



TEXAS
Department of Family
and Protective Services

Plan for Foster Youth in the Preparation for Adult Living Program Workgroup Report

**As Required by House Bill 700,
87th Legislature, Regular Session, 2021**

November 1, 2022

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Executive Summary

House Bill (H.B.) 700, 87th Legislature, Regular Session, 2021, directed the Texas Department of Family and Protective Services (DFPS) to collaborate with the Texas Higher Education Coordinating Board (THECB) in jointly establishing a work group to develop a plan to ensure foster youth who complete the standardized curriculum for the Preparation for Adult Living (PAL) Life Skills Training program are eligible to receive college credit. In developing its evidence-based recommendations, the workgroup was required to consider the feasibility of implementing each recommendation, a foster youth's access to the PAL Program, and the average length of time a foster youth will remain in a placement. DFPS must report the plan to the Legislature no later than November 1, 2022.

In addition, the bill required the workgroup to include representatives of both rural and urban institutions of higher education, as defined by Education Code, Section 61.003. To comply with this legislation, DFPS Transitional Living Services (TLS) program staff coordinated with the THECB to convene a workgroup comprised of DFPS and THECB staff, as well as six representatives of post-secondary institutions from across the state to explore the possibility of extending college credit for the completion of PAL Life Skills Training curriculum.

Through the work completed, the group not only explored the question of college credit for completion of PAL Life Skills Training classes, but also committed to reviewing the PAL Life Skills Training curriculum to consider ways to strengthen it to better equip youth who complete the classes for future academic and professional success.

The workgroup identified curriculum and accreditation barriers to the granting of college level credit for the PAL class coursework. As a result, the workgroup explored other options to receive credit, which included institutional credit-by-exam options, prior learning assessments (PLA), and competency-based education (CBE) courses. However, all options presented barriers.

Ultimately, the workgroup's findings resulted in the conclusion that college credit for the PAL Life Skills Training classes was not possible for two primary reasons: curriculum and accreditation requirements.

Nonetheless, as a result of its collaboration, the workgroup identified next steps in determining curriculum enhancements to the PAL Life Skills Training. Additionally, the workgroup developed a recommendation to remove the Texas Tuition and Fee Waiver student college enrollment age qualification in Education Code, Section 54.366(a)(2) to make it uniform with Section, 54.367, allowing students in all foster care situations to lock in the waiver at any age.

Background

Transitional Living Services

The DFPS TLS program includes a broad array of services and supports to youth and young adults age 14 to 23 years who are either presently or formerly in foster care. These services help support the successful transition to adulthood of eligible youth and young adults.

Services include the PAL programs; however, the PAL Life Skills Training classes are only one part of providing a youth with the skills, knowledge, and experience to successfully navigate the transition to adult living. Through the program, youth and young adults receive a minimum of 30 hours of instruction evenly spread across 6 broad categories:

- Health and Safety
- Housing and Transportation
- Job Readiness
- Financial Management
- Life Decisions and Responsibilities
- Personal and Social Relationships

The curriculum guidelines for this coursework include detailed goals, desired outcomes, and minimum standards, and is consistently being reviewed for Continuous Quality Improvement (CQI) efforts. This CQI included work done through workgroups subsequent to Senate Bill 1758, 85th Legislature, Regular Session, 2017, as well as other subsequent reviews of material, incorporation of participant results data and satisfaction surveys, and pilot programs of alternative methods of life skills training that have occurred over recent years.

The actual delivery of the PAL Life Skills Training curriculum to eligible youth and young adults is provided by contracted services in each of the DFPS regions across the state. The contractors develop their own program, but must follow the guidelines and minimum standards included in DFPS policy.

Workgroup Activities

The workgroup convened consisted of two members from DFPS, two members from THECB, and six members drawn from colleges both rural and urban from across the state. The first meeting occurred on October 25, 2021, and the postsecondary representatives agreed to review the PAL curriculum with institutional colleagues to determine whether the curriculum matched one or more courses offered for college credit that could be utilized to offer transfer credit for the PAL Life Skills Training classes.

At the second meeting on December 2, 2021, it was determined the Learning Frameworks course EDUC 1300 provided the best basis for comparison. There were concerns expressed that the PAL coursework lacked the rigor needed to qualify for college level credit classes. Postsecondary representatives also agreed to explore alternative credit options, such as credit by examination, prior learning assessment, and competency-based education courses at their respective institutions. Postsecondary representatives committed to reviewing the PAL curriculum and alternative credit operations over the coming months until the next meeting.

The group again convened for a third time on February 15, 2022, where the workgroup identified several curriculum and accreditation barriers to the granting of college level credit for the PAL class coursework.

Curriculum Barriers

The PAL Life Skills Training curriculum does not meet the qualifications of any other course for college credit. Postsecondary members of the workgroup identified EDUC 1300 course as one which provided the best basis for comparison. However, in working with the faculty at the colleges on this project, the PAL Life Skills Training was determined to lack needed qualities in order to qualify for credit for EDUC 1300. These include:

- The PAL curriculum does not cover all of the required objectives for the EDUC 1300 class, and there are no other credit classes which match up to the PAL curriculum.
- The work required of students in the PAL Life Skills Training classes does not meet the rigor required of college students. For academic credit, there is an expectation that the student must have work-output measuring knowledge and mastery of the course material. The PAL Life Skills Training program does not include any such work output.
- The PAL Life Skills Training classes do not contain student assessment measures required to offer college credit. The PAL Life Skills Training program does employ a knowledge assessment which is used for continual program improvements. However, the assessment does not impact a youth's receipt of credit for the courses and does not meet the requirements of college credit coursework.

Accreditation Barriers

To receive college transfer credit for college level courses there are minimum requirements for faculty teaching the classes. These are requirements of the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), which is the body for the accreditation of degree-granting higher education institutions in the southern states¹.

The SACSCOC principles of accreditation require faculty teaching a college credit course to have a minimum standard of a master's degree in the discipline being taught or a master's degree with a concentration in the discipline being taught (a minimum of 18 graduate semester hours in the discipline). However, under the contractual guidelines for the PAL Life Skills Training courses across Texas, the trainers/teachers of the classes need only hold a bachelor's degree and not necessarily in a subject core to the life skills classes.

This alone means the PAL Life Skills Training classes do not meet the requirements to transfer for college credit to an accredited institution of higher education.

Other Options Explored

Since the coursework is not eligible to transfer for credit to an accredited college, the workgroup explored other options to receive credit, but once again barriers were identified. The options discussed were the following:

- **Institutional credit-by-exam options**, allowing a PAL program graduate to demonstrate mastery of EDUC 1300 content through testing. Concerns included the need to strengthen the current PAL curriculum, inconsistencies in institutional credit-by-exam policies, exam fee barriers for students, and the fact that there are no standardized examinations for credit for learning framework courses as such as EDUC 1300.
- **Prior Learning Assessment (PLA)**, by which a PAL program graduate could earn college credit in combination with past training, completed certification programs, or work experience. The need to strengthen the current PAL curriculum and varying local PLA policies emerged as barriers to this approach.
- **Competency-Based Education (CBE) courses**, through which a PAL program graduate could enroll in an accelerated learning framework course and be allowed to complete missing course objectives based on the learner's competency level. Again, the need to strengthen the PAL curriculum and the likely inconsistency in CBE course requirements among colleges, along with possible tuition barriers, were deterrents to recommending this approach.

¹ The SACSCOC serves as the common denominator of shared values and practices among the diverse institutions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia, and Latin America that award associate, baccalaureate, master's, or doctoral degrees.

Further Work

In conclusion, it was not possible to offer college credit for the PAL Life Skills Training coursework, and the workgroup therefore chose to split into two sub-workgroups.

The THECB staff began work on a report for DFPS, detailing the barriers preventing colleges from extending credit for the PAL Life Skills training classes, including links to accreditation policy rules.

A second sub-workgroup, comprised of several of the postsecondary members, began work on reviewing the PAL Life Skills curriculum and delivering a report with recommendations for strengthening the PAL Life Skills Training curriculum guidelines to improve its rigor to better equip graduates of the program with skills to be successful in their adult life.

The workgroup met on April 26, 2022, and May 24, 2022, to monitor progress of these two sub-work group projects products. Additionally, the PAL curriculum sub-workgroup met on June 15, 2022, with several PAL Life Skills Training instructors, and DFPS PAL staff from across the state to discuss training methods, student engagement, and other factors to better understand how the curriculum guidelines are developed and delivered to students across the state.

Workgroup Findings

The result of the workgroup is that it is not possible to provide college credit for the PAL Life Skills Training classes, for two primary reasons: curriculum and accreditation requirements.

PAL Life Skills Training Curriculum

The curriculum itself does not come close to matching any other college course for which credit could be given. There is a significant barrier in content between the PAL classes and even the closest identifiable accredited class for which credit could be given (EDUC 1300).

To bridge that gap by adding material to the PAL Life Skills Training classes would require several additional subjects and classes. Those additional subjects may not fit entirely within the framework of the purpose of the Life Skills Training classes, as the learning objectives and course material for Life Skills Training classes and EDUC1300 class do not line up.

Furthermore, funding for additional course material would run at least an estimated \$750,000 additional annually, plus costs for development of the material, and this funding is not currently available to program or included in current contracts.

The PAL Life Skills Training classes do not have an individual testing or work-product expectation sufficient to meet academic rigor required for college level credit. Even if the curriculum gap were able to be bridged, the lack of rigor and work-output would still be a barrier to receiving college credit.

PAL Life Skills Training Instructors and Accreditation Requirements

The existing requirements of PAL Life Skills Training teachers and leaders do not meet the requirements necessary for college credit acceptance. Increasing the existing requirements for instructors for the program would face two barriers:

- Rural regions already at times struggle to find suitable candidates with the existing bachelor's degree requirement. Increasing the requirements increases the likelihood of being unable to service rural regions and counties.
- To increase the minimum requirements would require an increase in compensation for said trainers, and thus would require additional funding that program does not presently have.

Next Steps and Recommendation

While the stated goals of securing college level credit for the existing PAL Life Skills Training curriculum is not viable, the workgroup identified next steps and a recommendation as a result of its collaboration.

PAL Life Skills Training Curriculum Enhancements

As a next step to enhance the PAL Life Skills Training curriculum, the higher education members of the workgroup will produce a separate report in Fall 2022 with recommendations for strengthening this curriculum to better prepare youth transitioning from foster care for post-secondary academic success. DFPS will review those recommendations and explore the appropriateness of incorporating them into their ongoing CQI to ensure the best possible level of preparation and skills development is being provided to youth transitioning from foster care.

Texas Tuition and Fee Waiver Qualification Recommendation

A PAL program that received college credit would provide an advantage to foster youth to allow them to maintain access to their Texas Tuition Fee Waiver Qualification beyond the 25-year-old age limit, whose eligibility for the waiver comes through means other than having an adoption assistance agreement as described by Family Code, Chapter 162, Subchapter D.² For students receiving the waiver through a qualifying adoption assistance agreement, there is no

² Under Education Code, Section 54.367 a student can qualify for the Texas Tuition and Fee Waiver if they were adopted and the subject of an adoption assistance agreement that provided monthly payments and medical assistance benefits and was not limited to providing only for the reimbursement of nonrecurring expenses.

requirement in Education Code, Section 54.367 to lock in the waiver by enrolling in college prior to age 25.

Conversely, for students qualifying under Education Code, Section 54.366, they are required to enroll in college prior to turning 25 to lock in and retain access to the waiver. Innumerable studies have shown that youth and young adults who experienced foster care start college later and take longer to complete college degrees than traditional students.

For this reason, the workgroup recommends the Legislature consider removing the student qualification found in Education Code, Section 54.366(a)(2), which requires enrollment prior to age 25 to receive and retain access to the waiver, thereby mirroring the Texas Tuition and Fee Waiver provision of Education Code, Section 54.367 for a consistent approach to student qualifications. This will increase access to opportunities for postsecondary development, which will, in turn, provide the state with a more skilled workforce while simultaneously helping to support the successful transition of former foster care youth to adulthood.

Conclusion

The PAL Life Skills Training classes are only one part of the TLS program delivering a broad array of services and supports for the successful transition to adulthood for eligible youth and young adults who are either presently or formerly in foster care.

Although the curriculum guidelines for this coursework include detailed goals, desired outcomes, and minimum standards with consistent CQI efforts, the PAL Life Skills Training does not meet the qualifications of any other course for college credit. The learning objectives and course materials do not complement even the closest identifiable accredited class for which credit could be given, and there are no individual tests or work-product expectations for students sufficient to meet the academic rigor required for college level credit.

Additionally, PAL Life Skills Training bachelor's degree requirements for teachers and leaders do not meet the accreditation requirements for a master's degree necessary for college credit acceptance. Increasing these requirements would result in workforce shortages in rural regions and counties, as well as increased compensation for trainers not currently available in the program funding.

Despite this determination, the workgroup identified next steps in determining curriculum enhancements to the PAL Life Skills Training and developed a legislative recommendation to remove the Texas Tuition and Fee Waiver student college enrollment age qualification.

List of Acronyms

Acronym	Full Name
CBE	Competency-Based Education
CQI	Continuous Quality Improvement
DFPS	Department of Family and Protective Services
H.B.	House Bill
PAL	Preparation for Adult Living
PLA	Prior Learning Assessment
SACSCOC	Southern Association of Colleges and Schools Commission on Colleges
TLS	Transitional Living Services
THECB	Texas Higher Education Coordinating Board