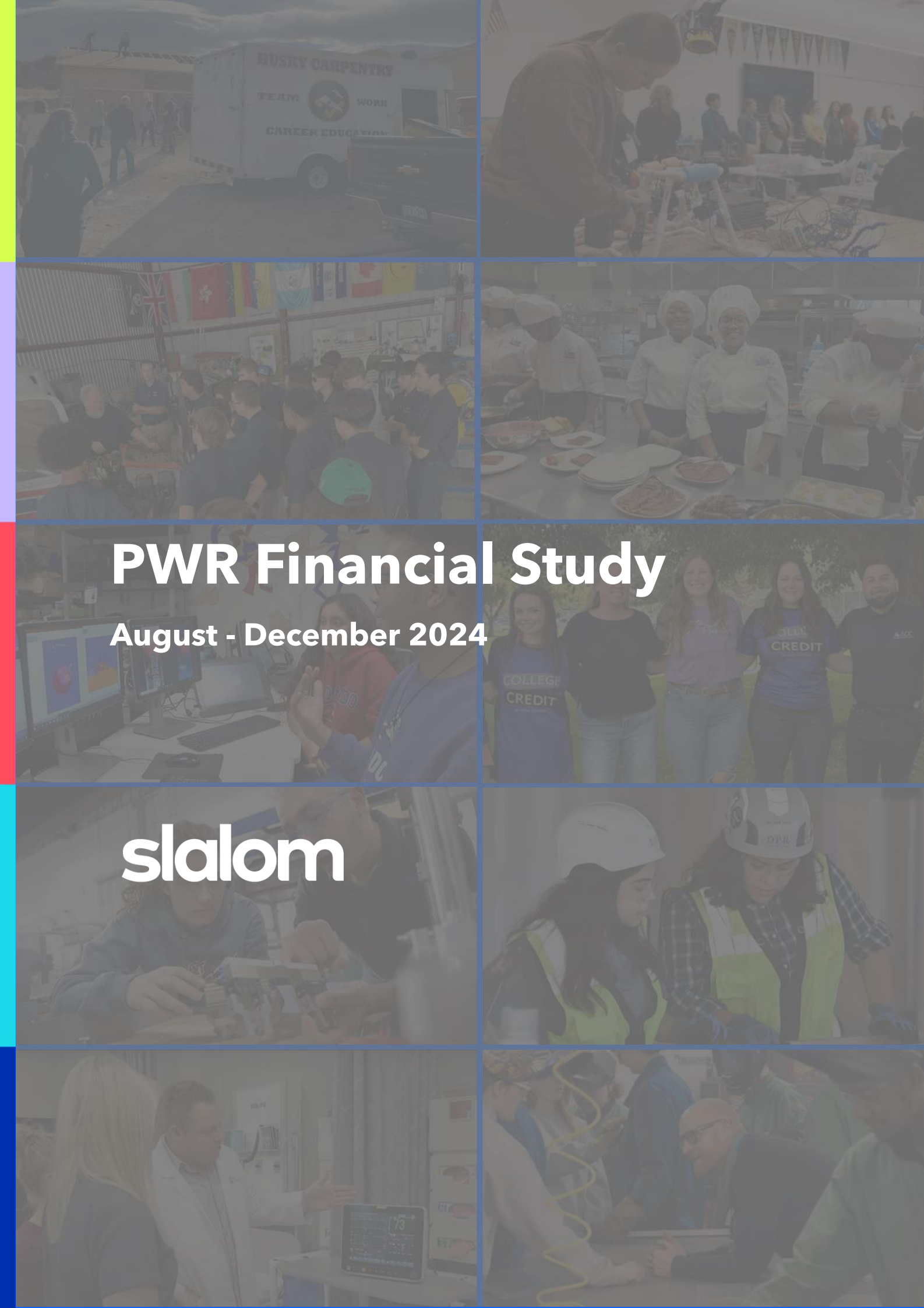

PWR Financial Study

August - December 2024

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Table of Contents

Executive Summary

The State of Colorado Department of Education (CDE) is dedicated to equipping all students for success beyond high school. Postsecondary and Workforce Readiness (PWR) and Career and Technical Education (CTE) programs have complexities in funding structures and administrative processes that present challenges impacting the effectiveness and equitable access.

This study explores these financial and administrative aspects, focusing on the programs that support students in achieving the "Big Three" PWR outcomes—Postsecondary Credit, Industry-Recognized Credentials, and Work-Based Learning (WBL). By providing comprehensive analysis from the perspective of Local Education Providers (LEPs), the study aims to build upon the findings of the 1215 Task Force and guide community collaborators towards enhancing Colorado's PWR initiatives for greater equity and impact.

Landscape from Local Education Providers' (LEPs) Perspective

LEPs are pivotal in implementing PWR programs that empower students to achieve the Big Three outcomes. Despite their critical role, LEPs face significant challenges that limit equitable and sustainable program delivery. Through extensive engagement with LEPs—including surveys, interviews, and workshops—and supported by quantitative data analysis such as funding and cost evaluations, this study identifies key systemic barriers affecting Colorado's PWR programming, as outlined below:

- **Inequitable Access to Programs Supporting the Big Three Outcomes**: Access to programs supporting the Big Three outcomes remains uneven, shaped by district resources and geographic location. Students in rural and remote districts participate in these programs at lower rates than their peers in urban and suburban areas, where larger student populations enable districts to benefit from economies of scale, and proximity to industry partners provides greater opportunities. Innovative collaboratives, consortiums, and partnerships have been established to support this challenge, but funding challenges remain across the State.
- **Administrative Workload Impacting Program Delivery**: LEPs with limited staffing face challenges in managing the administrative requirements of programs supporting Big Three outcomes. Successful program delivery relies on a team effort, with school counselors at the core, supported by teachers, academic advisors, and program coordinators. The ICAP framework serves as a critical tool for organizing and aligning these efforts, helping LEPs connect students to meaningful opportunities. Supporting LEPs in addressing these administrative demands is key to ensuring the success of PWR programs statewide.
- **Complex and Inefficient Funding Mechanisms**: The multitude of funding sources, each with its own requirements, leads to administrative inefficiencies. LEPs spend considerable time and resources navigating these complexities, detracting from their ability to focus on student support and program development.
- **Data Limitations Hindering Strategic Decision-Making**: The lack of detailed, student-level data limits the ability to fully assess program effectiveness and make informed policy decisions. Enhanced data tracking systems, like a State Longitudinal Data System (SLDS), are necessary to inform ongoing strategic resource allocation and improve program outcomes.

Recommendations for Prioritization

To address these challenges and enhance the effectiveness of PWR programs, this study proposes the following strategic initiatives:

1. **Create a Unified Big Three PWR Fund**
   Consolidate grants and incentives into a single funding source divided into an outcome-based Sustainability Fund and a two-pronged Start-up and Innovation Fund. Include administrative support from CDE and one-time funding for a Statewide ICAP System to streamline funding, reduce complexity, and ease administrative workload. This approach promotes equitable resource distribution, enabling LEPs to focus on delivering high-quality PWR programs.
2. **Establish a Dedicated Fund for Student Support Services**
   Create a categorical fund to enhance PWR, CTE, and ICAP support by funding school counselors, academic advisors, and career coaches. By reducing counselor-to-student ratios and providing training and administrative support, this fund will directly assist students in navigating programs and improving outcomes.
3. **Standardize Tuition Agreements for Concurrent Enrollment**
   Develop a unified Cooperative Agreement to set consistent tuition rates for Concurrent Enrollment programs, including online courses. This simplifies financial arrangements between LEPs and IHEs, reducing administrative burdens and promoting equitable access, particularly for rural and under-resourced districts.
4. **Adopt a Reimbursement Model for Extended-Year Programs**
   Transition 5th and 6th-year programs (e.g., ASCENT, P-TECH, TREP) to a reimbursement-based funding model. Aligning funding with actual expenses promotes fiscal responsibility and supports program sustainability, ensuring resources are efficiently allocated.
5. **Streamline Data Tracking through a Statewide ICAP System and SLDS**
   Leverage the SLDS and a Statewide ICAP System to track student outcomes related to the Big Three. Connecting data collection methods improves accuracy, reduces LEP reporting burdens, and enables data-driven policy decisions to enhance program effectiveness and equity.
6. **Reassess and Realign ASCENT**
   Evaluate ASCENT's alignment with its original intent of serving low-income, at-risk students or transition its objectives into broader funding initiatives. This realignment enhances equity, reduces administrative workload, and ensures resources are allocated effectively to underserved students.

The Big Three Analysis: A Deep Dive into Program Effectiveness

In addition to the six key recommendations above, this study provides an in-depth analysis of the current PWR programs that drive outcomes across the Big Three, examining their current state, challenges, and opportunities for improvement:

- **Postsecondary Credit Programs**: Identifies barriers to access, especially in rural areas, and highlights the need for standardized agreements to ensure equitable participation.
- **Industry-Recognized Credentials**: Discusses the disparity in availability and the financial challenges LEPs face in offering a diverse range of certifications, emphasizing the importance of targeted funding.
- **Work-Based Learning Opportunities**: Explores the critical role of industry partnerships and the obstacles in establishing these relationships in less-resourced LEPs, underscoring the need for supportive policies and incentives.

Guidance for Policy Priorities

The detailed findings and recommendations in this study highlight several key areas for policy focus:

- **Enhancing Equity in Access**: Consider policies that address geographic and resource disparities, ensuring that all students, regardless of their LEPs, have access to high-quality PWR programs.
- **Reducing Administrative Workload**: Support initiatives that streamline funding and reporting processes, allowing LEPs to allocate more time and resources directly to student support and program delivery.
- **Investing in Data Infrastructure**: Recognize the critical role of comprehensive data in evaluating program effectiveness and shaping informed policy decisions.
- **Fostering Collaboration**: Promote partnerships among LEPs, IHEs, industry, and state agencies to create cohesive networks that enhance program implementation and sustainability.

This study underscores the urgent need for strategic action to streamline and sustain Colorado's PWR programs. By focusing on the recommendations provided, policymakers have the opportunity to enact policies that will:

- **Empower LEPs**: Enable them to deliver PWR programs more effectively by reducing administrative workloads and providing equitable resources.
- **Advance Equity**: Ensure all students have the opportunity to participate in the Big Three programs, thereby enhancing their readiness for postsecondary education and the workforce.
- **Strengthen Colorado's Workforce**: By preparing students with the necessary skills and credentials, you contribute to a robust economy and a prosperous future for the state.

Engagement with the full study is encouraged, as it offers comprehensive insights and actionable strategies to transform Colorado's PWR programs. By prioritizing these initiatives, significant impacts can be made on the lives of Colorado's students, the effectiveness of educational institutions, and the vitality of the state's economy.

Introduction

Purpose and Scope of the Study

This PWR Financial Study evaluates the funding, costs, and impact of Colorado's key initiatives aimed at preparing students for success in both postsecondary education and the workforce. By examining the implementation of the programs driving outcomes across the "Big Three" - **Work-Based Learning, Industry Certifications,** and **Postsecondary Credit** —the study sheds light on how effectively related programs equip students with relevant outcomes. Through insights gathered from LEPs, collaborative partners, survey results, financial data, and legislative reviews, this study highlights funding challenges, assesses program efficacy, and identifies models to facilitate broader and more equitable access to these critical resources.

Background of Postsecondary Workforce Readiness Programs

Colorado's PWR programs aim to equip students with the skills, experience, and credentials necessary to succeed in postsecondary education and the workforce. The programs align with Colorado's educational and economic priorities by offering students hands-on learning experiences, postsecondary credit opportunities, and pathways to industry-recognized credentials. These programs are particularly valuable for first-generation college students, rural communities, and students pursuing non-traditional educational paths.

Study Objectives and Scope

This study assesses Colorado's PWR programs to identify key challenges, areas for improvement, and strategies to enhance student access and outcomes. By focusing on LEP feedback, funding models, and program structures, the study seeks to:

- Evaluate the current state of PWR programs, with a focus on equitable access.
- Analyze costs and administrative practices, especially in underserved LEPs.
- Develop recommendations for sustainable funding, streamlined processes, and stronger alignment with workforce demands.

LEP Engagement

Methodology Overview

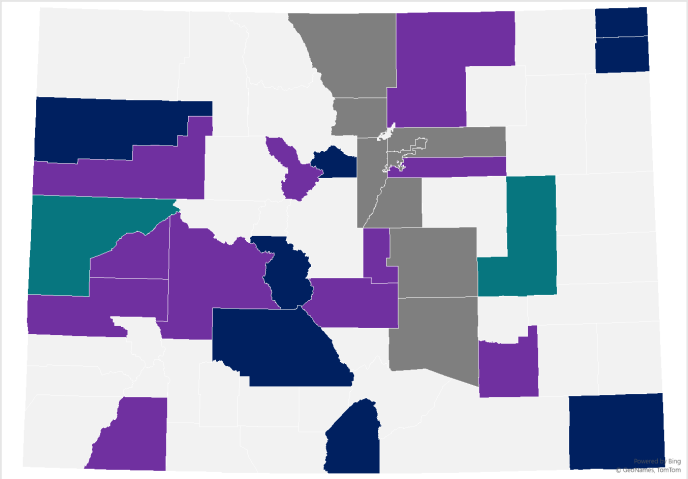
To gather a comprehensive understanding of the opportunities and challenges facing LEPs in implementing PWR programs, this study employed a human-centered design (HCD) approach, blending quantitative and qualitative data collection methods through surveys, in-depth interviews, and collaborative workshops.

The HCD approach ensured that the voices and experiences of LEPs were at the core of this financial study. By prioritizing empathy, ideation, and collaboration, this research aimed to understand and address the actual needs of the people, students and LEP staff —who are directly impacted by PWR programs. This approach informed both the structure of the data collection methods and the interpretation of results:

- **LEP Survey**: A 20-question survey gathered foundational data from 45 LEPs, capturing a broad range of perspectives on program offerings, funding, costs, and administrative challenges. This quantitative data highlighted overarching trends, such as barriers to program expansion and funding sustainability, across diverse LEP settings.
- **Interviews**: Following the survey, 21 LEPs engaged in one-on-one interviews designed to foster empathy by asking open-ended questions and actively listening to the specific needs, motivations, and frustrations of LEP staff. This qualitative phase provided deeper context and highlighted the "why" behind the survey data, uncovering the nuances of PWR implementation across varying LEP settings.
- **Workshops**: In alignment with HCD principles of ideation and collaboration, a series of workshops brought together 21 LEPs to review, refine, and provide real-time feedback on proposed recommendations. These sessions encouraged LEPs to think expansively about the possibilities for PWR programs and actively shaped the study's recommendations, ensuring they met the practical needs of LEPs across Colorado.

This human-centered approach provided a critical qualitative perspective, complementing quantitative findings on PWR program costs and funding with the real-life experiences of LEPs. By combining structured data with direct insights from LEP staff, this study offers a balanced, context-rich analysis that captures both the "what" of program costs and the "why" behind LEP decisions, challenges, and successes. It reveals the real-world context in which LEPs operate, highlighting their perspectives on funding sustainability, administrative complexities, and the importance of community partnerships, ultimately identifying recurring challenges and opportunities essential for shaping effective PWR strategies statewide.

The map below shows the counties that included LEP participants in the PWR Financial Study. NOTE: Colors represent the rural designation of the LEPs included in the study.



- Gray = Non-Rural
- Dark Blue = Small Rural
- Purple = Rural
- Teal = BOCES.

The detailed breakdown of the LEP Study participants' demographic and PWR program participation can be found in Appendix C: LEP Study Participant Analysis.

Data Limitations

This study combined qualitative insights from LEPs with district-level data on PWR program participation provided by the CDE, Colorado Dept of Higher Education (CDHE), and Colorado Community College System (CCCS), among others (for a complete list of sources see Appendix E - Data Sources and Methodology). While these sources offered valuable perspectives, limitations in data availability and granularity affected the depth of our analysis. Key challenges included:

- **Aggregated Data**: The district-level data provided was not disaggregated by student, making it difficult to assess demographics, enrollment patterns, and program outcomes comprehensively.
- **Concurrent Enrollment Specifics**: Data reflected only Full-Time Equivalent (FTE) students meeting eligibility under CCR 201-18 Rules for Administration of Concurrent Enrollment Program, excluding students counted as traditional in October counts who may have completed concurrent enrollment courses.
- **Data Delays**: Delays in accessing FY24-25 data due to ongoing procedural updates, including October count finalizations and updates to the long bill, impacted the availability of complete information during the study period.
- **District Level Insights Only**: Analysis focused on district and program participation rather than individual pupil participation, with limited insights into student-level access and outcomes.
- **Data Incident**: Constraints from a prior Colorado Department of Higher Education data incident further limited access to detailed concurrent enrollment data.

Despite these challenges, this study offers a timely snapshot of PWR program participation and funding distribution. Accurate, detailed, and sustainable data systems will be essential for future analyses to optimize funding, program design, and equitable access across Colorado's PWR landscape.

Document Structure

The study is structured as follows:

1. An overview of the Big Three and the experiences of LEPs implementing these programs.
2. Individual analyses of the Big Three providing detailed insights into their funding structures, administrative processes, costs, and equity considerations. These analyses highlight the specific challenges LEPs face and set the foundation for the recommendations aimed at streamlining and sustaining PWR initiatives.
3. Six recommendations to improve the PWR ecosystem and meet Big Three outcomes.
4. Appendices that support the entire study by offering additional resources and detailed information, with special attention given to the ASCENT Program Report. Additional appendices include a comprehensive Program Matrix, details on LEP Study Participants, summaries of Relevant Legislation, explanations of Data Sources and Methodologies, examples of Statewide Longitudinal Data System (SLDS) Use Cases, and an Updated Cooperative Agreement Template.

PWR Overview – the "Big Three"

In conversations with LEPs across Colorado, one message emerged clearly: LEPs seek a streamlined, more sustainable approach to implementing PWR programs. Aligned with the recommendations of the HB1215 Task Force, analysis in this study centers on "The Big Three" — **Postsecondary Credit, Industry-Recognized Credentials,** and **Work Based Learning** — as a framework to simplify and streamline PWR. Focused on outcomes, the Big Three equip students with essential postsecondary credits, certifications, and hands-on work based learning experiences, preparing them for success in postsecondary education and the workforce, and ultimately supporting their economic mobility.

- **Postsecondary Credit:** There are multiple avenues for students to earn postsecondary credit while in high school, including Advanced Placement (AP), International Baccalaureate (IB), and Concurrent Enrollment programs. AP and IB programs offer rigorous coursework and the opportunity to earn college credit by achieving qualifying scores on standardized exams. Concurrent Enrollment programs, established under the Concurrent Enrollment statute, allow students to simultaneously enroll in college courses while still in high school, earning both high school and college credits simultaneously. By lowering college costs and accelerating degree completion, all these programs are especially beneficial for low-income and first-generation higher education students.
- **Industry-Recognized Credentials:** Students achieve industry-recognized credentials by completing specialized coursework, passing assessments or exams, and earning certifications that validate their technical skills in high-demand fields. Through programs like CTE, Pathways in Technology Early College High Schools (P-TECH), Career Development Success Program (CDIP), and others, students earn certifications that enhance their employability in sectors such as healthcare, technology, and manufacturing, directly addressing workforce needs in Colorado and improving job prospects in their chosen industries.
- **Work Based Learning:** LEPs support students in achieving WBL outcomes by connecting them with hands-on career experiences, such as internships, apprenticeships, and structured on-the-job training. LEPs provide guidance, facilitate partnerships with local industries, and offer resources that enable students to gain practical skills in real-world settings. This experiential approach builds students' career awareness and strengthens their professional networks, especially benefiting those who plan to enter the workforce directly after high school or pursue careers that blend education with employment.

Individual Career and Academic Plan (ICAP) is a student-centered process, mandated under Colorado Revised Statutes, section 22-2-136, that LEPs use to guide learners in exploring career interests, academic pathways, and life goals. By fostering personalized planning and self-awareness, ICAP equips students with the tools to navigate their educational journeys and prepare for future success. This evolving, integrated process also aligns with the **Big Three outcomes**, connecting academic choices to meaningful postsecondary and career opportunities.

Research and feedback from several LEPs underscore the importance of starting ICAP processes in earlier grades, including elementary and, at minimum, middle school. Early implementation allows students to explore their strengths, interests, and aspirations, laying a strong foundation for focused planning in high school. These early efforts, supported by programs at younger grade levels, have

been shown to foster self-awareness, career readiness, and alignment with future opportunities, and are considered a best practice for helping students achieve their goals. ICAP supports students in connecting their academic choices to pathways such as higher education admissions, trade schools, gap years, apprenticeships, and military service, providing a structured and personalized framework for success.

ICAP helps advance critical goals for students and Colorado's economy. It improves student engagement and graduation rates by providing a clear sense of purpose and actionable plans. It enhances equity in postsecondary planning, ensuring that all students, regardless of background, have access to the resources and opportunities needed to pursue their goals. ICAP bridges academic and career planning, helping students understand how their decisions in school connect to long-term career opportunities. Additionally, ICAP supports Colorado's economic vitality by supplying talent pipeline data that educators use to design meaningful experiences, enabling students to envision their roles in the state's economic future.

LEPs fund ICAP through the use of PPR, adapting the framework and processes to best meet their local needs. The cost of planning, designing, delivering, and collecting data on ICAP statewide is part of the broader administrative effort that LEPs must navigate to achieve the best Big Three outcomes. Many LEPs have leveraged technology to streamline tracking and reporting, aligning PWR programs with ICAP processes. However, feedback indicates a need for additional tools, training, and actionable data to enhance decision-making and program alignment. A **statewide ICAP system** could provide standardized tools and resources, reducing administrative workload and supporting equitable access for all students, empowering them to achieve their academic, career, and personal aspirations.

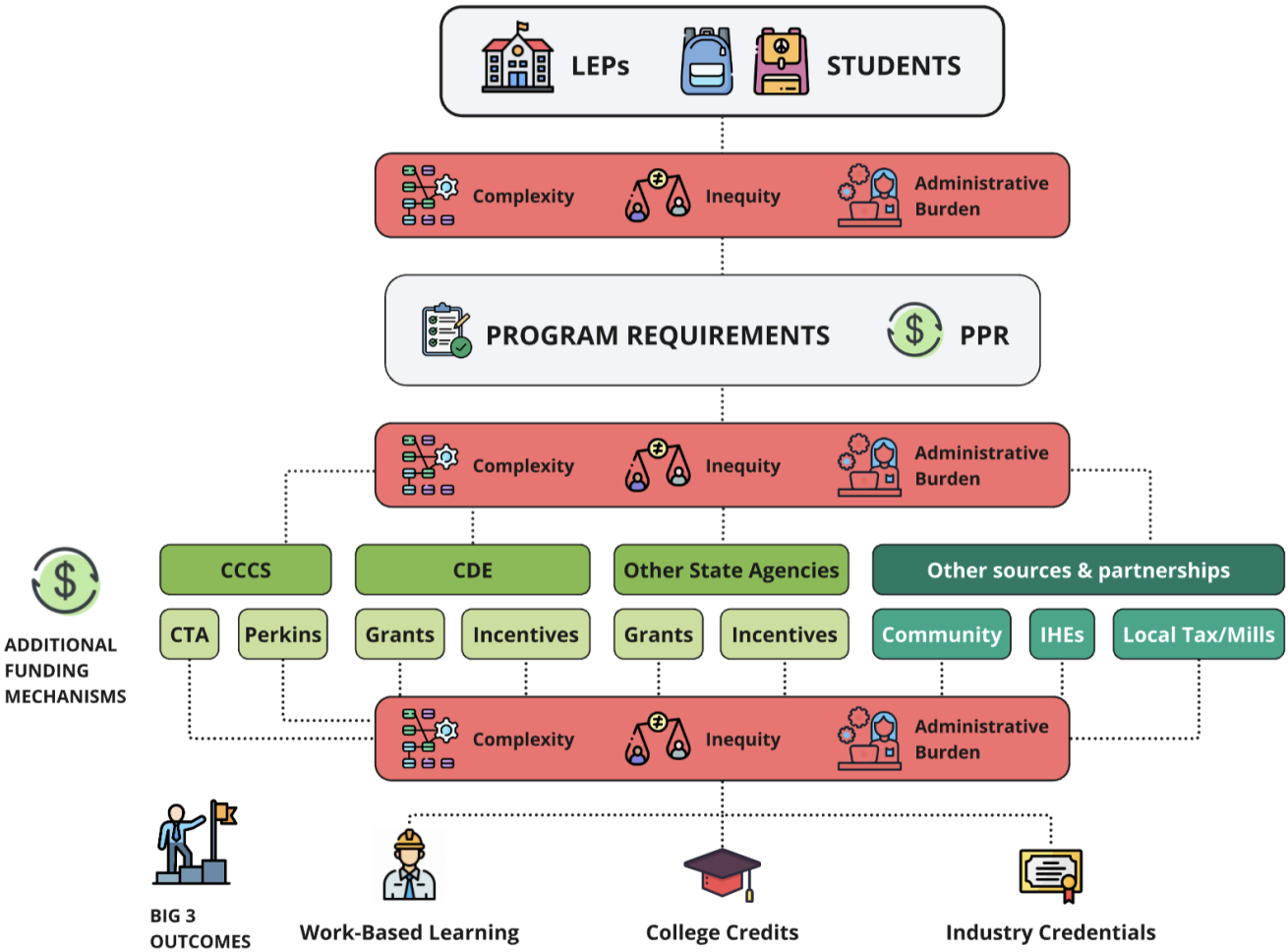
The full list of programs described in this study can be found in the Appendix B: Program Matrix. The following table aligns the key programs analyzed across the Big Three.

