What It Takes to Get Community College Bachelor's Degree Programs Approved

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Acknowledgements

I am grateful to the Strada Education Foundation for supporting this study of community college baccalaureate (CCB) degree program approval policies and processes. Special thanks to Justin Draeger, Stephen Payne, Kimberly Sluis, and Ruth Watkins for encouraging us to dig deeper into understanding how these programs come about in different state contexts. I also want to thank education leaders in CCB-conferring states who reviewed this brief: Chéri Fortin, Erin Larson, and Jill Leufgen (California), Michael Macklin (Colorado), Carrie Henderson and Katie Grissom (Florida), Rick Woodfield (Ohio), Shalee Hodgson, Celia Nunez, and Eric Juenemann (Oregon), and Kendrick Hang (Washington). Your insights on how CCB program approval works were incredibly valuable. Special thanks also goes to Angela Kersenbrock and Carmen Garcia-Beaulieu of the Community College Baccalaureate Association (CCBA) for reviewing this brief, and to Elizabeth Meza at the University of Washington whose research partnership was instrumental to carrying out this project. I am also grateful to Colleen Pawlicki of Troy Street Professional Services who guided the review, editorial, and production processes. Last, I want to thank the many dedicated educators who have contributed to my research on community college baccalaureates over the years. I value your wise counsel and support beyond measure.

Suggested Citation: Bragg, D. D. (2025). What it takes to get community college bachelor's degree programs approved. Seattle, WA: University of Washington. https://evans.uw.edu/wp-content/uploads/2025/05/Bragg-2025.-What-It-Takes-to-Get-Community-College-Bachelors-Degree-Programs-Approved.pdf

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About This Brief

This research brief describes how community college baccalaureate (CCB) degree programs are approved in 15 states, providing a fuller understanding of CCB program approval than has existed to date. Despite the growth of CCB degree programs, the majority of states do not allow any bachelor's degrees to be conferred by community colleges. Among the 24 states that authorize them, nine limit the awarding of CCB degrees to one or two community colleges and a small number of bachelor's degree credential types and programs of study. However, the remaining 15 states are seeing growth in CCB degrees, prompting this study of why and how programs are approved in CCB-authorizing states. If the goal of the CCB is to increase access to a bachelor's degree for students who otherwise would be unable or unlikely to secure one (Meza & Love, 2022), then CCB leaders have a long way to go in scaling up these degrees nationally.

So, what does it take to get a CCB degree program approved? Numerous steps are required, including local board approval, regional accreditation for "substantive change," and typically state board or higher education system approval, before decisions are made to support or deny program applications. Given the importance of keeping college curriculum up-to-date and responsive to student, workforce, and community needs, as most colleges and universities strive to do, it is important to understand how CCB degrees come to be, along with the policies and processes that lead to their approval. Further, understanding what it takes to navigate state and system program approval processes can inform future policy.

Introduction

Community college baccalaureate (CCB) degree programs are increasing in the United States, with one or more community colleges authorized to confer CCB degrees in 24 states (see Appendix). The Community College Baccalaureate Association (CCBA) now reports over 200 community colleges are approved to award one or more bachelor's degrees (CCBA & Bragg & Associates, 2024), yet securing the approval to offer such a program is no easy feat. States set a high bar to enable institutions historically limited to associate degrees to offer bachelor's degrees. This makes sense when establishing new programs with public funding, but what constitutes a rigorous and transparent approval process for CCB degree programs? With so much at stake for community colleges and their students, it is important to understand what it takes to get a CCB degree program approved.

Changing College Curriculum

College curriculum is constantly changing to keep pace with new scientific, social, and economic developments in the country and around the world. In their foundational text on higher education, Lattuca and Stark (2009) explain that college curricula shift for many reasons, including changing student demographics, evolving workforce needs, expanding instructional delivery modes, and shifting accountability requirements. Whereas Lattuca and Stark did not consider CCB degrees specifically, their observation about the numerous forces influencing higher education curriculum change is highly relevant to the growth of CCB degrees.

Davidson et al. (2019) studied changes in workforce-focused curriculum nationwide and concluded that carefully crafted program approval processes are the bedrock of high quality education that prepares graduates for meaningful and rewarding employment.

The authors observed approval processes should demonstrate how programs meet regionally focused workforce needs. Noting the importance of expanding high quality postsecondary workforce education programs, including CCB degree programs, Davidson et al. stated:

> The program approval process through which colleges make decisions about what to add must be strategic. It should not be an ad hoc approach that occurs only when a new idea bubbles up, but, rather, an ongoing cycle wherein leaders examine critical data on labor market trends and make decisions about if, when, and how to develop new programs aligned to regional needs. Effective colleges set clear standards that ensure that any new additions meet the needs of employers and populations, and they design efficient processes that enable responsiveness to emerging trends.

Case studies conducted by Davidson et al. identify key elements of postsecondary workforce-focused programs that culminate in baccalaureate degrees at Valencia College in Florida and Clark State Community College and Columbus State Community College in Ohio. These cases reinforce the importance of program approval processes that result in high-quality curriculum that prepares graduates for employment and meets regional workforce needs. Strong parallels exist between the Davidson et al. study and this study of CCB program approval; knowing how and why CCB programs are approved may contribute to the expansion of high quality bachelor's degrees in the future.

Multiple Levels of Approval

The policies and processes employed to approve CCB programs occur at the local, state, and regional levels. This multi-level approach helps ensure new programs are scrutinized and ultimately, as proposed, meet the requirements established by experts, essential stakeholders including students, and potential beneficiaries, including employers and communities. Measures to approve new CCB programs at each level include evidence of student demand, educational purpose, and workforce needs.

