



Report to the Oregon Legislature: Competency Based Education

ORS 350.125, August 2026



Southwestern Oregon Community College

2026 Competency Based Education Report (ORS 350.125), reporting period 2025-2026, presented to the Higher Education Coordinating Commission on August 13, 2026, and submitted to the Oregon Legislature. Developed by the Higher Education Coordinating Commission, Office of Community Colleges and Workforce Development, Shalee Hodgson, Ed.D., with contributions from Leslie Huntington, MEd, Paramedic, Education Coordinator, Emergency Medical Services Program, Oregon Health Authority, Public Health Division.

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EXECUTIVE SUMMARY

Under ORS 350.125¹, the Higher Education Coordinating Commission (HECC) reports annually on progress in competency-based education (CBE) in Oregon's public postsecondary institutions: its effectiveness, barriers, including accreditation, student outcomes, funding strategies, successful models, and policy recommendations. Prior reports centered on the statewide shift to competency-based assessment in Emergency Medical Services (EMS) education and on CBE elements in Career and Technical Education and Registered Apprenticeship. The EMS program reached a milestone this year: the Oregon Health Authority (OHA) adopted the competency-based assessment program in rule in January 2025, and 2025-2026 was its first full year of operation, with statewide reporting now underway. No baseline yet exists that would allow the program's effect on student outcomes to be measured.

This report centers on that EMS work, which remains the most developed competency-based practice across multiple higher education institutions in Oregon. It also explores the competency-based elements that continue in Career and Technical Education programs that pair mastery-based progression with Credit for Prior Learning. In addition, it describes an emerging question raised by college and school district partners during the year: how proficiency-based grading in Oregon high schools relates to the awarding of college credit earned in high school. Examining that question showed that Oregon's standards for college credit in high school already resolve much of it, because a dual credit course is graded under the college's standards. What remains is narrower, and the evidence available to the agency is limited to a small number of accounts from the field. This report therefore, describes what remains rather than drawing conclusions from it, and proposes to gather additional information over the coming year through channels that already exist.

The report makes three recommendations. First, continue to support the EMS competency-based assessment program, recognizing that professional development for new and part-time instructors is a recurring operating cost rather than a one-time cost of adoption. Staff will also work with OHA over the coming year to identify the measures it is positioned to track toward a student outcome baseline. Second, staff should continue to examine proficiency-based grading and college credit earned in high school using the annual dual credit reporting already in place, and report findings in 2027. Third, this report should be consolidated with the Credit for Prior Learning report required under ORS 350.110. Staff will carry that proposal forward through the reporting requirements study directed by House Bill 3026 (2025), which is due to the Legislature in November 2026.

¹ Oregon Revised Statute 350.125, https://oregon.public.law/statutes/ors_350.125

COMPETENCY-BASED EDUCATION IN OREGON

ORS 350.125 sets six reporting requirements. Table 1 shows where this report addresses each of them.

Table 1. ORS 350.125 Reporting Requirements and Where This Report Addresses Them

Statutory requirement	Where addressed in this report
(1) Describe the effectiveness of expanding competency-based education and of granting degrees on that basis	Update: CBE in Oregon's Public Postsecondary Institutions; Student Outcomes
(2) Identify issues and barriers, including postsecondary accreditation standards	Barriers to Expansion
(3) Analyze and describe student outcomes at institutions that have implemented competency-based education	Student Outcomes
(4) Identify funding strategies to implement or expand competency-based education at all public postsecondary institutions	Recommendations and Funding Strategies
(5) Analyze competency-based education models and determine which have been successful	Update: CBE in Oregon's Public Postsecondary Institutions: An Emerging Question
(6) Recommend specific policy changes and initiatives to expand competency-based education	Recommendations and Funding Strategies

OVERVIEW

As specified in ORS 350.125, this report defines CBE as a system, or systems, of instruction, assessment, grading, and academic reporting where success is defined based on students demonstrating progress towards, or competence in, specific skills². Under this definition, students advance at the speed at which they demonstrate mastery of particular skills or competencies instead of by accumulating seat time. Implementation of full CBE in Oregon's public postsecondary institutions remains limited. The most developed work is the statewide competency-based assessment program in EMS education, jointly led by the Oregon Health Authority (OHA) and the HECC, with CBE elements also present in CTE programs such as welding and in Registered Apprenticeship.