Program	Postsecondary Credit	Industry Certifications	Work Based Learning
Career Development Success Program (CDIP)		X	X
Teacher Recruitment Education and Preparation Program (TREP)	X		X
Innovative Learning Opportunities Pilot (ILOP) Program	X	X	X
ESSER III Rural Coaction Grant Program	X	X	X
Opportunity Now Grant Program	X	X	X
Governor Jared Polis's Response, Innovation, and Student Equity (RISE) Fund	X	X	X
K-12 Work-Based Learning Opportunities			X
Carl D. Perkins Career and Technical Education (CTE) Grant		X	X
Career and Technical Act (CTA)		X	
School Counselor Corps Grant Program	X	X	X
Concurrent Enrollment Program	X		
Accelerating Students through Concurrent Enrollment (ASCENT) Program	X		
Early College High Schools	X	X	
Pathways in Technology Early College High Schools (P-TECH) Program	X	X	X
Concurrent Enrollment Expansion and Innovation Grant Program	X	X	X
John W. Buckner Automatic Enrollment in Advanced Courses Grant Program	X		
Accelerated College Opportunity Exam Fee Grant Program	X		

PWR – The Big Three - Funding Structure

The current funding landscape for PWR programs is complex, involving several distinct mechanisms that LEPs use to facilitate access to the Big Three.

The graphic below illustrates the intricate funding ecosystem LEPs navigate to support PWR outcomes aligned the Big Three. At the core, LEPs rely primarily on Per Pupil Revenue (PPR) funding to start and provide ongoing funding for PWR activities. Program requirements in Years 1-4 for Concurrent Enrollment, ILOP, and P-TECH, also provide LEPs with an opportunity to receive part-time or full-time funding based on each program requirements. Additionally, PPR is used as a calculation in 5th and 6th year programs, like TREP and an adjusted PPR rate was introduced for ASCENT this year. LEPs navigate through the October count and maximize their FTE counts using PWR program requirements, but this funding alone is often insufficient to meet program requirements fully. Each funding stream has unique requirements, timelines, and limitations, making it **challenging for LEPs to navigate and deliver programs equitably**. The graphic illustrates these layered complexities, highlighting how LEPs must juggle multiple funding structures to support students in achieving the Big Three outcomes: postsecondary credit, industry-recognized credentials, and work-based learning.



To meet program needs and expand student access, LEPs must tap into a variety of funding sources, each with unique criteria. These funding mechanisms include grants, incentives, and targeted programs provided by CDE, CCCS, contributions from other state agencies, and local partnerships, including support from community organizations, IHEs, and local tax revenues.

- **Per Pupil Revenue (PPR)**: PPR is the foundational funding mechanism for LEPs in Colorado, calculated by multiplying the LEP's PPR rate by its funded pupil count. This calculation determines the total program funding each LEP receives, supporting both traditional educational activities and PWR programs. PWR programs such as Concurrent Enrollment, Early Colleges, ILOP, and P-TECH have unique eligibility criteria that allow LEPs to claim full-time equivalent (FTE) funding for students participating in these initiatives. For instance, P-TECH and TREP programs extend PPR funding for up to two years beyond high school graduation, while ASCENT provides a reduced PPR rate for a limited number of eligible students. These programs enable LEPs to receive funding for students engaged in nontraditional learning pathways, aligning with Colorado's goals to enhance postsecondary and workforce readiness. Understanding the interplay between PPR and these programs is crucial for LEPs to effectively leverage available funding, thereby expanding educational opportunities and supporting diverse student pathways.
- **Career and Technical Education (CTE) Funding**: CTE funding in Colorado involves both State and federal components, each with unique requirements. The **Colorado Technical Act (CTA)** uses a reimbursement model, where LEPs initially cover program costs for approved secondary CTE courses and are partially reimbursed based on specific eligibility criteria. This State funding helps LEPs offer industry-aligned courses that prepare students with practical, career-focused skills. However, not all programs meet eligibility requirements requiring LEPs to leverage PPR to fully fund some programs. Federal funding is provided through the **Perkins** grant, managed by the Colorado Community College System (CCCS). Perkins funding supports career-aligned secondary CTE programs across the state, covering costs for curriculum development, equipment, and teacher training. A majority of the funding is allocated to LEPs based on population of the school district below the poverty level (i.e., free and reduced lunch eligible (FRL)) with the remaining based on school district population of individuals ages 5-17. LEPs must meet federal compliance and reporting requirements, including a local matching component which includes CTA reimbursement, to access this support. This dual funding structure requires CCCS to support LEPs work across state and federal programs to maximize resources for industry-recognized credential programs.
- **Grants:** LEPs rely on federal and state grants to sustain and expand PWR programs. One-time federal grants, such as the now-concluded Elementary and Secondary School Emergency Relief Fund (ESSER) funded Colorado Rural Coaction initiative, provided targeted funding to address specific needs in rural areas. Ongoing state-based competitive grants, like the Concurrent Enrollment Expansion and Innovation Grant, continue to support broader access to postsecondary credit programs. Each year, there are often 5-10 grants available from CDE other State agencies like the Colorado Department of Labor and Employment (CDLE) or the Colorado Office of Economic Development & International Trade (OEDIT) that provide funds supporting aspects of PWR programming. While critical for program expansion, these grants often involve complex application processes, strict reporting requirements, and resource management challenges. LEPs also highlighted the risks of "funding cliffs," where the end of grant funding strains program continuity or shifts unexpected costs to students and families.

- **Incentive/Outcome-Based Funding**: CDIP uses an incentive-based structure, where funding is provided as an additional financial incentive for LEPs that successfully support students in earning industry-recognized credentials in high-demand fields, with potential for funding work-based learning opportunities. By linking funding to specific achievements, CDIP encourages LEPs to align programs with workforce needs and student outcomes. Currently, CDIP relies on LEP attestation of credentials and WBL with no direct means of verification and auditing of the credential or WBL outcomes.
- **Community Partnerships**: LEPs secure funding through diverse community partnerships that encompass direct donations or financial contributions, program participation opportunities such as internships, mentorships, and apprenticeships, as well as donations of materials and supplies. These collaborations are crucial for supporting comprehensive programs like P-TECH and Career and Technical Education (CTE), which depend on hands-on experiences and essential resources to effectively prepare students for postsecondary education and the workforce. However, inequities persist in this funding landscape, as LEPs in more affluent or well-connected districts typically have greater access to community partners and funding opportunities compared to those in underserved or rural areas.

PWR – The Big Three – Administration and Costs

Delivering PWR programs requires significant administrative coordination across various roles within LEPs, particularly as they guide students in working toward their ICAP-aligned goals to achieve outcomes in the Big Three. While ICAP provides the foundation for student centric frameworks, the administrative demands associated with funding management, program compliance, agency coordination, and scheduling require substantial time and resources from LEPs. Inconsistent master schedules and bell schedules further complicate resource sharing and implementation of specialized Concurrent Enrollment courses or CTE pathways. This administrative workload can divert resources from direct student support, underscoring the need for streamlined processes and additional support. Additionally, LEPs surveyed in this study revealed that 70% of LEPs pass on costs of programs to students and their caring adults.

- **Role of School Counselors and Academic Advisors**: School counselors play a vital role in guiding students through ICAP and PWR programs, helping them navigate academic and career pathways with personalized support. Their leadership ensures that students can make informed decisions and connect to meaningful opportunities. The School Counselor Corps Grant Program (SCCGP) has successfully expanded capacity for this critical role, implementing a comprehensive counseling model, inclusive of academic support, increasing graduation rates, attendance and behavior. Support from complementary roles like career coaches and program coordinators further enhances these efforts, strengthening the ability of LEPs to deliver impactful programs and drive positive outcomes for students.
- **Administrative Coordination with IHEs and Industry Partners**: Programs involving postsecondary credit, such as Concurrent Enrollment, ASCENT, and specialized models like **P-TECH and TREP**, require LEPs to work closely with both IHEs and industry partners. These specialized models are built on collaborative agreements between LEPs, IHEs, and industry partners to create pathways that combine high school education, college coursework, and work experience. For example, P-TECH prepares students for high-demand fields through an integrated approach that includes academic, technical, and workplace learning experiences. Industry and community partnerships provide essential resources and hands-on opportunities that support students' development of work-based competencies, thereby aligning educational experiences with workforce needs. However, the complexity of coordinating these partnerships contributes to the administrative workload for LEPs, as they must manage agreements, monitor governance requirements, and continually facilitate alignment in partnership with collaborators to meet program goals.
- **Instruction Time:** Instructional time costs vary depending on the instructor's location, who provides the instruction, and where students are located. These factors influence the cost structure across programs with concurrent enrollment:
    - **LEP Instructor at LEP Location**: Minimal costs, as instruction is provided by LEP staff at the LEP, utilizing existing resources with no additional tuition or fees.
    - **IHE Instructor at LEP Location**: Moderate costs, including instructor fees paid to the IHE, with students remaining at the LEP to minimize tuition and transportation expenses.
    - **IHE Instructor at IHE Location**: High costs, involving full tuition fees and transportation expenses for students traveling to the IHE campus.

    - **Online Instruction at LEP Location**: Very high costs, with online tuition fees, approximately 64% higher than standard tuition rates, and the need for classroom monitors or facilitators, as well as online learning infrastructure.

- **Salary considerations**: Survey data from LEP engagement revealed that 40 out of 45 respondents identified staffing as one of the most challenging costs to cover. In particular, LEPs frequently highlighted salary challenges for CTE instructors and bus drivers, roles that require specialized skills, licenses, and industry experience, which often command higher salaries. Schools must compete with more lucrative industry opportunities to fill these positions. Furthermore, successful PWR programs often depend on dedicated, non-instructional staff, such as program coordinators or career advisors, whose funding is difficult to secure under traditional school financing models that prioritize student-to-teacher ratios.
- **Tuition:** Tuition costs directly impact programs offering postsecondary credit. LEPs utilized PPR to cover, at a minimum, the tuition costs for students enrolled in college-level courses. These costs can vary depending on the course specifics and the terms outlined in the cooperative agreements between LEPs and IHEs, which may include cost-sharing or reimbursement provisions if the course is taught by the LEP instructor. While most IHEs utilize that standard tuition rate set by the Colorado State Board for Community Colleges and Occupational Education (SBCCOE), two district colleges in the state receive local district revenue through taxpayer investments allowing for reduced rates.
- **Books and Codes:** Many programs across the Big Three require books and access codes (e.g. digital resources, online course materials, and software licenses) to meet student outcomes. These critical resources are essential for students' access to learning content and for skill-building, particularly in technical fields. Analysis of 295 cooperative agreements revealed that approximately 12% of LEPs cover the cost of books, 11% require students to bear this expense, and the remaining agreements lack any provision specifying responsibility for book costs.
- **Fees:** Programs supporting concurrent enrollment often incur additional fees beyond tuition and books, with costs set by IHEs. LEPs vary in their ability to cover these fees; some rely on grants or local foundations, while others use general funds or shift expenses to families. These fees, which can include course materials and supplies, have led to challenges for some LEPs, with families occasionally receiving unexpected bills that cause anxiety and uncertainty. Analysis of 295 cooperative agreements revealed that approximately 10% of LEPs cover the cost of fees, 8% require students to bear this expense, and the remaining agreements lack any provision specifying responsibility for the cost of fees.
- **Materials and Supplies:** LEPs require a wide range of materials and supplies to support the hands-on learning necessary for PWR programs. This includes lab equipment, tools, and industry-specific materials essential for students pursuing industry-recognized credentials and engaging in WBL opportunities. In CTE programs, for example, students may use advanced machinery, medical training simulators, or automotive tools to develop practical skills aligned with workforce demands. Some LEPs have partnered with local industries to secure donations or funding for these supplies, while others rely on grants to cover these costs. However, the high expense and maintenance of specialized materials often pose challenges, particularly for smaller or remote LEPs, leading to disparities in program availability and quality.

- **Technology** (Hardware): LEPs utilize various hardware to support the implementation of PWR programs. This includes providing students with laptops and tablets to facilitate participation in online and hybrid postsecondary credit courses, as well as virtual training components for industry-recognized credentials and WBL. Additionally, LEPs invest in high-performance computers and specialized equipment to support CTE programs, ensuring students gain hands-on experience with industry-standard tools. To enhance accessibility, some LEPs have established lending programs for devices and portable Wi-Fi hotspots, addressing the digital divide among students. However, the costs associated with acquiring and maintaining such hardware can be substantial, leading some LEPs to seek grants or community partnerships to sustain these initiatives.
- **Technology** (Software): LEPs utilize software to support the implementation of PWR programs, with some purchasing systems to facilitate the ICAP process or integrating into their existing learning portals. Grants have provided funding for these systems, enabling innovative steps like gamifying outcomes aligned with their Portraits of a Graduate that correspond to ICAP and graduation guidelines. However, other LEPs have found the costs to implement and manage technology unsustainable, leading to initiatives being discontinued.
- **Transportation:** Transportation costs apply primarily to WBL and certain Postsecondary Credit programs where students travel between LEPs, IHEs, and industry sites. These expenses are particularly impactful for LEPs serving large or rural areas, where access to reliable transportation is essential to student participation.
- **Conferences / Events:** Conferences and events support the Big Three by providing students with exposure to career pathways, networking opportunities, and industry standards. LEP hosted events may include job fairs and partnership-building activities with industry partners. While industry partners sometimes contribute to funding, LEPs often need dedicated event budgets to cover costs such as registration, travel, lodging, and hospitality needs. LEPs also send staff to regional and State-based events that help build capacity by allowing staff to learn about and engage with best practices in CTE and PWR.
- **CDE Technical Assistance and Regional Training:** CDE provides leadership, technical assistance, and strategic partnerships to support PWR programs statewide. By offering targeted resources such as regional workshops to reduce travel costs, professional development possibilities, and collaboration with CCCS, CWDC, and state staff, CDE helps LEPs implement PWR initiatives effectively. A portion of specific grant funds is allocated to sustain these administrative services, enabling continuous improvement and alignment with Colorado's education and workforce objectives.

PWR – The Big Three - Equity Considerations

Ensuring equitable access to PWR programs across Colorado is a key priority. However, LEPs encounter challenges in providing consistent access to the Big Three, especially in regions where economies of scale are limited, and resources are constrained.

- **Geographic and Scale Challenges**: LEPs in rural or smaller districts face unique obstacles in offering the full range of PWR programs due to lower enrollment numbers and limited community funding. These challenges impact their ability to provide the same breadth of postsecondary credit, credentialing, and WBL options as larger districts, creating disparities in access to opportunities aligned with economic mobility.
- **Collaborative Models and BOCES Support**: In response to these challenges, some LEPs engage in collaborative models and consortiums, such as the Fremont Multidistrict Initiative (FMI) or partnerships with Boards of Cooperative Educational Services (BOCES). Additionally, the CTA supports many consortium-based models that allow districts to combine CTE programming across multiple regions. These collaborations enable LEPs to share resources, spread administrative workload, and expand program availability to underserved areas. While many LEPs acknowledged the benefits of these models during interviews and workshops, geographically remote regions often reported significant challenges related to scheduling and transportation, which limit the effectiveness of these partnerships for their students.
- **Targeted Funding Programs**: Programs like Opportunity Now and Colorado Rural Coaction provide critical funding for increasing access to the Big Three in underserved communities. These focused initiatives help fund the advising, administrative, and coordination roles essential to implementing PWR programs effectively. By focusing on capacity-building, they help address the staffing and resource gaps that disproportionately impact rural LEPs. However, as these programs were funded through now-ended federal sources, their temporary nature underscores the need for sustainable solutions to maintain and expand capacity-building and start-up support over the long term.

These equity-focused efforts underscore the critical role of targeted support in ensuring access to the Big Three across all regions. By leveraging collaborative models and strategic funding initiatives, LEPs work to bridge resource gaps and provide students in underserved areas with equitable opportunities to achieve their ICAP goals and advance toward long-term economic mobility.

Postsecondary Credits

LEPs play a critical role in helping students access postsecondary credits through programs like Concurrent Enrollment, Advanced Placement (AP), and International Baccalaureate (IB). These programs offer high school students the chance to earn college-level credit that counts toward both high school and college graduation requirements, enabling students to graduate with college credits and, in some cases, an associate degree. While certain CTE pathways could include coursework that includes simultaneous enrollment, the courses cannot be included in reimbursement of secondary CTE from CTA.

The programs listed below are funded through PPR that enable access to postsecondary credits, including Concurrent Enrollment, Early College High Schools, P-TECH, the TREP program, and ASCENT. Each of these programs has distinct funding structures and legislative objectives, outlined in detail in Appendix B – Program Matrix:

Program

Concurrent Enrollment: Program that allows LEPs to earn part-time or FTE status for students who simultaneously enroll at their LEP and an IHE, allowing them to earn college credits alongside high school requirements. Currently**,** 100 of the 179 (56%) districts utilize the Concurrent Enrollment program.

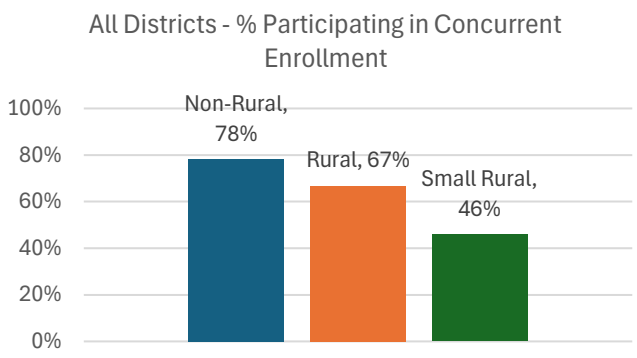
Note: This data does not include Traditional students in October counts who may have completed postsecondary credits.

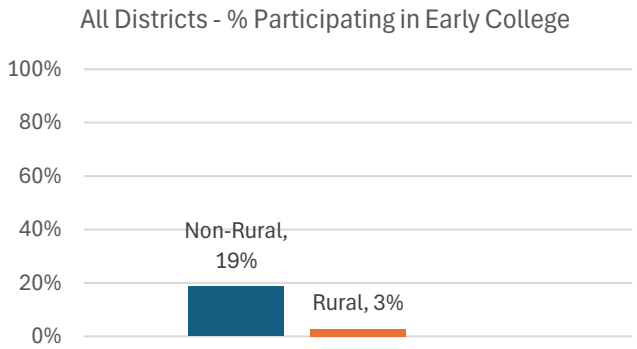
Early College: Enables students to graduate high school with an associate degree or industry recognized credential by combining high school and college coursework.

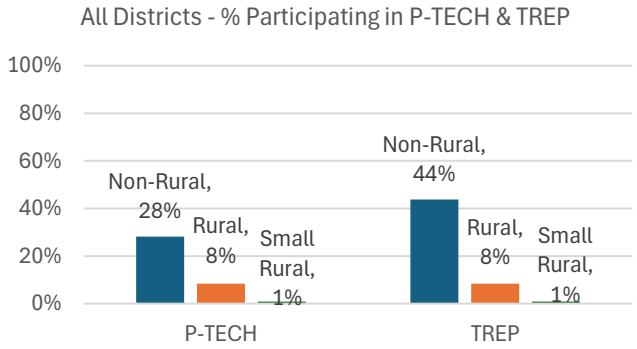
There are 16 specialized schools that are available in 4% (7 of 179) of districts with approximately 2,000 students enrolled in the State.

P-TECH: These programs allow students to extend their high school education to pursue postsecondary credit in collaboration with IHE. TREP is offered as a program in 10% (13 of 179) of districts. P-TECH is offered as a program in 7% (18 of 179) of districts. **P-TECH also includes WBL, and industry aligned credential**

All Districts (FY23-24) % Program Participation

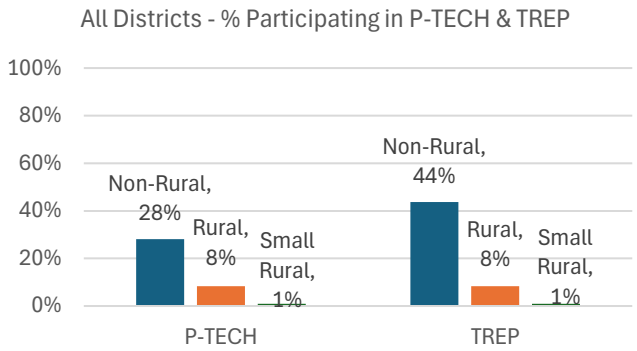




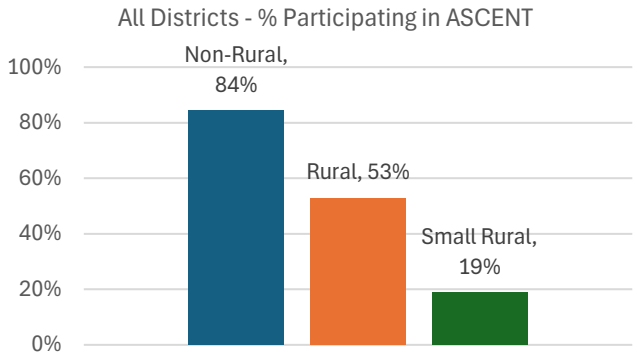


TREP These programs allow students to extend their high school education to pursue postsecondary credit in collaboration with IHE. TREP is offered as a program in 10% (13 of 179) of districts. P-TECH is offered as a program in 7% (18 of 179) of districts.

TREP also encourages WBL through student-teaching and job shadowing.



ASCENT: Allows qualified students to pursue postsecondary coursework for one year after high school with tuition costs covered by a set reduced PPR rate. As of the 23-24 school year, 37% of districts offered this program. This number is expected to grow with new numbers from the 24-25 school year.



Grants and Funding Sources

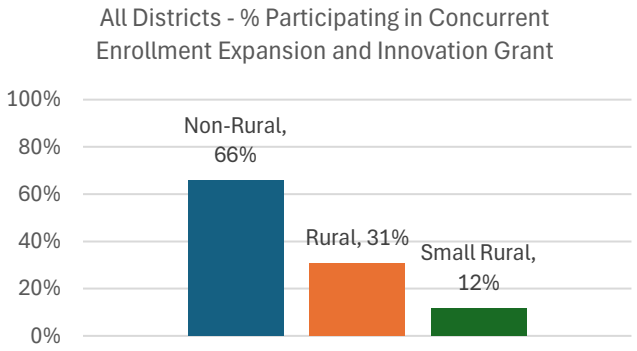
LEPs often use additional grants to support, expand, or sustain postsecondary credit programs. Programs include:

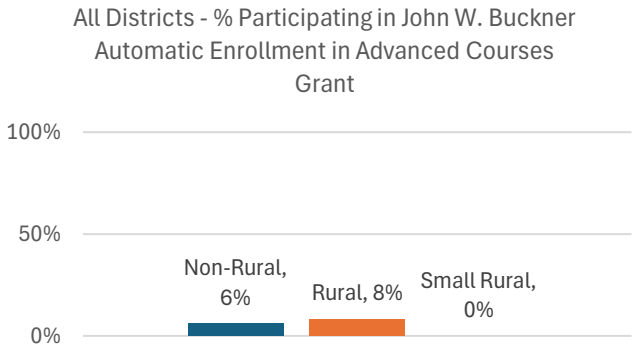
Grant

Concurrent Enrollment Expansion and Innovation Grant: Supports increased access to concurrent enrollment for underserved students but is competitive and favors LEPs with additional resources for application and management. This program provided $1.3M in FY23-24 and provided funding to 25% (45 of 179) of districts.

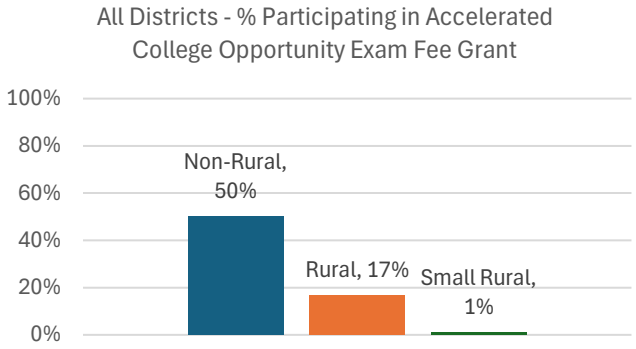
John W. Buckner Automatic Enrollment in Advanced Courses Grant: Expands access to advanced courses, supporting students' readiness for postsecondary credit opportunities. This program provided $219K in FY23-24 and provided funding to 5 districts total (3%).

All Districts (FY23-24) % Program Participation

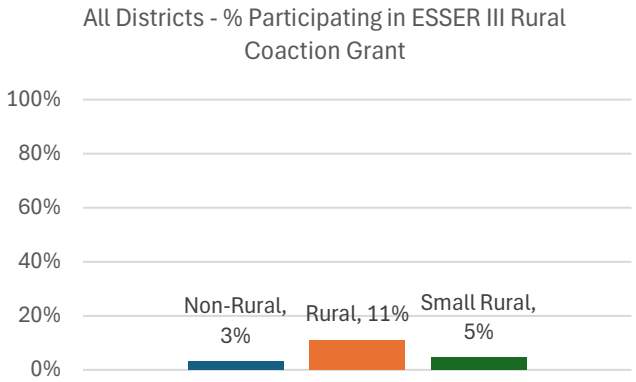




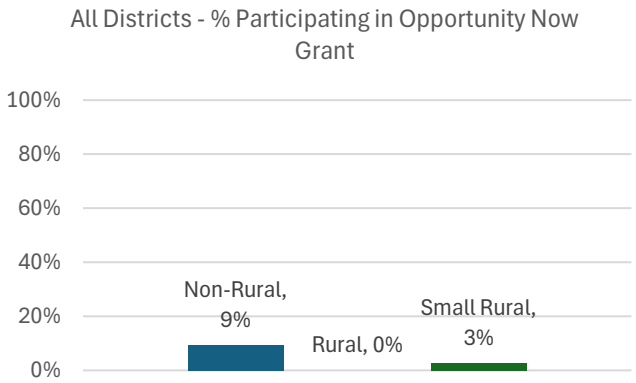
Accelerated College Opportunity Exam Fee Grant: Covers exam fees for college credit-bearing tests, reducing financial barriers for students. This program provided $525K in funds across 23 districts, representing 13% of districts.



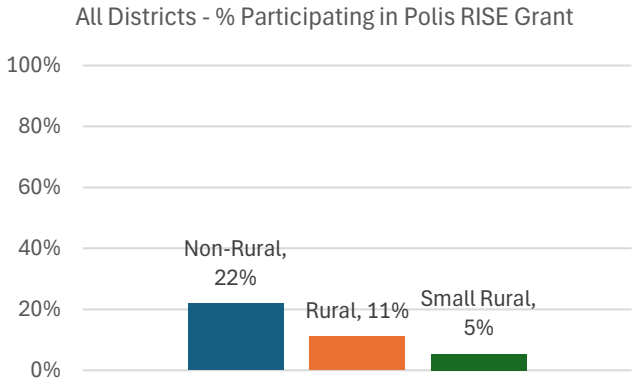
ESSER III Rural Coaction Grant Program: Through the ESSER III Rural Coaction Grant Program, rural districts gain additional funding to support postsecondary credit opportunities in response to COVID-19 recovery efforts. This grant focuses on enabling students in rural areas to access college credit programs that may have been previously limited, enhancing postsecondary access and supporting community recovery. This grant provided funding to 10 of the 179 districts (6%).



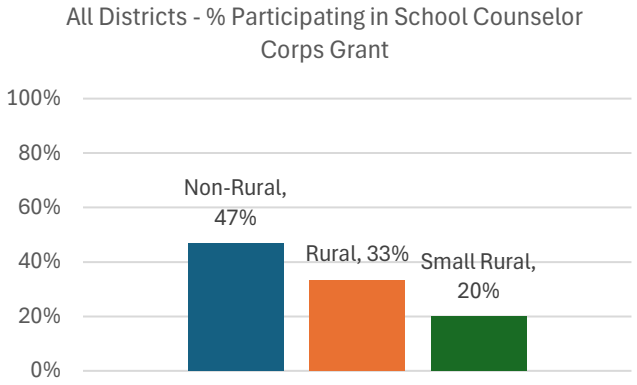
Opportunity Now Grant Program: The Opportunity Now Grant Program supports high school students in earning postsecondary credits through concurrent enrollment and other career-focused programs. By providing financial resources, this grant helps bridge gaps in access to college courses for students across various regions, aligning with Colorado's broader goals for postsecondary readiness. This grant provided funding to 6 of the 179 districts (3%).



Governor Jared Polis's Response, Innovation, and Student Equity (RISE) Fund: The Governor's RISE Fund is a key component in funding innovative approaches to education, including postsecondary credit initiatives. With a focus on underserved areas, the RISE Fund enables LEPs to expand concurrent enrollment and early college programs, thus supporting students in earning college credits while still in high school. This grant provided funding to 17 of the 179 districts (9%).



School Counselor Corps Grant Program: The School Counselor Corps Grant Program enhances guidance and support for students navigating postsecondary credit opportunities. By funding additional counseling resources, this program ensures that students receive the support they need to make informed choices about concurrent enrollment, early college high school programs, and other pathways to earning college credits. This grant provided funding to 49 of 179 districts (27%).



Please refer to the Appendix B: Program Matrix for further detail on current PWR programs.

Postsecondary Credits - Funding Structure and Challenges

While postsecondary credit programs offer significant benefits in reducing tuition costs and supporting degree completion, they also require robust partnerships with IHEs and carry varied levels of accessibility based on district resources. LEPs coordinate with IHEs through cooperative agreements, determining funding allocations and responsibilities. This often creates cost variability, especially when considering tuition costs, course fees, and logistical needs for transportation.

- **PPR Funding**: PPR funding aims to cover student expenses associated with postsecondary credit programs. However, as IHE tuition rates increase, some LEPs report that PPR alone is insufficient, particularly for smaller and rural districts where travel costs to IHEs or online tuition rates add a further burden. For these districts, PPR funding limits the expansion of postsecondary credit options, often creating disparities in program access.
- **Grant Dependency and Limitations**: While grants like the Concurrent Enrollment Expansion and Innovation Grant provide additional funding, they are limited and competitive. LEPs without consistent access to these funds struggle to maintain or expand programs sustainably, particularly in underserved areas. Additionally, the administrative workload of managing these grants, including application and reporting requirements, can be challenging for less-resourced LEPs.
- **IHE Role and Cooperative Agreements**: LEPs rely on cooperative agreements with IHEs for various postsecondary credit programs. Some IHEs absorb costs related to academic advisement, counseling, and credentialing, which are not covered by tuition funding. Cost-sharing arrangements often vary, creating additional coordination needs for LEPs, especially those with limited resources.

Postsecondary Credits - Administration and Cost Challenges

Supporting students in achieving postsecondary credit presents significant administration requirements or LEPs, especially given the variable definitions of success for each student and program. While the State's overarching goal is to provide every student with the opportunity to earn at least one postsecondary credit, individual programs like ASCENT, P-TECH, and Early College carry

specific legislative intents, often requiring LEPs to fulfill precise conditions beyond simply facilitating credit accumulation.

- **Cooperative Agreements with IHEs**: Programs like ASCENT and Concurrent Enrollment mandate formalized agreements between LEPs and IHEs. LEPs must coordinate these agreements to establish the parameters of dual enrollment, including financial responsibilities and curriculum alignment. This administrative task is substantial, requiring LEP staff to negotiate terms, track compliance, and manage relationships with multiple postsecondary partners.
- **Curriculum Alignment and Scheduling Coordination:** LEPs are responsible for ensuring that high school courses align with higher education standards and that schedules accommodate both high school and IHE academic calendars. This alignment is crucial for seamless credit transfer and often requires intensive coordination, particularly for Early College and P-TECH programs where students work toward earning an associate degree or industry recognized credential by high school graduation.
- **Student Advising and Program-Specific Tracking:** Each postsecondary credit program requires targeted advising to support students in meeting specific credit goals aligned with their ICAPs. For example, P-TECH programs necessitate ongoing collaboration with industry partners to incorporate WBL components. Early College programs require long-term academic planning to balance high school and postsecondary credits. LEPs must dedicate staff to monitor progress and guide students effectively, adding considerable administrative workload.
- **Tuition Payment and Program Coordination:** LEPs are responsible for coordinating tuition payments and managing program logistics across various postsecondary credit offerings. While ASCENT involves relatively straightforward tuition coordination, programs like P-TECH and Early College require ongoing alignment with IHEs, curriculum coordination, and, in some cases, partnerships with industry. Managing these diverse requirements adds to the administrative workload, particularly in LEPs with limited staff capacity.

Without dedicated support for these administrative functions, LEPs, especially smaller districts, face challenges in scaling postsecondary credit offerings equitably and helping students achieve the diverse credit goals set in their ICAPs.

Postsecondary Credits - Equity Considerations

Access to postsecondary credit programs varies widely across Colorado and is shaped by factors such as district size, rural designation, and available resources. While these programs offer benefits in reducing higher education costs and accelerating degree completion, rural and under-resourced LEPs face barriers that hinder equitable access.

- **Geographic and Resource Challenges:** Smaller and rural LEPs often lack local IHE options and face geographic isolation, limiting their ability to provide students with robust postsecondary credit options. Limited access to nearby institutions of higher education and transportation costs further restricts these LEPs' ability to establish partnerships and expand program offerings.
- **Funding Gaps:** While some LEPs benefit from supplementary grants like the Concurrent Enrollment Expansion and Innovation Grant, many others cannot consistently secure these competitive funds. This disparity is especially pronounced in districts serving high numbers of

low-income students, where additional costs for items such as books, fees, and transportation create barriers to participation.

- **Administrative Constraints:** The administrative workload of managing multiple postsecondary credit programs, each with distinct requirements and partnership demands, further strains smaller LEPs. This workload, without dedicated support, limits the ability of these LEPs to expand or prioritize postsecondary credit offerings, resulting in fewer options for students in resource-constrained districts.

In combination, these factors result in disparities in access to postsecondary credit opportunities. Students in rural and under-resourced districts often have fewer options compared to their peers in more affluent areas, underscoring the need for a more equitable, sustainable support structure across the state.

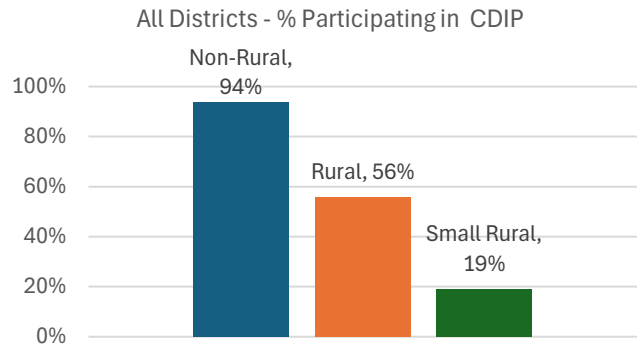
Industry Certifications and Credentials

Industry certifications and credentials validate students' proficiency in technical skills aligned with high-demand careers. These certifications not only improve students' employability but also address local workforce needs in areas such as healthcare, technology, and manufacturing. LEPs support students attain outcomes through programs like P-TECH and Early Colleges, as well as the following programs which promote and enable students to receive industry certifications or credentials:

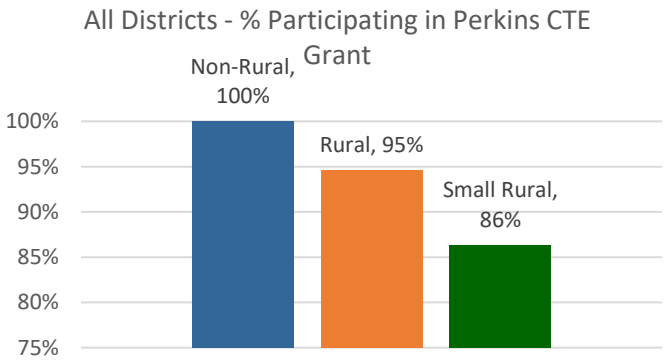
Program

Career Development Success Program: Also known as the Career Development Incentive Program (CDIP), delivers financial incentives to LEPs for each student who completes an approved industry credential or certification. This program provided funding to 71 of 179 Districts (40%).

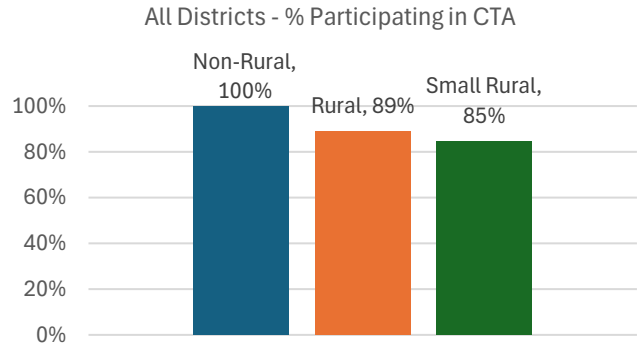
All Districts (FY23-24) % Program Participation



Carl D. Perkins Career and Technical Education (CTE) Grant: Allows LEPs to receive annual grant funding to develop and enhance CTE program offerings. The State of Colorado Perkins strategic plan highlights investment objectives and funds are distributed based on federally stipulated formula criteria. This program provided funding to 162 of 179 Districts (91%).



Career and Technical Act (CTA): Allows LEPs to receive expense reimbursement for the costs of running CTE programs, including certified instructor costs, specialized equipment and lab space exceeding the costs of standard education programs, and other related expenses. This program provided funding to 158 of 179 Districts (88%).



Recent legislative initiatives, including **HB23-065** and **SB24-143**, have bolstered funding and incentives for LEPs to expand credentialing opportunities for students while enhancing processes for identifying and promoting high-quality industry credentials. CDE, in collaboration with various agencies and partners, is integrating and expanding guidance for a robust quality framework for nondegree credentials within Colorado's education and workforce systems. This includes adopting the International Standard Classification of Education (ISCED 2011) standards to classify credentials and ensuring alignment with the Quality and In-Demand Non-Degree Credential Rubric. This rubric emphasizes demand, skill relevance, employment outcomes, and stackability, ensuring all approved credentials meet the criteria necessary to align with high-demand workforce needs and provide meaningful career pathways for students. Credentials are assigned ISCED equivalency levels within stackable pathways and apprenticeship programs, further reinforcing the alignment of high school programs with industry needs. An annual list of approved credentials provides LEPs with visibility into relevant opportunities for students.

LEPs play a central role in guiding students toward these credentialing opportunities through ICAP processes and career pathway guidance. School counselors and career advisors help students navigate and fulfill credential and certification requirements, which can be achieved through instructor-led CTE courses, postsecondary coursework, P-TECH programs, or individual self-study. While LEPs leverage Perkins and CTA funding to establish and sustain on-campus CTE programs, these funding mechanisms do not mandate student completion of credentials or certifications. CDIP serves as the primary incentive for encouraging students to attain qualified credentials, offering LEPs up to $1,000 per credentialed student, subject to caps. To qualify for CDIP incentives, credentials must align with the Quality and In-Demand Non-Degree Credential Rubric, ensuring their relevance and value.

Integrating the Quality and In-Demand Non-Degree Credential Rubric into ICAP processes offers significant potential to enhance student outcomes. The rubric provides a structured framework for evaluating credentials based on industry recognition, transferability, and alignment with career pathways. This helps school counselors and career advisors guide students toward credentials that are not only relevant to workforce needs but also stackable, supporting long-term educational and career advancement. By embedding these criteria into ICAP planning, LEPs can help students make informed decisions about their educational and career trajectories, ensuring the credentials they earn are meaningful and widely recognized.

Additionally, integrating the stackable credentials framework supports the development of clear pathways from secondary to postsecondary education and into the workforce. This approach enables students to progressively build on their achievements, facilitating smoother transitions and helping them attain higher levels of education and employment over time. Through these efforts, LEPs contribute to a more cohesive, equitable, and effective system for preparing students to succeed in Colorado's evolving workforce.

Industry Certifications and Credentials - Funding Structure and Challenges

LEPs use a variety of sources to fund programs that include the ability for a student to achieve certifications and credentials. This includes the previously mentioned postsecondary credit programs that could include coursework that culminates in the possibility of a credential, as well as the achievement of an associate's degree. Funding from Perkins and CTA is leveraged to develop and sustain CTE programs, but there is no direct funding in Perkins or CTA to support completion of

industry credentials and certifications. LEPs rely on CDIP and PPR funds to manage and deliver credential and certification opportunities to students.

- **CDIP:** The total funding for CDIP increased from $4.2M in FY22-23 to $9.2M in FY23-24 and the current legislation continues annual funding of $9.5M through FY33. However, participation in CDIP has increased over the years leading to prorated per student financial incentive payments with the amount being half of the expected $1,000 per student payment in some years. CDIP provides funding based on an attestation that is submitted yearly to CDE. The LEPs may only count a student once in the attestation regardless of how many certifications or credentials the student achieved.
- **CTA and Perkins:** Although CTA and Perkins funding plays a critical role in establishing and maintaining CTE programs that support credential and certification completion, these funds are often insufficient for LEPs with limited resources. The CTA reimbursement formula prioritizes programs whose costs exceed 70% of their associated PPR, favoring high-cost initiatives such as automotive repair, advanced manufacturing, and healthcare, which require specialized equipment, certified instructors, and extensive facilities. However, many LEPs, particularly those with constrained general fund resources, struggle to initiate or sustain these costly programs. Additionally, the administrative work and stringent eligibility requirements for accessing these funds pose significant challenges, particularly for smaller LEPs, further limiting their ability to implement high-impact CTE pathways.

Industry Certifications and Credentials - Administration and Cost Challenges

Career pathways and the approved list of industry credentials and certifications provide LEPs with reference for the types of potential opportunities they can offer, but the LEPs must specifically define which credentials and certifications to offer given student populations and demographics needs differ across districts. After opportunities are determined, LEPs face considerable administrative and cost-related challenges implementing and maintaining industry credential and certification programs.

- **Tracking and Reporting:** Many LEPs struggle with the substantial administrative workload required to manage certification tracking, complete funding applications, and fulfill detailed reporting requirements. For smaller LEPs with limited administrative staff the burden is amplified, often diverting attention from student engagement and program expansion efforts.
- **Cost to Deliver:** The costs of offering industry certifications vary widely. Although CTA and Perkins help to create and maintain CTE programs used to deliver industry credentials and certifications, there are additional costs associated with delivering opportunities to students. Some capital-intensive certifications, such as those in automotive services, demand significant investments in both equipment and specialized training, whereas others, like graphic design, present fewer financial barriers. This disparity complicates resource allocation, with LEPs needing to balance certification costs against student demand and available funding.
- **Exam Fees:** The cost of certification exams, often exceeding a few hundred dollars per student, poses a significant financial barrier, particularly for students from lower-income backgrounds. Without adequate funding, some LEPs are forced to pass these costs onto families or limit access to certification programs altogether, potentially restricting opportunities for students most in need of career-aligned skills. This disparity was underscored in survey responses, where LEPs from rural and small-rural regions frequently

cited the cost of exams and materials as a prohibitive factor in expanding their certification offerings.

- **Diversity of Offerings:** Many LEPs lack adequate resources to offer a full spectrum of industry certifications, which limits program accessibility for students, especially in rural and underfunded districts.
- **Curriculum Integration:** LEPs expressed the need for more structured support in aligning industry certification programs with existing curricula and instructional goals. For many LEPs, the lack of standardized certification options and curriculum guidelines complicates the process of integrating certifications into career and technical education (CTE) pathways. LEP staff also noted the administrative work involved in managing certification requirements and adjusting curricula, which often require specialized training and collaboration with industry partners. This demand for resources is particularly taxing for smaller districts with limited staff and budget, which underscores the need for streamlined processes and dedicated support to help LEPs embed certification pathways into their educational frameworks effectively.

Industry Certifications and Credentials - Equity Considerations

Access to industry certifications varies across Colorado's LEPs, with significant disparities between rural and non-rural districts.

- **Local Economy Limitations:** LEPs in rural areas face unique challenges in providing certifications due to limited access to industry partners, resources, and qualified instructors. This lack of local support infrastructure makes it difficult to establish the partnerships and funding required to sustain programs in high-demand fields, such as advanced manufacturing or healthcare.
- **Career Readiness Impact:** Students in rural districts often have fewer opportunities to earn certifications in some high-growth areas due to limited resources, potentially limiting their postsecondary and career readiness compared to students in non-rural areas.
- **Financial Burden:** The cost of certification exams further complicates equitable access, particularly for students from lower-income backgrounds who may struggle to cover exam fees. While state programs like CDIP provide some financial support, not all LEPs receive sufficient funding to cover the costs of high-demand certifications, or the materials needed for preparation. This funding gap often places a financial burden on students and their families, reinforcing existing socioeconomic inequities and limiting broader access to industry-aligned credentials.

Work-Based Learning

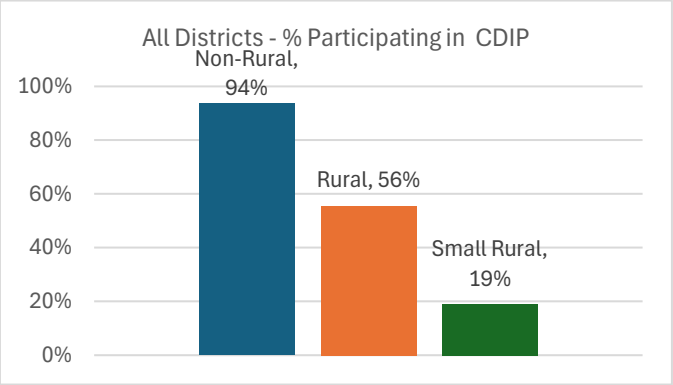
WBL programs integrate classroom instruction with real-world professional experiences, equipping students with practical skills, career exploration opportunities, and pathways to industry-recognized certifications or credentials. At the core of these initiatives is the Work-based Learning Continuum and related Quality Expectations, which establishes foundational guidance for all WBL programs.

This framework is supported by a range of legislative and programmatic initiatives that connect academic learning to career and technical skills, ensuring students are prepared for postsecondary success and workforce readiness. Rather than being a singular statute or policy, it provides a flexible structure to promote consistent and meaningful connections between classroom learning and professional experiences.

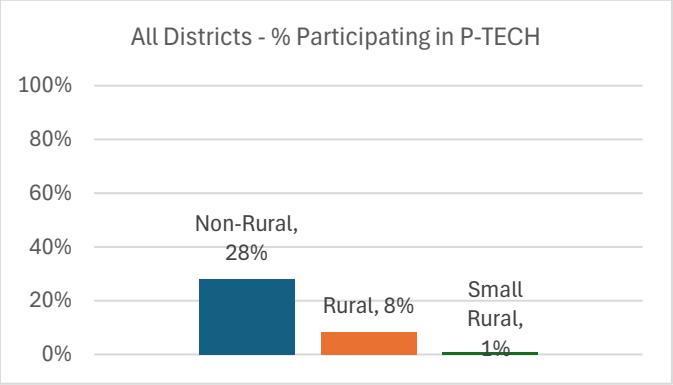
Program

All Districts (FY23-24) % Program Participation

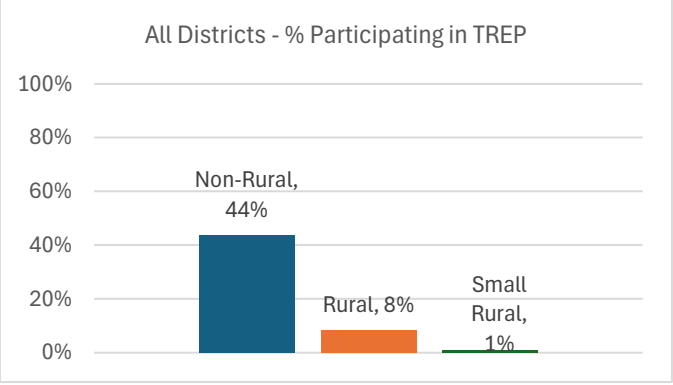
Career Development Success Program (CDIP): Provides financial incentives to districts for students who complete internships, apprenticeships, and earn industry credentials.



P-TECH: Includes industry partnerships offering mentorship, internships, and apprenticeships. This program provided funding to 13 of 179 Districts (75%)



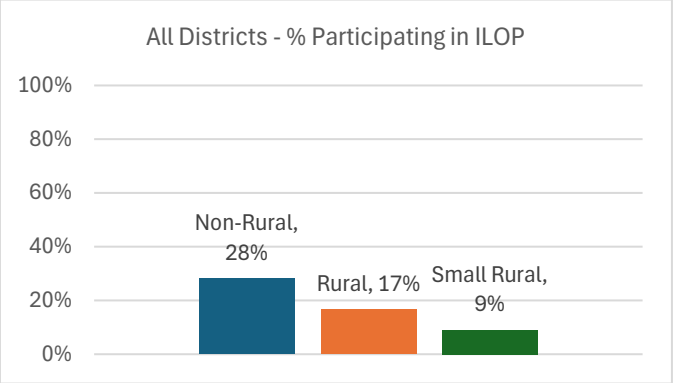
TREP: While the TREP program in Colorado primarily focuses on academic requirements for aspiring educators and does not mandate WBL, it may incorporate optional WBL experiences—such as classroom observations, internships, and mentorships—to enhance students' practical understanding of the teaching profession. This program provided funding to 18 of 179 Districts (10%)



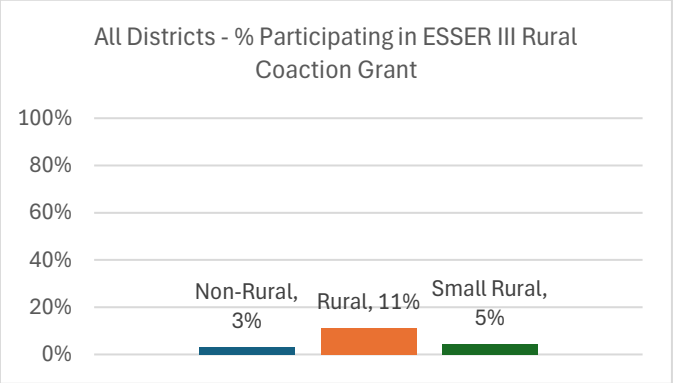
Program

All Districts (FY23-24) % Program Participation

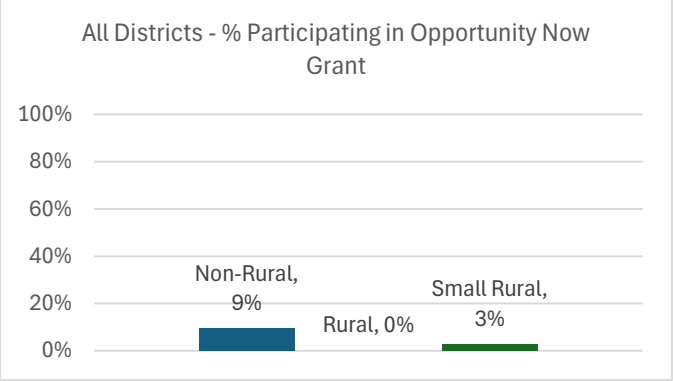
Innovative Learning Opportunities Pilot (ILOP) Program: Allows schools to implement innovative learning strategies, including WBL experiences. This program provided funding to 25 of 179 Districts (14%)



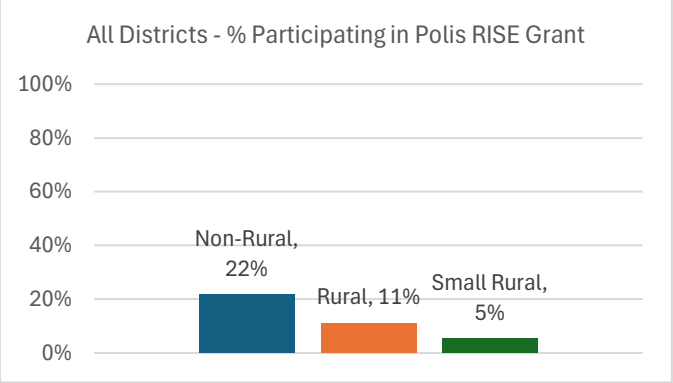
ESSER III Rural Coaction Grant Program: Part of COVID recovery efforts, this program can support WBL initiatives by funding partnerships and recovery efforts to expand access to workforce-related programs in rural areas. This program has provided funding to 10 of 179 Districts (6%).



Opportunity Now Grant Program (Regional Talent Development Initiative): Aims to bridge workforce gaps by supporting high school students' access to WBL. This program has provided funding to 6 of 179 Districts (3%).



Governor Jared Polis's Response, Innovation, and Student Equity (RISE) Fund: Provides funding for schools to develop innovative approaches to career and technical education, often with a focus on WBL. This program provided funding for 17 of 179 Districts (9%).



Recent legislative goals highlighted in **Senate Bill 24-104, Career & Technical Education & Apprenticeships** help to incentivize WBL by aligning high school career and technical education with registered apprenticeship programs. This legislation provides funding to expand pathways for high-demand occupations and fosters collaboration among apprenticeship programs, educational institutions, and industries.

LEPs leverage the Colorado Work-Based Learning Continuum, from the Colorado Workforce Development Council to create and manage WBL opportunities for students. The continuum identifies three categories of WBL activities: Learning ABOUT Work (e.g., career counseling, career planning, industry exposure, etc.), Learning THROUGH Work (e.g., clinical experience, internships, industry-sponsored activities, etc.), and Learning AT Work (e.g., apprenticeship, on-the-job training, etc.).

Each LEP has a different approach to establishing and delivering WBL programs. School counselors and career advisors use ICAP coupled with career pathway guidance to navigate and identify relevant WBL opportunities for students. However, the LEP must identify industry partners to help support WBL across the three continuum categories. P-TECH programs offer structured WBL opportunities for all participating students, but the LEP must identify a large industry partner to help facilitate the opportunities with additional capital investment required to establish the program. Individual WBL opportunities vary by district, including hiring a WBL coordinator to work with industry partners, creating on-campus internships, pooling resources across LEPs to host career days, and developing virtual opportunities.

LEPs utilize CDIP, ILOP, 5th and 6th year P-TECH, and other grant programs to fund creation and sustainment of providing WBL opportunities. However, willingness of industry partnerships is a critical element of WBL, and funding cannot change the economic realities and challenges some LEPs experience.

Work Based Learning - Funding Structure and Challenges

Funding for WBL initiatives through CDIP, P-TECH, and ILOP help support WBL opportunities, but each program faces distinct funding challenges that impact implementation and sustainability.

- **P-TECH:** LEPs receive PPR funding for all P-TECH students through grade 14, allowing them to complete high school along with postsecondary coursework for an associate degree. While highly valued for creating cohesive student cohorts and fostering industry connections, P-TECH requires significant upfront investment, as well as sustained industry partnerships, which can be difficult to secure, particularly in rural areas. The need for substantial initial capital and ongoing support often limits P-TECH to LEPs with large, local employers.
- **ILOP:** LEPs can count part-time high school students participating in approved innovative learning experiences as full-time for PPR funding purposes, regardless of actual instructional hours. To participate, LEPs must develop an Innovative Learning Plan (ILP) that aligns with specific principles for student learning and transition, as outlined by the Education Leadership Council, or meets established research-based design principles. CDE reviews these plans aligned to the Work Based Continuum framework to ensure they result in meaningful learning through work or at work that significantly support students' transitions from high school to postsecondary education or the workforce.

- **CDIP:** The total funding for CDIP increased from $4.2M in FY22-23 to $9.2M in FY23-24 and the current legislation continues annual funding of $9.5M through FY33. However, incentives for credentials and certifications are prioritized over WBL incentives limiting the availability of funding. Only 5% of funding went to apprenticeships or pre-apprenticeships and no eligible internships were funded.
- **Industry Partnership Incentive:** While businesses can engage in initiatives like CareerWise Colorado, a youth apprenticeship program that connects high school students with employers, there are no dedicated state-level tax credits or direct funding mechanisms exclusively for companies involved in K-12 PWR activities. General business incentives such as the **Job Growth Incentive Tax Credit** and the **Enterprise Zone Program** offer tax benefits for job creation and investment in designated areas but are not specifically tied to PWR program or secondary education partnerships.

Work Based Learning - Administration and Cost Challenges

LEPs face administrative and financial challenges managing and executing WBL programs. Not only is funding required for resources, materials, and other costs, but support from industry partners is an essential component of any WBL program.

- **Administrative Requirements:** WBL programs have a high administrative load, including stringent reporting, coordination with external partners, and compliance with complex funding requirements. These tasks, which often require dedicated resources, detract from direct student engagement and impose logistical burdens, particularly for rural LEPs.
- **Incentive Misalignment:** While funding through programs like P-TECH, ILOP and CDIP offer financial incentives for student completion of WBL activities, LEPs highlight a disparity between the funding received and the actual costs of program delivery. For instance, programs like P-TECH require significant initial investments and continuous resources for sustainability, but access to such resources varies by region, often leaving rural LEPs without the same level of industry support or administrative capacity as their urban counterparts.
- **P-TECH Cost:** P-TECH is highly valued for the sense of community it fosters among students, as cohorts are established early in high school, creating a strong peer network promoting pride and achievement. Industry partners play a vital role in providing WBL experiences and guaranteeing post-graduation job interviews, which directly connect students to the workforce. However, implementation and sustainment costs are high which creates challenges for some LEPs to stand up a P-TECH program.
- **Industry Partnership:** Not all LEPs have access or resources necessary to foster relationships with industry partnerships, particularly in rural areas, creating challenges to sustaining an effective WBL program.
- **Seat Time Requirement Limitations:** New school finance rules have provided additional possibilities for using alternative teacher-pupil instruction, including blended learning and WBL, including programs like ILOP. This means that WBL can be considered a credit-bearing course if it is incorporated within the students' ICAP in order to qualify for funding. The programs have greatly benefited LEPs with other noting that creating these unique programs can be difficult and time consuming when learner interest or career options change frequently.

Work Based Learning - Equity Considerations

Equity concerns are particularly prominent for WBL programs, as less resourced, smaller districts face more significant challenges in providing equitable access.

- **Demographic and Geographic Challenges:** Rural and small rural LEPs often have fewer local industry partners, which limits the availability of internships and apprenticeships—core components of WBL. This creates disparities in students' ability to participate in these valuable experiences based on geographic location. Moreover, rural districts may struggle with transportation barriers and the absence of nearby postsecondary institutions or industries, which further restrict students' access to hands-on career training and professional networking opportunities. The resource disparity between rural and non-rural districts impacts the effectiveness and reach of WBL programs, potentially exacerbating existing opportunity gaps.
- **Resource Constraints**: Smaller LEPs often report a higher administrative workload due to smaller staff sizes and less capacity to manage the complexities of WBL program requirements. These challenges are compounded by limited funding and a reliance on temporary grants, which creates uncertainty around program sustainability. Such financial and logistical barriers prevent rural LEPs from scaling their WBL initiatives, affecting the long-term career readiness and economic mobility of students in these districts.

Recommendations for Big Three Streamline and Sustainment

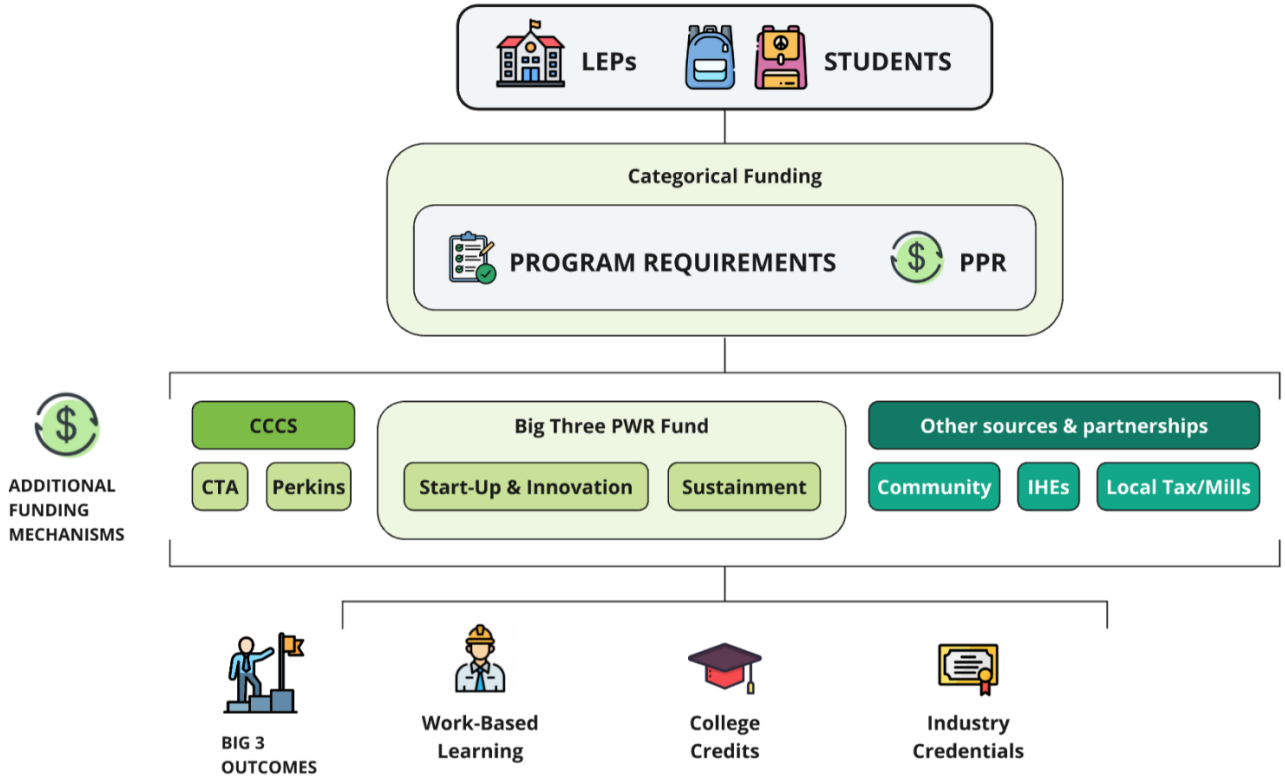
This study identifies significant barriers faced by LEPs in delivering PWR programs across Colorado. These challenges include fragmented funding structures, administrative workload, and inequities in program access, particularly for rural and underserved districts. In response, and in alignment with the HB1215 Task Force recommendations, this study proposes **six key recommendations** that emphasize the creation of streamlined funding mechanisms and targeted equity initiatives to address these systemic issues. Among these, two recommendations are particularly transformative for PWR program support:

1. **Create a unified Big Three PWR Funding Source**: This fund consolidates select existing PWR funding into a single, streamlined mechanism that supports programs enabling students to achieve the Big Three PWR outcomes. It simplifies the funding landscape, making it more accessible and equitable for all LEPs, including CDE Administrative Oversight and a proposed Statewide ICAP System to support efficient and equitable student tracking.
2. **Establish a Categorical Fund for Student Support Services**: This dedicated fund focuses on enhancing student guidance by providing resources for school counselors, academic advisors, and career coaches. By increasing staffing and support, LEPs can offer better assistance to students navigating PWR opportunities.

While data limitations and the complexity of overlapping funding structures—particularly between LEPs and **IHEs**—present challenges for complete financial modeling, the analysis demonstrates that substantial gains can be made by implementing these recommendations. The proposed changes are expected to:

- **Alleviate Administrative Burdens**: Simplifying funding processes reduces the workload on LEPs, allowing them to focus more on program delivery and student support.
- **Enhance Resource Predictability**: Streamlined funding provides more consistent and reliable resources, aiding in long-term planning and sustainability.
- **Promote Equity**: Targeted funding mechanisms address disparities, making quality PWR programs accessible to all students, regardless of geographic location or district resources.

The following diagram illustrates the **proposed future state**, showing how the **Categorical Fund for Student Support Services** and the unified **Big Three PWR Fund** work together to address the identified challenges:



- The diagram focuses on the future state, highlighting how the State of Colorado can provide the right funding to LEPs to promote equitable access to the Big Three PWR outcomes.
- It visually represents the streamlined funding flows and targeted support mechanisms that simplify processes and enhance resource allocation.

By implementing these recommendations, the State of Colorado can better equip LEPs to deliver PWR programs effectively, ultimately enhancing educational outcomes and preparing students for success in postsecondary education and the workforce.

The recommendations that follow provide detailed strategies for implementing these funds and additional measures to strengthen PWR programming across the state. Despite the limitations in data, the study's findings support the potential for significant positive impact through these recommended actions.

1. Establish a Unified Big Three PWR Funding Source

To effectively address the challenges of inequitable resource distribution and significant administrative workloads faced by LEPs, this study recommends the creation of a unified **Big Three PWR Funding Source**. This fund would consolidate a targeted list of existing state grants and incentive programs into a single, flexible funding mechanism designed to streamline processes, promote equity, and enhance the delivery of PWR programs across Colorado. By doing so, the State of Colorado can strategically allocate resources where they are most needed, ensuring equitable access to the Big Three PWR outcomes while minimizing administrative complexities.

Structure of the Big Three PWR Fund

The Big Three PWR Fund is structured into two distinct yet complementary funds: the **Start-Up and Innovation Fund** and the **Outcome-Based Sustainment Fund**. Each fund includes components that follow different funding mechanisms and distribution methods. Each component addresses specific needs while supporting the overarching goals of equity, flexibility, and student success.

1. Start-Up and Innovation Fund

The Start-Up and Innovation Fund is designed to help LEPs establish new PWR programs and foster innovative practices that enhance program quality and student outcomes. This fund consists of two primary components:

- **Needs-Based Start-Up Funding**: This component would provide financial assistance to LEPs to initiate or expand PWR programs. Allocations could be determined automatically based on specific criteria, including low PWR participation rates, high rates of FRL (in 9-12 grade), high dropout rates, truancy rates, graduation rates, and a student count leveling mechanism to align with areas of higher need. By eliminating competitive application requirements, this mechanism reduces administrative workload and facilitates timely support.

  Funding Mechanism: Funding from this component should be provided to districts as a yearly one-time fund that may be used for a variety of purposes, such as designing industry-aligned curricula, hiring qualified staff, and acquiring essential equipment and technology. Additionally, LEPs should be encouraged and awarded for pooling resources through consortiums or alongside BOCES to foster regional collaboration and share best practices.

- **Innovation Grant**: This component would offer competitive grants for LEPs proposing innovative and creative approaches to PWR programming. Grant proposals could be evaluated based on innovation, feasibility, scalability, and alignment with State workforce priorities. A diverse review committee, including representatives from the CDE and the CWDC, could assess applications to ensure equity and impact.

  Funding Mechanism: To address disparities, funding could be distributed based on district designation, e.g. 45% allocated to non-rural LEPs, 35% to rural LEPs, and 20% to small rural, and be awarded to one or several LEPs per designation. Applicants would be required to provide detailed project descriptions to address needs or gaps, along with implementation plans outlining timelines, key activities and roles. Recipients must also provide budget justifications and evaluation plans to ensure accountability and measurable impact.

Exceptional programs might receive Distinguished Program Recognition Awards and opportunities to share their work statewide.

To support implementation, technical assistance could be provided by CDE, and collaboration with industry, higher education, and other LEPs should be encouraged. Progress would be monitored through regular reports, with a final evaluation assessing the project's impact and lessons learned. Best practices from successful projects could be documented and shared to promote broader improvement across the state.

2. Outcome-Based Sustainment Fund

The Outcome-Based Sustainment Fund provides ongoing financial support tied to measurable student achievements in the Big Three PWR areas: Postsecondary Credit Attainment, Industry-Recognized Credentials, and Work-Based Learning. This approach aligns funding directly with student outcomes, facilitating sustainability and continuous improvement.

Funding Mechanism: The fund's mechanisms aim to streamline processes and reduce administrative workloads for LEPs, but effective implementation would require CDE administration to establish efficient processes and tools for tracking and verifying Big Three outcomes. In the short term, LEP-submitted attestations, similar to those used for credential and WBL verification in CDIP, could provide a practical solution. This recommendation also includes implementing a Statewide ICAP System to facilitate outcome tracking while supporting a broad range of PWR services for students, staff, and caring adults. Long-term strategies should leverage data from an SLDS, incorporating bi-directional integrations to enrich learners' longitudinal records and supplement ICAP data with postsecondary credit details. Initial efforts should focus on optimizing processes and tools, with future plans to automate funding allocation through an SLDS for greater consistency and efficiency.

A. Postsecondary Credit Attainment: LEPs receive allocated resources based on a single measurable threshold: students who earn 12 or more postsecondary credits while in high school—incentivizing meaningful credit attainment and focusing funding on tangible student academic progress.

B. Industry-Recognized Credentials: LEPs receive funding for students earning an industry-recognized credential. A tiered incentive structure rewards higher-tier credentials—those requiring significant effort, aligning with high-demand industries, or necessitating extensive training—at higher rates (e.g., $1,000 per student). Lower-tier credentials, which are foundational or entry-level certifications providing basic skills, are reimbursed at standard rates (e.g., $300 per student). An additional 20% weight for FRL students would also be applied when applied to the final distribution.

C. Work-Based Learning Opportunities: Funding provided for students participating in eligible WBL opportunities. Funding could be given based on requirements being met, for example 40 hours per semester, or scaled based on engagement duration, with higher incentives for more substantial experiences. For example, short-term engagements meeting minimum required hours might receive a base incentive (e.g., $300 per student), while extended experiences with more contact hours could receive higher incentives (e.g., $1,000 per student). Additional considerations for WBL outcomes could include whether the student experience was completed through a School Based Enterprise, whether it was tied to a

specific program or pathway (e.g. P-TECH) and give additional incentives for LEPs who have students who are FRL eligible complete WBL outcomes.

Funding Administration – Statewide ICAP System

To bolster programmatic support and tracking, this study recommends the implementation of a **Statewide ICAP System** as a strategic approach to enhance PWR outcomes. This student-centric platform could become integral to a student's educational experience, starting as early as elementary school, and would function alongside academic transcripts. By standardizing ICAP processes across LEPs, the system aims to increase efficiency, reduce administrative workload, and improve tracking of the Big Three PWR outcomes.

The proposed Statewide ICAP System could be developed through a collaborative effort involving LEPs, CDE, CDHE, and other relevant stakeholders. Designed to supplement existing tools such as MyColoradoJourney and Connecting Colorado, it could be built in a way to facilitate interoperability and use of critical components of each rather than redundancy. This would require adopting data sharing agreements, open standards or integrations, and interoperable frameworks that could facilitate seamless data exchange between various platforms, enhancing functionality while providing a unified interface for students, educators, and administrators.

Key technical features of the system include implementation of a consistent framework for administering ICAP activities across all LEPs, allowing for customization to meet local needs while maintaining alignment with state standards. Flexibility to incorporate new programmatic initiatives, such as an In-Demand Quality Credential Framework checklist, keeps the ICAP process current with evolving industry requirements and educational best practices. Centralized tracking of students' industry credentials and WBL experiences could be used to capture detailed records that benefit both students and LEPs. This data management capability supports outcome-based funding allocations by providing verifiable evidence of student achievements aligned with the Big Three outcomes.

Utilization of analytics tools to correlate labor market data with students' interests and goals assists educators and administrators in designing programs that meet both student needs and economic demands, supporting strategic planning at both the LEP and state levels. Bidirectional data flows between the Statewide ICAP System and the SLDS enhance the robustness of longitudinal student records, allowing for real-time updates and enriching the accuracy and utility of statewide educational data.

The system architecture would be built on scalable infrastructure to accommodate LEPs of varying sizes and adapt to evolving technological needs. A modular design approach allows for the addition of new features without disrupting existing functionalities. Ongoing collaboration with industry partners, IHEs, and workforce development agencies maintains the system's relevance and responsiveness to external trends and requirements.

The implementation of a Statewide ICAP System offers several strategic benefits. Automating data collection and reporting processes reduces administrative workloads on LEPs, allowing educators to focus more on student engagement and less on paperwork. Centralizing data within a unified system enhances accuracy and facilitates real-time access to critical information for educators, administrators, and policymakers. The system provides policymakers with accurate, up-to-date data

to inform funding decisions and educational strategies aimed at improving equity and access to PWR programs. Elevating the ICAP to a central role in students' educational experiences empowers them to actively participate in shaping their futures, aligning educational pathways with personal interests and labor market demands.

By integrating the Statewide ICAP System with existing educational infrastructure and aligning it with the Big Three PWR outcomes, the approach supports Colorado's commitment to preparing a skilled workforce that meets the demands of a dynamic economy. The system enhances the ability of LEPs to deliver effective PWR programs, facilitates equitable access to educational opportunities, and contributes to the overall economic vitality of the state.

The technical implementation of a Statewide ICAP System represents a forward-looking strategy to enhance PWR outcomes through standardized processes, advanced data management, and collaborative stakeholder engagement. By addressing the technical, administrative, and strategic considerations outlined, the system has the potential to significantly improve the efficiency and effectiveness of PWR programs across Colorado, ultimately benefiting students, educators, and the broader economy.

Big Three PWR Fund - Financial Modeling

To operationalize the proposed Big Three PWR Fund, this study developed a comprehensive financial model that applies the recommended funding structures and allocation strategies. The model demonstrates how existing State funds can be consolidated and reallocated to support the Big Three PWR outcomes while addressing equity and administrative efficiency.

Building the Financial Model

The financial model begins by identifying existing PWR-related funding streams that could be reallocated into the Big Three PWR Fund. Using **FY24–25 funding totals from the Long bill, School Finance and special bills**, the following programs were considered for reallocation:

- Accelerated College Opportunity Exam Fee
- Automatic Enrollment in Advanced Course Grant Program
- Colorado Career Advisor Training Program
- Concurrent Enrollment Expansion and Innovation Grant Program
- School Counselor Corps Grant (partial reallocation)
- CDIP
- P-TECH (Partial reallocation of 5-6 year PPR)
- TREP (Partial reallocation of 5-6 year PPR)
- ASCENT (options for full or partial reallocation of funding)

Detailed Financial Model

Below is an overview of the financial model for **Year 1**, illustrating how the funds could be allocated across the different components of the Big Three PWR Fund.

Existing PWR Funding for Reallocation (Year 1 Total: $35,997,903)

Existing PWR Funding for Reallocation	Year 1 %	Year 1
1. Accelerated College Opportunity Exam Fee	100%	$561,665
2. Automatic Enrollment in Advanced Course Grant Program	100%	$246,276
3. Colorado Career Advisor Training Program	100%	$1,000,000
4. Concurrent Enrollment Expansion and Innovation Grant Program	100%	$1,476,948
5. School Counselor Corps Grant	30%	$3,602,247
6. Career Development Incentive Program	100%	$9,518,950
7. Partial Reallocation of 5-6 Year PPR from P-TECH + TREP	30%	$751,397
8. ASCENT	100%	$18,840,420
Total Funding		$35,997,903

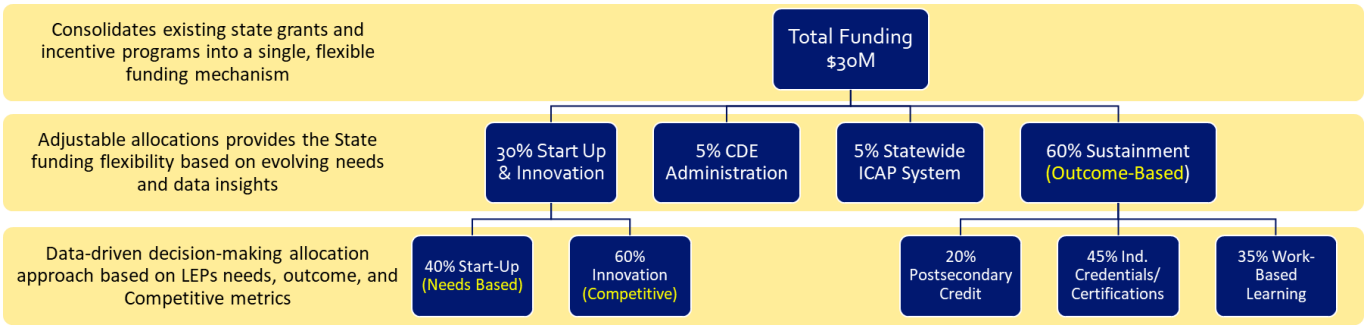
In the modeling of the funds available for reallocation to a unified Big Three PWR Fund, the following assumptions were included:

- 30% allocation of SCCG funds in Year 1 reflects the need to honor existing commitments to LEPs under multi-year contracts. This percentage is planned to increase in subsequent years as these contracts conclude, allowing for a gradual reallocation of SCCG funds into the Big Three PWR Fund.
- Reallocation of 30% of funds from 5th and 6th Year PPR funding allocations from P-TECH and TREP aligned with recommendation #4 to implement cost containment measures by implementing a reimbursement model for tuition, books, and fees for 5th and 6th year programs.
- Aligned with recommendation #6 in this study, reallocate ASCENT funding towards a unified Big Three PWR Fund. This allocation of ASCENT funding can be adjusted in modeling based on decisions made for reassessing and realigning the ASCENT program.

After establishing the total Big Three PWR funding amount, an initial 30/60 split between the Start-Up and Innovation Fund and the Outcome-Based Sustainment Fund is proposed. This allocation could be adjusted in future years as industry trends, workforce needs, and student outcomes develop over time.

It is recommended to allocate 5% of the total funds in Year 1 for the development of a Statewide ICAP System, with an additional 2% allocated in Year 2 for any enhancements and maintenance requirements. Additionally, an estimated 5% of the total fund should be allocated towards CDE Administration to support the PWR team with programming, competitive grant support, and the required administrative support to manage the funding mechanisms aligned to recommendations.

The image below provides a detailed breakdown for how the Big Three PWR Fund could be allocated:



The table below summarizes the proposed allocations of funds that will be utilized by each component of the funding mechanism.

Big Three PWR Fund	Year 1 %	Year 1
Start-up and Innovation Fund	30%	$10,799,371
Statewide ICAP System (Year 1)	5%	$1,799,895
Sustainment Fund	60%	$21,598,742
CDE Administration	5%	$1,799,895

Start-up and Innovation Fund – Model

The table below outlines the components that would be used to determine the allocation of funds between start-up and innovation. For this model, the total amount of ~$10.79M is split 60% Start-up and 40% Innovation allocation for distribution of the funds allocated.

Start-up Fund:

In Year 1, the model allocated $6,479,623 to a needs based Start-up fund based off the allocation metrics shown below.

Start-up and Innovation Fund (TOTAL)					$10,799,371
				Year 1 %	**Year 1**
Start-up - Need Based				60%	$6,479,623
Allocation Metric	High	Med	Low		
PWR Participation (% Total 9-12)	15%	10%	5%		
FRL Rate (greater than)	50%	40%	30%		
Truancy Rate (greater than)	8%	5.3%	2.6%		
Graduation Rate (less than)	90%	80%	70%		
Dropout Rate (greater than)	2%				
9-12 Student Count Cap	4000		200		
Innovation - Competitive				40%	$4,319,748
Non-Rural	45%				$1,943,887
Rural	35%				$1,511,912
Small Rural	20%				$863,950

The model relies on district level data to assign a point system for key metrics. Based on the district demographics, points are assigned to quantify the need, with a higher point total across each allocation metric noting higher needs and a great proportion of the total Start-up Fund. This point system, outlined in the table below, is then applied to a student count cap which creates a proportional funding spread that allows for equity so that districts with less than 200 students do not receive very minimal funding and districts with more than 4,000 students do not disproportionally utilize funds.

Point Allocation	PWR Participation Rate Points	FRL Rate Points	Truancy Rate Points	Dropout Rate Points	Graduation Rate Points
High +	0.00	1.00	1.00	1.00	0.00
Medium - High	0.25	0.50	0.50	-	0.25
Low - Medium	0.50	0.25	0.25	-	0.50
- Low	**1.00**	**0.00**	**0.00**	**0.00**	**1.00**

Note: PWR Participation points were based on FY23-24 district participation for 9-12 students in P-TECH, Concurrent Enrollment Program, ILOP, and CDIP.

Innovation Fund:

In Year 1, the model allocated $4,319,748 to a competitive innovation based grant that could be divided amongst Non-Rural, Rural, and Small Rural LEP designations. This would allow for great equity in funding distribution and the ability to award LEPs for innovative practices or distinction in a particular PWR outcome. Funding distribution would follow a competitive grant process. For the purpose of showing the outcomes of the model, the innovation grant funds have been spread across LEPs.

Outcome Based Sustainment Fund - Model

Using 60% of the total funds, or $21,598,742, the outcome-based sustainment fund will allocate resources to LEPs based on student achievements across the Big Three outcomes. The fund is designed to distribute 20%, 45%, and 35% of the allocation across Postsecondary Credit, Industry Credentials and Certifications, and WBL, respectively. Due to the lack of student-level data for postsecondary credit, this model does not estimate specific distributions for that category and instead uses an equal spread for representation purposes.

The allocation for Industry Credentials and WBL is modeled after FY23-24 CDIP data. The higher proportion directed toward Industry Credentials and WBL reflects the existing availability of funding mechanisms for postsecondary credit that LEPs can leverage, such as the concurrent enrollment program. This approach prioritizes critical areas that currently lack equivalent funding options, promoting balanced and equitable investment across the Big Three.

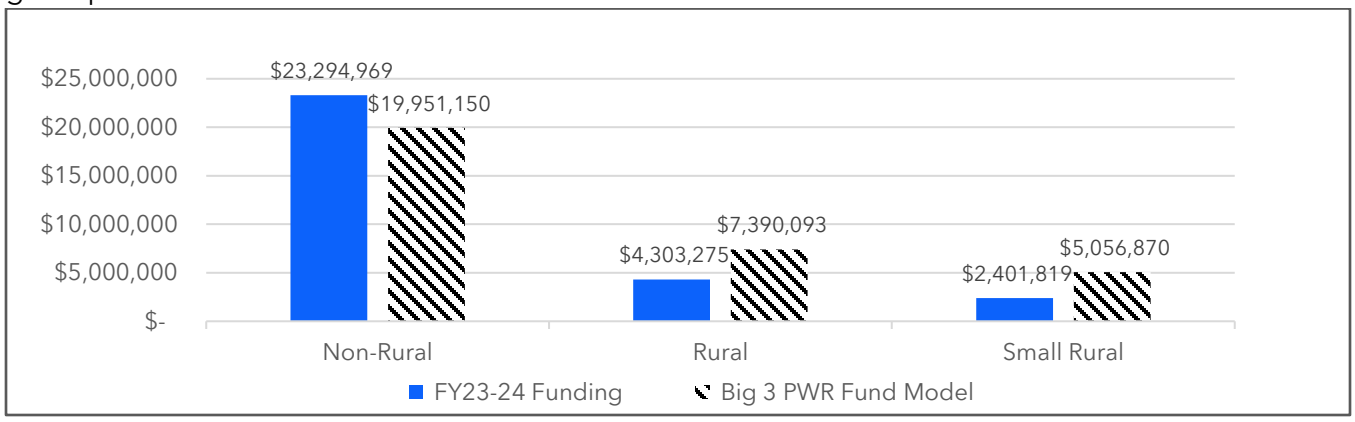
Sustainment Fund - Outcome Based		$21,598,742
	Year 1 %	**Year 1**
Postsecondary Credit	20%	$4,319,748
Industry Credentials / Certification	45%	$9,719,434
Work-Based Learning	35%	$7,559,560

Projected Impact on LEPs (Year 1)

By utilizing the concepts outlined in this model, the table below outlines the potential impact across LEPs comparing FY23-24 funding in the same programs to the proposed model for the Big Three.

	FY 23 – 24 Comparison			**Big Three PWR Fun Year 1**		
LEP Designation	**FY23-24 Funding**	**% Total**	**Avg Funding Per Student**	**Big 3 PWR Fund Model**	**% Total**	**Avg Funding Per student**
Non-Rural	$23,294,969	78%	$111.02	$19,951,150	62%	$130.78
Rural	$4,303,275	14%	$163.53	$7,390,093	23%	$256.89
Small Rural	$2,401,819	8%	$345.86	$5,056,870	16%	$761.83
Total	$30,000,063	100%	$266.19	$32,398,113	100%	$544.64

This reallocation results in increased funding percentages for rural and small rural LEPs, addressing the equity concerns identified in this study. Non-rural LEPs see a decrease in the total funding amount, but more equitable distribution of fund increases the average amount of funding being given per student.



The financial model demonstrates how the Big Three PWR Fund can be operationalized using existing resources, considering existing commitments such as those under the SCCG. By reallocating funds and applying the structured allocation strategies discussed, the model provides LEPs with targeted support to enhance PWR programs. It aligns funding with measurable outcomes and LEP needs, promoting equity and reducing administrative workloads through standardized processes.

This practical application of the proposed funding model offers a clear direction for the State to implement the recommendation effectively, ultimately enhancing the quality and accessibility of PWR programs for all Colorado students.

Implementation Strategy

The Big Three PWR Fund operates with flexibility, allowing the State to adjust allocations based on evolving needs and data insights. Key aspects of the implementation strategy include:

- **Adjustable Allocations**: The State retains flexibility to modify percentage allocations between the Start-Up and Innovation Fund and the Outcome-Based Sustainment Fund overtime. This adaptability ensures that funding remains responsive to program performance and emerging needs.
- **Data-Driven Decision-Making**: Although there are data limitations, particularly with concurrent enrollment outcomes, the fund's structure allows for adjustments as more comprehensive data becomes available. This approach facilitates increasingly precise and effective funding decisions.
- **Leveraging Existing Models**: For Industry-Recognized Credentials and WBL, the fund can adopt mechanisms like those used in the Career Development Incentive Program (CDIP), ensuring continuity and leveraging proven strategies while refining them to better meet LEP needs.
- **Automation and Efficiency**: By basing funding on standardized outcome data, the process can be automated. LEPs report their outcomes through established data systems, and funding allocations are calculated accordingly without the need for additional applications or paperwork (except for the Innovation Grants).

While the Big Three PWR Fund offers a robust solution, it is important to acknowledge potential limitations:

- **Data Limitations**: The current lack of comprehensive data, especially for concurrent enrollment, necessitates reliance on LEP attestations. Investment in data systems like the SLDS is essential for future automation and accuracy.
- **Complex Funding Structures**: Integrating funds across agencies and with IHEs requires careful coordination to avoid disruption of existing programs.
- **Ensuring Fairness**: Careful calibration of incentive amounts and thresholds is necessary to ensure that funding appropriately reflects the effort required and the value of different outcomes.

Anticipated Benefits

The implementation of the Big Three PWR Fund includes several key strategies to ensure its success:

- **Alignment with Workforce Needs**: Collaborating with the Colorado Workforce Development Council and aligning incentives with high-demand industries ensure students gain relevant skills and credentials valued in the workforce
- **Equity Advancement**: Targeting resources based on measurable student outcomes and supporting LEPs with greater needs promotes equitable access to PWR programs.
- **Administrative Efficiency**: Standardized processes and potential for automation reduce administrative tasks for LEPs, allowing them to focus on delivering quality programs.
- **Enhanced Student Outcomes**: Incentivizing LEPs based on student achievements encourages the development and support of programs that effectively prepare students for postsecondary success.

By implementing these recommendations, the State of Colorado can achieve several significant benefits. The fund's alignment with workforce priorities ensures that students gain the skills and credentials needed for high-demand industries. Targeted equity measures address disparities in access to PWR programs, while streamlined funding mechanisms enhance resource predictability and administrative efficiency.

2. Establish a categorical fund for school counselors that includes provisions for academic advisors and career coaches, including technical training and administrative support.

Throughout this study, LEPs consistently report that managing the administrative aspects of multiple programs diverts critical resources away from direct student support, hindering their ability to meet students' needs in achieving the Big Three. In meeting this need, it is recommended that there be a new categorical fund for School Counselors with provisions to utilize a percent of funds for Academic Advisors and Career Coaches. This fund could also include programmatic training and administrative support from CDE, ensuring that students, particularly those in high-need schools, have access to the guidance necessary for successful participation in PWR programs.

School counselors play a pivotal role in assisting students to develop and pursue their ICAP, which are crucial for achieving the Big Three outcomes. They provide academic guidance, career exploration assistance, and social-emotional learning support, all of which contribute to student success in PWR programs. This proposed categorical fund represents a significant yet strategic investment in Colorado's education system, totaling approximately $300.8 million—around 3% of the total General Fund. By directly supporting the implementation of the Big Three outcomes, this investment addresses longstanding equity challenges while fostering a prepared and competitive workforce.

An analysis of the School Counselor Corps Grant Program (SCCGP) highlights the positive impact that increased counseling services have on student outcomes. For example:

- **Rural Outlying Cities:** Schools funded by SCCGP have an average matriculation rate of 56.98% compared to 46.23% in non-funded schools.
- **Small Rural Towns:** Funded schools show a lower dropout rate and a higher matriculation rate (50.72% vs. 42.17%) than non-funded counterparts.
- **Non-Rural Urban-Suburban Areas:** Funded schools demonstrate slightly lower dropout rates and higher matriculation rates, further confirming the benefits of enhanced counseling support.

Despite the positive impacts, challenges remain that underscore the need for a dedicated categorical fund:

- **Staffing Shortages:** Many LEPs struggle to attract and retain qualified school counselors due to competitive salary requirements and high workloads.
- **High Student-to-Counselor Ratios:** The current counselor-to-student ratio in Colorado averages 1:312, exceeding the nationally recommended ratio of 1:250. Some districts do not have school counselors or face ratios as high as 1:1,100.
- **High-Need Schools:** LEPs serving high percentages of students eligible for FRL, students in Special Education (SPED), and schools with high dropout rates face disproportionate challenges in meeting student needs.
- **Academic Advisors and Career Coaches:** In addition to School Counselors, LEPs reporting the highest success also include additional roles to support PWR, including those that

support students with academic advising, establish career coaching, and coordinate PWR programming.

Proposed Components of the Categorical Fund

This recommendation proposes a categorical fund to address these challenges, with the following key components:

1. **Enhanced Staffing Levels:**
    - Establish a **minimum salary benchmark of $62,500** for school counselors, with adjustments for high cost-of-living areas (e.g., a 1.45 escalator for regions like Denver, increasing the salary to $90,625).
    - **Career Coaches/Academic Advisors:** Establish a **minimum salary benchmark of $50,500**, with adjustments for high cost-of-living areas (e.g., a 1.45 escalator for regions like Denver, increasing the salary to $73,225).
    - Utilizing this funding allocation would create the need for approximately **394 additional school counselors** and **499 career coaches/academic advisors**, bringing much-needed capacity to districts statewide.
2. **Equity-Based Allocations for High-Need Schools:**
    - Additional counselor allocations will be based on key indicators of need:
        - **Dropout Rates:** Schools with rates exceeding 2% will receive 0.25 additional FTEs per 1,000 students.
        - **FRL Eligibility:** Schools with FRL populations above 50% will receive 0.25 additional FTEs per 1,000 students.
        - **SPED Populations:** Schools with SPED populations above 21% will receive 1 additional FTE.
        - **Counselor-to-Student Ratios:** Schools exceeding the target ratio of 1:250 will receive additional FTEs to bring them closer to compliance.
3. **Flexibility for Career Coaches and Academic Advisors:**
    - Allow districts to allocate up to **25% of total FTE funding** for hiring Career Coaches and Academic Advisors. These roles will focus on career exploration, navigating PWR programs, and connecting students to industry opportunities, directly supporting the attainment of the Big Three outcomes.
4. **Programmatic Training and Administrative Support:**
    - Allocate **2.5% of the total fund** (approximately $5.79 million) for CDE administrative and technical assistance to build a comprehensive counseling program, as well as oversee and implement the fund.
    - Provide **$2,000 per new hire** for training, ensuring that newly hired counselors and advisors are equipped to support students effectively.

Total Investment

The proposed categorical fund totals approximately **$300.1 million**, distributed as follows:

- **School Counselors:** $231.76 million for all school counselors including 394 new hires
- **Career Coaches/Academic Advisors:** $62.1 million for academic advisors and career coaches reflecting approximately 496 new hires.
- **Administrative Support:** set aside 2.5% of the total funds for CDE administrative support which will equal $5.76 million annually
- **Training Funds:** set aside approximately $2,000 per estimated new hires, or a total of $1.78 million for counselors, academic advisor, and career coach training.

The table below outlines the inputs and assumptions that were used to determine the categorical funding model recommendation.

ASSUMPTIONS	INPUTS		Categorical Fund OUTPUT	New Hires
School Counselor - Base Salary	-	$62,500	$218,353,924.13	394
Career Coach / Academic Advisor - Base Salary	-	$50,500	$62,092,875.32	496
HCOL Escalator (e.g. Denver Metro)	-	1.45	-	-
Desired Ratio - School Counselor	-	250	-	-
Drop Out - Additional FTE (per 1,000 students)	0.25	2%	-	-
FRL Above - Additional FTE (per 1,000 students)	0.25	50%	-	-
SPED Above - Additional FTE	0.5	21%	-	-
Pupil Count Below Ratio - Additional FTE	0.5	250	-	-
Allowable FTE Allocation for Academic Advisors / Career Counselors	-	25%	-	-
CDE Administrative Funding	-	2.5%	$5,458,848.10	-
Training Funds per new Headcount	-	$2,000	$1,779,847.65	890
TOTAL CATEGORICAL FUNDING			$287,685,495.20	

Strategic Impact

This investment is designed to address longstanding challenges in counselor and advisor staffing across Colorado. By reducing counselor-to-student ratios to the recommended 1:250 and targeting additional resources to high-need schools, the fund will ensure that all students—regardless of geography or socioeconomic status—have access to the guidance necessary for participating in PWR programs.

The flexibility to hire Career Coaches and Academic Advisors further strengthens this proposal, enabling districts to address specific needs and support students in exploring pathways that align with their career aspirations. Combined with training and administrative support, the categorical fund provides a comprehensive solution to one of the most pressing barriers to achieving the Big Three outcomes.

By following these recommendations, the model produces the following updated ratios:

LEP Designation	FY23-24 Ratio	Model Counselor Ratio	Model AA / CC Ratio	Model Combined Ratio
Non-Rural	385	298	893	223
Rural	343	299	897	224
Small Rural	266	227	681	170
Total	**312**	**255**	**766**	**191**

A dedicated categorical fund for school counselors and career advisors represents a strategic investment in Colorado's education system. By addressing staffing shortages, reducing administrative workloads, and prioritizing high-need schools, this fund will improve equitable access to PWR programs and help prepare students for successful futures. This initiative aligns with the state's broader goals of fostering economic mobility and building a competitive workforce.

This strategic investment is designed to enhance student support services, reduce administrative workloads on existing staff, and promote equitable access to PWR programs across all districts. By bolstering the availability of counselors and support staff, the state can improve student outcomes related to Postsecondary Credit, Industry-Recognized Credentials, and WBL, ultimately contributing to a more prepared and competitive workforce.

3. Develop an updated and standard Cooperative Agreement that establishes an outline for a set Concurrent Enrollment tuition rate that includes online costs.

To promote equitable access and financial clarity in **Concurrent Enrollment** programs, it is crucial to develop an updated and standardized **Cooperative Agreement** that outlines a consistent tuition rate, including costs for online courses, between LEPs and IHEs. This standardized agreement aims to eliminate disparities and unpredictability in tuition fees that currently exist due to varying agreements across districts.

By establishing a set tuition rate for CE courses, LEPs can better budget and plan for student participation, ensuring that all students have equal opportunities to earn postsecondary credits while still in high school. Including online course costs is particularly important for students in rural or remote areas who rely on virtual learning options to access CE programs. A uniform rate for both in-person and online courses simplifies financial planning and removes barriers caused by additional fees associated with online instruction.

This standardization also reduces administrative workloads by streamlining the negotiation process between LEPs and IHEs. With clear, consistent terms, both parties can focus on supporting students rather than managing complex financial agreements. Ultimately, a standardized Cooperative Agreement enhances the effectiveness of PWR programs by fostering transparency, promoting equity, and ensuring that financial considerations do not impede student access to valuable educational opportunities aligned with the **Big Three** outcomes.

Detailed recommendations for creating an updated Cooperative Agreement Template can be found in Appendix G.

Return to Executive Summary

4. Implement cost containment measures by implementing a reimbursement model of tuition, books, and fees for 5th and 6th-year programs.

To enhance the sustainability of PWR programs and address inefficiencies in resource distribution for 5th and 6th-year programs, this study recommends transitioning to a reimbursement model for tuition, books, and fees. Programs such as ASCENT, P-TECH, and TREP provide critical opportunities for students to extend their education beyond traditional high school years; however, the current funding structure often results in disproportionate allocation of resources. A reimbursement model would tie funding directly to the costs of tuition, books, and fees incurred by LEPs, facilitating a more equitable and efficient use of state funds while maintaining access to these programs.

Financial Analysis Supporting the Recommendation

This study's financial analysis of ASCENT and 295 cooperative agreements served as the foundation for evaluating 5th and 6th-year program funding. Using FY23-24 ASCENT data:

- Tuition was modeled at $160 per credit for on-campus courses and $276 for online courses, assuming 25% of credits were completed online.
- Additional costs for books and fees were modeled at $59 and $29 per credit, respectively.

The analysis revealed that ASCENT's reduced PPR funding covered approximately **160%** of the estimated annual expenses for a student completing 24 credits, leaving 30%-40% of funds available for potential reallocation. While LEPs often use these surplus funds for broader programming, such as staffing or curriculum expansion, this flexibility creates resource allocation barriers that blur the distinction between K-12 and higher education funding. Additionally, at least 12% of LEPs according to Cooperative Agreements, pass on the cost of books and fees to students and caring adults. Given the limited reach of 5th and 6th-year programs and their disproportional benefits, transitioning to a reimbursement model provides a more effective and accountable approach to funding.

Proposed Reimbursement Model

This study recommends implementing a phased reimbursement model designed to uphold the integrity and impact of 5th and 6th-year programs while fostering cost containment. Key elements include:

1. **Upfront Allocation:** LEPs would receive an initial allocation during the October count based on projected program enrollment. This allocation would provide liquidity for program startup and ongoing operations.
2. **Reimbursement of Verified Costs:** LEPs would submit verified invoices from IHEs covering tuition, books, and fees. Reimbursements would be made periodically from the allocated account, ensuring funds align with actual program expenses.
3. **Year-End True-Up:** At the end of the academic year, IHEs would submit reconciled invoices to the State, allowing for final adjustments to LEP accounts. Any unspent funds could be reallocated to other PWR initiatives, promoting efficient use of resources.

This mechanism preserves LEP autonomy while aligning funding with program-specific expenditures, improving transparency and accountability without undermining broader program goals.

Balancing Cost Containment with Program Goals

The recommendation acknowledges that surplus funds currently allocated to 5th and 6th-year programs are often reinvested in critical activities that support PWR outcomes. These include:

- Expanding access to industry-aligned credentials and WBL opportunities.
- Supporting administrative roles that enhance program delivery.
- Building and sustaining industry partnerships that benefit students and communities.

The intent is not to diminish these efforts but to create a structure that promotes strategic resource use, particularly given the high per-student costs of 5th and 6th-year programs compared the funds that are allocated across other PWR initiatives.

Aligning Funding with Equity and Sustainability

By transitioning to a reimbursement model, the State can address funding imbalances while supporting LEPs in maintaining and expanding high-impact programming. Additionally, the proposed outcome-based sustainment fund could complement this model by incentivizing LEPs to prioritize student completion of credentials and postsecondary transitions, ensuring that funds are tied directly to measurable outcomes.

This recommendation seeks to maximize the impact of PWR funding, balancing the needs of students, LEPs, and IHEs while addressing the growing cost pressures associated with extended-year programs.

5. Establish a means for tracking the Big Three outcomes using streamlined administration. Consider utilizing a Statewide ICAP System and an SLDS to establish student record tracking of postsecondary credit, industry certifications, and WBL.

The 1241 Task Force, convened through H.B. 23-1241, recently conducted a detailed review of Colorado's education accountability system[1]. Their work emphasized the need for transparency, equity, and efficiency in tracking student outcomes, particularly in areas critical to PWR. Findings from this study align closely with the Task Force's recommendations, supporting a phased, streamlined data-tracking system that leverages Colorado's SLDS and proposes the establishment of a Statewide ICAP System. While the SLDS has funding prioritized via HB1364, the Statewide ICAP System would require new investment, which should be prioritized within the unified Big Three PWR Fund to enhance outcome monitoring, reduce administrative workloads, and inform resource planning.

The phased approach recommended in this study includes the following steps, each designed to incorporate specific Task Force recommendations into tracking PWR outcomes:

Now: Invest in and implement a Statewide ICAP System that provides a more robust framework for capturing the Big Three outcomes, especially credentials and WBL. This student-facing tool would be utilized by LEPs to facilitate the ICAP process, bringing a consistent methodology, aligned data, and the ability to effectively track PWR outcomes. By capturing detailed information on credentials—including credential numbers, issuers, and relevant dates—and connecting students with available WBL opportunities, the Statewide ICAP System would enhance the capacity of LEPs to support students in achieving their PWR goals. This aligns with the Task Force's emphasis on enhanced data transparency, ensuring that all student groups are represented and enabling early identification of achievement gaps and targeted support.

Next: Integrate the Statewide ICAP System with the SLDS, utilizing the SLDS as a means of verification and validation. The ICAP System would feed data into the SLDS, which would leverage this dataset to track students' longitudinal records. Additionally, the SLDS could serve data back to the Statewide ICAP System, providing students and LEPs with information on current postsecondary credits attained, connections with job opportunities, and rich datasets to assist LEPs with forecasting and planning. This bidirectional flow of information would enhance the utility of both systems, minimizing reporting work on LEPs and aligning with the Task Force's recommendation to standardize reporting across institutions.

Later: Automate the tracking and reporting of Big Three outcomes within the SLDS, using data from the Statewide ICAP System. Automating PWR data collection would enhance accuracy, reduce time, and enable outcome-based funding decisions based on real-time data. Including instructional and administrative capacity data—such as staffing for instructors, counselors, academic advisors, career coaches, and concurrent enrollment instructors—would allow LEPs and the state to assess the

[1] Final Full Report - 1241 Task Force: Accountability, Accreditation, Student Performance, and Resource Inequity Task Force Report, November 2024; and noted in Appendix E.

availability of critical staff and resources, making it easier to identify and address gaps that could impact students' access to PWR opportunities.

This phased approach reflects and builds on the Task Force's core recommendations in several ways:

- Establishing a Statewide ICAP System integrated with the SLDS aligns with the Task Force's call for robust accountability measures. By providing a more robust framework for capturing the Big Three outcomes and facilitating bidirectional data flow, this approach ensures accurate, data-driven reporting on student outcomes, allowing stakeholders to evaluate and improve program effectiveness over time.
- Equitable data collection and reporting are directly addressed by collecting and reporting disaggregated data through the Statewide ICAP System. By tracking outcomes across various student groups—including historically underserved populations, this approach ensures that the SLDS supports both transparent public reporting and the identification of achievement gaps, helping LEPs implement targeted supports and programs.
- Assessing capacity and addressing resource inequities become more manageable by including data on instructional and support staff in the Statewide ICAP System and the SLDS. This addition creates a clearer picture of where LEPs may need additional resources to effectively deliver the Big Three. Addressing these gaps is critical for equitable program access, especially for LEPs with limited resources or staffing.

By fostering more effective program delivery and equitable access to postsecondary readiness pathways for all Colorado students, this integrated approach not only aligns with the Task Force's recommendations but also strengthens the state's ability to meet the diverse educational needs of its students. Implementing a Statewide ICAP System as a critical component of this tracking and accountability process will empower students, streamline administration for LEPs, and provide valuable data for informed decision-making at both the local and state levels.

Additionally, this study recommends two key SLDS use cases to be included in the system's ongoing mobilization:

1. **Longitudinal Tracking of Big Three Outcomes**: This use case supports a data-driven approach for monitoring student outcomes over time, aligning directly with the Task Force's goals for transparent, comprehensive accountability.
2. **Instructor Capacity**: Tracking instructor capacity aligns with the current challenges associated with providing adequate instructional support for the Big Three outcomes. This data can highlight where resources may be insufficient to deliver effective programs, supporting strategic resource allocation to address these gaps.

Together, these use cases ensure that SLDS enhancements are both data-focused and responsive to the current needs of LEPs, fostering more effective program delivery and equitable access to postsecondary readiness pathways for all Colorado students.

Details on the two use cases above are included in Appendix F: SLDS Use Cases.

6. Reassess and Realign the ASCENT Program

Originally established under **HB09-1319**, ASCENT was designed to assist FRL eligible students who required 15 or fewer credit hours to complete their credential, emphasizing equitable access and bridging barriers to higher education. Over time, legislative changes have expanded ASCENT's scope. The removal of the 500-student statewide cap and the lowering of credit requirements have led to increased participation among non-FRL students, particularly in urban and suburban districts. This shift has resulted in disproportionate growth in these areas, while rural districts face challenges such as limited partnerships with IHEs and transportation barriers. Consequently, ASCENT's benefits are not reaching the underserved populations it was initially designed to support.

Given these findings, detailed in **Appendix A**, it is recommended that the State reassess and realign the ASCENT program. To address the misalignment and enhance the program's effectiveness and equity, the state should consider one of the following options:

1. **Realign ASCENT with Its Original Intent**
    - **Action**: Reform the ASCENT program to focus specifically on low-income and at-risk students who are close to completing a postsecondary credential.
    - **Rationale**: By refocusing on the program's original objectives, ASCENT can better serve its intended population. Implementing measures such as reinstating district-level participation caps, adjusting eligibility criteria, and providing additional support to rural LEPs would enhance equity and ensure resources reach those most in need.
2. **Transition to a Reimbursement-Based Funding Model**
    - **Action**: Modify ASCENT's funding mechanism by adopting a reimbursement model where LEPs are reimbursed for actual program costs incurred.
    - **Rationale**: A reimbursement model would tie funding directly to the actual expenses of tuition, fees, and books, promoting fiscal responsibility and ensuring efficient use of resources. This approach would reduce surplus allocations, address funding disparities, and potentially alleviate administrative workloads on LEPs.
3. **Reallocate ASCENT Funds to Broader PWR Initiatives**
    - **Action**: Redirect the funding currently allocated to ASCENT into the broader **PWR Fund** to support a larger and more diverse student population.
    - **Rationale**: Reallocating funds would enhance equity and maximize the impact of state resources across all districts. By investing in programs that serve a broader range of students, the state can better support its PWR goals and ensure more equitable access to postsecondary opportunities.

By evaluating these options, the state can realign the ASCENT program with its original goals, enhance educational equity, and ensure that resources are utilized effectively to support Colorado's PWR initiatives. This reassessment is crucial for maximizing the impact of state funds and fostering postsecondary success for all Colorado students, thereby contributing to the state's economic vitality and workforce readiness.

Appendix A: Robust ASCENT Report

Introduction to ASCENT

The Accelerating Students through Concurrent Enrollment (ASCENT) program was established as part of Colorado's Postsecondary Workforce Readiness (PWR) framework, designed to provide eligible high school students with the opportunity to transition seamlessly into postsecondary education. By offering a fifth year of high school during which students take postsecondary courses, ASCENT allows participants to earn higher education credits at no tuition cost while remaining funded by their Local Education Provider (LEP).

Originally enacted under **HB09-1319**, ASCENT was specifically designed to support low-income students eligible for free or reduced-cost lunch (FRL) under the federal "National School Lunch Act" and who required 15 or fewer credit hours to complete a postsecondary credential. These foundational principles emphasized equitable access for at-risk students, bridging financial and logistical barriers to postsecondary education.

Over time, legislative adjustments have expanded the scope and scale of ASCENT, with mixed outcomes. **HB22-1390** removed the 500-student statewide cap, allowing any eligible student to participate, while lowering the minimum credit requirement from 12 to 9. More recently, **HB24-1393** introduced structural adjustments, including a district-level participation cap based on 2024-25 October enrollment counts and new requirements for FAFSA or CAFSA submission. These changes aim to streamline the program and improve accountability but have also raised concerns about equity and sustainability.

Rationale for Reevaluating ASCENT

While ASCENT remains popular among LEPs, its current cost and outcomes warrant a reassessment:

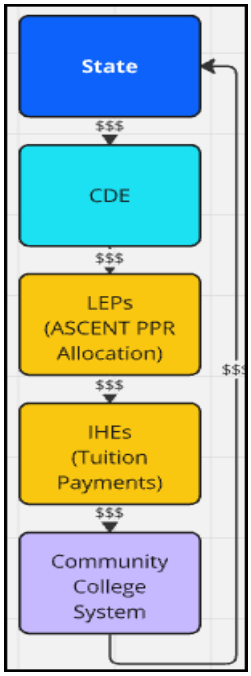
- **Cost and Scale Disparities**: For FY24-25, ASCENT is projected to cost **$18 million** for fewer than **2,000 students**, compared to the approximately **$25 million** allocated for CDE funded PWR grant and incentive programs serving the overall 9-12 population of approximately **282,903 students**. This imbalance raises concerns about the equitable distribution of state resources, particularly when ASCENT's reach remains relatively limited.
- **Student Outcomes Unclear**: Despite its financial investment, ASCENT lacks robust data demonstrating clear, measurable outcomes, such as increased degree attainment or reduced time to credential completion. Enrollment trends show growing participation among students not eligible for FRL, suggesting a drift from its original intent to prioritize underserved populations.
- **Program Popularity vs. Equity**: ASCENT's flexibility and financial benefits have made it popular in urban and suburban districts, which account for over **91.5% of total enrollment in FY23-24**, although they only account for 88% of State funding and enrollment. Conversely, rural districts face logistical challenges, including limited partnerships with Institutions of Higher Education (IHEs) and transportation barriers, restricting their ability to benefit from the program.

ASCENT Program Funding

The ASCENT program is primarily funded through Colorado's Per-Pupil Revenue (PPR) model, which allocates resources to Local Education Providers (LEPs) based on annual student October enrollment counts. For each full-time ASCENT student, LEPs receive a set PPR allocation. While LEPs are required to cover the cost of tuition, they may also choose to cover fees, books, and related materials. The specific costs covered, beyond tuition, are determined by the terms outlined in cooperative agreements between LEPs and Institutions of Higher Education (IHEs). A review of these agreements indicates that only 15 of the 179 districts cover all associated costs. For the FY23-24 academic year, the PPR allocation is set at $9,588 per full-time student, with funding scheduled to be capped at $9,586 beginning in FY24-25.

Funds flow through the following steps:

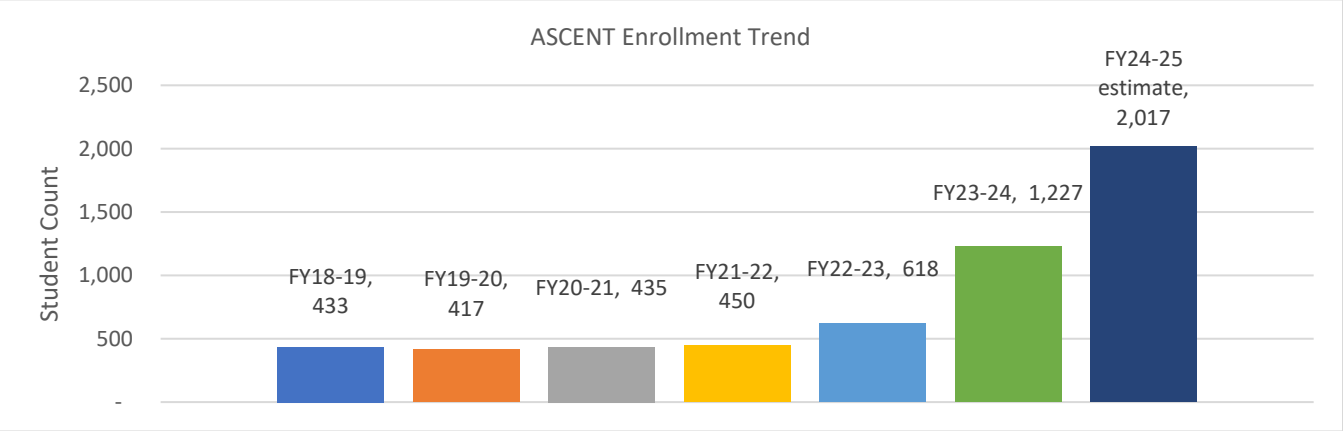
- **CDE Allocation**: CDE allocates funding to LEPs based on October enrollment counts for ASCENT participants.
- **LEP Administration**: LEPs receive the PPR allocation and use these funds to cover tuition costs for students enrolled in IHE courses.
- **IHE Payments:** LEPs transfer tuition payments to participating IHEs, primarily the Colorado Community College System, which is also state-funded.
- This **circular funding flow** channels state resources back into the higher education system.



The current ASCENT funding model creates inefficiencies and inequities. Non-rural LEPs with higher participation often benefit from economies of scale, allowing surplus PPR funds to support administrative costs. In contrast, rural LEPs face fixed costs that outweigh their ASCENT participation, leading to financial strain.

ASCENT Cost and Participation Analysis

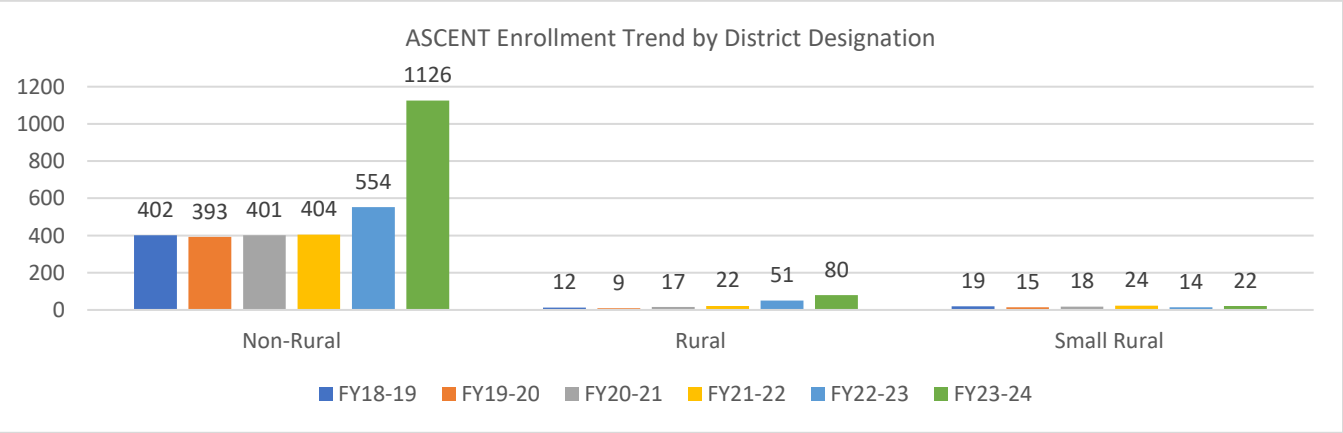
The chart below illustrates ASCENT's enrollment trend from FY18-19 to the estimated FY24-25, showing substantial growth over time. Enrollment numbers remained relatively stable in the early years but experienced sharp increases starting in FY22-23, when legislative changes removed the statewide cap. Currently, the program has grown to an estimated 2,017 students participating in FY24-25, underscoring the need for a reassessment of the program's funding model and alignment with its original objectives.



Enrollment Trends by District Type

ASCENT participation has grown significantly since FY18-19, particularly in non-rural districts. In FY23-24:

- **Non-Rural Districts**: Accounted for 91.5% of enrollment (1,126 students), receiving over $10.8 million in funding.
- **Rural Districts**: Enrolled only 80 students (6.5%), receiving $767,043.
- **Small Rural Districts**: Represented just 22 students (1.8%), receiving $210,937.



ASCENT Enrollment Trend – Student Count

District Designation	FY18-19	FY19-20	FY20-21	FY21-22	FY22-23	FY23-24
Non-Rural	402	393	401	404	554	1126
Rural	12	9	17	22	51	80
Small Rural	19	15	18	24	14	22
Grand Total	**433**	**417**	**435**	**450**	**618**	**1227**

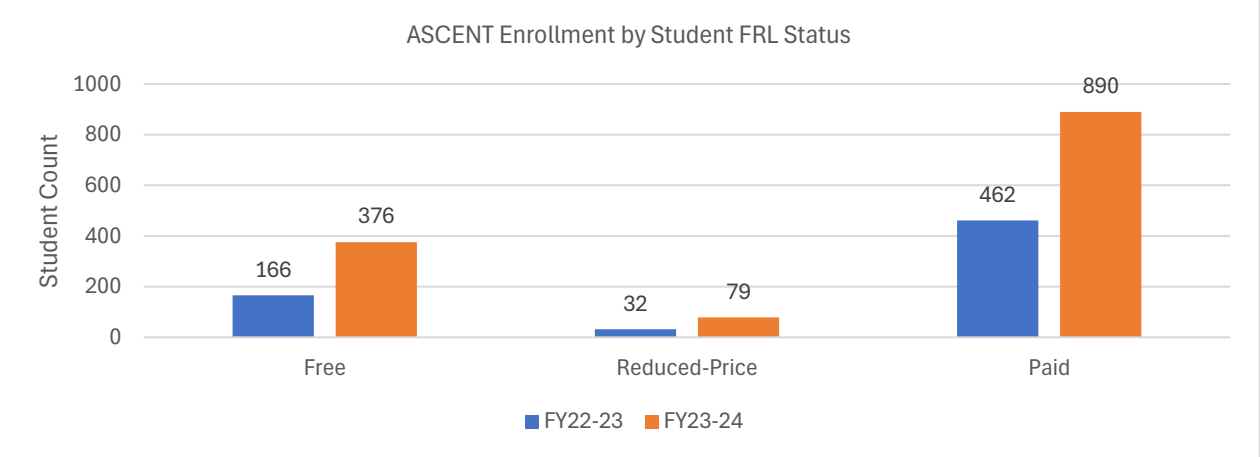
ASCENT Enrollment Trend – Student Count Percent Change

District Designation	FY18-19	FY19-20	FY20-21	FY21-22	FY22-23	FY23-24
Non-Rural	No data	-2%	2%	1%	37%	103%
Rural	No data	-25%	83%	33%	130%	57%
Small Rural	No data	-21%	17%	34%	-40%	54%
Grand Total	No data	**-4%**	**4%**	**3%**	**37%**	**99%**

This distribution highlights disparities in access and benefits, with rural districts often unable to capitalize on ASCENT due to limited administrative resources, fewer IHE partnerships, and geographic barriers.

Enrollment Trends by Student FRL Status

The program's original focus on low-income students has shifted over time. Data comparing FY22-23 to FY23-24 reveals that while student FRL eligible participation has grown, the largest enrollment increases have occurred among students not eligible for FRL:



FRL-Eligible Students: Increased from 198 to 455 participants.

Non-FRL Students: Increased from 462 to 890 participants.

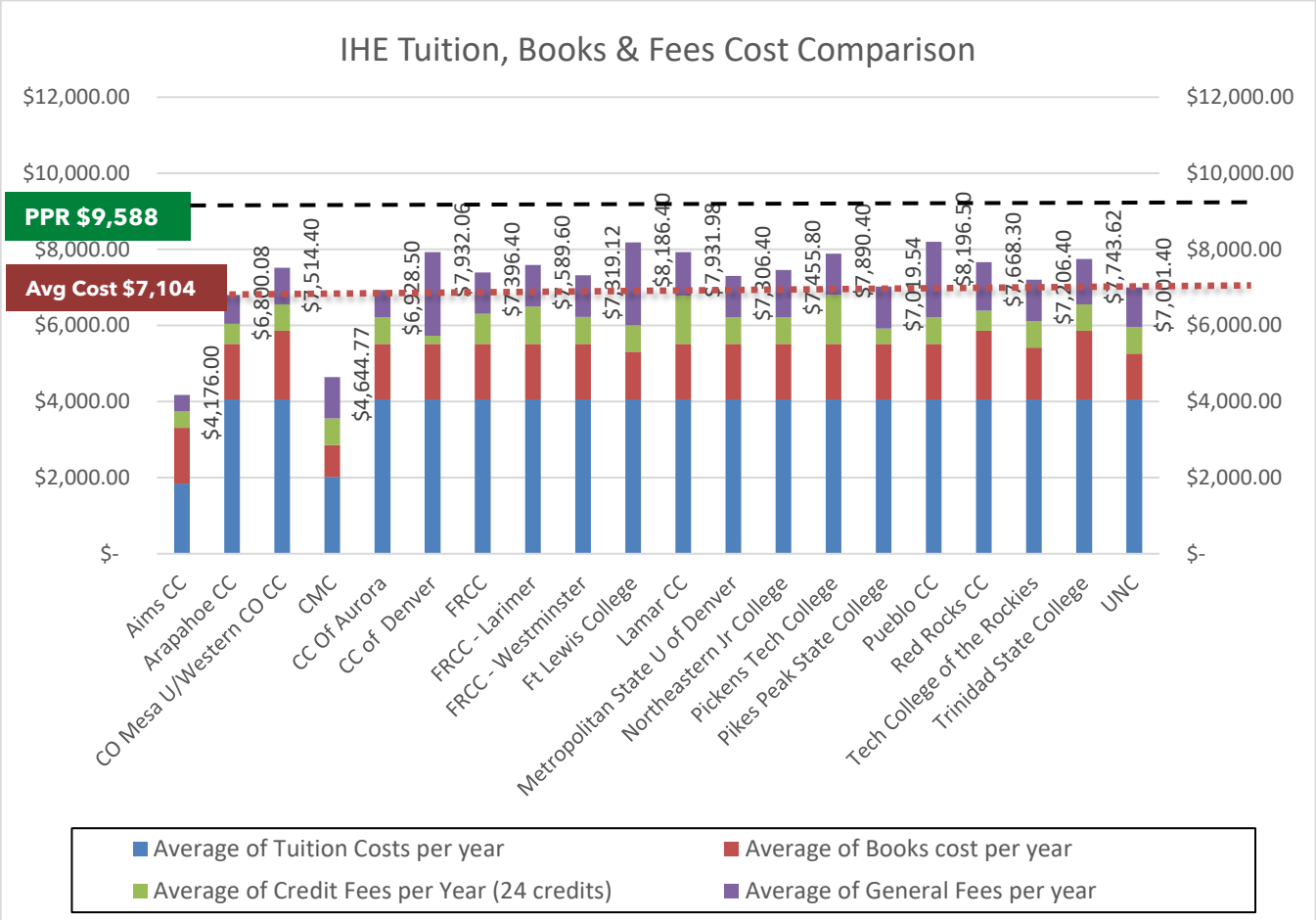
This trend raises concerns about whether ASCENT is fulfilling its equity-driven mission to support underserved populations.

ASCENT Program Sustainability

The current PPR model often results in surplus funding for LEPs, particularly in high-participation districts. However, the fixed administrative costs of ASCENT—such as managing cooperative agreements, compliance, and student advising—create inefficiencies for districts with lower enrollment.

Funding vs. Actual Costs

The ASCENT program's current funding model allocates a fixed PPR rate to LEPs for each participating student, regardless of the actual costs associated with enrollment. However, a closer analysis reveals a discrepancy between the PPR allocation and the average actual costs per student incurred. Tuition and fees for in-state students vary by institution but generally range between $2,000 and $4,058 annually. Fees, textbook and related material costs add an additional $3,300 on average, with some LEPs opting to cover these expenses while others require students to bear these costs.



ASCENT Administrative and Operational Considerations

Cooperative Agreements with Institutions of Higher Education

A key operational component of the ASCENT program is the establishment of cooperative agreements between LEPs and participating IHEs. These agreements outline the terms of ASCENT participation, including tuition costs, cost-sharing arrangements, and any additional fees. However, analysis of existing agreements reveals significant variability across institutions, creating inconsistencies in ASCENT costs and administrative requirements for LEPs.

While some IHE agreements include detailed financial provision terms, with transparent tuition rates and minimal additional costs, other agreements may lack specificity, leading to uncertainty in cost expectations and budgeting for LEPs. This variability in agreement terms can impact program affordability and make it challenging for LEPs to allocate ASCENT funds consistently across their student population.

Additional fees, such as technology fees, course-specific surcharges, and health insurance requirements, further complicate the financial landscape. In some cases, technology-intensive courses may incur additional fees to cover equipment and software expenses. These variances not only impact the affordability of ASCENT for students but also place a strain on LEPs that must navigate differing agreements without a standardized framework.

Administrative Workload on LEPs

The operational demands of the ASCENT program extend beyond cooperative agreements and introduce a considerable administrative workload for LEPs. LEP administrators are responsible for overseeing ASCENT eligibility requirements, coordinating dual enrollment with IHEs, managing compliance with funding and reporting requirements, and advising students through the application and enrollment process.

Since ASCENT participants have already met high school graduation requirements and are in their fifth year, focusing solely on postsecondary coursework, LEPs must manage a unique set of tasks. These include tracking student progress exclusively within the IHE system for the postsecondary-level classes, maintaining compliance with both state and IHE-specific guidelines, and ensuring that students are fulfilling the requirements of the ASCENT program. Additionally, program reporting requirements, particularly around funding and legislative compliance, require dedicated staff time and resources to ensure accurate and timely submissions.

ASCENT Legislation and Impact Analysis

The ASCENT (Accelerating Students through Concurrent Enrollment) program in Colorado is designed to provide high school students with the opportunity to enroll in postsecondary courses and earn credits after the completion of graduation requirements. The intent behind ASCENT is to facilitate a smoother transition from high school to postsecondary education, reduce the time and cost required to earn an advanced degree or credential, and increase the overall higher education-going and completion rates among Colorado students.

House Bill 09-1319, The Accelerating Students Through Concurrent Enrollment (ASCENT) program was established as part of Colorado House Bill 09-1319 in 2009 to address barriers to postsecondary education for underserved student populations. Specifically, the program targeted students who required **fifteen or fewer credit hours** to complete a postsecondary credential and were eligible for **free or reduced-cost lunch** under the federal **"National School Lunch Act" (42 U.S.C. Sec. 1751 et seq.)**. By allowing these students to remain in their Local Education Providers (LEPs) for an additional year while enrolling in postsecondary courses, ASCENT aimed to bridge gaps in access and affordability. This focus on low-income students underscores the program's original intent to promote equity and accelerate postsecondary attainment among Colorado's most vulnerable populations.

House Bill 17-1294: In 2017, HB17-1294 was enacted to refine the program further. This bill included provisions for counting ASCENT students in school district or institute charter school graduation rates, ensuring that participation in the program did not negatively impact a school's reported graduation statistics.

House Bill 22-1390: Significant changes came with the Public School Finance bill (HB22-1390) in 2022. This legislation removed the cap of 500 ASCENT slots statewide, allowing any eligible student to participate in the program. It also reduced the number of postsecondary credit hours required for eligibility from 12 to 9, making it easier for students to qualify. This change further supported the inclusion of underrepresented students by lowering barriers to participation.

House Bill 24-1393: The 2024 legislative session introduced significant adjustments to the ASCENT program through HB24-1393, aimed at refining eligibility requirements, participation guidelines, and funding structures. Starting in the 2025-26 school year, the number of ASCENT participants will be capped based on the participation rate of each district in the 2024-25 school year. Additionally, ASCENT students are now required to apply for FAFSA/CAFSA, although they cannot accept federal or state financial aid. This bill also adjusted the funding formula for ASCENT students, capping the per-pupil revenue at the district's 2024-25 extended high school rate. These changes seek to streamline ASCENT's objectives and align the program more closely with statewide goals for postsecondary access and workforce readiness.

- **FAFSA/CAFSA Submission Requirement:** Beginning in April 2024, all students participating in ASCENT are required to submit a Free Application for Federal Student Aid (FAFSA) or a Colorado Application for State Financial Aid (CAFSA). However, ASCENT students are prohibited from accepting state or federal financial aid, meaning Pell Grant-eligible students may choose direct postsecondary enrollment as an alternative. This requirement introduces a new administrative component for LEPs, as they must guide students through the financial aid application process despite ASCENT's restriction on accepting aid. For students and families

unfamiliar with the FAFSA/CAFSA process, this requirement could pose an additional barrier, particularly in underserved communities with limited access to financial aid advising.

- **Participation Cap for 2025-2026**: HB24-1393 introduces a participation cap for the 2025-2026 academic year, setting a district-level enrollment ceiling based on 2024-2025 participation numbers. This cap marks a shift from the current "uncapped" model, limiting each LEP's ASCENT participation to the prior year's October count. For LEPs in districts with historically high ASCENT participation, this cap could restrict future growth and limit opportunities for new students who could benefit from the program. Conversely, districts with low participation may find the cap less impactful, providing a stable target for managing program enrollment within a defined scope.

HB24-1393 Potential Impact on LEPs and Students

The changes enacted through HB24-1393 are expected to have varying impacts on LEPs and ASCENT students, depending on each district's participation levels, administrative capacity, and demographic needs.

- **Implications for High-Participation Districts**: For districts with high ASCENT enrollment, the participation cap may create challenges in meeting growing student demand. These districts may need to implement more selective enrollment processes or allocate slots based on priority criteria, potentially reducing program accessibility for some students. High-participation LEPs may also experience increased administrative strain in managing the FAFSA/CAFSA requirement and could require additional support to guide students through the financial aid application process, even if aid is not ultimately accepted.
- **Implications for Low-Participation Districts**: In districts with lower ASCENT engagement, the cap may serve as a manageable target that reflects their existing levels of participation. These LEPs may not experience significant disruptions from the cap but could face similar challenges in implementing the FAFSA/CAFSA requirement, especially in areas where financial aid counseling resources are limited. For these LEPs, the cap may provide a stable framework for budgeting and resource allocation, allowing them to plan ASCENT participation within predictable enrollment limits.
- **Administrative Workload of FAFSA/CAFSA Compliance**: The FAFSA/CAFSA requirement introduces an administrative responsibility that may increase workload for LEPs, particularly those with limited staff capacity or those serving high-need populations. Meeting this requirement may necessitate additional resources, including training for school counselors and advisors who support students in completing these forms. This requirement aligns with state-wide goals for financial transparency yet presents a logistical challenge that could affect ASCENT accessibility for some students.

ASCENT LEP and Student Feedback

Summary of LEP Experiences with ASCENT

Feedback from LEPs highlights both the strengths and challenges of the ASCENT program. Many LEPs appreciate ASCENT's ability to bridge the gap between high school and IHEs by offering students an additional year of academic preparation and the chance to complete postsecondary credits at low to no cost. This opportunity is especially valuable for students who may not qualify for

financial aid but still face economic challenges, as ASCENT funding enables them to progress toward a degree without incurring immediate expenses.

However, LEPs have also identified several challenges associated with ASCENT. Accessibility is a primary concern, particularly for rural and underserved districts that may lack strong partnerships with nearby IHEs or have limited administrative resources to support program coordination. LEPs report that administrative requirements, including student tracking, reporting, and compliance with varying IHE agreements, can be a significant burden, especially in smaller districts with fewer staff.

In terms of program relevance, feedback indicates that ASCENT's structure is beneficial for students who are higher education-bound but may not meet the immediate criteria for financial aid. However, some LEPs noted that the program's requirement to delay high school graduation may deter certain students who prioritize timely graduation and full entry into the workforce or higher education. For these students, the delay in diploma receipt can be a barrier, particularly in communities where early workforce entry is valued.

LEP Perspectives on Student Experiences

LEPs shared observations on the general impact of ASCENT for students, particularly highlighting benefits such as reduced financial pressure and improved postsecondary readiness. LEPs noted that ASCENT's cohort-based structure often fosters a sense of camaraderie and peer support among participants, which can enhance academic performance and overall program satisfaction. However, they also indicated that the FAFSA/CAFSA filing requirement, coupled with restrictions on accepting federal or state aid, may discourage some eligible students, particularly those who might benefit more directly from other financial aid options, such as Pell Grants.

LEPs provided insights on ASCENT's accessibility and effectiveness for at-risk students, with survey responses indicating moderate levels of satisfaction. On average, LEPs rated ASCENT's accessibility for at-risk students at 2.87 out of 5, with effectiveness in meeting the needs of students at risk of not completing postsecondary education rated at 2.76. These ratings reflect the mixed experiences of LEPs and suggest a need for additional support to enhance ASCENT's reach and impact, particularly for students who may not traditionally consider postsecondary pathways.

Qualitative Insights from LEPs

Several qualitative insights from LEPs provide additional context for their experiences and observations:

- **LEP Insight**: "ASCENT has been a game-changer for students who might not otherwise have had the opportunity to transition smoothly into higher education. But for smaller districts like ours, the administrative load is a real challenge. We'd benefit from more consistent resources to help manage these responsibilities."
- **LEP Insight**: "The program has helped us reach students who wouldn't have gone straight to college. But the need to hold off on graduation to participate sometimes makes it hard to convince students and families of its value, especially when they want to move on from high school."

These qualitative insights underscore ASCENT's value as a transitional program while also highlighting areas for improvement in accessibility, administrative support, and communication of program benefits to both students and families. Addressing these areas could help ASCENT more

effectively meet the needs of diverse student populations and enhance its role within Colorado's Postsecondary Workforce Readiness strategy.

ASCENT Summary and Key Recommendations

ASCENT Summary of Findings

The analysis of Colorado's ASCENT program highlights several critical findings related to funding sustainability, legislative impacts, and feedback from Local Education Providers (LEPs). The funding analysis reveals that the current adjusted PPR model often results in a surplus for LEPs, with allocations exceeding actual program costs such as tuition, fees, and books. However, this surplus does not consistently address the administrative and operational needs of ASCENT, particularly in rural and underserved districts, creating discrepancies in how LEPs manage program resources.

Legislative changes introduced through HB24-1393 have added new requirements, such as FAFSA/CAFSA submissions, and established district-level participation caps based on the 2024-2025 October count. While these changes aim to enhance program oversight and efficiency, they pose challenges for both high-participation districts, which may face enrollment limitations, and rural districts, where financial aid advising resources are often lacking. LEPs have highlighted both the benefits and challenges of ASCENT, praising its role in fostering postsecondary readiness but expressing concerns about the administrative workloads it imposes.

ASCENT Key Recommendations

The first 3 recommendations below are mutually exclusive.

1. **Reallocate ASCENT Funds to Broader PWR Initiatives:**
   Given ASCENT's limited reach, high cost, and lack of clear outcomes, the program could be discontinued. Redirecting the $18 million currently allocated for ASCENT into broader PWR initiatives would support a larger student population and ensure a more equitable use of state resources.
2. **Reform ASCENT:**
   If the program is retained, it should be realigned with its original objectives under HB09-1319, focusing on low-income, at-risk students requiring 15 or fewer credit hours to complete a credential. A district-level cap proportional across non-rural, rural, and small rural districts should also be reinstated.
3. **Adopt a Reimbursement Model:**
   Transition ASCENT to a reimbursement-based funding model, ensuring resources are directly tied to actual program costs. LEPs would pay IHE invoices per cooperative agreements and then submit them to CDE for reimbursement.
4. **Standardize Cooperative Agreements:**
   Require LEPs and IHEs to address all the "Insert …" fields on page 15 of the Cooperative Agreement template which delineates costs and which party covers which costs.
5. **Expand Data Collection and Analysis:**
   Leverage the Statewide Longitudinal Data System (SLDS) to provide comprehensive insights into ASCENT outcomes, such as degree attainment and workforce alignment. Enhanced data capabilities would support evidence-based program adjustments and demonstrate ASCENT's impact.

Appendix B: Program Matrix

PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Accelerated College Opportunity Exam Fee Grant Program	To increase the number of eligible students who take Advanced Placement (AP) or International Baccalaureate (IB) exams. The program helps ensure that students receive scores for which college academic credit is awarded by providing funds to high schools to cover all or a portion of the exam fees. This is aimed at reducing the financial barriers for students, especially those from low-income backgrounds, and increasing access to college-level coursework.	$561,665 (FY24-25)	State Grant (CDE)
ASCENT	To allow eligible high school students to extend their enrollment for a fifth year to take college courses tuition-free. This program aims to help students earn postsecondary credits, supporting their transition to higher education or workforce readiness. The ASCENT program is governed by the Concurrent Enrollment Programs Act (C.R.S. § 22-35-108), which outlines its structure and funding. The primary goal is to enhance access to college education while reducing financial barriers for students.	$18,840,420 (FY24-25)	Extended ASCENT PPR Funded Enrollment will be capped at 2024-2025 October counts by district
Auto Enrollment in Advanced Courses Grant (John W. Buckner)	To increase the number of students enrolled in advanced courses, specifically targeting those who have demonstrated proficiency in certain subjects. This program, enacted through Senate Bill 19-059, provides funding to local education providers (LEPs) to automatically enroll eligible students in advanced coursework, such as Advanced Placement (AP) or International Baccalaureate (IB) classes, to encourage higher academic achievement and readiness for postsecondary education (Colorado Department of Education).	$246,276 (FY24-25)	State Grant (CDE)

PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Career Development Incentive Program (CDIP)	To incentivize Colorado school districts and charter schools to offer industry-recognized certification programs, internships, and pre-apprenticeship programs. The program's statutory purpose is to prepare high school students for employment in Colorado's most in-demand industries, such as healthcare, skilled trades, IT, and STEM fields. Schools receive up to $1,000 in incentive payments for each student who successfully completes a pre-approved credential or WBL experience. These funds are used to expand certification offerings, purchase necessary technology, and cover transportation costs for students engaged in WBL. CDIP is broken into tiers for incentive funding as follows: Tier 1: Qualified industry credential programs, pre-apprenticeships and apprenticeships; Tier 2: Workplace training programs (internships); or Tier 3: Computer Science Advanced Placement (AP) courses.	$9,518,950 (FY24-25)	State Grant – Outcome-based Reimbursement (CDE)
Colorado Career Advisor Training Grant Program	To enhance career advising statewide by funding professional development for career advisors. Its intent is to strengthen advisors' abilities to guide students and job seekers toward meaningful careers that align with Colorado's economic needs, promote the use of current labor market information, and support the development of a standardized Colorado Career Advisor Credential. Educational institutions, workforce agencies, and nonprofits are eligible for grants to support this work.	Approximately $972,000 is available for the 2023-24 grant cycle, with funds accessible through June 30, 2025.	State Grant (CDE)
Concurrent Enrollment Expansion and Innovation Grant Program	To provide grants to LEPs and IHEs in order to expand and innovate concurrent enrollment opportunities for qualified students. The goal is to increase access to concurrent enrollment, enabling high school students to earn both high school and college credit simultaneously, thereby improving college readiness and reducing the cost of postsecondary education (Colorado Department of Education).	$1,476,948 (FY24-25)	State Grant (CDE)

PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Concurrent Enrollment Programs	To allow high school students to enroll in postsecondary-level courses while still in high school, earning both high school and credit simultaneously. The statutory purpose of these programs is to provide students with an opportunity to begin their postsecondary education early, reduce the overall time and cost of earning a degree, and improve college readiness. Higher education tuition is covered by the student's local education provider (LEP) or school district, reducing the financial burden on students and families. These programs were designed to increase postsecondary access for students, especially those from underrepresented or low-income backgrounds. Students can take a range of courses from general education to CTE giving them the flexibility to explore different career paths. The program is governed by the Concurrent Enrollment Programs Act (C.R.S. 22-35-101), which encourages local education providers and postsecondary institutions to collaborate in offering these opportunities to students.		Funded through PPR. Credit enrollment requirements dictate part-time (<12 credits) or full-time (>12 credit) FTE allocation in October counts.
Career and Technical Act (CTA)	To assist local school districts in offering CTE programs. The act provides financial reimbursement to eligible districts for the additional costs of running CTE programs, such as specialized equipment and lab space, which exceed the costs of standard education programs. These reimbursements are based on submitted costs and are governed by state regulations. CTA, originally known as the Colorado Vocational Act of 1970, currently supports around 178 school districts across Colorado.	$30,409,006 (FY23-24)	State Reimbursement (CCCS)– Tied to Federal (Perkins) match

PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Career and Technical Education (CTE)	To prepare students for careers in various fields by providing them with both academic knowledge and technical skills. These programs focus on sectors like healthcare, information technology, skilled trades, and more. CTE equips students with practical experience, industry-recognized credentials, and employability skills, often through hands-on learning, internships, and partnerships with local businesses. It is intended to bridge the gap between education and workforce needs, preparing students for postsecondary education or immediate entry into the job market.		Perkins / CTA
Perkins V: Strengthening Career and Technical Education for the 21st Century Act	To develop more fully the academic knowledge and technical and employability skills of secondary and postsecondary education students who elect to enroll in career and technical education programs and programs of study. In Colorado, Perkins V funding is administered by the Colorado Community College System (CCCS). The funds are allocated to eligible recipients, including school districts, consortia, and colleges, based on population and economic need.	$5,487,150 (FY23-24) – Secondary only	Federal Grant – CCCS Administered
Colorado Early Colleges (CEC)	To provide high school students with the opportunity to enroll in postsecondary courses, enabling them to earn college credits, associate degrees, or industry certifications alongside their high school diploma. CEC operates multiple campuses across Colorado, offering a curriculum that integrates high school and college coursework. Students can take college courses tuition-free, with the potential to graduate with significant college credits or an associate degree.		Funded through PPR

PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Graduation Guidelines	To outline the minimum requirements students must meet to earn a high school diploma. These guidelines emphasize competency-based measures over seat time, allowing students to demonstrate their skills in core areas such as math, reading, and writing through various options like exams (SAT, ACT), capstone projects, or industry certifications. These guidelines aim to ensure that students graduate with the knowledge and skills necessary for postsecondary education, the workforce, or military service.		General funds
Individual Career and Academic Plan (ICAP)	To guide students as they explore career, academic, and postsecondary opportunities. Starting in middle school, students, along with their families and educators, create a personalized plan that includes career goals, academic coursework, and college or career readiness activities. ICAP aims to ensure that students are prepared for postsecondary success, whether they pursue higher education, enter the workforce, or join the military.		General funds
Innovative Learning Opportunities Program (ILOP)	To provide high school students (grades 9-12) with learning experiences that extend beyond the traditional classroom setting. The primary goal is to help students transition more effectively from high school to postsecondary education or the workforce by offering flexible, innovative learning paths. These learning experiences can include WBL such as internships, apprenticeships, or residencies, competency-based learning and capstone projects, and other activities aimed at developing professional, civic, interpersonal, and entrepreneurial skills. Participating school districts or LEPs are allowed more flexibility in how they meet state requirements for instruction hours, enabling them to count part-time students as full-time based on their participation in the program.		PPR – Students must meet requirements for participation in ILOP to received part-time or full-time equivalent for October counts

PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
K-12 Work Based Learning Opportunities	To provide hands-on experiences that help students explore career paths, develop essential skills, and gain real-world experience. These programs are a key part of the state's strategy to bridge the gap between education and employment, particularly in high-demand industries. WBL encompasses a variety of strategies to offer learners experiential opportunities to explore potential careers. Each of these strategies rely on developing industry relationships and learning opportunities outside of the classroom. “Learning ABOUT Work” strategies focus on exposing learners to a variety of industries. “Learning THROUGH Work” engages learners in partnerships with industry representatives for hands-on learning. "Learning AT Work” prepares learners for specific career pathways.		Multiple avenues, including federal grants like Perkins, state allocations, and LEP general funds. Partnerships with businesses and community organizations often contribute resources and support. Specific funding amounts vary annually based on program scope, participation rates, and available resources.
Opportunity Now Colorado	To foster innovative workforce and talent development initiatives across the state. Launched under Governor Jared Polis' administration, the program aims to address the growing workforce gaps in high-demand industries such as healthcare, education, infrastructure, and advanced manufacturing. The program supports regional partnerships between educational institutions, industry leaders, and employers to create pathways for Coloradans to transition into high-skill, high-wage jobs. It also focuses on closing workforce shortages in rural areas, with nearly half of the funding supporting those communities. The grants are structured in three tracks—seed, planning, and scale—to support projects at different stages of development.	$85M	One-time State Grant (Federal Funding)

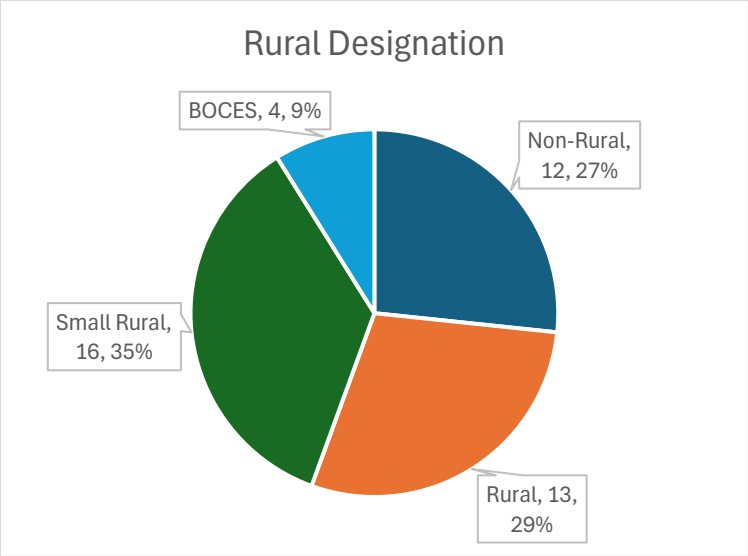
PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Response, Innovation, and Student Equity (RISE) Education Fund	To provide funding for innovative educational programs that address learning challenges related to the economic, social, and health impacts of COVID-19, with a focus on equity and student success. The RISE Education Fund offers grants to high-needs school districts, charter schools, and public institutions of higher education. The program supports initiatives that improve student learning, close equity gaps, and enhance operational efficiency. Projects funded include the development of new learning models, expansion of career and technical education programs, and support for remote learning infrastructure.	Approximately $42 million has been awarded through multiple rounds of funding since the program's inception.	One-time State Grant (Federal Funds)
Pathways in Technology Early College High School (P-TECH)	To prepare students for high-skill jobs by allowing them to earn both a high school diploma and an associate degree in a STEM (Science, Technology, Engineering, and Math) field within six years. Students begin the program in 9th grade and continue through 14th grade (equivalent to two years of college), receiving comprehensive support services such as mentoring, internships, and pre-apprenticeships, as well as job shadowing and other workplace educational experiences. P-TECH aims to serve all students, with a particular focus on enrolling those who are socio-economically and racially diverse, including first-generation college students, English language learners, and students with disabilities. As of 2021, Colorado had 11 approved P-TECH schools, which partner with local industry leaders and community colleges to provide degrees in fields like cybersecurity, manufacturing technology, and environmental studies. Notably, 58% of the program's graduates are either employed in their field of study or pursuing continued education.		PPR – covering up to 6-years of education. Students must meet P-TECH requirements for WBL and concurrent enrollment. Industry partners and grants help supplement funding for P-TECH.

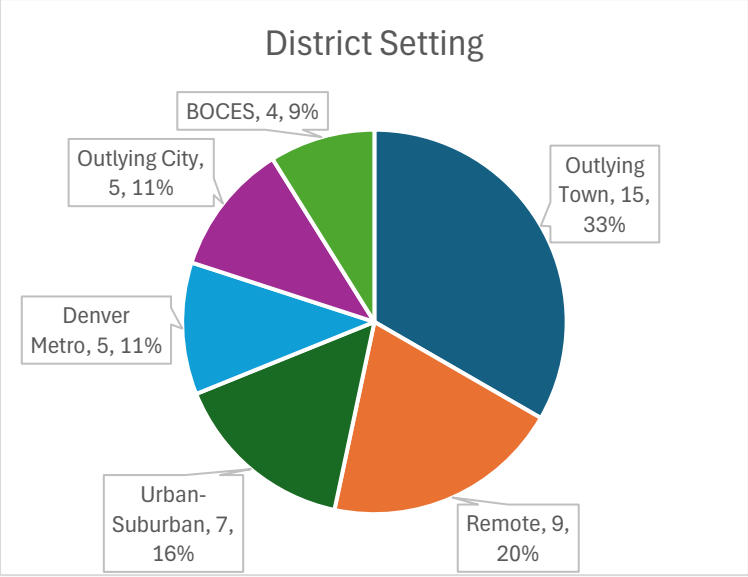
PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Rural Coaction Grant Program	To enhance career-connected learning and career pathways for students in rural school districts. The program supports collaboration between rural school districts, Boards of Cooperative Educational Services (BOCES), and other local education providers to increase student engagement and access to career-oriented learning experiences. Funded through the American Rescue Plan (ARP) ESSER III, this initiative primarily targets students who were disproportionately impacted by the COVID-19 pandemic. The goal is to help rural communities build or expand programs that offer career opportunities, partnerships with industry, and pathways to higher education. The funding can be used for teacher training, equipment, and building partnerships with local businesses and higher education institutions. Two types of grants are available under this program: Accelerated Coaction, for established partnerships ready to expand, and Incubated Coaction, for new collaborations that need time for planning and development.	$15 Million	One-time State Grant (Federal Funds)
School Counselor Corps Grant Program (SCCGP)	To increase the availability of effective school-based counseling to help increase the state graduation rate and increase the percentage of students who appropriately prepare for, apply to, and continue into postsecondary education. SCCGP provides competitive, four-year grants to eligible education providers, including school districts, BOCES, and charter schools. The program focuses on hiring licensed school counselors to develop and implement data-driven programming that supports students' academic success, career readiness, and personal/social development.	$12,007,490 (FY24-25)	State Grant (CDE)

PWR Program / Initiative	Statutory Purpose	Funding Total (Fiscal Year)	Funding Type / Mechanism
Teacher Recruitment Education and Preparation (TREP)	TREP in Colorado was created to increase the number of students entering the teaching profession, especially among low-income and traditionally underserved populations. TREP allows eligible students to enroll in college-level courses tuition-free for up to two years after high school, helping them fast-track their entry into postsecondary educator preparation programs. The program also aims to create a more diverse teacher workforce and reduce the time required to complete teacher certification.		PPR – covering up to 2 years of postsecondary education.
HB21-1330: Higher Education Student Success	To support public higher education institutions and students to improve degree completion rates, re-engage students, and increase financial aid applications under ARPA. This program provides institutional funding for student success programs, grants for financial aid application completions, and the CORE initiative to award associate degrees to eligible students.	$51.5 million	One-Time State Grant (Federal Funds)
HB22-1366: Improving Students' Postsecondary Options	To enhance students' transitions to postsecondary education and careers, supporting financial literacy, educator training, and postsecondary planning through grants. This program supports student and family guidance in postsecondary planning and incentivizes educator participation in financial literacy training.	$1.625 million	State Grant (CDE)
HB24-143 Expansion of Career Pathways	To integrate frameworks for non-degree credential evaluation and classification into state education and workforce systems, aligning stackable credential pathways. This bill mandates the Office of Future of Work to determine International Standard Classification of Education (ISCED) equivalency levels for registered apprenticeship programs and stackable credential pathways by July 31, 2025.	$124,287 from the General Fund to the Department of Higher Education and $30,000 to the Department of Labor and Employment for implementation.	
HB24-104 PWR Program Support and Incentives	To align educational programs with registered apprenticeships, enhancing career and technical education (CTE) pathways.		

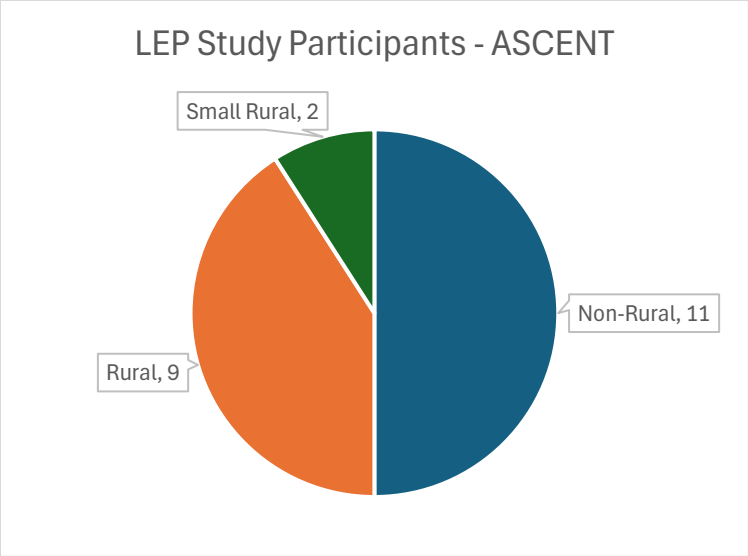
Appendix C: LEP Study Participants

There were a total of 45 LEPs who participated in interviews, workshops, and surveys for this PWR Financial Study. The information below details the demographics of the districts who participated and their PWR program participation:





There were 22 of the 45 LEPs who participated in the ASCENT program, spread across the rural designation shown in the chart below:



The table below shows the breakdown of participation in PWR Programs by LEPs who participated in this study, representing participation across all programs.

District Participation	**Non-Rural**	**Rural**	**Small Rural**	**BOCES**	**Total**
Career and Technical Act	100%	85%	63%	0%	73%
Concurrent Enrollment Program	83%	77%	44%	0%	60%
CTE (Perkins)	100%	62%	19%	50%	56%
CDIP	100%	62%	19%	0%	51%
ASCENT	92%	69%	13%	0%	49%
Concurrent Enrollment Expansion and Innovation Grant Program	58%	38%	50%	25%	47%
School Counselor Corps Grant Program	67%	31%	19%	25%	36%
Accelerated College Opportunity Exam Fee	75%	15%	13%	0%	29%
ILOP	42%	15%	25%	25%	27%
TREP	50%	15%	0%	0%	18%
ESSER III - Rural Coaction Grant	8%	8%	13%	100%	18%
Polis RISE Grant	33%	8%	0%	25%	13%
Opportunity Now	25%	0%	6%	50%	13%
P-TECH	25%	8%	0%	0%	9%
Early College	33%	0%	0%	0%	9%
Automatic Enrollment In Advanced Course Grant Program	8%	15%	0%	0%	7%

Appendix D: Relevant Legislation Timeline

Legislative summaries for SB24-104, HB21-1330, SB24-143, and other supporting policies.

Bill Number	Date Signed	Bill Name	Summary
Public Law 98-524	October 13, 1984	Carl D. Perkins Vocational Education Act	Established federal funding for vocational education programs.
Public Law 109-270	August 12, 2006	Carl D. Perkins Career and Technical Education Improvement Act of 2006	Reauthorized the Perkins Act, emphasizing the development of academic and career and technical skills.
SB08-212	May 14, 2008	Colorado Achievement Plan for Kids (CAP4K)	Established a framework for P-20 alignment, defining postsecondary and workforce readiness standards and creating a roadmap for student success from preschool through higher education.
SB09-285	June 1, 2009	Colorado Career and Technical Education Act (CTA)	Created a framework for funding Career and Technical Education (CTE) programs to support workforce readiness and high-demand skills training.
HB09-1319	June 5, 2009	Concurrent Enrollment Programs Act	Established concurrent enrollment, allowing high school students to take college courses for credit. This also created the ASCENT program.
House Bill 10-1376	June 1, 2010	School Counselor Corps Grant Program	Established grants to increase the availability of effective school-based counseling.
State Board of Education Policy	May 21, 2012	Graduation Guidelines	Set statewide graduation requirements to ensure students are prepared for postsecondary education and the workforce.
HB12-1155	May 22, 2012	ASCENT Eligibility and Funding	Extended the Accelerating Students through Concurrent Enrollment (ASCENT) program for fifth-year students, allowing funding for college courses.
House Bill 15-1270	May 4, 2015	Pathways in Technology Early College High Schools (P-TECH)	Created a public-private partnership model for students to earn a high school diploma and an associate degree in six years.
HB16-1289	May 27, 2016	Career Development Success Program	Created incentives for schools to help students earn industry certifications, internships, and apprenticeships.
HB17-272	May 10,2017	Measures of Postsecondary and Workforce Readiness	Introduced requirements for measuring postsecondary and workforce readiness, including the adoption of additional readiness indicators and accountability measures.
House Bill 16-1289	June 10, 2016	Career Development Success Program (CDIP)	Provided financial incentives to school districts for students who complete qualified industry credential programs
Senate Bill 18-225	June 6, 2018	Early College High Schools Amendment	Redefined early college programs to require completion within four years.
House Bill 18-1309	June 6, 2018	Teacher Recruitment Education and Preparation (TREP) Program	Allowed high school students to enroll in postsecondary teacher preparation programs.

Bill Number	Date Signed	Bill Name	Summary
Public Law 115-224	July 31, 2018	Strengthening Career and Technical Education for the 21st Century Act (Perkins V)	Reauthorized the Perkins Act, focusing on aligning CTE programs with labor market needs.
House Bill 19-1260	May 10, 2019	Accelerated College Opportunity Exam Fee Grant Program	Assisted low-income students with the cost of Advanced Placement and International Baccalaureate exam fees.
House Bill 19-1196	May 10, 2019	Concurrent Enrollment Expansion and Innovation Grant Program	Established grants to expand concurrent enrollment opportunities.
SB19-176	May 31, 2019	Expanding Concurrent Enrollment	Expanded funding and support for concurrent enrollment programs, increasing accessibility for high school students across Colorado.
House Bill 20-1002	June 29, 2020	Innovative Learning Opportunities Pilot Program	Created a pilot program to provide students with flexible learning opportunities outside the traditional classroom.
House Bill 20-1396	July 11, 2020	Opportunity Now Grant Program	Established grants to develop regional talent development initiatives.
HB21-1330	June 23, 2021	Higher Education Student Success	Focused on supporting student success in higher education through funding flexibility, transferability of credits, and improvements to financial aid structures to encourage postsecondary completion.
HB22-1390	June 6, 2022	ASCENT Program Requirements and Funding	Introduced FAFSA/CAFSA submission requirements for ASCENT, capped district participation, and set a fixed per-pupil funding rate.
SB24-104	Expected 2024	Expansion of Career Pathways	[Placeholder] Aims to expand career pathway programs, with a focus on high-demand industries and partnerships between secondary and postsecondary institutions.
SB24-143	Expected 2024	PWR Program Support and Incentives	[Placeholder for confirmation and further details based on final bill text.] Adds funding adjustments to PWR programs, including the CDIP credential tiering recommendation.

Return to Executive Summary

Appendix E: Data Sources and Methodology

Detailed description of data sources used in the study

The analysis for the PWR Financial Study was supported by a diverse set of data sources from educational and governmental institutions. The CDE PWR team contributed data through the PWR website and individual program pages. The Colorado Department of Higher Education (CDHE), and other state assessments were also integrated into the analysis. Program participation data was gathered from current CDE reporting over the last 5 years, with federal grant data from the lifetime of the grant and State grant data analyzed over FY23-24.

Per Pupil Revenue funding is sourced from CDE Finance's FY24-25 District Funding Calculation Worksheet (SB24-188 Draft) and FY23-24 Funding Calculation Worksheet (June 2024). PPR is the amount of funding a school district receives per student. The School Finance Act is the primary law that outlines how school districts are funded in Colorado. CDE Finance also provided summarized and detailed breakouts of HS student counts by district and program for the analysis.

An overview of the School Finance handbook for Colorado provided additional budgetary and per pupil calculation details. This publication was prepared by the Colorado Legislative Council Staff, and is available online at: http://leg.colorado.gov/agencies/legislative-council-staff/school-finance. The numbers in this handbook reflect the FY 2023-24 appropriation contained in House Bill 24-1207, the midyear supplemental adjustment bill, and are subject to change.

State District and School level graduation and completion dates were sourced from CDE State Accountability Data Files; Postsecondary and Workforce Readiness: 2023 Matriculation Rates, Graduation Statistics and Dropout Statistics, which provided state, district and school level matriculation rates (2-yr and 4-yr institutions & CTE) for the 2022 graduation cohort, including historical trend data at the state-level.

Additional FY22-23 demographic data was sourced from the DillingerRAD Grant Study, and statistical high school student data was sourced from Colorado Community College System's operational data store, while IHE tuition rates were obtained from CCCS's affordability resources. Colorado County Median Income was sourced from the CO Dept of Rev Demographics and Migration of Individual Income Tax Filers County Report.

All District-BOCES-Charter Data was sourced via CDE Data Pipeline, or directly from District/School website as necessary: https://www.cde.state.co.us/datapipeline/org_orgcodes

Additional insights, including student-to-counselor ratios and district data, were sourced from Human Resources Snapshot Data collection and the Data Pipeline.

ASCENT cooperative agreements were provided by CDHE, and program-specific data, including CTA/CTE details, were shared by CCCS.

CDE Grants Project: summarized and consolidated data prepared and provided by the DillingerRAD Study conducted on CDE Competitive Grants (Dillinger Research and Applied Data, Inc.). Additional financial details, including Grant Awards Letters and state grant assessments; sourced from CDE.

Studies of Note:

Final Full Report - 1241 Task Force: Accountability, Accreditation, Student Performance, and Resource Inequity Task Force Report, November 2024; https://www.cde.state.co.us/accountability/1241taskforcefinalreport

Colorado Work-based Learning Continuum and defined by the Work-Based Learning Quality Expectations; https://cwdc.colorado.gov/strategies/work-based-learning; and https://www.cde.state.co.us/postsecondary/workbasedlearning

Framework to Support Quality Non-degree, 2023 Colorado Workforce Development Council. The framework was developed by partners of the TalentFOUND Network, and partners including the Colorado Department of Higher Education (CDHE), Colorado Community College System (CCCS), Colorado Department of Education (CDE), and Colorado Succeeds - as well as multiple partners from business, education, and governmental and non-governmental organizations; https://cwdc.colorado.gov/blog-post/state-releases-framework-to-support-quality-non-degree-credential-pathways-to-the

Pathway to Affordability: Annual Report on Dual and Concurrent Enrollment in Colorado, The Colorado Department of Higher Education and Colorado Department of Education, 2022; https://cdhe.colorado.gov/sites/highered/files/2021_Concurrent_Enrollment_March_2023.pdf

HB 24 – 1364 Statewide Longitudinal Data System (SLDS): This bill creates the Colorado Statewide Longitudinal Data System in OIT to establish a means to share education and workforce data and outcomes that support decision making by students, families, educators, and policy makers.

Student-to-School-Counselor Ratios, © Copyright 2024 American School Counselor Association, https://www.schoolcounselor.org/about-school-counseling/school-counselor-roles-ratios

At-Risk Measure Update Pursuant to SB23-287, Submitted to: Education Committee of the Senate and Education Committee of the House of Representatives Joint Budget Committee By: Colorado Department of Education March 2024; https://www.cde.state.co.us/cdefinance/newatriskmeasuresb23287

Appendix F: SLDS Use Cases

Use Case 1: Longitudinal Tracking of Big Three Outcomes

This use case enables Colorado's education community to continuously track student outcomes related to the Big Three: postsecondary credit, industry-recognized credentials, and work-based learning (WBL). By leveraging the SLDS and incorporating data from a proposed Statewide ICAP System, this longitudinal tracking provides valuable, transparent data that supports equitable access to high-quality pathways, identifies achievement gaps, and informs resource allocation. Centralizing this data allows LEPs, policymakers, and collaborators to gain a cohesive view of statewide and localized educational progress, enabling evidence-based decision-making.

Reporting Requirements

- **Frequency**: Quarterly and annual updates.
- **Data Filters**: Student demographics, program participation, geographic location.
- **Report Components**:
    - **Summary**: Aggregated statewide data for each Big Three outcome.
    - **Detailed View**: Breakdown by LEP, school, and individual program.
    - **Trend Analysis**: Year-over-year tracking, identifying disparities among student groups.
    - **Equity Insights**: Highlight areas with low program access or participation among historically underserved populations.

Data Sources and Integration

1. **Postsecondary Credit Data**: From CDHE databases, potentially enhanced with data from the Statewide ICAP System, including credit attainment, program type, and pathway information.
2. **Industry Certification Data**: Currently collected through CDIP attestations; future integration with credential tracking systems and the Statewide ICAP System to capture certification types, attainment records, credential numbers, issuers, and relevant dates.
3. **WBL Data**: Currently from LEP attestations; eventual integration with a statewide WBL database and the Statewide ICAP System to include details on WBL experiences, employer partnerships, and student engagement levels.
4. **Supporting Datasets**: SURDS and October Count Data for additional context on enrollment and demographics.

Approach to Data Collection and Integration

- **State-Level Coordination**: Establish data-sharing agreements among CDHE, CDE, LEPs, and the Statewide ICAP System to standardize data collection methodologies and formats for the Big Three outcomes.
- **Implement the Statewide ICAP System**: Serve as a unified platform for LEPs to capture detailed student data, reducing administrative workloads and improving data accuracy. The

system would facilitate the collection of credential details and connect students with available WBL opportunities.

- **Integrate with the SLDS**: Create a cohesive data ecosystem with bidirectional data flow, where the SLDS receives data from the ICAP System and provides data back to it, such as current postsecondary credits attained and available job opportunities. This integration enhances LEPs' ability to forecast needs for partnerships, curricula, and credential offerings based on students' ICAPs.
- **Leverage Existing Systems During Transition**: Continue using existing data collection mechanisms while supporting LEPs in adopting the Statewide ICAP System. Provide resources and training to facilitate this transition, ensuring uninterrupted tracking of the Big Three outcomes.
- **Ensure Data Privacy and Security**: Implement robust data governance policies and security protocols for both the Statewide ICAP System and the SLDS, ensuring compliance with FERPA and other relevant regulations to protect student information.

Users

- **Primary Users**:
    - LEPs and schools for internal planning, resource allocation, and student support tracking
    - Colorado Department of Higher Education and Department of Education for compliance and reporting
    - Policymakers for legislative and funding decisions focused on education equity and workforce readiness
- **Secondary Users**:
    - Nonprofits and advocacy organizations focused on educational outcomes for underserved groups
    - Researchers analyzing trends in postsecondary and workforce readiness

Policy Questions Answered

- **Equity and Access**: Are students from historically underserved groups accessing The Big Three outcomes at comparable rates to their peers? Where are the achievement gaps most prominent?
- **Program Effectiveness**: Which PWR programs yield the highest rates of credential attainment, WBL, or postsecondary credits, and do outcomes vary by student demographics or location?
- **Resource Allocation**: What resources or supports are needed in areas with low program participation or access to improve equitable access to The Big Three?
- **Longitudinal Impact**: How do early engagement in The Big Three pathways affect students' postsecondary success and employment outcomes?

Use Case 2: Instructor Capacity Tracking

This use case is designed to provide insight into instructor availability and qualifications for delivering complex, high-impact programs such as CTE and concurrent enrollment. Tracking this capacity at the LEP and IHE levels will support the state's understanding of where qualified teaching resources are insufficient, identify gaps in the distribution of instructors across Colorado, and enable strategic resource allocation to address these shortages. By centralizing instructor capacity data, this use case facilitates targeted interventions to improve access to qualified instructors and thus broaden student access to the Big Three.

Reporting Requirements

- **Reporting Frequency**: Annual, with mid-year updates where applicable
- **Data Filters**:
    - Location (district, LEP, IHE)
    - Instructor qualifications (credentials, endorsements, experience level)
    - Program type (CTE, Concurrent Enrollment, etc.)
    - Course complexity (e.g., advanced STEM courses, certifications)
    - Demographics of districts facing shortages (rural, urban, underserved areas)
- **Report Sections**:
    - **Summary**: Statewide overview of instructor capacity, with a focus on shortages in CTE and concurrent enrollment
    - **Instructor Distribution**: Breakdown by location and program type, highlighting high-demand or underserved areas
    - **Credential Alignment**: Analysis of instructor qualifications vs. program requirements, with a view into gaps
    - **Capacity Challenges**: Identification of districts or LEPs lacking instructors for key programs, especially where access to The Big Three is limited
    - **Policy Implications**: Recommendations for recruitment incentives, credentialing pathways, and training to mitigate instructor shortages

Data Sources / Datasets

1. **Educator Licensing Data**:
    - **Source**: CDE and CDHE or Department of Regulatory Affairs (DORA) licensing databases
    - **Data Points**: Instructor licenses, endorsements, certifications, CTE-specific credentials, teaching history
    - **Insight**: This data provides the foundation for understanding instructor qualifications, current licenses, and eligibility for CTE and concurrent enrollment instruction.

2. **IHE Instructor Standards Data**:
    - **Source**: Individual IHEs, in coordination with the Colorado Higher Education Commission
    - **Data Points**: Institutional standards for concurrent enrollment instruction, including specific credentialing and experience requirements by institution
    - **Insight**: Collecting or aligning data across IHEs would establish consistent standards for instructor eligibility, supporting analysis of gaps in qualifications by region.
3. **Employment and Assignment Data**:
    - **Source**: LEP and IHE human resources departments, supplemented by regional labor market data if available
    - **Data Points**: Instructor assignments by course, location, full-time equivalency, and vacancies for CTE or concurrent enrollment programs
    - **Insight**: Understanding instructor assignment patterns and vacancies will help pinpoint areas with shortages, especially for critical courses in high-demand pathways.
4. **Colorado Workforce Development Council and Perkins Grant Data**:
    - **Source**: CWDC and Perkins V Grant reporting
    - **Data Points**: Data on workforce needs and funding allocations for instructor development, particularly in CTE fields
    - **Insight**: Workforce data informs alignment between state workforce needs and available instructional capacity, helping identify areas for targeted funding and development.

Users

- **Primary Users**:
    - LEPs and IHEs for strategic hiring, recruitment, and credentialing decisions
    - CDE, CDHE, CCCS, and IHEs for policy development and funding allocations
    - State workforce and economic development boards focused on aligning education capacity with labor market needs
- **Secondary Users**:
    - Advocacy groups and educational nonprofits addressing resource disparities in rural and underserved areas
    - Legislators and policymakers needing data on educational equity and workforce readiness to inform funding decisions

Policy Questions Answered

- **Capacity Distribution**: Where in Colorado are qualified instructors for CTE and concurrent enrollment most scarce, and what factors contribute to these shortages?

- **Credential Alignment**: How aligned are instructor qualifications with the requirements for teaching CTE and concurrent enrollment courses? Where do disparities exist, and how might the state address them?
- **Resource Allocation**: Which districts or regions require additional funding or incentives to recruit and retain instructors capable of supporting Big Three outcomes, particularly in specialized CTE fields?
- **Impact on Student Access**: How do instructor shortages impact student access to high-quality CTE and concurrent enrollment pathways, and where should resources be directed to bridge these gaps?

Approach to Data Collection and Integration

1. State-Level Coordination for Credential Data

- **Challenge**: IHEs in Colorado have autonomy in setting specific credentialing requirements for concurrent enrollment instructors, aligned with guidance from the Higher Education Commission.
- **Solution**: A coordinated data-sharing agreement with IHEs and the CDE to standardize data collection on instructor credentials, training programs, and experience requirements.
- **Outcome**: Consistent credential data across IHEs, integrated with SLDS, to identify mismatches between instructor qualifications and teaching demands.

2. LEP and IHE Reporting on Instructor Assignments and Shortages

- **Challenge**: LEPs may not systematically report on instructor vacancies, making it difficult to assess real-time needs.
- **Solution**: Annual reporting requirements for LEPs and IHEs on instructor assignments for CTE and concurrent enrollment programs, including unfilled positions and future needs projections.
- **Outcome**: A comprehensive dataset on instructor availability, enabling targeted initiatives to address capacity issues.

3. Integration of CDE's Educator Licensing and CWDC Workforce Data

- **Challenge**: There's limited alignment between educator licensing data and workforce demand insights, especially for high-demand CTE sectors.
- **Solution**: Integrate CDE licensing data with CWDC labor market data in the SLDS, creating a combined view of educator capacity and regional workforce needs.
- **Outcome**: Insight into where educational programs are not meeting workforce demand, guiding investment in instructor development.

Appendix G: Cooperative Agreement Template

Based on the ASCENT report and recommendations, here are suggested updates to the **Financial Provisions Addendum** and other sections of the cooperative agreement template (Forms and Sample Documents | CDE):

1. **Checkboxes for Cost Responsibility**:
    - Add checkboxes on the Financial Provisions Addendum to clarify which party (LEP, Student, or IHE) is responsible for **tuition credit fees, general fees, books, and other required course materials** to increase transparency and simplify financial planning for all parties.
2. **Standardized Cost Structure for Online Courses**
    - To address the often higher cost of online courses compared to on-campus courses, we recommend **standardizing the tuition rate for online courses to match that of on-campus offerings.** This adjustment would improve accessibility for rural students who may not have reasonable proximity to an IHE campus, supporting equitable access to ASCENT and TREP programs across geographic regions.
3. **Course Location and Cost Allocation**:
    - The current agreement includes a section specifying **tuition return rates when courses are taught at LEP sites by LEP personnel**. It may be useful to add a **checkbox or option to clarify cost allocation for courses taught at mixed locations** (e.g., courses partially taught online by IHE instructors but supported on-site by LEP personnel).
4. **FAFSA/CAFSA Compliance Support**:
    - Given the new FAFSA/CAFSA requirements for ASCENT students, adding a checkbox or line item to indicate which party (LEP or IHE) will provide **support for FAFSA/CAFSA compliance** may be helpful. This can clarify responsibilities for advising students through the application process, even though ASCENT students cannot accept aid directly.
5. **Optional Checkbox for Additional Student Support Services**:
    - Some LEPs may wish to offer additional support, such as **transportation or technology resources**. Adding an optional checkbox or field for such services could help LEPs document these services in alignment with their budget and resource availability.

These updates can help streamline the agreement by making roles and financial responsibilities more transparent, while aligning with the ASCENT recommendations.