Looking at the **local level,** the seed to form CCB programs typically takes root when college leadership, faculty, employers, students, and/or other stakeholders express interest in a bachelor's degree program. Consequently, the first formal decision to approve or deny a new CCB program is made by a community college's board of trustees. In a few states (e.g., Arizona, Michigan) local boards have sole authority to approve CCB degree programs without additional state approval.

Moving to **state program approval,** a national study of higher education by Venters (2023) offers a valuable framework for understanding how CCB program approval policies and processes work at the state level.

This State Higher Education Executive Officers (SHEEO) study details the policies, measures, and processes employed in all 50 states by state boards and higher education systems with an eye toward improving higher education program approval. Venters suggests program approval processes should focus more attention on how new programs address student access and outcomes. Echoing this priority, a national initiative on CCB program quality highlights the importance of student access and outcomes as a critical element of high-quality CCB programs (Pawlicki et al., 2023).

Drawing on results of the SHEEO study, Table 1 displays program approval measures at the state level according to two major categories: 1) program quality, focusing on strategic curriculum and instruction, students, and faculty; and 2) resource use, including the cost to develop and offer new programs, evidence of non-duplication of newly proposed programs with existing programs, and data on employer and workforce needs. Venters' measures are used to organize, analyze, and report the findings of the present study, discussed later in this brief.

Table 1. Major Categories of Measures for New Program Approval

Major Measures of Program Quality	Major Measures of Resource Use
Curriculum	Costs
Students	Preventing duplication
Faculty	Employer need/demand
Facilities and libraries	State workforce needs
Institutional and program accreditation	Student demand
External review of program application	Other types of needs and demands
Support for state strategic plan	
Support for institutional strategic plan	

Source: Venters, M. (2023). State-level program approval and review. State Higher Education Executive Officer (SHEEO) Association.

To offer CCB programs also requires **regional accreditation**. A process of "substantive change" in regional accreditation is required when a higher education institution seeks a fundamental change in policies and practices, such as when community colleges elevate from conferring the associate to bachelor's degree as their highest formal college credential. The substantive change review process can be demanding of personnel time and effort, and it can be costly to execute. The review process typically requires a campus visit and extensive review of curriculum and campus policies and processes. It also includes gathering evidence demonstrating the institution has sufficient financial resources to hire qualified faculty to teach upper-division courses, to stock laboratories and library materials, and to provide academic and student supports that students need to succeed (Wright-Kim, 2022).

Speaking to the "substantive change" process, the Higher Learning Commission (HLC) (2020) published guidelines for community colleges seeking to offer bachelor's degrees in states falling under its jurisdiction. These guidelines present four criteria that community colleges must address to receive approval to confer bachelor's degrees: 1) mission; 2) ethical and responsible conduct; 3) institutional effectiveness, resources, and planning; and 4) teaching and learning. The HLC acknowledges institutional changes required to meet these criteria demand time and resources, leading to the recommendation that community colleges seek guidance and support from the HLC at the earliest stage of pursuing a bachelor's degree program.

In addition, some programs require or highly recommend specialized accreditation to ensure the proposed programs will meet industry standards and prepare students for employment in the industry. Teacher preparation and nursing are just two examples of programs that can require specialized accreditation. Though not universal among states, some take into consideration an institution's history with or potential to obtain specialized accreditation when deciding whether to approve a new CCB program.

Considering this multi-level process and the variation within it, the landscape of CCB degree conferral varies considerably from state to state. Whether CCB degrees are authorized in a few colleges or allowed to spread to colleges across a state depends largely on state law and program approval processes.

Methods and Research

The stated purpose of program approval policies across states is to ensure high quality bachelor's degree programs, but what do these policies entail? To answer this question, this study gathered data on program approval policies and processes not available prior to this research. The following three research questions guided the study:

1. How are CCB programs approved in 15 selected states that are experiencing growth and positioned to further scale CCB degrees?
2. What specific policies and measures are used by these states to approve new CCB programs?
3. How do CCB program approval processes function, and how do they compare from state to state in relation to scaling up more CCB degrees?

Building on studies documenting the scale-up of CCB programs in the United States from 2020 through 2024 (Bragg & Pawlicki, 2024; CCBA & Bragg & Associates, 2024; Fulton, 2020; Love et al., 2021), this study examined policies authorizing CCB degrees using public documentation (e.g., statutes and administrative rules, policy statements, websites). This information was gathered from governmental bodies and online interviews with education leaders in California, Colorado, Florida, Ohio, Oregon, and Washington. A review was conducted of CCB program applications in Ohio, Oregon, and Washington, states where such documentation is publicly accessible on websites. The study was also informed by publications by Floyd and Skolnick (2019), Fulton (2020), and Love and Palmer (2020), who discuss various aspects of CCB program approval.

Fifteen states were selected for this study, shaded in dark blue in Figure 1 (page 9). These states allow all associate-dominant colleges to confer CCB degrees, based on each state's adopted program approval policies and processes.

The colleges in these 15 states make up over 90 percent of all associate-dominant institutions authorized to award bachelor's degrees in the United States, and they also represent about 90 percent of all approved CCB programs nationwide.

Shaded in light blue in Figure 1 are nine states conferring CCB degrees that were not chosen for this study. These nine states have limited opportunity for more CCB programs due to restrictive language in state legislation and/or higher education system policy (see the Appendix on page 21 for a detailed discussion on CCB growth across CCB-conferring states).

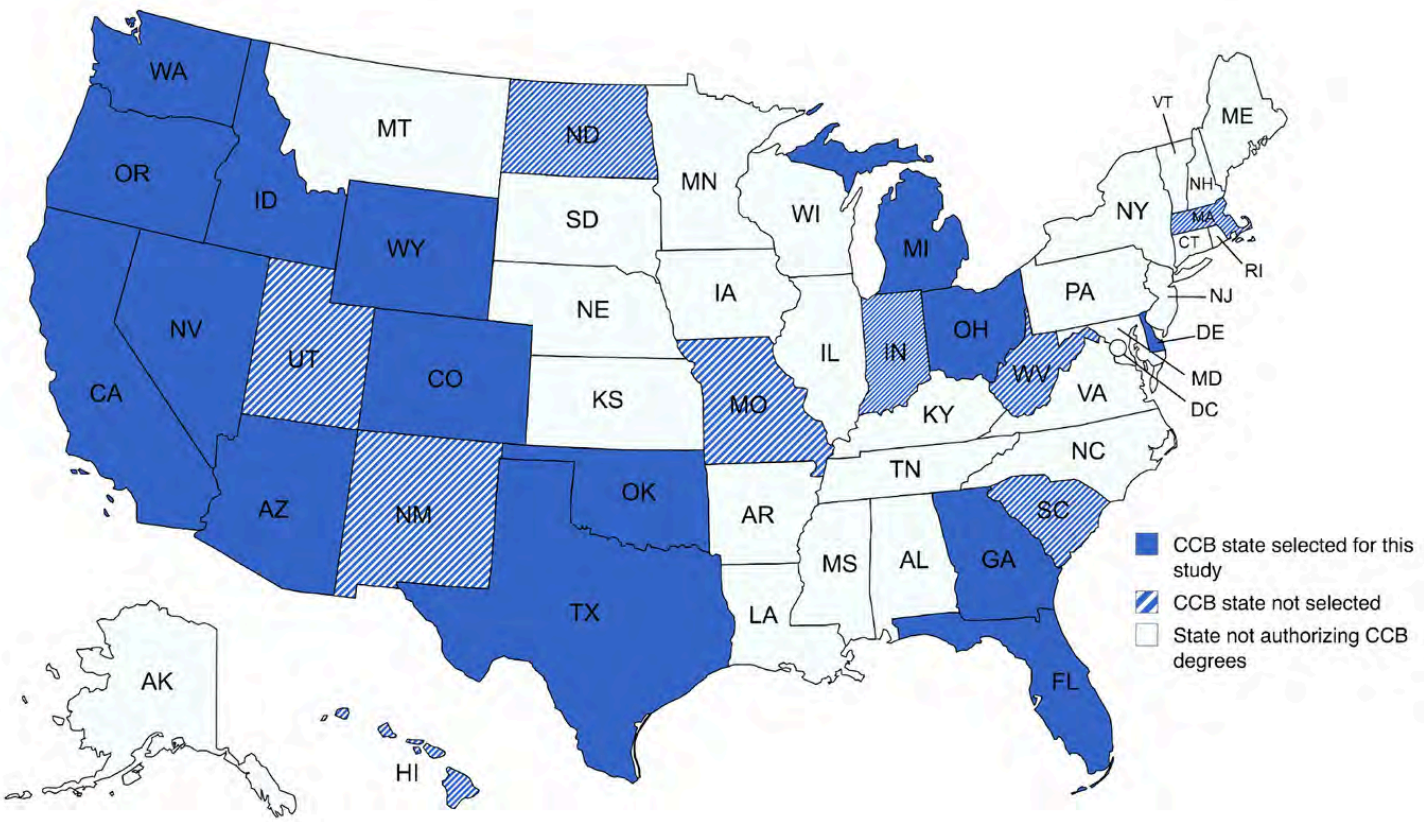
Content analysis was used to analyze the CCB program approval policies and processes gathered for this study. Venters (2023) aforementioned study provides a useful roadmap for the analysis. Using the two major categories of program quality and resource use revealed in Venters' research, a list of program approval measures was created through inductive analysis. Detailed sub-categories of measures associated with program quality and resource use emerged through content analysis of the large volume of information associated with CCB program approval across the 15 states. Once the cataloguing and coding was completed for each state, cross-state patterns were identified and documented in the findings.

This study has limitations. First, a study of program approval that included all 24 CCB-conferring states would undoubtedly yield a more comprehensive view of CCB program approval in the U.S., but resources were insufficient to take this expansive approach. That said, I sought to control for this limitation by selecting 15 states that account for approximately 90 percent of all CCB degree programs offered in the country. These states also dominate the national landscape in terms of their potential to grow, although CCB program approval and implementation in many of these states is still relatively new.

Second, by focusing on publicly accessible documents, including websites, this study may have missed or underestimated nuanced aspects of CCB program approval. To help control for this limitation, care was taken to review all accessible materials thought to represent the most current, relevant, and useful aspects of program approval processes. In addition, I solicited feedback on the findings of this brief from CCB leaders in six states having the largest or most rapidly growing CCB programs in an effort to gather additional insights that may have been missed in the document review.

Last, this research would benefit from review of more actual CCB program applications to illustrate examples of case-making using data to articulate need and merit. In-depth information of this sort could also benefit policymakers and practitioners who seek to understand how to carry out and improve CCB program approval processes in the future.

Figure 1. U.S. Map Showing the 24 States Authorizing CCB Degrees and Highlighting the 15 States Included in this Research



Results

This section discusses major findings pertaining to program approval within the 15 states selected for this study. State-level results are presented according to measures of program quality and resource use (Venters, 2023), and comparative results inform lessons learned to enhance state- and higher education system-level CCB program approval across the 15 states.