CBE remains closely aligned with Oregon's Adult Education Attainment Goal, which calls for 300,000 adult Oregonians to earn a new postsecondary degree, certificate, or credential of value by

² Competency-Based Education Network (C-BEN), "What is Competency-Based Education?" <https://www.cbenetwork.org>

2030 (OAR 715-017-0002)³. Mastery-based progression, paired with Credit for Prior Learning (CPL) and stackable credentials, can shorten the path to a credential for adults who bring significant knowledge and experience with them. This year's focus on dual credit connects the work to Oregon's companion goal as well. The 40-40-20 educational attainment goal (ORS 350.014)⁴ applies, as clarified by the Legislature in 2017, to young Oregonians rising through the education system, the population dual credit serves most directly. Removing friction where proficiency-based grading meets the awarding of college credit, therefore, serves both of the state's attainment goals.

Terminology in this area varies. This report uses dual credit and dual enrollment interchangeably, as the field generally does, to describe a college catalogued course in which a high school student earns college credit. Accelerated learning serves as the umbrella term for several ways Oregon students earn college credit while in high school, including dual credit, sponsored dual credit, assessment-based learning credit, Advanced Placement, and International Baccalaureate.

SCOPE OF THIS YEAR'S REPORT

This report follows the pattern of prior editions. It provides an update on the statewide EMS competency-based assessment program, which remains the most developed competency-based work in Oregon's public colleges and universities, together with the barriers, student outcome limitations, and funding considerations that ORS 350.125 requires. It then describes an emerging question at the intersection of Oregon's secondary system and postsecondary institutions, raised by partners during the year, and recommends a way to examine it. That question connects to the HECC 2024-2029 Strategic Plan⁵, adopted by the Commission in October 2024, whose Alignment goal commits the agency to connecting learning across the education continuum and to supporting transitions for high school students into postsecondary education and training. The competency-based practices described throughout this report also advance the plan's Relevance goal of connecting education and training to workforce needs, as the EMS program illustrates.

³ OAR 715-017-0002, Adult Education Attainment Goal,
<https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=254467>

⁴ ORS 350.014 (formerly ORS 351.009), Mission of education beyond high school, establishing the 40-40-20 educational attainment goal; amended in 2017 to apply the goal to young Oregonians.
https://oregon.public.law/statutes/ors_350.014

⁵ Higher Education Coordinating Commission, 2024-2029 Strategic Plan, adopted October 2024,
<https://www.oregon.gov/highered/strategy-research/pages/strategic-plan.aspx>

UPDATE: CBE IN OREGON'S PUBLIC POSTSECONDARY INSTITUTIONS

The Oregon Health Authority's EMS and Trauma Systems program (OHA-EMS) leads the statewide competency-based assessment program, which remains the most developed CBE work across multiple higher education institutions.⁶ The CBA program maps assessments to five competency areas: patient care, clinical rationale, systems knowledge, communication and interpersonal skills, and professionalism. As reported last year, statewide data collection and quality improvement processes launched with the 2024-2025 academic year, with the first comprehensive outcome reporting anticipated from OHA's data systems.

OHA adopted the CBA program in rule in January 2025, at OAR 333-264-0070, and the 2025-2026 academic year was its first full year of operation. Sixteen community colleges and one public university are approved to conduct EMT courses under the model; eight community colleges are approved at the Advanced EMT level, and three at the EMT-Intermediate level. Table 2 shows the courses delivered across the two years. Total volume rose while composition shifted. OHA attributes the growth at the Advanced EMT and EMT-Intermediate levels to programs that had paused those offerings during the transition and have brought them back online. It attributes the decline at the EMT level to two or three planned courses that programs dropped because of staffing changes. At the EMT level, both years remain above where the state stood before the model was adopted in rule: OHA reports that approximately 44 EMT courses were conducted in the 2022-2023 academic year. Comparable counts for the Advanced EMT and EMT-Intermediate levels in that year are not available.

