways to quality jobs and family sustaining wages. Research provides insight into how states can structure financial aid programs to most effectively serve students who need financial support to access short-term, career-oriented programs and pathways.

Need-based aid is generally seen as the most effective and equitable way to reach people who stand to benefit the most from financial assistance and who face the greatest structural barriers to accessing postsecondary opportunities.[26] It has been found to contribute to higher graduation rates for students with low incomes and students with low grade point average (GPA), and to increase wages post-graduation for some students.[27] Merit-based aid and performance requirements (e.g., GPA requirements) tend to benefit middle- and higher-income students who are predominately white, rather than students with low incomes and students of color, due to systemic barriers present throughout the education system that put them at a relative disadvantage to higher-income and white students.[28]

Other policies that can have unintended consequences for learners include satisfactory academic progress requirements (SAP)—a metric that requires a student to meet a minimum GPA in order to remain eligible for financial aid—and eligibility rules based on a student's date of high school graduation, age, or enrollment intensity. SAP requirements can make it harder for students to stay enrolled and to re-enroll if they have to stop out, while age-based and full-time enrollment rules disproportionately impact adult learners, who may be enrolling for the first time or the first time in many years and who are likely to enroll part-time so they can work while enrolled.[29]

A range of practices have demonstrated effectiveness in increasing the reach of financial aid to students with low incomes, adult learners, and others who are less likely to enroll without financial support. For example, simplifying financial aid application processes and making information easily accessible can encourage applications and enrollment especially among students with low incomes, who may not be familiar with the college-planning process or who do not have access to advising services or social networks that can alert them to the availability of aid.[30] This could include having a clearly published deadline, making funding available on a rolling basis or pushing application deadlines to late in the year (such as August), rather than relying on a first-come-first serve model.[31] Finally, allowing financial aid to cover costs beyond tuition (e.g., transportation, housing, food), can reduce students' cost of attendance and increase the likelihood of credential attainment.[32]

EXAMINING STATE FINANCIAL AID FOR NON-DEGREE CREDENTIALS: KEY DESIGN CHOICES AND MODELS FROM FIVE STATES

While many of the choices facing state policymakers in developing financial aid programs to support students pursuing non-degree programs and credentials mirror those present when designing aid to support degree-seeking students, there are certain factors specific to NDCs that make this a unique process. Existing state financial aid programs for NDCs provide examples of how states can structure programs so that they are responsive to students' needs, meet state goals related to credential attainment, and respond to employer demand for skilled workers. NSC has examined a set of six programs across five states—**Indiana**, **Iowa**, **Louisiana**, **Virginia**, and **Washington**—to highlight what these programs look like and the themes and design characteristics that stand out as potential models for consideration or replication in other states as they explore ways to support QNDC attainment (Table 1; detailed profiles of the six state financial aid programs can be found online at this link: https://nationalskillscoalition.org/wp-content/uploads/2024/07/Profiles-of-State-Financial-Aid-Programs.pdf).

TABLE 1. OVERVIEW OF STATE FINANCIAL AID PROGRAMS

Program	Award Amount	Aid Coverage	Holistic Support Availability	Program Eligibility (Credit vs. Noncredit)	Eligible Providers
Indiana Workforce Ready Grant	Up to $5,000, with other aid applied first for credit-bearing programs	Tuition and fees	Recipients are referred to their local WorkOne Center for career services	Noncredit and Title IV-eligible credit only	Multiple institutions and training providers, including approved employers or businesses
Iowa Gap Tuition Assistance	Remaining eligible costs after all other aid applied	Tuition, fees, training costs, course equipment, assessment or testing fees, child care	Campus-based Gap navigators provided direct services, financial support, and connections to community resources	Noncredit and credit bearing programs that are too short to be eligible for Title IV	Community colleges
Louisiana M.J. Foster Promise	Up to $6,400 over a max of 3 years ($3,200/year)[33]	Tuition, fees, books, and instructional materials	Access to the M.J. Foster Promise Program Virtual Network Group[34]	Noncredit and eligible credit (Title IV status irrelevant)	Community colleges and approved universities and for-profit colleges
Virginia New Economy Workforce Credential Grant Program (FastForward)	Two thirds of the program cost (student pays remaining third)	Tuition and fees	Nothing provided in statute	Noncredit only	Community colleges[35]
Virginia Get a Job, Get Ahead, Give back (G3)	Remaining eligible costs after all other aid applied	Tuition, fees, and course materials	Student incentive grants of $900/ semester and $450 for summer term for eligible students[36]	Noncredit and eligible credit (Title IV status irrelevant)	Community colleges
Washington Opportunity Grant	Up to $4,623 (for AY23-24) after all other aid applied	Tuition and fees	$1,000 for books and $1,500 for wraparound services[37]	Eligible credit (Title IV status irrelevant)[38]	Primarily community colleges and a small number of private career colleges[39]

WORKING TO EXPAND FINANCIAL AID FOR QUALITY NON-DEGREE CREDENTIALS WITH ARKANSAS, MICHIGAN, AND MINNESOTA

Launched in 2022, National Skills Coalition's (NSC) *State Financial Assistance for High-Quality Non-Degree Credentials Initiative* (SFA Initiative) engaged three states—**Arkansas**, **Michigan**, and **Minnesota**—over the course of eighteen months, to expand the availability of state financial aid for QNDCs that are not eligible for Title IV federal aid. This initiative built on NSC's past technical assistance for eleven states focused on the development of QNDC definitions and advancement of state policy agendas that utilize quality assurance frameworks to increase QNDC access and attainment, improve equity in access and outcomes for students—particularly students of color, and enhance state capacity to measure and report on NDC outcomes.[40] The SFA Initiative focused particularly on state investments in high-quality NDCs, with a goal of closing gaps in access to financial aid for QNDCs that lead to equitable education and labor market outcomes, so they are more accessible to people interested in pursuing education and training that can lead to a good jobs.

Each state in the SFA Initiative entered this work from a different starting point. Arkansas has an existing NDC financial aid program that is lottery-funded, but which education policy leaders and practitioners feel needs better data to understand the students receiving it and their outcomes, and to inform tweaks to program design. Michigan has a relatively new financial aid program providing limited support to students pursuing NDCs, which the state's Office of Sixty by 30 is working to implement according to new requirements that include quality assurance factors. Minnesota is working to apply a newly adopted quality assurance framework for degree and non-degree credentials to its State Grant Program. All three states are also working to improve the data supporting their NDC investments and policies and are making efforts to understand and define quality when it comes to NDCs. As a part of the initiative, NSC created opportunities for state teams to learn from states that are further down the road in terms of the development of financial aid programs, data systems, and reporting capacities surrounding eligible NDCs, including **Iowa**, **Louisiana**, and **Virginia**.

Profiles of the three SFA Initiative states and their work to expand financial aid for students earning QNDCs are shared throughout this report.

Designing Financial Aid to Reach the Students Who Need It

How programs define student eligibility, and the stringency of those eligibility requirements, are both essential factors for how effectively a financial aid program will reach the students a state wants to serve, and to achieving its ultimate policy goals (Table 2). Depending on a state's goals, certain eligibility requirements for students can direct aid to specific populations, such as adult learners. Eligibility requirements that create a tight window for the students who can qualify for aid, or which create hurdles for students to easily access aid, however, may disincentivize students to apply or limit access to students who could benefit. Since many students who pursue NDCs are adult learners seeking their first postsecondary credential while often juggling work with family commitments and economic insecurity, programs which are easy to learn about, apply for, and access are often best suited to effectively meet their needs.[41]

Considering Need-Based Eligibility Rules for Financial Aid Supporting Non-Degree Credentials

Need-based financial aid, widely recognized as an equity-oriented policy model, allows states to direct funds to students who have demonstrated financial barriers to accessing postsecondary education. For state financial aid programs intending to support students in noncredit and short-term, credit bearing programs—those excluded from Title IV eligibility—however, the decision to implement an income requirement is not as straightforward as for traditional financial aid supporting degree and certificate programs. Because need-based aid requires an application providing prior earnings of a student (and at times their parents), it may create unintended barriers to entry for students and families that states are hoping to serve.

The primary method states use to determine eligibility based on income is the FAFSA, which can present a real or perceived roadblock to many students.[42] Students who are undocumented and do not have a Social Security number and those who have difficultly accessing their parents' tax information may be especially unlikely to apply if they are required to complete the form.[43] Extensive research also documents the effects of administrative burden placed on people with low incomes, Black, Indigenous, Latino/a, and other people of color, people identifying as LBGTQ+, people with disabilities, and older adults, to access public assistance that can help alleviate financial hardship.[44]

States should consider whether the student populations likely to be served by these programs are already predominately lower income (as suggested by existing research and which could be established more concretely with improved noncredit data collection practices and systems).[45] Placing an income-based requirement on aid for students enrolled in noncredit programs may also present difficulties, as these students typically do not fill out the FAFSA and institutions are not as accustomed to requiring information like income or Social Security number for enrollment in noncredit programs. Among the programs in this report, some have built in flexibility with the FAFSA requirement while others have opted out of any eligibility restriction based on income, with variations based on credit-bearing status.

TABLE 2. OVERVIEW OF STUDENT REQUIREMENTS FOR SELECT FINANCIAL AID PROGRAMS FOR NON-DEGREE CREDENTIALS

Program	Income	Additional Financial Aid Applications	Age	Secondary Credential Attainment	Enrollment Intensity	Student Academic Performance	Citizenship Status	Justice-Involved Status
Indiana Workforce Ready Grant	N/A	FAFSA for credit-bearing programs	N/A	High school diploma or equivalent	Full-time for dependent students; half-time for independent students for credit-bearing programs	SAP required for credit-bearing programs	U.S. citizen or eligible non-citizen and a state resident. DACA students may qualify for non-credit but not credit-bearing[46]	People with felony convictions or who are incarcerated are eligible for noncredit
Iowa Gap Tuition Assistance	Income requirement at institutions' discretion[47]	N/A (depending on the institution)	18 years or older	N/A	N/A	Recipients must meet regularly with staff to document progress in their program	Must be eligible to work in the U.S. and a state resident	N/A
Louisiana M.J. Foster Promise	Household income <300% of FPL	FAFSA for second semester (credit-bearing only)	20 years or older for the 2024-25 academic year[48]	High school diploma or equivalent or enrolled in IET program	Continuous enrollment, unless granted an exemption	SAP and 2.0 GPA for credit-bearing programs	U.S. citizens and state residents only	People convicted of violent crimes not eligible
Virginia New Economy Workforce Credential Grant Program (FastForward)	N/A	N/A	N/A	N/A	N/A	N/A	U.S. citizens and state residents only	N/A
Virginia Get a Job, Get Ahead, Give back (G3)	Household income ≤400% of FPL	FAFSA and any other federal/state aid applications for which students may be eligible	N/A	N/A	At least six credit hours/semester for credit-bearing; cannot exceed 150% of required credits	SAP required for credit-bearing programs, as is showing reasonable progress towards an associate degree in 3 years or less	U.S. citizens and state residents only	N/A
Washington Opportunity Grant	Household income ≤200% of FPL	FAFSA or WASFA prior to second disbursement	N/A	N/A	Up to 45 credits allowed	SAP and at least a 2.0 GPA	Washington resident students[49]	N/A

States should remain equity-centered in determining which students will be served be a financial aid program, including whether to include or waive income requirements.

While there are benefits to providing a streamlined pathway for adult learners to access aid, this can also pose a risk that aid dollars may flow to some individuals who have a moderate or greater income. This is particularly true for non-degree programs that are targeting individuals who are working professionals seeking to build or stack upon an existing degree or certificate. States should remain equity-centered in determining which students will be served be a financial aid program, including whether to include or waive income requirements.

- **LOUISIANA:** Enacted in 2021, the M.J. Foster Promise Program originally required students to complete the FAFSA and apply other sources of aid to tuition and fees before covering remaining eligible costs. After the first year of operation, however, public higher education and proprietary institutions administering the grant found that few students were benefiting from the program since other aid covered all eligible costs (for credit-bearing programs).[50] Based on the institutions' feedback and input from the Louisiana Office of Student Financial Assistance (LOSFA), the legislature changed the structure of the program for the 2023-2024 award year. Now, students do not have to fill out a FAFSA or apply for other aid before receiving their first M.J. Foster grant. To receive subsequent awards, students do have to fill out the FAFSA and apply other sources of aid to eligible costs. For students enrolled in eligible noncredit programs, all awards are applied toward eligible costs because those students are not eligible for Title IV student aid.[51]

- **IOWA:** While originally a need-based program serving people earning incomes equal to or less than 250 percent of the Federal Poverty Guidelines, the Gap Tuition Assistance Program has since removed income requirements following a pilot expansion of eligibility in FY21-22 funded by the Governor's Emergency Education Relief (GEER) Fund.[52] The pilot expansion was made permanent given the recognition that the program was missing students, especially in rural areas, who could benefit from Gap awards because they earned too much, despite still facing real financial barriers to enrollment.[53] Gap now allows institutions to determine if they want to require students to fill out a FAFSA to apply and meet certain need-based qualifications to be eligible. This change has resulted in Gap reaching more students—since the removal of the income requirement, the state has seen a 145 percent increase in students served by Gap-approved, high-demand programs.[54]

- **VIRGINIA:** In Virginia, policymakers opted to not institute an income requirement, and therefore do not require FAFSA completion, for the FastFoward program, which supports students enrolled in approved noncredit programs. Despite the broad nature of FastForward eligibility, the program is largely serving adults without prior college experience and low incomes: in 2022, nearly seventy percent of FastForward students were twenty-five or older (with a median age of thirty-two), two thirds were first-time college students, and they had a median income of $24,877 prior to enrolling.[55]

- **WASHINGTON:** In Washington, students may file an application form for the Opportunity Grant, as well as the FAFSA or Washington Application for State Financial Aid (WASFA), though much like Louisiana, they are not required to fill out a financial aid application to be eligible to receive their first grant award (though they do need to apply to receive subsequent awards).[56] The WASFA provides students an alternative way to apply for aid when they cannot file the FAFSA because of immigration status, parents not filing taxes, or monies that may be owed to the U.S. Department of Education.[57]

REESTABLISHING MICHIGAN'S SKILL SCHOLARSHIP WITH GREATER QUALITY ASSURANCE

The Michigan Skills Scholarship, which originated from the initial Michigan Reconnect legislation passed in 2020, is one of the only programs in Michigan that provides financial aid for students pursuing short-term training. Administered by the Michigan Department of Labor and Economic Opportunity (LEO), the Reconnect Private Training Learning Initiative—otherwise known as the Skills Scholarship—launched in 2021.[58] As originally established, the scholarship was intended to be a one-time pilot program providing to $1,500 in last-dollar aid to a limited number of eligible students pursuing a qualified occupational training program.[59] Once appropriated funds were spent down in 2021, the program was closed until new funding was appropriated.

In the fall of 2022, the Michigan state legislature passed a FY23 state budget which included $6 million for Michigan Reconnect Short-Term Training Grants—aka Skills Scholarship. A policy bill making reforms to the larger Michigan Reconnect program passed a few months later in a lame duck session, including language to reauthorize the Skills Scholarship.

As advocates and state officials regrouped following state elections and the lame duck session, the Michigan Community College Association and LEO Office of Sixty by 30, in partnership with NSC, focused efforts on exploring additional changes to the Skills Scholarship. NSC provided support to understand which changes could be made to increase the LEO's ability to apply a quality framework for Skills Scholarship awards. NSC also supported the implementation of the 2023 bill once passed, helping to clarify the Department's role in determining program eligibility based on legislative language and identifying eligible programs.

Other Student-Centered Eligibility Considerations
Restrictive eligibility requirements can unintentionally limit access for students, including, at times, the student groups the program is aiming to reach. States should intentionally weigh the benefits of creating a highly targeted program against the barriers such restrictions can create. Students who are served by and can benefit from the economic mobility and educational pathways associated with QNDCs are not monolithic, so states should carefully consider instituting student eligibility restrictions when designing state financial aid for NDC programs.

Gearing Aid to Adult Learners. Designing financial aid programs specifically to serve adult learners has become a more common policy goal—one necessitated by age or other limitations imposed by many traditional financial aid programs focused on students graduating from high school. Relying on an age cutoff for eligibility, however, can unintentionally exclude people that states may also want to serve. Age restrictions—even ones that restrict eligibility to adults (e.g., 25 and older)—can miss many people who face similar obstacles to college affordability, enrollment, and completion as 'adult learners,' but may be younger than the cutoff, including many "independent" students—a federal student aid classification describing students who are twenty four or older, as well as people of any age who are parents, veterans or active duty military, married, currently or formerly in the foster system, emancipated minors, and homeless or housing insecure.[60]

> Of the six state programs profiled in this report, all but two allow people of all ages to qualify for awards. **Louisiana** has changed its age requirements from requiring students be at least twenty-one years old to a gradual lowering of the age requirement to seventeen by the 2027-28 academic year, and **Iowa**'s restriction ensures that eligible students are over the age of eighteen.[61]

Access for Students Who are Undocumented.
Immigrants in the United States—particularly those without documentation—are likely to face financial challenges to accessing college, even though many could benefit from opportunities to pursue postsecondary programs. More than two in five (forty-four percent) of unauthorized immigrant adults ages 25-64 hold less than a high school diploma as their highest level of education, and fifty seven percent have incomes below 200 percent of Federal Poverty Guidelines.[62] To be eligible for federal student aid, people born outside the United States must be either naturalized U.S. citizens or "eligible noncitizens"—typically legal permanent residents, also known as green-card holders.[63] The remainder of immigrants are not

eligible for federal student aid, including people who have Deferred Action for Childhood Arrivals (DACA), Temporary Protected Status (TPS), are undocumented, or are seeking asylum or have another humanitarian status. In addition, many states forbid these immigrants from accessing state-funded financial aid.[64] Providing access to financial aid to pursue QNDCs for people who do not have access to federal aid can increase the equity impact of a financial aid policy, creating access to educational opportunities for those who may otherwise be unable to earn credentials that provide access to quality jobs and family sustaining wages.[65]

> **Three of the six programs in this report provide eligibility to at least some undocumented state residents (Indiana, Iowa, and Washington). Three programs restrict eligibility to state residents who are U.S. citizens (Virginia and Louisiana).**

Accepting a Range of Prior Education Levels. Whether the aid program will be limited to students who have earned a high school diploma (or the equivalent) is another choice-point for states in designing financial aid for students in short-term programs. States should have some way to provide financial support to students enrolled in integrated education and training (IET) programs, which is a well-established model that provides instruction in foundational skills alongside occupational or industry-specific technical skills. Some states may have a dedicated funding source for IET or they can integrate it into their non-degree financial aid program. Other states may not want to set any requirements related to prior education.

Many people who pursue short-term NDCs do so to supplement existing skill sets and prior credentials to advance in their jobs or change careers. There may also be circumstances where someone has a degree they have not used for the purposes of employment in many years, making the attainment of a QNDC an important strategy for them to stay in or reenter the labor force. Supporting these adults' access to QNDCs could fit with a state's overarching goals of supporting the preparation of a trained workforce that has the skills and competencies needed to fill in-demand jobs as they emerge.

> **Louisiana's M.J. Foster Promise Program requires students to have only earned a high school diploma or its equivalent prior to seeking an NDC. However, there is an exception for students enrolled in an eligible IET program. Washington's Opportunity Grant program actively works to ensure students enrolled in Integrated Basic Education and Skills Training (I-BEST), which is an IET program that allows students to earn a postsecondary credential while receiving adult basic education, receive benefits if they are eligible.**

Eligibility for Students Who Are or Were Justice Involved. Many state financial aid programs exclude current or formerly incarcerated students from eligibility, despite research that shows increasing educational access in prisons can lead to higher employment rates among release and a lower risk of recidivism.[66] Nearly two thirds of people incarcerated in federal and state prisons have earned at least a high school diploma or its equivalent and a 2016 survey found that a majority express interest in enrolling in additional postsecondary education.[67] In 2023, the twenty-six-year ban on providing Pell Grants for people who are incarcerated was lifted, building on efforts to provide additional educational opportunities for this population.[68] Providing people who are incarcerated with affordable opportunities to earn high-quality credentials, including QNDCs, would help them gain the skills and competencies required by the labor market, better allowing them to secure good jobs, increase their earning potential, and establish stability upon release.[69]

> **The Gap program in Iowa, FastForward and Get Skills, Get a Job, Get Ahead (or G3) in Virginia, and Washington's Opportunity Grant all allow people who have been involved with the justice system to qualify for eligibility.**

Integrating Holistic Supports into the Design of Financial Aid Programs Supporting Non-Degree Credentials

Policies designed to fill gaps in the financial aid system must consider the tuition and non-tuition costs related to enrollment in programs that lead to NDCs. A growing body of evidence sheds light on the extent of basic needs insecurity among college students and the importance of supporting students holistically to effectively promote equitable enrollment, persistence, and completion of postsecondary credentials.[70] This evidence undergirds qualitative accounts of how life circumstances—such as having children, being the first in one's family to go to college, or facing significant financial strain—and the ability to meet basic needs—such as food and housing security—fundamentally affect people's ability to pursue and complete programs and earn credentials.[71]

Students pursuing non-Title-IV-eligible non-degree programs are likely to encounter myriad expenses, such as the costs of food, housing, transportation, child care, as well as other incidental costs, such as licensure exam fees, that can affect their ability to enroll and complete a program. Students enrolled in noncredit workforce education and training are also less likely to get access to the support infrastructure offered to students enrolled in academically oriented and credit-bearing programs.[72] The lack of support availability for students in noncredit programs is concerning given that research suggests

While financial aid that addresses tuition and fees for NDCs is critical to broadening access to college opportunities, it is not sufficient on its own to promote access and equity, particularly for people who have faced historic and ongoing systemic barriers to education, such as Black, Indigenous, and other students of color.

that providing them with career, personal, and academic supports leads to improved rates of program completion, credential attainment, and credit accumulation, compared with students in noncredit programs who do not receive those supports.[73]

So, while financial aid that addresses tuition and fees for NDCs is critical to broadening access to college opportunities, it is not sufficient on its own to promote access and equity, particularly for people who have faced historic and ongoing systemic barriers to education, such as Black, Indigenous, and other students of color. Considering access to the supports and services that are known to promote equity in access to, affordability of, and completion of college as a quality metric and design feature of NDC financial aid would enable states to more readily achieve goals related to equitable college attainment and employment. Existing state programs do this in a number of ways.

- **IOWA:** Students receiving awards from the Gap Tuition Assistance Program receive support and guidance from Gap navigators on community college campuses, who make determinations about how to support students facing basic needs or other barriers to success. The intake progress involves interviews with a case manager, a career interest inventory, and an aptitude assessment to allow the case manager to best support the student in making informed decisions about the education and careers and identify support and other needs.[74] Navigators can use funding from the Gap or Pathways for Academic Career and Employment (PACE) programs to cover the costs of supportive services, if they deem it necessary to help a student persist and complete their programs. In addition, they regularly leverage deep connections to their campus and community to connect students to other resources and services that can help them meet their needs. Many Gap students are also eligible for PACE, which provides additional navigation support and financial assistance with holistic support needs, including child care, transportation, and tutoring.[75]

- **VIRGINIA:** Virginia's G3 program provides full-time enrolled G3 students who are eligible for the maximum federal Pell Grant with additional support for wraparound services. These students can receive up to $900 per semester and up to $450 for the summer term to cover costs related to attendance such as food, transportation, and child care.[76] G3 recipients also receive academic and career advising from their community colleges as a part of the financial aid program, as well as benefit from access to SingleStop, which connects VCCS students to a wide range of benefits and supports, including child care assistance, the Women Infants and Children (WIC) program, and SNAP/SNAP E&T.[77]

  FastForward students are regularly screened and matched with public assistance, in addition to working with coaches provided by the colleges that connect them with relevant services. VCCS is a designated SNAP 50/50 provider, and the system uses these funds to support advisors on every campus and SingleStop. FastForward students are, as a result, three

times as likely as career and technical education students who do not receive FastFoward grants to receive SNAP 50/50 support.[78] VCCS is actively working to find new and innovative ways to increase take-up of SNAP E&T benefits, working with Virginia Department of Social Services and researchers to test new strategies and leverage data sharing to maximize students' access to available public assistance.[79]

- **WASHINGTON:** Recipients of the Opportunity Grant may receive up to $1,000 for books and $1,500 for wraparound support services, including tutoring, counseling, retention strategies, as well as child care and transportation, in addition to a grant for financial aid for tuition and fees.[80] This support is supplemented by college staff who screen students for other support for which they may be eligible, such as Basic Food Employment and Training—Washington's SNAP E&T program—emergency assistance, or housing.[81] Benefits navigators, which are now required for all Washington public institutions of higher education as of legislation passed in 2023 (Wash. Rev. Code § 28B.10.935), help students navigate application and eligibility for multiple programs and funding sources, including Opportunity Grants, to provide adequate support to students. Students who are screened for SNAP E&T are automatically screened for Opportunity Grant eligibility, and vice versa. Navigators serve as a central hub of support access that triage students' needs and work to support the access of sources and supportive services to effectively serve them.[82]

How Funding Structure Choices Affect Non-Degree Credential Affordability

While the overall cost of pursuing short-term NDCs is often comparatively lower than degree programs, additional expenses related to course materials, certification, and exam fees, and other non-tuition expenses related to a student's life outside of the classroom can dramatically increase the overall cost of attendance. The cost of attendance for Title IV eligible programs is fairly straightforward, as this information is generally disclosed by the institution on its website or in an offer of financial aid. The cost of short-term, non-degree programs, and especially noncredit programs, however, is less transparent. State policymakers designing financial aid programs to cover NDCs should make an effort to understand their cost, including common non-tuition expenses associated with enrollment, and take these costs into account when determining how much aid and in what ways it will be distributed.

The inherent design of financial aid programs directly affects their ability to cover costs beyond tuition and fees. Of the programs highlighted in this report, some provide a grant award up to a certain threshold while others are designed as a type of "promise program," or one that eliminates all tuition and fees for eligible student payments. Promise programs are structured according to how awards will operate in relation to federal and other financial aid:

- "**First-dollar**" programs award aid to students regardless of/in addition to other sources of support they may receive, such as Pell Grants.
- "**Last-dollar"** programs make awards after all other sources of aid are applied, filling the gap between other aid, and remaining eligible costs.
- "**Hybrid**" programs, a term which NSC is using to define those financial aid programs which follow a multi-pronged approach, use a first-dollar model for a student's first award and require a financial aid application to enable a last-dollar model for subsequent awards.

In some instances, the state programs in this report are designated last dollar but have the ability to provide additional financial support for students beyond tuition and fees. Much like hybrid programs, states have made addendums and modifications to best serve their student populations.

- **INDIANA:** Indiana's Workforce Ready Grant (WRG) supports the cost of tuition and fees, if applicable, for students in both eligible credit and noncredit programs. Students enrolled in eligible credit-bearing programs are encouraged to file a FAFSA and all other grant aid will be applied toward tuition and mandatory fees before the WRG is applied—a last-dollar model. Students in noncredit programs are typically eligible for up to $5,000 that can be applied to tuition and fees, and only programs that cost $5,000 or less are eligible, with some exceptions. Other non-tuition costs of attendance are not covered for either credit- or noncredit students.

State policymakers designing financial aid programs to cover non-degree credentials should make an effort to understand their cost, including common non-tuition expenses associated with enrollment, and take these costs into account when determining how much aid and in what ways it will be distributed.

- **IOWA:** Iowa's Gap Tuition Assistance Program operates as a last-dollar program, providing up to the full cost of tuition, fees, direct training, books, and equipment after all other state and federal aid is applied, as well as funds to cover other non-tuition expenses.[83] There is no cap on the award amount.[84] Funds are paid from the state to community colleges. Between ten and twenty percent (dependent on the size of the community college) of funding distributed to community colleges may be used to provide direct staff support services. These services may include financial support for marketing, outreach, and assistance with the application, interview, and assessment processes. The remaining funding must be used to provide financial assistance for eligible students to cover costs associated with eligible training programs, including tuition, fees, equipment, course materials, and direct training costs, as well as costs related to personal supports, like child care and transportation.[85]

- **LOUISIANA:** The M.J. Foster Promise Program provides students enrolled in eligible non-degree and associate degree programs grant aid for up to three years. Grant funding can be applied to tuition, fees, books, and other instructional materials for up to sixty credit hours. M.J. Foster operates as a hybrid first-dollar/last-dollar program. A students' first semester award is first dollar, meaning they can get the maximum amount of funds they are eligible for regardless of other aid. Subsequent semesters/awards are last dollar, meaning they fill the gaps in allowable expenses after other aid, like Pell Grants, are accounted for. Functionally, awards are always first dollar for students who pursue noncredit courses and programs since they are not eligible for additional aid.

- **VIRGINIA:** FastForward is designed as a performance-based program for eligible noncredit programs. Participating students pay one-third of their tuition upon enrolling in the program and the remaining two thirds are paid by the state to the college, assuming the student completes. If the student does not finish their program, the student is responsible for paying a second third of the program cost to the institution, and the institution does not receive reimbursement from the state for the third. The structure of FastForward does not align with the promise model, as there is an expectation that the student will pay for some of the tuition costs. However, in many instances, additional need-based aid is available from the state to cover some, if not all, of these tuition costs for students.[86]

  G3 operates as a last-dollar promise program covering the remaining cost of tuition, fees, and course materials after all other federal and state financial aid is applied. Full-time G3 students who qualify for a maximum Pell Grant are eligible to receive a student support incentive grant of up to $900 per semester and up to $450 for the summer term. This grant may be used to cover other costs related to attendance such as food, transportation, and child care.

- **WASHINGTON:** The Washington State Board for Community and Technical Colleges distributes Opportunity Grant funding to institutions based on the number of full-time equivalent students being served under the grant in total. Eligible students receive aid to cover the tuition and mandatory fees for up to forty-five credits, as well as up to $1,000 for books and $1,500 for wraparound support services. While students are encouraged to submit a FAFSA or WAFSA, they are not required to do so for the first award. Hence, some students may receive their first award from the Opportunity Grant without being required to file any financial aid forms.[87] Additionally, the college has some discretion in how the Opportunity Grant will interact with other sources of aid. For example, the Opportunity Grant may be applied first to tuition and fees while reserving Pell Grant funds for other non-tuition costs of attendance.[88]

A transparent approach to ensuring that state financial aid programs are directing people and public funds to high-quality credentials is necessary given the wide range of NDCs that exist, the variability in outcomes experienced by NDC earners, and the growing investment in and demand for these credentials among policymakers, employers, and learners.

Applying Quality Criteria to Program Eligibility for Financial Aid Supporting Non-Degree Credentials

Many people seek streamlined pathways to good jobs with family-sustaining wages. At the same time, employers are looking for workers with specific competencies and credentials that can meet their immediate workforce demands. Financial aid to support people's pursuit and attainment of NDCs can help meet both of those needs. But, while some NDCs lead to good jobs and career pathway opportunities, others have little economic benefit and can reproduce occupational segregation and systemic inequities in the labor market.[89]

Promoting equitable opportunities to earn high-quality credentials—QNDCs—that enable one to thrive in an inclusive economy is especially vital for people of color and women who are actively pursuing NDCs as a route to a meaningful career. A transparent approach to ensuring that state financial aid programs are directing people and public funds to high-quality credentials is necessary given the wide range of NDCs that exist, the variability in outcomes experienced by NDC earners, and the growing investment in and demand for these credentials among policymakers, employers, and learners. States should use quality assurance frameworks to inform which programs and credentials are eligible for state financial aid and are therefore expected to advance progress towards key state higher education, employment, and economic development priorities.

To assess the quality of specific NDCs, states can develop quality criteria and frameworks that take into account the demand for particular credentials and outcomes associated with them. NSC has developed a set of quality criteria for NDCs, in partnership with several states, that can guide how states think about and design state financial aid for people pursuing NDCs in a way that supports strong and equitable outcomes for students and employers.[90] These criteria are intended to help states consider how they are using evidence of employment and earnings outcomes—including the quality of jobs connected to NDCs, skill and competency attainment, employer demands, stackability, and portability—to set standards for and assess the quality of NDCs and the value they hold for individuals and employers. For example, **Louisiana** has developed a definition for quality credentials of value that outlines criteria for counting NDCs towards the state's postsecondary attainment goal, including evidence of competencies, alignment to jobs with strong growth and wage prospects, evidence of employment and earnings outcomes, and the ability to meet these criteria without additional credentials.[91]

QUALITY CRITERIA FOR NON-DEGREE CREDENTIALS

NSC defines a quality non-degree credential (QNDC) as one that provides people with the means to equitably achieve their informed employment and educational goals, as demonstrated by valid, reliable, and transparent evidence that the credential satisfies criteria constituting quality, including:

Substantial job opportunities – While the definition of substantial may vary, it should include current labor market data, future projections, as well as economic development opportunities. Evidence must include quantitative data and input from employers.

Competencies mastered by credential holders – The education and training program associated with the NDC must include clearly defined competencies that align with expected job opportunities and employer needs.

Employment and earnings outcomes of people after obtaining the credential – Evaluation of earnings, employment, and job quality associated with a credential are essential in determining its value. This evaluation should include the disaggregation of employment and earnings data by race, ethnicity, gender, disability status, and other characteristics to measure equitable progress. States may also consider an evaluation of job quality associated with NDCs, such as the availability of health benefits, sick leave, retirement benefits, and regular and sustainable hours. In addition to guiding state, system, and institutional decision making, information on how people fare in the labor market after earning specific credentials should be made readily available to consumers so they can make informed choices regarding their education and training options.

Stackability to additional education or training – QNDCs that are directly aligned with education and training pathways, especially for NDCs associated with low-earnings potential, increase the likelihood that credential holders gain access to stronger wage opportunities and better employment outcomes. This can include the creation of career pathway programs, credit articulation and direct transfer agreements, credit for prior learning, as well as consumer information tools to promote these opportunities.

Portable to a range of job opportunities and employers – An important indication of NDC quality is whether the credential is industry recognized across multiple employers and regions; providing the NDC holder multiple job opportunities and the ability to advance their career goals.[92]

States must also take into account the quality of the education and training programs that lead to NDCs by assessing how students fare in particular programs and the track record of the training provider. Completion rates and the rates of placement into a job related to the credential earned are a fundamental way to assess program outcomes (though there should be some flexibility built into these metrics so that they are tailored to suit the population being served and do not incentivize 'creaming,' or selectively working with people deemed most likely to complete a program and find employment).

Indiana does a form of this for noncredit programs eligible for the Workforce Ready Grant, for example: eligible providers, including employers and businesses, seeking to offer noncredit training programs eligible for the Workforce Ready Grant must also be approved under the state's Eligible Training Provider List (ETPL) and maintain a performance standard of at least eighty percent completion rate and seventy percent credential attainment rate.[93] Most states will need to expand their data collection and infrastructure capacity to collect the data needed to understand these outcomes—particularly placement rates—however these factors should represent aspirational quality assurance levers as states build out more robust NDC data and reporting.

In addition, assessment of quality should be expanded to include the types of attainment models, supports, and services that are known to promote equitable college access, affordability, and attainment, particularly for the "new majority learners" that are likely to pursue NDCs—including Black, Indigenous, Latino/a, and other students of color, students with low incomes, people who are first generation college students, adult learners, student parents, immigrants, and students who are justice impacted.[94]

For example, states can consider requiring intentional connections between financial aid-eligible non-degree programs and opportunities to attain credit for prior learning and/or progress along defined career pathways that facilitate transitions to additional and credit-bearing educational attainment. They should connect financial aid recipients to academic and career coaching, public benefits navigation, basic needs resources, and other holistic supports that are essential for building equitable

access to postsecondary opportunities and for increasing people's ability to enroll, persist in, and complete credential programs. Strategically investing in financial aid to support the pursuit of QNDCs can amplify the impact of accessible career pathways, enabling learners to leverage QNDCs as steppingstones on a longer educational journey that leads to meaningful careers and economic mobility.

The six state financial aid programs analyzed for this report apply a range of quality metrics to program and credential eligibility (Table 3). These metrics are designed to achieve state goals of meeting state and regional workforce demands, ensuring employers have access to a pool of skills workers to fill in-demand jobs, and expanding access to quality education and good jobs for learners.

Strategically investing in financial aid to support the pursuit of QNDCs can amplify the impact of accessible career pathways, enabling learners to leverage QNDCs as steppingstones on a longer educational journey that leads to meaningful careers and economic mobility.

TABLE 3. OVERVIEW OF PROGRAM ELIGIBILITY AND QUALITY INDICATORS FOR NDC FINANCIAL AID PROGRAMS

	Aligns with In-Demand Occupations	Produces Industry Recognized and/or Employer Validated Credential	Considers Labor Market Outcomes	Requires Credential Stackability and/or Alignment with a Career Pathway
Indiana Workforce Ready Grant	Programs must be aligned with one of 6 priority sectors and be ranked in the top 2 tiers of the INDemand Job list (top tier for noncredit)	Programs must result in an industry-recognized credential	Programs must be aligned with the INDemand Jobs list, which considers median wages from the U.S. Bureau of Labor Statistics	N/A
Iowa Gap Tuition Assistance	Must be aligned with one of four in-demand sectors	Must meet one of 5 criteria validating that the program/credential leads to an industry-recognized credential	Program approval considers median wages, as reported on the application forms submitted by colleges	Programs must be aligned with credit-bearing certificate, diploma, or degree programs and be stackable
Louisiana M.J. Foster Promise	Must be aligned with one of five sectors based on demand and alignment with workforce priorities	N/A	Sectors identified for eligibility include consideration of wages	N/A
Virginia New Economy Workforce Credential Grant Program (FastForward)	Eligible programs/ credentials aligned to VA Demand Occupations List	Colleges submit evidence of employer demand for graduates with credentials/ programs to be eligible	N/A	Programs must show evidence stacking as part of a career pathway and portability to multiple employers and regions
Virginia Get a Job, Get Ahead, Give back (G3)	Eligible programs/ credentials must be in one of five high-demand industries which are aligned to VA Demand Occupations List	N/A	N/A	Programs, must be stackable and have a clear pathway to an associate degree
Washington Opportunity Grant	Programs must provide evidence a link to a career pathway that leads to high-wage, in-demand jobs	Programs must demonstrate support from business, labor, workforce development councils, and CBOs	N/A	Programs must provide evidence that they are on an identified career pathway

Alignment with In-Demand Occupations

All the financial aid programs profiled in this report include some requirement that program eligibility is aligned with in-demand sectors or occupations. This represents not only an important requirement for students—ensuring there are job opportunities for program completers—but also for employers looking for workers to fill job openings. It can also help align financial aid programs with areas identified by the workforce system as priorities for the state.

- **INDIANA:** Indiana identified six priority sectors (advanced manufacturing; building and construction; health sciences; IT and business services; transportation and logistics; and early childhood education) for eligibility for its Workforce Ready Grant (WRG). WRG-eligible programs must be linked to quality jobs that receive a high enough ranking via Indiana's INDemand Jobs methodology, which works to identify high-demand and high-wage jobs in the state.[95] Credit-bearing programs must lead to occupations included in the top two tiers of the INDemand Jobs list; noncredit programs must be aligned with occupations on the top tier of the list.[96] That ranking considers demand, wage level (using regional wages), and current job postings. Occupations on the list are ranked based on short- and long-term projected growth, job posting data, and wages, using wage estimates from the Bureau of Labor Statistics.[97] The INDemand Jobs methodology is currently undergoing a revision led by the Governor's Workforce Cabinet and will be updated in the coming months.

- **VIRGINIA:** G3 and FastForward both rely on a list of high-demand occupations developed by the Virginia Board of Workforce Development. The Virginia Demand Occupations List was created and is annually updated by the Virginia Board of Workforce Development (VBWD) as directed by the legislation that created the New Economy Workforce Credential Grant Program in 2016.[98] The VBWD Demand Occupation Task Force identifies high-demand fields and occupations, and the noncredit training and credentials that align to those occupations and publishes those lists to its website. The list serves as a resource providing recommendations to eligible institutions seeking to align their training programs. Institutions can also request approval of additional occupations for the list if those occupations meet local or regional demand.

- **WASHINGTON:** In Washington, to be eligible for the Opportunity Grant, programs must demonstrate that business, labor, workforce development councils, and community-based organizations are supportive of the program.[99] Community college programs must provide evidence that they are linked to a career pathway that leads to high-wage, in-demand jobs. Data provided by the Washington Employment Security Department can verify this information for the purposes of program eligibility.

Employer Engagement and Validation of Competencies and Credentials

In addition to quantitative assessments of employer demand and job openings associated with the programs and credentials eligible for state financial aid, ideally states have a way to at least semi-regularly engage employers to verify this information and gain greater insight into workforce needs and areas of likely growth. Direct communication with employers can shed light on nuances related to expected job openings, identify emerging job opportunities and associate competencies and credentials, and verify whether eligible credentials are used in hiring, retention, or promotion decisions.[100] Trade associations, industry sector partnerships, other business associations, and regional or state career and technical education advisory councils are a few examples of groups that could provide this type of information. States should include information from minority and women-owned businesses to ensure a diverse range of perspectives are included.[101]

- **VIRGINIA:** Community colleges submit documentation to VCCS from employers providing evidence of demand for graduates with credentials for which they are seeking FastForward eligibility as a part of the program approval screening process. Programs must show proof of employer demand and third-party validation, with a process for determining workplace validity, relevance, and continuous improvement.[102] Colleges do this in a number of ways, including employer letters of support speaking to their demand for people with particular credentials and employer advisory groups that ensure the curriculum, equipment, and outcomes are in line with demand in that field.[103] VCCS verifies the information on employer demand submitted by colleges by leveraging labor market data for the college's service region, which allows them to look at demand and opportunity for students to enter jobs with sustainable wages and job growth. Once VCCS staff and leadership have vetted credentials submitted for consideration, the Virginia State Board for Community Colleges provides final approval. Separately, VCCS hosts statewide industry summits by field or industry to develop action plans to expand recruitment, training, and job placement for priority high-demand occupations.

- **IOWA:** Individual community colleges consult with local employers and business groups—through advisory boards, interviews, and focus groups, for example—to ensure there is demand for the credentials associated with a particular program and that it confers the skills

Without evidence of the employment and earnings outcomes associated with a credential supported by a state financial aid program, state policymakers cannot really know if public funds are effectively supporting the economic outcomes intended by the policy.

and competencies aligned with employer needs before submitting it to the state for Gap program approval.[104] The state reviews and approves submitted programs for Gap participation, taking into account labor market demand and information as well as the availability of the program in a particular area across institutions.[105]

Ensuring Quality Labor Market Outcomes

Perhaps the ultimate test of an NDC's value is whether a credential holder obtains employment and how much they earn.[106] This is not to say that economic value is the only value that matters, but improving one's employment and earnings is a major reason individuals enroll in post-secondary education or training, and this is particularly true of NDCs (other than personal enrichment classes). Without evidence of the employment and earnings outcomes associated with a credential supported by a state financial aid program, state policymakers cannot really know if public funds are effectively supporting the economic outcomes intended by the policy. Employment and earnings outcomes should be accompanied by contextual information that helps policymakers understand if the outcomes are equitable. This information includes the demographic characteristics of people obtaining the credentials, including race, ethnicity, gender, disability status, and age, as well as the industry in which individuals are employed.[107]

- **IOWA:** The state takes median wages into account for program approval for the Gap Program, as reported on the application forms submitted by colleges, though they do not rely on any particular wage threshold for approval.[108] Individual community colleges monitor completion rates and employment outcomes for students graduating from Gap-funded programs, sharing information that signals potential problems with the noncredit program team so they can address issues related to the course curriculum, enhance teacher professional development, or increase business coordination.[109]

- **INDIANA:** In Indiana, median wages from the U.S. Bureau of Labor Statistics Occupational Employment and Wage Statistics inform the algorithm determining the INDemand ranking for occupations, thus informing programmatic eligibility for the Workforce Ready Grant.[110]

- **VIRGINIA:** State Council of Higher Education for Virginia (SCHEV) collects data from VCCS, to which institutions report on student enrollment and outcomes. SCHEV matches student-level data to Unemployment Insurance (UI) wage records and reports pre- and post-program outcomes for FastForward students who have at least four quarters of information prior to enrollment and four quarters of wage information after completing. SCHEV reports on wage changes and the wage premium from completing a FastForward program.[111] VCCS also looks at FastForward student data matched to wage records; they disaggregate data by student characteristics, including race and ethnicity, to see trends and equity gaps.[112]

Stackability and Portability

The gold standard in developing non-degree pathways is ensuring that credentials stack to additional education or training and that they are portable to multiple employers and regions. State financial aid policies should support stackability as much as possible. This is particularly important for credentials associated with low earnings, so students can progressively stack NDCs to further education that leads to higher paying jobs and careers. Stackable credentials can help individuals advance in education and employment and can be particularly important for people of color and others who have been traditionally underserved by higher education.[115]

Stackability is also closely aligned with the development of career pathways. Career pathways are a series of industry specific education and training programs and support services that have multiple entry and exit points.[116] They facilitate employment in a related industry while also allowing for the student to advance, or "stack," related educational credentials to build better job and earning opportunities.[117] Making state financial aid available to students pursuing credentials along these pathways could potentially increase their chances of attainment and movement from one phase of the pathway to the next.

- **VIRGINIA:** Noncredit programs approved for FastForward must show evidence of how they stack to additional skills and credentials as part of a career pathway and are portable to multiple employers and regions.[118] To facilitate credential stacking and credit for prior learning for FastForward students, VCCS utilizes an advising portal that allows students to see how many credits a particular FastForward credential would confer.[119] Information on how much progress

IMPLEMENTING A QUALITY FRAMEWORK TO EXPAND STATE FINANCIAL AID TO QUALITY NON-DEGREE CREDENTIALS IN MINNESOTA

The Minnesota Office of Higher Education, Minnesota Department of Employment and Economic Development, and Minnesota State Colleges and Universities have been working together, with other state stakeholders and NSC, to advance a financial aid use case for a newly developed quality assurance rubric for both degrees and NDCs. This rubric, developed by the Minnesota P-20 Education Partnership Credentials of Value work group and advanced, in part, through NSC's 2022-23 Quality Postsecondary Credential Policy Academy, outlined key criteria for credentials, programs, and providers to be designated as high quality.[113] With the completion of the rubric, the Minnesota state team, led by the Minnesota Office of Higher Education (OHE) and Minnesota State Colleges and Universities (MinnState), are working to implement it through a variety of use cases, including through its application to the Minnesota State Grant program, the state's largest need-based financial aid program.

Currently, many students pursuing noncredit and very short-term education and training (less than 300 clock hours or eight weeks) are not eligible for this state financial aid program.[114] Using the rubric, non-Title IV providers and programs that are currently ineligible for the Minnesota State Grant Program would be approved for participation based on meeting a set of to-be-determined thresholds aligned with the state's quality rubric, which outlines metrics separately for credentials, programs, and providers.

Next steps for OHE and the other members of the P-20 Education Partnership Credentials of Value work group will be to gather data to inform the development of appropriate quality thresholds and enable sustained assessments according to the quality rubric, for which OHE has received a federal grant to support. In addition, they will work to determine whether additional criteria are needed, work with programs/providers to identify barriers and meet the thresholds, and propose a legislative rule change for enactment, including a funding request to support implementation and administration.

an individual student has made towards an associate degree, for example, if they were to convert their noncredit learning to credit, can be tracked using the portal and used by advisors to talk with students about additional educational opportunities, credit for prior learning, and financial aid.

Similarly, G3 requires eligible programs, including those that are non-degree and/or noncredit, to have a clear pathway to an associate degree.[120] Community colleges submit programs in the targeted sectors that are part of stackable pathways to the Virginia State Board for Community Colleges for approval. Some programs may overlap with those that are eligible for FastForward, in which case they meet both the FastForward quality criteria and requirements for G3, including alignment and articulation to a credit-bearing pathway.[121] In addition, VCCS structures G3 eligible programs so that students can start with non-degree career and technical education and training that stack up to an associate degree, which would be completed in the second year.[122]

- **WASHINGTON:** Washington's Opportunity Grant requires programs to provide evidence that they are on an identified educational pathway linked to a career pathway.[123] The grant program is regularly used in tandem with Washington's I-BEST model.[124] The Basic Education for Adults Department intentionally coupled the grant application process to be inclusive of the Opportunity Grant program's high demand and high wage criteria to increase pathways for students. The community and technical colleges have the ability to submit a pathway program, short-term or certificate, for I-BEST approval which will then initiate screening for Opportunity Grant approval, in an effort to support the most students through both programs to help ensure their attainment and entry into a good job.[125] Program proposals must include evidence of its being on a defined pathway, starting with adult basic education through a one-year certificate or higher, with information on how each level of attainment prepares the student for the next educational level and including a diagram that illustrates the pathway.

Systems and Practices to Help States Understand the Impact of Financial Aid for Non-Degree Credentials

Data are essential to understanding the reach and outcomes of financial aid programs to ensure they are leading to greater equity in credential attainment and labor market outcomes for students, advancing progress towards state postsecondary attainment goals, and effectively responding to employers' workforce needs. Data are also necessary for developing and implementing quality

assurance frameworks that can inform how states structure financial aid programs supporting NDCs to ensure they invest funds in credentials, programs, and pathways that meet their policy goals and result in positive and equitable outcomes for students.

Many states, including some included in this report, are working to improve their data collection, systems, and infrastructure to better understand students who pursue and earn NDCs and their educational and labor market outcomes over time, particularly for noncredit education, where there are big gaps in existing data. The Education and Employment Research Center at Rutgers University's School of Management and Labor Relations has been particularly engaged in documenting the characteristics of noncredit education and training, reviewing evidence connected to noncredit program outcomes and NDC quality, and providing technical assistance to community college systems and states—including in Iowa, Louisiana, and Virginia—to help them improve noncredit data collection and reporting.[126] Some of this work is reflected in NSC's review of states' efforts to understand state financial aid impact and outcomes below.

State Financial Aid Data Collection and Disaggregation

All states have some ability to track and report on programs where students earn NDCs, particularly those which are eligible to receive funds from WIOA and those that are Title IV eligible.[127] Yet capacity, infrastructure, and collection vary widely and NDCs produced through completion of a community college short-term program may or may not be tracked, depending largely on whether programs are offered for academic credit.

For many states, data practices connected to non-degree programs that lead to NDCs have been developed and refined in response to the establishment of a state financial aid program which requires reporting from participating institutions and relevant state agencies. In some cases, data practices that inform reporting on state financial aid for NDCs pre-existed those aid programs but enhance states' ability to understand and track the outcomes of those investments. Other states' data collection, analysis, and reporting, at least public reporting, related to the recipients of state financial aid for NDCs and their educational and labor market outcomes are not as robust and represent a growth edge for their ability to understand whether those programs are achieving intended goals and serving students effectively.

Data are necessary for developing and implementing quality assurance frameworks that can inform how states structure financial aid programs supporting non-degree credentials to ensure they invest funds in credentials, programs, and pathways that meet their policy goals and result in positive and equitable outcomes for students.

- **IOWA:** The Iowa Department of Education has collected data on noncredit courses, programs, and students since 1999.[128] The state tracks students from noncredit programs under the Gap Tuition Assistance Program to credit-bearing pathways, if they pursue them, and follows them for five years post program completion. Data can be disaggregated by race/ethnicity, gender, age, previous educational attainment, and other characteristics, regardless of credit- or noncredit status. The state also matches data to wage records to allow them to report on quarterly median wages before, during, and after enrollment. The Department reports on the Gap Tuition Assistance Program annually to the legislature and provides information to the public via the Iowa Student Outcomes website and dashboard.[129]

- **LOUISIANA:** In 2020, LCTCS began to integrate noncredit data into its main student information system.[130] This integration is intended to, among other things, create a shared pool of student data for recruiting and eligibility for financial aid; remove siloes in data collection and reporting across departments; and improve and streamline the use of data to inform decision making. This work has been important for the state's goal to track and report on M.J. Foster Promise Program recipients' credential attainment and earnings, as required by legislation. The integrated data system will also ultimately allow for more detailed reporting on student outcomes such as credit awarded for prior learning, transition from noncredit to credit, and completion rates.[131]

- **VIRGINIA:** The codification of the FastForward program in 2016 sharpened Virginia's focus on noncredit data collection and quality, given the reporting requirements attached to grant funds for participating community college programs. Community colleges must provide documentation of FastForward-eligible noncredit programming and students to SCHEV via VCCS. Data collected and reported are similar to credit-bearing program reviews, including having to produce labor market information for particular credentials.[132] G3 data are collected regularly through standard student level collections conducted by SCHEV.[133]

IMPROVING DATA AND AWARENESS RELATED TO THE ARKANSAS WORKFORCE CHALLENGE SCHOLARSHIP

Created via legislation in 2017 and funded through lottery revenue, the Arkansas Workforce Challenge (AWC) Scholarship provides financial support for students enrolled in both credit-bearing and noncredit programs in health care, information technology, and manufacturing (or "industry").[134] Programs must be offered by public or private, nonprofit institutions in Arkansas that are eligible to receive Title IV federal funds.[135] The scholarship has almost no student eligibility requirements other than enrollment in an approved program, which are identified and published online annually by the Arkansas Division of Higher Education (ADHE).[136] Students can apply for the scholarship through a rolling application that is open year-round. Scholarship recipients may apply for and receive additional rounds of support if they successfully complete the program for which they originally received the award. Awards cover program tuition, fees, books, and equipment, up to a maximum of $800.[137]

ADHE, ARData, Arkansas Community Colleges (ACC), and individual community colleges are working together to improve data describing students who receive the AWC scholarship, particularly those pursuing eligible noncredit programs. In the summer of 2023, ADHE and ACC convened a set of college workforce and institutional research leaders to discuss noncredit data collection and infrastructure needs and goals, before fielding a survey of community college noncredit data collection practices. Ultimately, the state aims to gain a clearer, data-informed understanding of noncredit AWC recipients and their post-completion outcomes. Once better data are available, efforts will be made to increase the scholarship award amount to better meet the financial needs of students pursuing eligible NDC programs.

This goal of improving the collection and management of noncredit student data is aligned with the state's goal of expanding the State Longitudinal Data System to include noncredit and other nontraditional postsecondary education data, so that all postsecondary pathways are represented, and to enable greater research and consumer data access via publishing to a credential registry.

Using Data to Inform Decision Making

As states invest in financial aid and program development related to NDCs, they are also thinking about how to use data connected to those programs and investments. In particular, getting the right data and information into the hands of prospective students, state policy and agency leaders, education providers, and employers represents a central concern. These data are essential to inform whether financial aid and other policies supporting equitable NDC attainment across groups of students, industries, regions, and other forms of equity, and whether and how they are producing outcomes that are meeting key state priorities. In addition, people who are interested in pursuing NDCs to gain skills and become competitive for quality jobs need information on which programs and credentials will reliably help them achieve their education and career goals.

- **IOWA:** Colleges use outcomes data related to students' performance in Gap-eligible programs to identify completion and employment gaps and work with educators to review curriculum, employer needs, and other factors to make sure students are set up for success in the labor market upon graduation.[138] Separately, the Iowa Student Outcomes dashboards compile all public-facing noncredit and credit data together in one place.[139] The website allows people to view noncredit enrollment across different categories over twenty years, pre-, during, and post- program employment, median wage outcomes, continued enrollment in credit-bearing programs, and other key information.

- **VIRGINIA:** VCCS is leveraging data connected to FastForward programs and students to understand patterns and outcomes related to students' economic mobility, with a strategic goal of increasing the share of graduates who achieve upward mobility to fifty percent by 2027.[140] VCCS, for example, matches UI records with student outcomes data for FastForward recipients to see trends and equity gaps tied to race, ethnicity, and gender, including whether these students are securing jobs post-completion. With this information in mind, VCCS works closely with industry partners and employs career counselors to identify skills needed for open jobs and the wages associated with credentials offered, to ensure students' expectations are realistic and to steer the programs offered by institutions towards high-wage opportunities. VCCS is paying particular attention to how institutions can help students of color make decisions about credentials and employment, so that they are pursuing pathways that lead to high-paying careers.[141] In addition, Virginia's Office of Education Economics (VOEE) is working to develop and refine multiple dashboards and datasets that can inform decision making related to non-degree credentials and talent development, using data pulled from FastForward-eligible noncredit programs.[142]

Affordable pathways for people to earn quality non-degree credentials that enable them to equitably advance their educational and career goals are an important component of an accessible postsecondary system that effectively helps all people thrive.

CONSIDERATIONS FOR DESIGNING STATE FINANCIAL AID TOWARDS QUALITY NON-DEGREE CREDENTIALS

To promote an inclusive economy—one where workers and businesses most impacted by economic shifts, as well as workers who face structural barriers of discrimination or lack of opportunity, are empowered to equitably participate and benefit—we must establish policies that promote accessible and equitable education and skills attainment. Affordable pathways for people to earn QNDCs that enable them to equitably advance their educational and career goals are an important component of an accessible postsecondary system that effectively helps all people thrive. As states consider new avenues to invest in the skill attainment of their residents, policymakers should consider some of the lessons from and choices illustrated by existing state financial aid programs that support students' pursuit of QNDCs. They should clearly articulate their goals connected to state NDC financial aid, define what success will look like and how program administration, resources, and data will contribute, and establish systems for measuring and transparently reporting on progress towards achieving those goals. The following considerations are aimed at helping states center students and workers who can benefit from QNDC attainment, especially those new majority learners which are often not served effectively by traditional higher education models, in program goals and design so that learners, employers, and states themselves can benefit.

1. **Learn about the students who are already pursuing the non-degree programs and credentials in which a state intends to invest through financial aid to determine whether and which student eligibility requirements are—or are not—necessary for reaching the students a state wants to support.** States should look at available data and conduct qualitative inquiries to better understand the students enrolling in NDC programs. NDC students are likely to already be working adults, parents, people with low incomes, first-generation college students or first-time college goers, and people whose highest level of prior educational attainment is high school or the equivalent.[143] Eligibility requirements, such as those based on income, age, or prior educational attainment may lower the cost to operate the program. However, those restrictions may also increase the barriers people face to accessing and benefiting from financial aid programs intended to support them. Other potential barriers related to financial aid program design and implementation for NDC students may include first-come, first-serve access, enrollment intensity requirements, and restrictions around satisfactory academic progress, all of which can disadvantage adult students and other new majority learners.

2. **States should build inclusive financial aid programs that reach groups who may particularly benefit from affordable and accessible high quality short-term credentialing opportunities**. Groups who face particularly high barriers to postsecondary access and affordability—such as immigrants and students who are or were incarcerated, as well as other new majority learners—may stand to disproportionately benefit from flexible, fast, and affordable pathways to quality credentials that lead to good jobs. These students are less likely to be eligible for other sources of financial aid, many do not hold any postsecondary credentials, and they are likely to experience economic insecurity.[144] Short-term QNDC opportunities, supported by state financial aid, could accelerate their ability to get good jobs and increase their chances for achieving economic mobility—especially if programs require alignment with easily accessible pathways for further education. Quality assurance, however, is essential to ensure these students are not tracked into programs that lead to poor quality credentials and to jobs without advancement opportunities.

3. **States should design NDC financial aid to cover all or most of the cost of attendance of eligible short-term programs (to the extent possible according to available funds).** While the rise of college promise programs has met mixed reviews at times, the perception of universal access to an education or training program has helped create an awareness of affordability that has driven an increase in enrollments.[145] At the same time, many promise programs are last dollar, meaning they supplement other forms of aid when available, and target tuition expenses alone, without addressing other costs of attendance. Students pursuing NDCs are not unique; they too have non-tuition costs related to housing, transportation, child care, and other expenses that can affect their ability to pursue and complete postsecondary programs. Designing aid programs that are first dollar, middle dollar, or which offer additional pathways to financial assistance for non-tuition costs, can support access, retention, and completion among NDC students who may have financial and non-financial needs that could affect enrollment and persistence.

4. **Use assessments of program quality and student outcomes connected to NDC financial aid programs to ensure state investments improve student wellbeing, meet employers' needs, align with quality job opportunities, and advance state priorities.** NDC financial aid programs informed by quality criteria should account for the outcomes of students who enroll in them as well as by the changing nature of both short-term program offerings and the demand for and projected growth of occupations on a statewide and regional/local level. Key considerations for program eligibility should include completion rates (including whether the program is successfully serving diverse populations), whether completers are able to attain desired credentials and jobs aligned with the credential they earned, and students' employment and earnings outcomes in the years following program completion. Continuous feedback loops that include colleges and employers, alongside the use of rigorous and dynamic data collection, evaluation, and reporting, are also necessary to ensure program eligibility keeps up with a constantly evolving program and economic landscape.

5. **States should integrate support for key access and attainment strategies that are known to increase equity in educational enrollment and completion into the design of financial aid programs supporting NDCs**. Financial aid that supports NDC students' ability to establish basic needs security and to navigate life circumstances, college systems, and career decision making is essential for building equitable and inclusive postsecondary opportunities. Providing funds directly to students to cover non-tuition expenses is one way to do this. Another way is to build in resources for community colleges to enable them to expand and sustain their provision of student services, including holistic supports like career and academic coaching, public benefits navigation, and support accessing child care, food, transportation, and housing. Both would be a significant investment in achieving key state credential attainment, equity, and workforce goals.

6. **States that support noncredit enrollment through financial aid should create accessible opportunities for students to continue their education and gain access to holistic supports as a part of program design**. Alignment of noncredit education with credit-bearing educational pathways, including easily accessible and understandable processes for transferring from noncredit to credit, should be integrated into policy design that is co-developed with community colleges. In addition, states should invest greater attention to and financing for colleges to provide holistic support access for students enrolled in noncredit workforce education and training.

7. **States should consider the data collection, systems, and infrastructure capacity at community colleges (and any other eligible providers), as well as at the state level—and provide appropriate resources for capacity building—especially when crafting a financial aid program that will provide aid to students enrolling in noncredit programs**. Most states do not systematically collect data on noncredit programming and student outcomes. Financial aid programs that fund students in these programs can be an impetus to develop—and should provide resources to support and maintain—more sophisticated data systems that allow colleges and states to better understand the noncredit landscape and invest in credentials that lead to strong outcomes.

8. **States should direct NDC financial aid towards programs and credentials that reliably lead to quality jobs and equitable career pathways, as part of efforts to establish an inclusive economy.** Quality jobs seek diversity in recruitment and hiring, provide good wages and benefits, ensure a safe, fair, healthy, and accessible workplace with a predictable schedule, provide opportunities to build skills and advance within a career, ensure that workers have a meaningful voice, and foster diversity, equity and inclusion so that all workers feel respected and empowered. States should consider integrating quality metrics for jobs associated with NDCs eligible for financial aid. While there may be limitations on available data, such metrics could include earnings, including whether earnings are equitable across groups, access to benefits, predictability and availability of work hours, and opportunity for growth and advancement.

APPENDIX. METHODS

This report is informed by a national policy scan of state financial aid programs that support short-term NDCs, a review of literature describing effective practices for student financial aid design and equity, and a review of available research describing noncredit programs and students.

In addition, nine interviews with representatives from each state featured in this report, and one state site visit (Virginia), informed NSC's description and analysis of the six programs described. NSC also reviewed relevant state websites, published state documents, and information shared via email by interviewees. The six state financial aid programs were chosen to spotlight how they integrate considerations of student eligibility, equity, and quality standards, use data to inform policy and programming, extend aid to students in noncredit programs and pathways, and support students' non-tuition needs. Representatives interviewed for this report were given the opportunity to review, provide feedback on, and approve content about their state's financial aid program prior to publication.

Finally, the report draws from NSC's technical assistance, landscape analysis research, and peer learning sessions provided to state teams from Arkansas, Michigan, and Minnesota for the 2022-2023 Expanding State Financial Aid for Quality Non-Degree Credentials Initiative, as well as its past work with states on quality assurance for NDCs.

State representatives engaged for this report include:

ARKANSAS

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