CCB Legislative and Program Approval Authorization

Table 2 (page 11) shows the CCB-authorizing legislation, by date, as well as the number of colleges and programs in the state by bachelor's degree type: Bachelor of Science (BS), Bachelor of Applied Science (BAS), Bachelor of Applied Arts and Science (BAAS), Bachelor of Science in Nursing (BSN), Bachelor of Applied Technology (BAT), and Bachelor of Science in Education (BSE). The information in Table 2 is drawn from the national inventory of CCB programs (CCBA & Bragg & Associates, 2024) and updated information from informants in four states with large and/or growing CCB programs (California, Oregon, Texas, and Washington). Column three reveals the types of bachelor's degrees conferred across the selected states, and column four shows the scale of approved CCB offerings by college and program.

This research confirms some states allow all community colleges to apply to the state or system for approval to confer a CCB degree, whereas others limit authorization to a subset of associate-dominant institutions. For example, the results show Florida has the most approved CCB programs, with 196 offered across all 28 Florida system colleges. Conversely, Georgia authorizes bachelor's degrees in six institutions associated with the University of Georgia system, but technical colleges outside of this system are not authorized to confer such degrees. Oklahoma allows two institutions associated with the Oklahoma State University system to confer bachelor's degrees, with just one community college approved to confer a bachelor's degree in a single program.

Other institutional restrictions come into play through state laws governing CCB degree conferral, such as Texas' authorization of CCB degrees at institutions that demonstrate taxable district income of $6 billion or more, with a lower threshold of $4 billion if the only CCB program offered is nursing. Love et al. (2024) express concern that this restriction may result in reduced CCB degree conferral for students in smaller districts, but the Texas Higher Education Coordinating Board (THECB) explains this requirement helps ensure community college districts do not jeopardize their financial stability, which would have a concerning impact on all students.

Also, some state- or system-level approval processes affect the program foci and degree types that can be offered by community colleges. An example occurs is Michigan, where only four occupational programs are authorized: concrete technology, culinary arts, energy, and engineering technologies. 12 years after CCB conferral had been possible in Michigan, only five community colleges had elected to confer CCB degrees in these areas.

Affecting CCB program growth even more directly are state laws that prohibit community colleges from offering nursing and education programs. In the 15 states studied, 10 approve nursing programs, and eight authorize education programs. That said, state approval of these programs has been growing as more CCB-conferring states authorize nursing and education programs to meet regional workforce needs.

Finally, in respect to bachelor's degree type, 11 of the selected states authorize applied bachelor's degrees, typically in the form of the BAS. However, other bachelor's degree types are increasing, including BS and BA degrees. We should anticipate seeing more CCB programs confer these degrees as programs in education, nursing, and various STEM fields increase across states.

Table 2. Status of CCB Conferral in 15 States, from Oldest to Newest Year of CCB Degree Authorization

State	State Law or System Change by Year	Bachelor's Degree Type	Number Colleges and Approved Programs
Georgia	System change (1997)	BA, BS, BAS, and BSN	6 colleges, 53 programs
Nevada	System change (1999)	BA, BS, BAS, and BSN	4 colleges, 36 programs *(All public associate-dominant colleges confer 1 or more CCB degrees)*
Florida	S.B. 1162 (2001) S.B. 1716 (2008) FL S.S. 1007.33 (2023)	BS, BA, BAS, and BSN	28 colleges, 196 programs *(All public associate-dominant colleges confer 1 or more CCB degrees)*
Texas	S.B. 286 (2003) H.B. 2198 (2007) S.B. 2118 (2017)	BAS, BAT, BAAS, and BSN	21 colleges, 62 programs[1]
Oklahoma	System change (2004)	BAT	3 colleges, 7 programs
Washington	H.B. 1794 (2005, 2008) S.B. 6355 (2010) H.B. 2483 (2012) S.B. 5928 (2016) S.B. 5401 (2021)	BS, BAS, and BSN	34 colleges, 165 programs[1] *(All public associate-dominant colleges confer 1 or more CCB degrees)*
Colorado	S.B. 10-101 (2010) S.B. 14-004 (2014) H.B. 18-1086 (2018) H.B. 18-1300 (2018) H.B. 19-1153 (2019) C.R.S. 23-60-2011 (2024)	BAS and BSN	10 colleges, 36 programs
Michigan	H.B. 4496 (2012)	BS	5 colleges, 6 programs
California	S.B. 850 (2014) S.B. 1406 (2018) AB 927 (2021)	BS	42 colleges, 51 programs[1]
Delaware	2015	BSN and BSE	3 campuses of Delaware Technical Community College, 2 programs *(All public associate-dominant colleges confer 1 or more CCB degrees)*
Idaho	H.B. 73 (2017) H.B. 217 (2023)	BAS	3 colleges, 4 programs
Ohio	H.B. 49 (2018) S.B. 135 (2021)	BAS and BSN	14 colleges, 25 programs
Oregon	S.B. 3 (2019) S.B. 523 (2023)	BAS and BSN	8 colleges, 10 programs[1]
Wyoming	S.F. 111 (2019)	BAS	4 colleges, 7 programs
Arizona	S.B. 1453 (2021)	BS and BSN	13 colleges, 21 programs

1. This study identified additional community colleges and programs in California, Oregon, Texas, and Washington where CCB degrees have increased beyond the 2024 national inventory (CCBA & Bragg & Associates, 2024). These updated numbers are shown in Table 2.

CCB Program Approval Authorities

The primary documentation used to analyze state- and system-level policies on CCB program approval is summarized in Table 3 (page 13), including naming the official bodies authorized to approve new CCB programs. The results show nine of the 15 states studied (i.e., California, Colorado, Florida, Idaho, Ohio, Oregon, Texas, Washington, and Wyoming) assign responsibility for CCB program approval to the state's board for higher education and/or community college education. States that coordinate education offered by community colleges and universities separately often require both boards to sign off on new CCB programs at some point in the approval process.

It is also worth noting that CCB program approval authority has changed in some states over time, with states like Colorado and Washington passing laws to formally shift CCB degree program approval from one state agency to another. For example, the Washington State Board of Community and Technical Colleges (SBCTC) assumed responsibility for CCB program approval with the passage of H.B. 2483, after the state board coordinating higher education was eliminated with major restructuring of higher education. In Colorado, a statute passed in 2024 gives the Colorado Community College System board authority to approve CCB programs in the form of BAS and BSN degrees, shifting responsibility from the Colorado Commission on Higher Education.

Compared to the nine states mentioned above, Arizona, Delaware, and Michigan differ markedly in their approach to CCB program approval. In these states, CCB program approval is conducted by local college boards of trustees, not by the state. Arizona S.B. 1453 authorizes CCB program approval by community college boards of trustees, prescribing the use of an extensive set of requirements to approve CCB programs. Approval in Delaware and Michigan is similarly situated with local college boards, with few details accessible online to inform the exact measures that must be addressed to secure board approval of new CCB programs.

Finally, Georgia, Nevada, and Oklahoma use higher education and/or university system boards to approve CCB degrees.

In these three states, the Board of Regents of the University System of Georgia, the Board of Regents of the Nevada Higher Education System, and Oklahoma State Regents for Higher Education approve CCB degree programs. Of these three states, Nevada has scaled CCB degrees most extensively, with CCB degrees offered by all four community colleges in the state. As mentioned previously, only a few institutions in Georgia and Oklahoma are authorized to offer bachelor's degrees, while most community and technical colleges are not allowed to confer CCB degrees.

CCB Program Approval Using Venters' Framing

Drawing on Venters (2023) study, Table 1 displayed on page 6 lists the measures of state program approval according to two major categories: 1) **program quality,** focusing on strategic curriculum and instruction, students, and faculty; and 2) **resource use**, including the cost to develop and offer new programs, evidence of non-duplication of newly proposed programs with existing programs, and data on employer and workforce needs. This framework, developed originally by Venters to study program approval measures at any level of higher education, is used here to analyze state CCB program approval measures and processes, resulting in detailed information on how these processes work and compare from state to state.

Measures associated with CCB program approval are shown in Tables 4 (page 15) and 5 (page 17). In total, 23 measures of program quality and 10 measures of resource use were identified through content analysis of state CCB program approval policies and processes. In Tables 4 and 5, cells marked with an X indicate the presence of measures explicitly stated in policy and procedural documents used to approve CCB programs. Empty cells indicate that the corresponding measure was not identified explicitly in the state's CCB program approval documentation. This aspect of the study is limited to states that provided sufficient information to carry out the research process, totaling 13 of the 15 states. Delaware and Michigan were excluded due to the lack of sufficient detailed information to confidently know which measures were required for CCB program approval.

Table 3. State and System Authority for CCB Program Approval

State	Primary State or System Entities Authorizing CCB	Links to CCB Program Approval Process & Forms
Georgia	University System of Georgia	Board of Regents of the University System of Georgia Policy Manual: 2.8 Institutional Mission; New Program Approval Resources
Nevada	Nevada System of Higher Education	Board of Regents of the Nevada System of Higher Education Handbook, Title 4, Chapter 14, Section 10; Community College Baccalaureate Proposal Development and Review Process; New Academic Degree Program Approval Form: https://nshe.nevada.edu/system-administration/departments/asa/proposals/
Florida	Florida State Board of Education	Baccalaureate Approval and Accountability Process; Baccalaureate Proposal Approval Process (Flowchart)
Texas	Texas Higher Education Coordinating Board (THECB)	New Program Development website
Oklahoma	Oklahoma State Regents for Higher Education (OSRHE)	Chapter 3, Academic Affairs Policy (December 7, 2023)
Washington	Washington State Board of Community and Technical Colleges	Bachelor's Degree Program Approval Process, including Program Proposal Template and Applied Baccalaureate Eternal Review Rubric
Colorado	State Board of Community Colleges and Occupational Education (SBCCOE)	Colorado Community College System Program Approval Process
Michigan	District board approval; No program approval by state	No documentation identified through public sources
California	Board of Governors of the California Community Colleges	Baccalaureate Degree Program Application Materials
Delaware	Delaware Technical Community College Board	No documentation identified through public sources
Idaho	Idaho State Board of Education	Postsecondary Program Approval
Ohio	Ohio Department of Higher Education (ODHE)	Proposal for permission to proceed to HLC and to the ODHE Program Approval Process for an Applied Bachelor's or BSN Degree Program
Oregon	Higher Education Coordinating Commission (HECC)	Program Approval Process for Bachelor Degrees at Community Colleges ORS 341.013
Wyoming	Wyoming Community College Commission (WCCC)	Update on Bachelor of Applied Science (BAS) Programs, including approval process overview;
Arizona	District board approval; no program approval by state	No documentation identified through public sources

Measures of Program Quality in CCB Program Approval. Table 4 displays results on program approval processes pertaining to **program quality.** In this analysis, 23 measures emerged that align with Venters' framework. The findings reveal that while a few states use a similar approach to approve CCB programs as all other higher education programs, most states craft program approval processes specific to the CCB degree. Specifically, the nine states of Arizona, California, Colorado, Florida, Ohio, Oregon, Texas, Washington, and Wyoming conduct program approval processes specific to CCB degrees, noting these programs offer applied curriculum and courses specific to the baccalaureate requirements of community colleges. For example, Oregon, Texas, and Washington align CCB program approval closely with career-technical education (CTE) or professional-technical education (PTE) program approval. **Comparing this study to Venters' research, it appears most states and systems require more empirical justification specific to workforce need, student demand, and program non-duplication for CCB programs than new program applications submitted by universities.**

Looking across the measures of quality shown in Table 4, we see the majority of states require numerous quality measures, including the proposed program name, degree type, faculty recruitment and qualifications, Classification of Instructional Program (CIP) codes, program accreditation, program majors and learning outcomes, program enrollments (past and future), and modes of delivery (i.e., in-person, online, or hybrid; main or off-campus location). The majority of states also require colleges to explain how facilities, equipment, and experiential learning will be used. Additionally, most states require colleges to explain how CCB planning processes were carried out, including describing program implementation and initial student enrollment dates.

Just under half of the states include a measure of quality related to support services, and about half also require descriptions of how associate degree programs align with CCB programs, sometimes referencing specializations, concentrations, and embedded- or micro-credentials that students can attain along their pathway to the baccalaureate. Fewer states require that colleges spell out specific academic content and standards or transfer and articulation agreements pertaining to proposed CCB programs, although all states require continued transfer and articulation policies. It is noteworthy that seven states offering CCB degrees (California, Florida, Michigan, Oklahoma, Texas, Washington, and Wyoming) have some of the highest transfer outcomes in the country, based on research by Velasco et al. (2024).

Fewer approval processes require staffing of non-faculty positions be addressed, nor do most require details on program evaluation, sustainability, and termination. It is possible, however, that these processes are addressed through other means of administration and accountability. It is also noteworthy that naming specific student populations for CCB programs is not typically included, but most states do require applicants to explain how learners with limited academic, financial, or economic access will participate. An exception is two criteria in Washington's CCB program application that require applicants to explain how place-bound working adults will be served by CCB programs, along with an implementation plan addressing how historically marginalized students will be recruited and supported. Similarly, Oregon has a criterion requiring applicants explain how they will collaborate with other similar higher education programs in the state to increase access and improve equity relative to educating students.

Table 4. Measures of Quality for CCB Programs
(Ordered from Most to Least Utilized)

Measures of Program Quality	Georgia	Nevada	Florida	Texas	Oklahoma	Washington	Colorado	California	Idaho	Ohio	Oregon	Wyoming	Arizona
1. Program name, degree type, courses, and catalogue description	X	X	X	X	X	X	X	X	X	X	X	X	X
2. Faculty qualifications, recruitment, or support	X	X		X		X	X	X	X	X	X	X	X
3. Program accreditation and licensure	X	X	X	X		X	X	X		X	X		X
4. Program learning outcomes and outcomes assessment	X	X		X		X		X	X	X	X	X	X
5. Naming of program major(s), concentration(s), specialization(s), and track(s), credential(s), and micro-credential(s)	X	X	X	X	X	X		X	X	X	X	X	
6. Classification of Instructional Program (CIP) code name and name, including explanation of CIP outside the norm	X	X	X	X		X		X	X	X	X		
7. Delivery mode (face-to-face, online, hybrid, on-site/off-site)	X	X	X	X	X	X	X				X		X
8. Program enrollment and graduates for similar or related bachelor's programs, including minimum requirements	X	X	X	X	X	X		X	X				X
9. Program facilities, equipment, and experiential learning sites	X	X	X	X		X			X	X	X		X
10. Program plan for implementation, with timeline and date of first offering	X	X	X	X	X	X			X			X	X
11. Student recruitment and admissions, including selective admission, and access for underrepresented students	X	X	X	X	X	X					X		X
12. Program contact/credit hours and terms, including explanation of any hours/terms outside norm	X	X	X	X		X	X				X		X
13. Associate degree pathway to bachelor's degree, with data on associate program enrollment, graduation, etc.			X	X		X	X	X		X	X	X	
14. Support services for students in the program		X		X		X	X	X			X	X	
15. Library and media specific to the program	X	X	X			X		X	X				X
16. Program-required clinicals, fieldwork, and work-based and experiential learning	X	X		X					X	X	X		
17. Alignment of program with institution or system mission	X	X				X					X	X	
18. Academic standards specific to the program	X		X	X		X					X		
19. Program transfer and articulation		X		X			X	X			X		
20. Staff (non-faculty) recruitment, qualifications, or support	X						X		X			X	X
21. Program evaluation, quality assurance, and improvement	X	X			X	X			X				
22. Documentation of internal program development process, faculty involvement and review, and local program approval		X	X					X			X	X	
23. Program sustainability and termination plans			X			X				X			

Measures of Resource Use in CCB Program Approval. Table 5 displays results on program approval processes pertaining to **resource use**. In this analysis, 10 measures emerged that align with Venters' six measures for higher education program approval generally. These measures relate to program features other than curriculum, faculty, and facilities, focusing instead on the intersection of new programs with institutional resources to offer the program and taking into account internal and external stakeholder needs and requirements pertaining to the region. Measures related to employer need, student demand, and administrative processes, including budgeting, fall into this category.

Every state requires that CCB program applications address employer demand for program graduates, addressing how the program is uniquely situated to meet local supply and demand needs. Some states ask for additional information on employment outlook and opportunities for graduates several years into the future. A few states seek information on CCB graduates' salaries relative to associate graduates, and some states encourage colleges to secure employer commitments to hire CCB graduates. Whereas some of the data used to demonstrate supply and demand is standard from state to state, there are substantial differences in the level of specificity that states require related to workforce and employment demand, as well as student and graduate supply. For example, California, Florida, and Ohio require the use of specific labor market data sets, templates, and/or formulas to calculate unmet workforce need, presumably ensuring greater consistency in decision-making about program approval among reviewers.

Most states also require CCB program applicants to provide evidence of student demand, including explanations of how colleges solicited input on student interest in enrolling in bachelor's programs. This information is typically gathered from the college's own associate degree graduates as well as other prospective students. Sometimes employers and community leaders from the region are surveyed to identify students they may recommend to enroll in a proposed CCB program.

Detailed budgets for the proposed program are also explicitly required in almost all program approval processes, including sources of revenue supporting the program, coupled with details on personnel, materials, facilities, and other expenses. Not common among the selected states but worthy of mention is Florida's requirement for applications to compare student costs for the proposed program relative to what students would pay attending a similar program offered by other higher education institutions in the college's service district, including both public and private universities. This concern for college affordability is reflected in about half of the state program approval processes studied.

Table 5. Measures of Resource Use for CCB Programs (Ordered from Most to Least Utilized)

Measures of Resource Use	Georgia	Nevada	Florida	Texas	Oklahoma	Washington	Colorado	California	Idaho	Ohio	Oregon	Wyoming	Arizona
1. Workforce & employer need & demand for the program	X	X	X	X	X	X	X	X	X	X	X	X	X
2. Projected budget for program (revenues and expenditures)	X	X	X	X		X	X	X	X	X	X	X	X
3. Student interest, demand, and population to be served	X	X	X	X	X	X	X	X	X		X		X
4. Duplication/competition justification, including non-duplication objections and alternative proposals to resolve duplication	X	X	X	X	X	X		X	X	X	X		X
5. Regional/institutional accreditation (obtained, planned, and pending)	X	X	X	X			X	X			X	X	X
6. Cost to students for program tuition & fees (affordability)	X		X				X	X	X	X	X		X
7. Regional planning and coordination with other higher education institutions (public and private)		X	X			X	X	X		X	X		X
8. Employment outlook for program graduates	X	X	X		X	X		X			X		
9. Industry advisement, partnership, alignment & standards		X	X	X		X		X		X	X		
10. Budget impact on existing programs and cost effectiveness						X	X	X	X		X		X

Going Deeper on CCB Program Approval

CCB program approval processes follow a fairly common pattern, with almost all states requiring some form of a **notice of intent** (NOI), a formal **CCB program application process**, a process to identify **program duplication** (also referred to as competition), and a final **review process**. The following discussion delves deeper into common processes in CCB program approval.

NOI. The process of approving CCB programs has multiple phases, beginning with an NOI sent to the official office or entity tasked with program approval. California is a notable exception to this rule, although other forms of review mentioned later in this section are part of this state's CCB program approval process. An NOI launches a series of initial review activities that determine whether the program application will be viable on a fundamental level, including institutional eligibility to offer the program. It typically includes the program name and degree type, as well as a basic description of the program.

Some NOIs also require evidence of regional supply and demand, although these data are not as extensive as what's required in full program applications.

Moreover, the formality of the NOI process varies across states, as does the length of time NOIs are reviewed, depending on how extensively NOIs are circulated for review and comment. From 30 to 90 days is typical for sharing NOIs, with some states breaking this initial phase down into multiple steps, starting with formally naming the program and moving on to distributing elements of the program application for review across the state. Some of this difference in timing is also attributable to the differing roles and responsibilities of boards, as established in state statute. When multiple boards are required, the approval process typically takes longer to perform.

Application Processes. Following the submission of the NOI and a decision to proceed, all states require the formal CCB program application process to address measures of student/graduate interest in program enrollment relative to employer demand for graduates to assume positions in the workforce, whether filling new jobs or proceeding in established career pathways. Despite the consistency in requiring this measure, there is considerable variation in what states expect the supply and demand analysis to entail.

Further, the expectations for supply and demand analysis have changed over time in some states as new specifications have been developed and imposed on program approval, sometimes following passage of additional state law. An example of this change occurred in Florida, where CCB applicants must provide detailed evidence of demand, estimating unmet need and student/graduate supply according to state guidance and specified labor market datasets.

Similarly, California developed clearer and more consistent specifications for labor market analysis, including engaging regional Centers of Excellence in certifying that labor market assessments are done specifically for the proposed CCB program (California Community Colleges, 2024; Larson & Leufgen, 2025).

Ohio's program approval process also specifies the labor market data to be used in CCB program applications, and it encourages the submission of qualitative data on employer commitments to hiring qualified graduates. Plus, Ohio requests program applications include an employer provision to provide work-based learning to CCB students.

Duplication. An especially contentious aspect of CCB program approval is duplication, or competition, of CCB programs with seemingly similar curriculum offered by other higher education institutions in the state (Bragg, Meza, & Soler, 2022). The duplication of programs offered by community colleges and university programs is of particular concern due to the historical commitment of universities to baccalaureate degree conferral and the relative newness of community colleges to offer similar degrees. Claims of CCB degrees demonstrating mission creep are not uncommon, particularly when these degrees are newly authorized (see, for example, Floyd & Skolnik, 2019).

Some program approval processes call for decisions about duplication based solely on curriculum, but the trend is for these decisions to also consider such factors as cost, geography, and regional and community need. Student geographic access and local workforce, education, and community needs can vary widely within a state, which is why Florida, Texas, Washington, and other states take these factors into account when determining whether proposed CCB programs duplicate existing higher education programs. The fact that education deserts exist in all states (Hillman, 2016) contributes to decisions made in the above states about whether CCB programs can attract students from the region who are less likely to go away to college, with the goal of retaining them in local employment.

Whereas nearly all states require a duplication review, California is an important case to consider in terms of how program competition is evaluated without the use of an NOI. In this state, the California State University (CSU) and University of California (UC) systems review CCB program applications once they have been provisionally approved by the California Community College Chancellor's Office. This review focuses on potential duplication of curriculum, no matter where the proposed CCB programs are to be offered geographically in the state or who they are to be offered to. In contrast to how most other states review CCB programs, the assessment of duplication by the CSU and CU systems does not take local student demand and workforce need into account. Such concerns slow the program approval process led by the California Community College Board of Governors; since 2023, 14 CCB program applications have been delayed in reaching the Board's docket for approval (Burke, 2023). However, the Chancellor's Office has taken steps to address this problem. Specifically, the Office has created a form requiring community colleges to speak to critical elements of program duplication that have been raised by the CSU and UC systems, including specifying upper-level courses, course objectives, and other curricular considerations (California Community Colleges, 2024). State leaders express confidence that forthcoming changes to the state's CCB program approval process will facilitate timely decisions that will assist the state to meet its strategic goal of approving 200 CCB programs by 2030.

Formal Review Process. Finally, the formal process of reviewing CCB program applications varies from state to state, with some states utilizing state government personnel and experts from inside and outside of the state to carry out the assessment process. Members of state and college councils, including presidents, chief academic officers, and researchers, may also participate in the review of CCB program applications. An emerging trend in states with longer experience approving CCB program applications is to engage community college practitioners in the CCB program application review process. These practitioners can be involved at multiple points, beginning with the submission of an NOI to when final decisions are made to accept, revise, or deny program applications. For example, Florida's program approval process provides opportunities for practitioners to object or provide alternative proposals, and Washington community college practitioners can participate in a Baccalaureate Leadership Council (BLC) that advises the state on CCB program approval policies and processes. Due to their long experience with CCB degrees, these two states offer useful models for other states seeking to adopt or refine CCB degree program approval policies and processes that reflect the experiences and insights of community college practitioners who have implemented CCB programs.

Conclusion and Recommendations

This brief provides insights into how approval policies and processes work for new CCB programs in 15 selected states. Despite variation from state to state, results show most states consider multiple measures related to program quality and resource use, along with a sequential step of reviews, including submitting a public notification of intent and instituting a formal review process involving multiple stakeholders, particularly other higher education institutions in the state. Data addressing workforce need, student interest, and projected outcomes and impact are widely sought in new program applications as well. Comparing these findings to that of Venters' (2023) study, this extensive set of requirements often exceeds what is typically required for state approval of other higher education bachelor's degree programs.

Given the newness of CCB degree programs, scrutiny required of program applications makes sense on some level, but requirements that stall or block CCB program proposals that otherwise provide valid and compelling data on increased student access, improved workforce outcomes, and enhanced community well-being should be avoided.

Considering these findings, the following recommendations are offered:

- State laws authorizing CCB degrees should be evaluated regularly. Understanding how state laws increase or restrict the growth of CCB degrees is necessary to understand how CCB programs are implemented over time within states and nationally.
- Differences between community colleges and universities in their respective program approval processes should be scrutinized and, whenever possible, eliminated to ensure all higher education entities are treated comparably, fairly, and respectfully.
- All new program approval processes for bachelor's degrees (CCB and otherwise) in a state should be rooted in data that speaks to student interest, employer demand, and community need.
- States should carefully and transparently curate the types of data, measures, and methods needed for program approval in order to promote successful applications that avoid duplication and facilitate high quality programs.
- Cross-state sharing about CCB program approval should be encouraged and supported by organizations such as CCBA and other national groups focused on high quality community college programming.
- Lessons from this research should be used to help guide future CCB program planning and implementation in states already offering CCB degrees, as well as in states considering passing legislation authorizing the conferral of CCB degrees for the first time.

Appendix

Community College Bachelor's Degree Growth

The latest national inventory of CCB degrees logged a total of 678 programs by early 2024, representing a 15 percent increase over the number of CCB programs inventoried in fall 2021 (CCBA & Bragg & Associates, 2024; Love et al., 2021). While the focus of these programs varies, the most common degree programs are business; education; healthcare including nursing; and various science, technology, engineering, and mathematics (STEM) programs.

There is considerable variation in the pace and scale of adoption of CCB programs from state to state. In **Delaware, Florida, Nevada, and Washington**, one or more state- or system-approved CCB programs are implemented by all community colleges, which means these states have approved one or more CCB degree programs in all the community and technical colleges in the state. CCB programs are also growing in **Colorado, Idaho, Ohio, and Wyoming**, with more than half of the associate-dominant colleges in these states having received approval to confer CCB degrees.

California and Texas have accelerated approval of CCB degree programs in recent years, positioning these two states to join Florida and Washington as the largest state providers of CCB degrees in the country. To date, California has approved 51 CCB programs at 42 of the state's 116 community colleges, and Texas has authorized 62 CCB programs at 21 community colleges in the state's 50 community college districts.

Another newer CCB-conferring state is **Oregon**, which recently approved nursing programs at six community colleges in response to new legislation allowing the conferral of bachelor of science in nursing (BSN) degrees by community colleges with state approval (Chemeketa Public Affairs, 2025; Falcone, 2023). Another new CCB-conferring state, **Arizona**, passed its first CCB bill in 2021 and already has 11 community colleges approved to implement CCB programs, relying on local board authorization in the absence of a state administrative board for community colleges. **Michigan** operates similarly to Arizona in its approach to local board approval, but it limits CCB programs to four occupational fields.

Georgia and **West Virginia** limit CCB degrees to a relatively small number of regional campuses of public universities. In Georgia, these degrees are limited to associate-dominant institutions that are part of the University of Georgia system, excluding the state's 22 technical colleges.

A similar pattern exists in **Oklahoma,** with a few associate-dominant colleges affiliated with the Oklahoma State University system authorized to confer CCBs. However, recently one junior college was authorized to offer a single CCB program, possibly opening the door for growth in this state.

Eight states with even fewer CCB programs are **Hawaii, Indiana, Massachusetts, Missouri, New Mexico, North Dakota, South Carolina, and Utah.** Here, CCB degree programs are limited to one or two associate-dominant institutions.

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