Table 2. Courses Delivered Under the Oregon EMS Competency-Based Assessment Program, by Academic Year

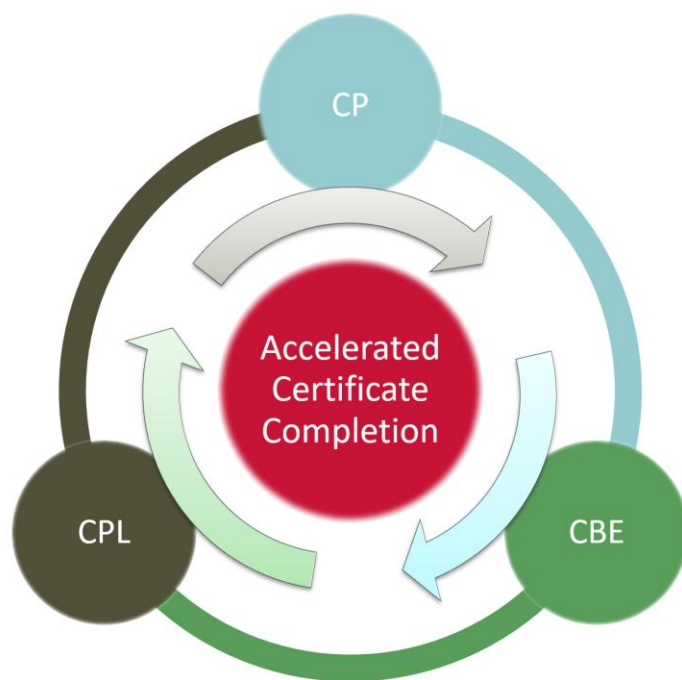
Provider level	2024-2025	2025-2026
Emergency Medical Technician	65	59
Advanced Emergency Medical Technician	2	10
EMT-Intermediate	1	3
Total	68	72

Statewide annual reporting began in May 2025 and covers the elements required under OAR 333-264-0070(9), along with instructor feedback on whether the state framework's outcomes and proficiency targets reflect realistic expectations for entry-level practice. Quality improvement in these first cycles has been largely technical. OHA education staff have helped program directors design course CBA blueprints, build assessments, monitor student progress, and adjust assessment

⁶ Oregon Health Authority, Education and Training for EMS Providers, <https://www.oregon.gov/oha>

strategies during a course. Programs in turn reported plans to refine remediation policies and processes, improve student tracking, adjust the timing of certain assessments, revise or create assessments for clinical rotations and charting, and incorporate more peer assessment.

Because this year's report examines the awarding of college credit to high school students, staff asked OHA whether EMS coursework reaches that population. Several Emergency Medical Responder courses have been offered in high schools as CTE offerings, generally coordinated by the high school's CTE instructor or by an EMS instructor qualified as a course director under OAR 333-264-0100. Whether any carried college credit would depend on a college partnership, which OHA does not track. At the EMT level, OHA identified two examples: courses offered by Umpqua Community College at Roseburg High School, and EMT courses conducted by Chemeketa Community College for high school students, which carry college credit. Staff will confirm the full set of such partnerships and the accelerated learning model under which each awards credit, as part of the work described in the recommendations below. Informal feedback on placing EMS courses in high school centers on logistics rather than grading: short class periods, meetings spread across several days, and difficulty scheduling laboratory time outside the school day. OHA staff observe, separately, that proficiency-based grading is difficult to integrate into college coursework, an observation relevant to the emerging question described later in this report.



CBE elements also continue in CTE programs, where several colleges pair competency-based progression with Credit for Prior Learning⁷ and stackable certificates, including Career Pathways Certificates of Completion. These programs remain the clearest Oregon examples of competency-based practice operating inside conventional credit hour structures, and several of them partner with high schools that use proficiency-based grading. Figure 1 shows how the three strategies relate, each one shortening a different part of the path to a certificate.

Figure 1. Alignment of Career Pathways, Credit for Prior Learning, and Competency-Based Education to Accelerate Certificate Completion

⁷ Oregon Revised Statute 350.110 defines Credit for Prior Learning; see https://oregon.public.law/statutes/ors_350.110

BARRIERS TO EXPANSION

The structural barriers identified in prior reports persist. The Community College and Public University Support Funds base much of their distribution on student credit hours or clock hours, which limits the feasibility of scaling models that award credit on demonstrated competency. Robust learning management systems with outcome tracking are unevenly available across colleges. Faculty need sustained professional development in assessment design and competency mapping, and current capacity-building resources are thin. Data systems capture Credit for Prior Learning through established codes, but they do not identify which programs or courses are competency-based, which limits the evidence available for policy and funding decisions. Institutional accreditation also remains a consideration. The Northwest Commission on Colleges and Universities (NWCCU) revised its Substantive Change Policy and its Direct Assessment and Competency Based Education Policy in 2023⁸. Under those policies, offering a competency-based or direct assessment program for the first time is a substantive change requiring advance approval, and federal guidance directs accreditors to review an institution's method for determining credit hours in CBE programs. The 2023 NWCCU Substantive Change Manual distinguishes course and credit-based approaches, in which demonstrated competencies are embedded in a conventional curriculum and credits are awarded, from direct assessment programs measured without credit or clock hours. Oregon's EMS competency-based assessment program operates as a course and credit-based approach. Institutions remain responsible for determining their own substantive change obligations with NWCCU.

OHA's 2026 quality improvement reporting surfaced a further constraint specific to sustaining a competency-based model. Turnover among instructors and administrators exposed three related vulnerabilities. Where the faculty member who had served as a program's CBA lead stepped down, incoming staff generally arrived with little familiarity with the model. An existing course blueprint did not carry the practice forward on its own. New staff had to learn the framework and build their own blueprints rather than pick up the documented plan. Incoming faculty were also often unfamiliar with the learning management system, a steep curve because competency tracking is embedded in the LMS, and steeper still for part-time skills instructors moving into the course director role. Because many programs operate with one full-time faculty member and several part-time lab assistants who participate at varying frequency, orientation has to reach further than a single inservice or self-guided training. OHA staff report that it also has to shift long-standing beliefs about assessment, including a prevalent view that skills testing is the only defensible measure of performance, which places a continuing burden on the one full-time faculty member.

OHA convened a group of course directors over the summer of 2026 to develop orientation and mentorship resources for distribution to programs. The lesson generalizes beyond EMS. Competency-based models rest on assessment literacy that must be rebuilt each time staffing turns

⁸ Northwest Commission on Colleges and Universities, Standards for Accreditation; Substantive Change Policy and Manual (revised 2023); Direct Assessment and Competency Based Education Policy, <https://nwccu.org>. See also U.S. Department of Education guidance on direct assessment and competency-based programs (updated February 2024).

over, and the Oregon experience indicates that documentation alone does not carry it. That makes instructor development a recurring operating cost rather than a one-time cost of adoption.

These barriers are consistent with national experience. The American Institutes for Research (AIR) National Survey of Postsecondary Competency-Based Education found that most adopting institutions implement elements of CBE rather than full direct assessment programs, and cite start-up costs, business systems, technology, and faculty capacity as the principal barriers⁹. AIR has also published a student outcomes metrics framework, developed with the Institute for Competency-Based Education at Texas A&M University-Commerce, that defines common measures of access, price, progression, quality, and completion for competency-based programs¹⁰. It includes licensure pass rates among its measures and cautions that comparisons between competency-based and traditional programs require care, both of which bear directly on the measurement limits described in the Student Outcomes section below. A June 2026 AIR brief on change management drew on interviews with program leaders at five institutions. It reports that the common barriers to CBE implementation are institutional rather than curricular: integrating the model into existing systems and business processes, securing faculty and staff buy-in, and working within accreditation and financial aid requirements. It identifies staff development, meaning sustained investment in training, coaching, and technology support, as one of five strategies that carry institutions through the transition¹¹. A companion report examines implementation across the same five institutions¹². The staff development finding matches what Oregon's EMS programs report. Oregon's incremental, program-level approach is otherwise consistent with how postsecondary CBE is developing nationally.

⁹ Mason, J., Parsons, K., & Cap, Q. N. (2021). *State of the field: Findings from the 2020 national survey of postsecondary competency-based education*. American Institutes for Research. <https://www.air.org/sites/default/files/2021-07/State-of-the-Field-Findings-from-2020-Postsecondary-CBE-Survey-July-2021.pdf>

¹⁰ Parsons, K., & Rivers, C. (2017). *Measuring student success in postsecondary competency-based education programs: Toward a student outcomes metrics framework*. American Institutes for Research & Institute for Competency-Based Education at Texas A&M University-Commerce, with support from Lumina Foundation.

¹¹ American Institutes for Research. (2026). *Change management in postsecondary competency-based education program implementation: Lessons from the field*. Funded by Ascendium Education Group. <https://www.air.org/sites/default/files/2026-06/AIR-CBE-Implementation-Mini-Brief-June-2026.pdf>. The five core strategies are drawn from Eckel, P. D., & Kezar, A. (2003). *Taking the reins: Institutional transformation in higher education*. Greenwood.

¹² American Institutes for Research. (2026). *Implementing postsecondary CBE: Lessons learned from five institutions' implementation journeys*. <https://www.air.org/sites/default/files/2026-06/AIR-CBE-Implementation-Report-June-2026.pdf>

STUDENT OUTCOMES

Because the HECC does not identify which courses are competency-based and CBE assessment remains concentrated in EMS, statewide outcome analysis specific to CBE is not yet possible. Two developments will change that. First, OHA's annual reporting requirements for EMS programs, supported by outcome-tracking learning management systems, are producing longitudinal, competency-level data for the first time. The HECC Office of Analysis and Strategy continues to consider year-over-year comparisons of EMT course outcomes as programs implement the CBA model. Second, the information gathering described in the recommendations below will begin to establish what is actually happening in Oregon, where proficiency-based grading meets college credit earned in high school. Together, these establish the foundation for the outcome analysis that ORS 350.125 contemplates.

OHA's first reporting cycles also illustrate the limits of early competency data, and those limits are worth stating plainly. No baseline exists for enrollment or course completion against which to measure the transition. EMS licensure records do not identify where an applicant was educated, so licensure results cannot be traced to a particular program or instructional model. The National Registry of EMTs also redesigned its certification examination during the first months of CBA implementation, which means the change in assessment model and the change in the examination cannot be disentangled. The figures that follow are therefore descriptive context, not a measure of the CBA program's effect, and should not be cited as evidence that the program did or did not improve student outcomes. For the period from December 15, 2025, through July 14, 2026, OHA reports that Oregon's first-time pass rate at the EMT level was 81 percent, against a national average of 76 percent. At the Advanced EMT level, on a small sample, the rate was 80 percent against a national average of 75 percent. Because the redesigned examination places greater weight on the application of knowledge, OHA staff read these results as consistent with the direction of the CBA framework rather than as evidence of its effect. Establishing a comparable baseline is a precondition for the outcome analysis ORS 350.125 contemplates, and is a principal reason the data work described above matters.

AN EMERGING QUESTION: PROFICIENCY-BASED GRADING AND COLLEGE CREDIT EARNED IN HIGH SCHOOL

During the 2025-2026 year, partners working in dual credit raised a question about how proficiency-based grading in high schools relates to college credit earned in high school. Oregon's K-12 system permits districts to award high school credit on the basis of demonstrated proficiency. Under the Oregon Department of Education's credit options framework¹³, districts may award credit when a student demonstrates defined levels of proficiency or mastery of standards, through classroom work,

¹³ Oregon Department of Education, Options for Awarding Credit (OAR 581-022-2025), <https://www.oregon.gov/ode/students-and-family/OregonDiploma/Pages/Credit-Options.aspx>; see also <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=145206>

collections of evidence, stand-alone assessment, or documentation of prior learning. Grading policy itself is adopted by each local school board rather than set at the state level.

The question arrived as a single one, and separating it is the main thing this year's examination produced. As posed, it presumes that a proficiency determination made under a district's grading must somehow be carried into a college grade. Under Oregon's standards for college credit in high school¹⁴, it is not. A dual credit course is a catalogued college course approved through the sponsoring institution's regular course approval process. Students enroll in the college course, and grading and transcription are consistent with those of similar courses at the college or university. The standards require the college or university to ensure that students' attainment of learning outcomes is measured using grading standards and assessment methods comparable to on-campus sections¹⁵. Alignment is established during the course rather than reconciled after it. In practice, it is maintained through mechanisms such as norming or calibrated grading, in which high school teachers and sponsoring college faculty grade the same student work to confirm consistency with the college's standards¹⁶. The two systems meet in the same school, often in the same classroom and the same teacher's workload, but at the point where a college grade is determined, they are kept distinct. That is the answer to the question as it was raised, and it is worth stating plainly because it means the matter is one of supporting existing practice rather than of closing a gap in state policy.

Two narrower matters remain. The first belongs to the K-12 side and falls outside the scope of this report. Proficiency-based grading generates detailed evidence of what a student has demonstrated. That is an opportunity for districts to communicate more to their postsecondary partners than a letter grade alone conveys, and realizing it depends on transparency about what proficiency marks represent.

The second is worth a closer look, though not for the reason the question assumed. Assessment-based learning credit awards college credit on the basis of a college or university course assessment, or assessments, showing that a student attained the course's learning outcomes, rather than through enrollment in the college course. On grading, the anchor holds here as well. Assessment Standard ABL-A4 requires that assessment-based learning credit be awarded using comparable standards of achievement of student learning outcomes, and comparable grading standards, to those used for

¹⁴ Higher Education Coordinating Commission, Accelerated Learning, <https://www.oregon.gov/highered/about/pages/accelerated-learning.aspx>

¹⁵ Higher Education Coordinating Commission, Oregon Standards for Accelerated College Credit Partnerships: Dual Credit Standards (September 2019), adopted June 12, 2014 and updated May 16, 2019. See Curriculum Standard DC-C1, Assessment Standard A1, and the Key Terms appendix. <https://www.oregon.gov/highered/about/Documents/High-School-College/DC%20Oregon%20Dual%20Credit%20Standards%202019.pdf>. HECC authority for accelerated learning standards is established in ORS 340.310 and OAR 715-017-0005. Parallel provisions appear in the Oregon Sponsored Dual Credit Standards (2019).

¹⁶ Hodara, M., Weeks-Earp, E., & Riggs, S. (2025). *Sponsored dual credit in Oregon: A unique dual enrollment teacher qualification design*. Education Northwest. <https://educationnorthwest.org/sites/default/files/pdf/sponsored-dual-credit-or-policy-brief-508c.pdf>

students taking the course from the college or university. What the model does not require is strict alignment outside of assessment practices. The standards do not call for alignment with the college or university course structure and delivery. They also do not include requirements for curriculum alignment, or for the timely registration and transcription practices that accompany taking a college course¹⁷. That is a deliberate design choice. It means the college assessment, rather than the course that prepared a student for it, is what carries the credit. That makes it the model where a high school's proficiency-based instruction and a college's grading standards come closest to meeting. How that works in Oregon practice is worth exploring further.

Assessment-based learning credit emerged from a partnership based at Western Oregon University (WOU) and remains the smallest of the three models, accounting for approximately 6 percent of college credit in high school courses in 2022-2023¹⁸. WOU also revised its own institutional grading regulation effective fall 2024, replacing the grades of D- and F with a No Credit notation that does not affect grade point average. The university describes the approach as strength-based and oriented toward student competencies and achievements¹⁹. That change is a revision to a letter grade scale rather than proficiency-based grading in the K-12 sense, but it makes WOU a useful place to see postsecondary assessment and grading innovations in practice.

The national research offers useful context, though little of it addresses this specific intersection. Grading research spanning a century finds that traditional letter grades blend academic achievement with behaviors such as homework completion, participation, and timeliness, and that grading practices vary widely from teacher to teacher even within the same school²⁰. Studies of standards-based grading report positive associations with external measures of achievement²¹, teacher-reported

¹⁷ Oregon Standards for Accelerated College Credit Partnerships: Assessment-Based Learning Standards. See Assessment Standard ABL-A4 and the Key Terms appendix definition of Assessment-Based Learning credit. <https://www.oregon.gov/highered/about/Documents/High-School-College/DC%20Oregon%20Dual%20Credit%20Standards%202019.pdf>

¹⁸ Hodara et al. (2025), Figure 2, based on the authors' analysis of HECC course partnership data for 2022–2023. The figure includes the 22 Oregon public colleges and universities offering any form of college credit in high school.

¹⁹ Western Oregon University, “Western Oregon University implements a strength-based grading approach to enhance student success,” January 5, 2024, <https://wou.edu/2024/01/05/western-oregon-university-implements-a-strength-based-grading-approach-to-enhance-student-success/>; see also Strength-Based Grading FAQs, <https://wou.edu/provost/strength-based-grading-faqs/>, and Inside Higher Ed, “Western Oregon University adopts new grading system,” January 25, 2024.

²⁰ Brookhart, S. M., Guskey, T. R., Bowers, A. J., McMillan, J. H., Smith, J. K., Smith, L. F., Stevens, M. T., & Welsh, M. E. (2016). A century of grading research: Meaning and value in the most common educational measure. *Review of Educational Research*, 86(4), 803–848. <https://doi.org/10.3102/0034654316672069>

²¹ Pollio, M., & Hochbein, C. (2015). The association between standards-based grading and standardized test scores as an element of a high school reform model. *Teachers College Record*, 117(11). <https://doi.org/10.1177/016146811511701106>

effects on instruction, assessment, and student ownership²², and effects on student mindset and test anxiety²³. A research primer synthesizing this literature also notes persistent implementation challenges in teacher training, communication with families, and gradebook technology²⁴. On the transition to college, the evidence is reassuring. A study tracking graduates of standards-based high schools through their first university semester found the students performed well academically while adjusting to traditional grading practices²⁵. Comparative work has found no significant differences in college readiness measures between graduates of standards-based and traditionally graded high schools²⁶. Surveys of college admissions personnel conducted for the New England Secondary School Consortium found that applicants with proficiency-based transcripts were not penalized in admissions, with admissions staff emphasizing that clear documentation of what marks mean is what matters²⁷.

Maine offers the most complete statewide experience. The Legislature there required proficiency-based high school diplomas in 2012 and repealed the mandate in 2018. Researchers who studied implementation throughout found wide variation in how districts defined proficiency and reported grades, and consistent educator reports that the work required more embedded professional time than was provided²⁸. A study of ten rural Maine districts, conducted by the Education Development Center and funded by the Nellie Mae Education Foundation, found that implementation had focused largely on identifying graduation standards and adopting proficiency-based grading practices, while traditional classroom practices remained fairly common. The same study observed higher student engagement where exposure to proficiency-based practices was greater, alongside a

²² Knight, M., & Cooper, R. (2019). Taking on a new grading system: The interconnected effects of standards-based grading on teaching, learning, assessment, and student behavior. *NASSP Bulletin*, 103(1), 65–92. <https://doi.org/10.1177/0192636519826709>

²³ Lewis, D. (2022). Impacts of standards-based grading on students' mindset and test anxiety. *Journal of the Scholarship of Teaching and Learning*, 22(2), 67–77. <https://eric.ed.gov/?id=EJ1347380>

²⁴ Townsley, M., & Buckmiller, T. (2016). *What does the research say about standards-based grading? A research primer* (Faculty Publications No. 3). University of Northern Iowa, Department of Educational Leadership and Postsecondary Education. https://scholarworks.uni.edu/elpe_facpub/3 (ERIC ED590391)

²⁵ Guskey, T. R., Townsley, M., & Buckmiller, T. M. (2020). The impact of standards-based learning: Tracking high school students' transition to the university. *NASSP Bulletin*, 104(4), 257–269. <https://doi.org/10.1177/0192636520975862>

²⁶ Townsley, M., & Varga, M. (2018). Getting high school students ready for college: A quantitative study of standards-based grading practices. *Journal of Research in Education*, 28(1), 92–112. <https://eric.ed.gov/?id=EJ1168171>

²⁷ New England Secondary School Consortium. (2017). *I want to know more: How do colleges view proficiency-based transcripts?* (Leadership in Action Briefing No. 16). https://www.newenglandssc.org/wp-content/uploads/2017/03/NESSC_Briefing_NO16_College_Admissions_Know_More.pdf

²⁸ Stump, E., Doykos, B., & Brache, M. R. (2018). *Proficiency-based high school diploma systems in Maine: Getting to graduation*. Center for Education Policy, Applied Research, and Evaluation, University of Southern Maine. <https://eric.ed.gov/?id=ED586183>

negative association with SAT scores, in a design that does not support causal attribution²⁹. Post-repeal analysis attributes the outcome in part to the absence of a common definition of student proficiency within and across districts, which left local graduation requirements varying widely in rigor and undermined comparability between them³⁰. Maine's lesson applies to high school transcripts rather than to college credit earned in high school. Where proficiency determinations travel outside the district that made them, shared definitions are what allow the additional information to be understood and used. For college credit earned in high school, the anchor is different and already established. National concurrent enrollment standards require that student proficiency be measured using grading standards and assessment methods comparable to on-campus sections³¹, and Oregon's dual credit standards carry the same requirement, as described above. