

San Diego and Imperial Counties Community Colleges Regional Consortium

REGIONAL EARLY COLLEGE CREDIT DEFINITIONS

Phase I of regional initiative to strengthen K-14 early college credit opportunities for career pathway completion

Focus & Intent

The Community Colleges of the San Diego Imperial Counties (SDIC) are interested in strengthening early college credit (ECC) opportunities for career pathway completion. Establishing regionally agreed-upon definitions related to early college credit will help bridge gaps across K-14 career pathways and create consistency for K-12, Adult School, noncredit education, and community college practitioners.

Impact

In endorsing the enclosed definitions, SDIC Community Colleges will adjust internal language to align to these regional definitions. Regionally endorsed definitions will be distributed to K-12, Adult School, and Noncredit Education partners. Regional student-centered materials for counselors, parents, and students will be created based on these definitions and made available to K-14 partners.

Regionally endorsed definitions solely provide baseline, agreed upon, common vocabulary and do not equate to regional practices or consistent implementation. Each SDIC Community College may have their own, unique implementation methodologies, strategies, and requirements for early college credit.

Priority Early College Credit Definitions for Career Pathway Completion:

While there are a variety of ECC opportunities available to high school, Adult School, and noncredit education students the following three (3) opportunities are of particular interest to the SDIC Community Colleges for increasing career pathway completion and closing equity gaps within career pathways and completions (pages 3 – 8):

1. Dual Enrollment (CCAP, Non-CCAP, SB554 – Dual enrollment for adult education)
2. Concurrent Enrollment
3. Articulation Credit by Exam

Other forms of Early College Credit:

Consistent terminology across the SDIC Community Colleges for additional forms of ECC will support consistency and increased clarity for K-12, Adult School, and noncredit education partners, students, and parents. Regionally endorsed definitions for the following three (3) additional forms of ECC are included (pages 9 – 11):

1. Advanced Placement (AP)
2. International Baccalaureate (IB)
3. College Level Examination Program (CLEP)

Implementation Terms

Regionally endorsed definitions for common early college credit (ECC) opportunities further supports clarity and consistency for K-14 partners. For that reason, the following thirteen (13) implementation terms are included (pages 11 – 13):

1. Apportionment
2. College/Career Readiness Indicator
3. Course Outline of Record (COR)
4. Credit for Prior Learning (CPL)
5. CTE Transitions
6. Instructional Service Agreement (ISA)
7. Memorandum of Understanding (MOU)
8. Perkins
9. Regional Occupational Centers and Programs (ROC/P)
10. Special Admit Students
11. Special Part-Time, Special Full-Time Students
12. Transcribed Credit
13. Vocational TOP Codes

Phase II

The San Diego Imperial County Regional Consortium is committed to supporting K-12, Adult School, noncredit education, and community college practitioners in working together to build meaningful early college credit opportunities for career pathway completion. Beyond establishing common terminology through regionally endorsed definitions (a critical first step), the regional consortium will help increase transparency of college-specific early college credit processes and facilitate opportunities for K-14 partners to collaboratively address issues identified by stakeholder feedback, explore promising practices, and strengthen student outcomes.

EARLY COLLEGE CREDIT (ECC) DEFINITIONS

PRIORITY ECC OPPORTUNITIES FOR CAREER PATHWAY COMPLETIONS

1. Dual Enrollment
2. Concurrent Enrollment
3. Articulation Credit by Exam

Dual Enrollment

The term dual enrollment is used when high school, Adult School, and noncredit students are enrolled in their institutions and in community college credit-bearing courses. At the college, these students are known as “special part-time” or “special full-time” students. Dual enrollment is sometimes used synonymously with concurrent enrollment, but they are different. *Dual enrollment involves college courses scheduled for and made up of high school (or Adult School) students whereas concurrent enrollment involves students acting individually to apply to take college courses at college.* Dual enrollment includes dual enrollment through College and Career Access Pathways (CCAP) Partnership Agreements, non-CCAP dual enrollment, and SB 554, the legislation enabling dual enrollment for Adult School and noncredit students. Details and distinctions are below.

Dual Enrollment through College and Career Access Pathways (CCAP) Partnership Agreements.

Purpose. Dual enrollment through CCAP partnership agreements is intended to offer or expand dual enrollment opportunities to prepare students to be college ready and to extend support to disproportionately impacted students in higher education.

The language used in [AB 288](#), the legislation authorizing CCAP partnerships, states that these agreements are “for students who may not already be college bound or who are underrepresented in higher education, with the goal of developing seamless pathways from high school, including continuation high school, to community college for career technical education or preparation for transfer, improving high school graduation rates, or helping high school pupils achieve college and career readiness.”

Key Components. Authorized by [AB 288](#), dual enrollment through CCAP requires a CCAP partnership agreement or contract between a community college district and K-12 school district. According to the CCCCO’s Dual Enrollment and Assembly Bill 288 (CCAP) [Legal Opinion 16-02](#) (see p. 9, II. CCAP Track, Section F), colleges are advised to use the title “College and Career Access Pathways (CCAP) Partnership Agreement.” These agreements should document student eligibility criteria, the institutional allocation of instructional time, and information sharing protocols. Other required contents of CCAP Partnership Agreements are identified in the law and in guidelines, such as the August 2020 [update to AB 288--Chancellor’s Office Memorandum](#).

The governing board of each district in the CCAP partnership agreement must present the agreement as an informational item at an open public meeting of that board prior to adopting it.

Courses are usually held at the high school campus as part of the regular day, although this varies by college. Students receive high school and college credit for the course. Students participating in a CCAP partnership agreement may enroll in up to [a maximum of 15 units per term](#). [Tuition and textbooks are free to students](#).

[Courses can be taught](#) by either high school or community college instructors—but if taught by a high school teacher, they must meet California Community College minimum qualifications. High school teachers may not displace college instructors and college instructors may not displace high school teachers.

Developmental math or English are allowed [under certain circumstances](#) (e.g., to juniors or seniors).

How Students Receive College Credit. Students must have a current college application and dual enrollment permit on file and be enrolled in the college course. All grades earned become part of a permanent college transcript and record. Each college defines its own course enrollment processes.

Dual Enrollment (Non-CCAP).

Purpose. Dual enrollment existed prior to AB 288, and schools and colleges can partner to serve non-AB 288 students through non-CCAP dual enrollment. Non-CCAP dual enrollment courses are not restricted to students meeting the AB 288 requirements. In contrast to CCAP dual enrollment, [the goal of non-CCAP dual enrollment](#) is to provide advanced scholastic and vocational training to students who are determined to be ready to undertake college credit coursework.

Key Components. Non-CCAP dual enrollment courses, like CCAP dual enrollment courses, require legal agreements between educational partners. These agreements may be special admit student agreements, MOUs, Instructional Service Agreements (ISA, see below), or other types of official agreements between participating partners. These agreements may be created at the school-to-school or district-to-district level. To avoid confusion between the types of agreements, non-CCAP agreements may be referred to as “Agreements,” “MOUs,” or “ISAs,” while CCAP agreements must be referred to as “CCAP Partnership Agreements.”

Existing non-CCAP agreements require students (called “special admit” students in the community colleges) be determined or affirmed as ready to undertake degree-applicable credit coursework as a precondition for admission to a community college. This “readiness” is determined by the submission of a form that must be signed by the student, their parent or guardian, and the school principal or their designee. Each

college's form may be slightly different. Some colleges also include student expectations and/or responsibilities on this form.

Courses may be held at the high school campus during agreed-upon school hours. Students receive both high school and college credit for the course. Tuition is free, but other fees may apply. Students have access to an abundant selection of courses that is not limited by their pathway. Because they are considered college students, students have access to college counselors and all their resources, as well as career services and health services.

How Students Receive College Credit. Students must have a current college application and dual enrollment permit on file and be enrolled in the college course. All grades earned become part of a permanent college transcript and record. Each college determines the course enrollment process.

SB 554 Dual Enrollment for Adult Education.

Purpose. SB 554 enables dual enrollment for Adult School and noncredit students, allowing them to benefit from the same accelerated transition to postsecondary education opportunities that are available to high school students.

SB 554 is new as of 2019. Colleges may not yet have fully developed systems to implement SB 554. The CCCCO released a [memo in August 2020](#) with basic guidance on implementation.

Key Components. SB 554 authorizes the governing board of a school district overseeing an adult education program (or the governing board of a community college district overseeing a noncredit program) to allow students who are pursuing a high school diploma or equivalency certificate to enroll as special part-time students at a community college.

The community college is reimbursed through the apportionment process, provided that no other school district is receiving reimbursement for the same instructional activity. Tuition for students is free, but other fees may apply.

Because they are considered college students, students have access to college counselors and all their resources, as well as career services and health services.

There is an 11-credit limit per semester, and Adult School and noncredit students may not displace regularly admitted community college students.

How Students Receive College Credit. Students must have a current college application and dual enrollment permit on file and be enrolled in the college course. All grades earned become part of a permanent college transcript and record. Each college defines its own course enrollment process.

Concurrent Enrollment

The term concurrent enrollment is used when high school and Adult School students are enrolled in their institutions and in community college credit-bearing courses. At the college, these students are known as “special admit” students (see below). Concurrent enrollment is sometimes used synonymously with dual enrollment, but they are different. *Concurrent enrollment involves students acting individually to apply to take college courses at college (with or without high school credit), whereas dual enrollment involves college courses scheduled for and made up of high school (or Adult School) students.* Concurrent enrollment allows high school students to enroll in postsecondary courses — for postsecondary credit. Some high schools, but not all, provide high school credit as well.

Purpose. Concurrent enrollment allows high school and Adult School students to accelerate their education by enrolling in college-level courses for college credit prior to high school graduation. It is also used to provide content not available at the high school or Adult School.

Key Components. A high school student can enroll in courses offered at the local college (with parental and principal permission) by completing the normal college application, admissions, and exam requirements prior to enrollment. Students have access to an abundant selection of courses and are not limited by their pathway. Students are treated the same as all other enrolled college students, meaning they are responsible for all deadlines set by the college to enroll, drop, or withdraw. Students are financially responsible for all regular college fees and textbooks, although this varies by college.

Unlike dual enrollment, concurrent enrollment is a student-initiated process (there is no required agreement between institutions).

The college course is a regularly scheduled college class taught by college faculty at the college (online, onsite, or hybrid) and open to the public. Courses are scheduled following the college academic calendar and, therefore, may be held during the regular K-12 school day or after school. K-12 students need to check the scheduled days and times to avoid conflict with their high school class schedule. Unlike dual enrollment, non-high school and non-Adult School students will be enrolled in the course.

When tied to a Memorandum of Understanding (MOU), however, concurrent enrollment opportunities may be part of high school career pathways and involve the college “holding” seats within certain courses to ensure high school students are able to enroll in the college course, most often for the goal of completing a certificate prior to high school graduation. When offered through an MOU, additional partnership opportunities may be included (including waiving of fees, special activities, etc.).

How Students Receive College Credit. Upon completion of any supplemental documentation and/or applications (details vary across colleges), students receive a grade which is transcribed like that of any college student. All grades earned become part of a permanent college transcript and record. Depending on the high school, students might receive high school credit

in addition to college credit for successfully completing the course. College credit may transfer to colleges and universities (dependent on receiving college's policies and preferences).

Articulation Credit by Exam (K-12/Adult Education)

Articulation credit by exam is a course alignment process between K-12, Adult School, or noncredit career and technical education (CTE) classes and college career education (CE) courses. Articulation credit by exam is designed to provide students with a nonduplicative sequence of progressive achievement and the potential to earn college credit through credit by exam. Upon request, college faculty members evaluate the class content and objectives, and often the textbooks, equipment, or exams of high school, Adult School, and noncredit institution's classes against the college Course Outline of Record (COR) to determine whether the class meets requirements for college credit. The actual materials reviewed vary by college. Articulation credit by exam requires an agreement between the institutions and assures college faculty that students who demonstrate sufficient mastery of the student learning outcomes and course content, exhibited through the credit by exam process, can progress to the next level of postsecondary instruction.

Purpose. The goal of articulation credit by exam is to minimize or eliminate course repetition for students by coordinating policies and practices among segments of the education system and granting college credit where warranted thereby decreasing time to college degree or certificate completion.

Key Components. Articulation credit by exam courses are mostly vocational TOP-coded courses tied to college courses that are part of college career education degree or certificate programs. In K-12, Adult School, and noncredit institutions, articulated credit by exam courses are mostly CTE or vocational classes.

Articulation credit by exam requires a written articulation agreement that establishes the course-to-course equivalency with the postsecondary course. Conditions of the college credit and exam requirements are outlined in the agreement and determined through negotiation between institutions, with ultimate determination set by the college. Articulation agreements are valid for 2-3 years, depending on the institution; most colleges review the agreement annually. The development of articulation agreements provides valuable opportunities for college faculty to develop relationships with high school and Adult School career pathway programs. Outreach events and activities tied to agreements often increase the likelihood that students who receive college credit through the agreement will attend the college.

If the community college in the service area of a K-12 or Adult School does not have a program with which to articulate, the K-12 or Adult School district may partner with another community college that offers a better aligned program, with permission from the college within the service area.

Each postsecondary institution determines its own requirements for students to request credit. Some colleges require additional steps that support data sharing and student success tracking

such as creating a student account in CATEMA (Career and Technical Education Management Application – see implementation terms).

Articulated courses are taught on high school campuses, ROC/Ps (Regional Occupational Centers and Programs), Adult Schools, or in some cases, noncredit institutions, by the teachers who normally teach those courses. Because of the articulation credit by exam process and agreement, high school teachers are permitted to teach articulated courses without meeting California Community College minimum qualifications (contrast with dual enrollment).

How Students Receive College Credit. Articulation agreements feature a credit by examination process, by which high school students demonstrate proficiency in college-level studies by satisfactorily passing a final assessment approved and/or proctored by a discipline faculty member of the receiving community college (this varies by college). The inclusion of credit by exam enables the student to receive college credit, transcribed onto their official college transcript. Without the credit by exam component, articulation may only enable a student to waive a course requirement, rather than receive early college credit.

College credit for the comparable community college course named in the articulation agreement is documented on a student's college transcript (called "transcribing") - if the institutional agreement is in place and the student has met all additional process requirements. Additional process requirements vary by college. Students must have an active college application on file and a college student ID to receive credit. The college credit earned through articulation credit by exam is free. Not all articulated credits will be accepted at 4-year institutions; it depends on the individual community college and 4-year institutions.

- College grade requirements vary. For example, most, but not all, colleges require a B or higher in the course and on the approved final assessment in order to be eligible for college credit.
- College transcription policies and practices vary. For example, some colleges in the region transcript a P for Pass; others do not; some colleges in the region transcript the course grade; others transcript the grade earned on the final exam. The process of transcription is not automatic and can take time to complete following course completion; the exact timing varies by college.
- As of December 2020, Title 5 requires community colleges to ensure all students are given the opportunity to accept, decline, or appeal all college credit earned through credit for prior learning (which includes credit by exam). College practices for meeting this requirement vary. For example, some colleges required the completion of a student petition or opt-in form.

OTHER FORMS OF EARLY COLLEGE CREDIT (ECC):

Advanced Placement ([AP](#))

The Advanced Placement ([AP](#)) program is a form of early college credit created by the College Board to expand access to higher education by providing college-level courses and exams that students can take in high school.

Purpose. AP helps students prepare for a successful transition to college by experiencing “college-level work while they are still in high school—whether they are learning online or in the classroom. Through taking AP Exams, students can earn college credit and placement.”

Key Components. Teachers complete an authorization process that provides them with guidelines and requirements for teaching AP classes. AP class curricula and exams are then provided to teachers by the College Board, although teachers may submit their own syllabus for approval.

AP classes are held at the high school campus as part of the regular day. They are offered in most academic disciplines, ranging from Arts to World Languages. Classes taught by CTE-credentialed teachers such as computer science and environmental science are also included in AP offerings. Students take an exam at the end of the class to determine eligibility for college credit.

How Students Receive College Credit. Each postsecondary institution has its own AP policy that determines minimum AP exam scores required to earn credit for equivalent college courses. That information is found on the [AP website](#) as well as through postsecondary institutions’ own websites and college catalogs. Students should be counseled that college credit is not automatic at all institutions: in some cases, students may receive placement but not college credit.

As of spring 2021, each exam costs students \$95, though fee waivers for low-income students may be arranged by high schools or community-based institutions.

AP opportunities are provided solely at the high school level and not scheduled in partnership with community colleges.

At some high schools, students who take AP classes may receive an additional boost to their high school grade point average (GPA), since AP courses may be “weighted” and offer higher grade points compared to regular high school classes. Students should be counseled, however, that some colleges recalculate GPA including only certain AP class weights.

International Baccalaureate ([IB](#))

International Baccalaureate (IB) is a set of international education programs, two of which are designed for high school students: the Diploma Programme and the Career-related Programme.

Purpose. IB's [Diploma Programme](#) "was established to provide students with a balanced education, facilitate geographic and cultural mobility and to promote international understanding." The [Career-related Programme](#) combines the IB Diploma Programme courses with career-related studies, equipping students with future-ready skills and preparing them to "follow their career pathways, combining academic subjects with their own professional interests."

Key Components. High schools complete an authorization process that includes teacher professional development to deliver IB programs. Schools pay a fee to become an IB World School.

IB classes are held at the high school campus as part of the regular day. Diploma Programme students choose classes from the following subject groups: language and literature, language acquisition, individuals and societies, sciences, mathematics, and the arts. Career-related Programme students take Diploma Programme classes and career academy courses such as finance, hospitality, engineering, and healthcare. The IB core includes theory of knowledge element, a research essay element, and a creativity, activity, and service element, the latter of which puts to action their knowledge and research acquired in the first two elements. Students take an exam at the end of each Diploma Programme class to determine eligibility for college credit.

How Students Receive College Credit. Each postsecondary institution has its own IB policy that determines whether the full IB diploma and/or individual IB exams earn college credit. That information is found on the [IB website](#) as well as through postsecondary institutions' own websites and college catalogs. Students should be counseled that college credit is not automatic at all institutions: in some cases, students may receive placement but not college credit.

As of spring 2021, each IB exam costs students \$125.

As with AP, IB opportunities are provided solely at the high school level and not scheduled in partnership with community colleges.

At some high schools, students who take IB classes may receive an additional boost to their high school grade point average (GPA), since IB courses may be "weighted" and offer higher grade points compared to regular high school classes. Students should be counseled, however, that some colleges may recalculate GPA IB without those extra class weights.

College Level Examination Program ([CLEP](#))

[CLEP](#) is a collection of standardized tests created by the College Board that assesses students' knowledge in introductory college-level material for potential college credit.

Purpose. CLEP allows students to earn college credit based on prior knowledge, whether that knowledge came from advanced high school classes, independent reading and study, online courseware or textbooks, noncredit classes, or on-the-job training. CLEP exams were developed for adult students and military service members to save time and money while earning degrees, but now high school and college students take the exams as well.

Key Components. There is no coursework associated with CLEP; the exams function more like Credit for Prior Learning (CPL – see implementation terms). CLEP exams cover a wide range of disciplines, from Business and Finance to World Languages. Students register to take CLEP exams, either at a CLEP test center or online.

Each exam includes a fee, which is non-refundable. As of spring 2021, each exam costs students \$89. If students wish to take the test online, there is a \$30 remote proctoring fee. Some test centers charge an additional \$25 administration fee.

How Students Receive College Credit. Although CLEP exam scores are widely accepted for college credit, colleges and universities have varying policies on granting college credit or course exemption without credit. CLEP recommends students check university websites prior to taking the exams.

Some colleges do not grant credit for a CLEP exam if a student has already attempted a college-level course closely aligned with that exam.

IMPLEMENTATION TERMS

Apportionment. Apportionment is how funding is allocated in education. It is done differently in the K-12, noncredit, and community college systems, as described below:

ADA. ADA stands for “Average Daily Attendance” in the K-12 system. In grades 9-12, a minimum of 240 instructional minutes per day must be met for the district to claim ADA funding. It can be challenging to establish CCAP partnership agreements that hold classes during the regular school day because the high school cannot claim ADA for those students if the college is using the attendance to count towards their FTES (see below). However, [Ed Code Section 46146\(c\)](#) allows districts to claim $\frac{3}{4}$ of an ADA for each student who is enrolled as a special part-time student (see below) at a community college. Another option is to offer CCAP classes outside of the regular school day. A [Career Ladders Project interview](#) with an instructional time specialist in the California Department of Education provides more detailed explanations of how ADA is claimed under different enrollment scenarios.

Full-Time Equivalent Faculty (FTEF). FTEF stands for “Full-Time Equivalent Faculty,” the metric used by colleges to standardize faculty workload and calculate instructional cost. It is not the actual number of faculty members but based on a formula using standard course hours and teaching load.

Full-Time Equivalent Student (FTES). FTES stands for “Full-Time Equivalent Student,” the metric used by colleges to standardize student enrollment for allocating funding. It is not headcount or enrollment, but based on a formula using enrollment, contact hours, and term length. One FTES is calculated to be 525 contact hours in an academic year.

Positive Attendance Hours. Used by the noncredit system, [positive attendance hours](#) are based on the actual count of enrolled students present at each class meeting. This formula divides the total hours of attendance by the standard FTES (i.e., 525 contact hours).

Career and Technical Education Management Application (CATEMA). CATEMA is an online application and database used to award student credit through articulation credit by exam. It is the most common tool used in the state to manage articulation credit by exam agreement enrollments and student outcomes. High school teachers need a CATEMA account to enter student grades. Students need a CATEMA account in order to be in the system to receive college credit. Regionally, not all colleges use CATEMA.

College/Career Readiness Indicator. The College/Career Readiness Indicator (CCI) for the K-12 system establishes measures of college and career readiness that shows how well California high schools are preparing students for success after high school graduation. Several of the measures include early college credit (including AP exams, articulation credit by exam, concurrent enrollment, CCAP dual enrollment, and non-CCAP dual enrollment), thus incentivizing K-12 districts to develop college credit opportunities.

Course Outline of Record (COR). COR is the official district-level course outline for college and noncredit institution courses. A faculty syllabus is not the course outline of record. The format for CORs varies by district, but [by law must include](#): the number of credits or units available through the course, the length of the course in contact hours, prerequisites/ corequisites (if any), the catalog description, scope, objectives (e.g., Student Learning Outcomes), and content as determined by the discipline. The COR must also “specify types or provide examples of required reading and writing assignments, other outside-of-class assignments, instructional methodology, and methods of evaluation for determining whether the stated objectives have been met by students.” ([see page 5](#))

Credit for Prior Learning (CPL). CPL is an umbrella term used within the community college system that includes early college credit opportunities as well as credit for industry credentials, portfolios, regular credit by exam, and more. CPL primarily targets adult and military students, but it can benefit all students.

CTE Transitions. In many community colleges, CTE Transitions is the office that handles articulation credit by exam. These offices may have formerly been known as Tech Prep offices. The work of the CTE Transitions Coordinator typically involves facilitating the establishment of an articulation agreement and the maintenance of the articulation credit by exam process. Both names (CTE Transitions and Tech Prep) came from Perkins legislation (see below). As of 2019, the legislation no longer includes designated CTE Transitions or Tech Prep funds. However, many institutions continue to leverage Perkins dollars to support this work and continue to use the term CTE Transitions for their articulation credit by exam office.

Instructional Service Agreement (ISA). An ISA is an agreement between a community college and an outside organization, such as a K-12 district, to deliver college-level education or training. Instructional costs are often shared, and students may receive college credit.

Memorandum of Understanding (MOU). An MOU is an official agreement between agencies or districts that establishes the terms and conditions of the partnership.

Perkins Legislation. The Carl D. Perkins Act is the federal legislation that provides funding for career and technical education in K-12 and postsecondary education. There have been several reauthorizations since the first Act was signed in 1984. The latest reauthorization, the Strengthening Career and Technical Education for the 21st Century Act, was signed in 2018. It eliminated targeted funding for Tech Prep (or articulation credit by exam), although Perkins funds can still be used to support it.

Regional Occupational Centers and Programs (ROC/P). ROC/P centers provide high school students 16 years of age and older and adult students with career and technical education. Most ROC/Ps offer courses during the regular school day (with students sometimes bused to the centers), in the late afternoon and evening, and during the summer months.

Special Admit Students. “Special admit student” is the designation given to high school or other eligible students who enroll in community college credit-bearing courses.

Special Part-Time, Special Full-Time Students. Special part-time students and special full-time students are special admit students enrolled in dual enrollment programs at community colleges such as CCAP or SB 554.

Transcribed Credit. Transcribed credit is credit that has been posted to an official college transcript as the result of successfully completing a college course.

Vocational TOP Codes – The [California Community Colleges Taxonomy of Programs \(TOP\)](#) is a numeric coding system by which community colleges categorize degree and certificate programs and courses on the basis of similarities of their published goals and objectives. Many TOP codes are designated as vocational for accountability purposes under various federal and state vocational education mandates (e.g., Perkins, see above).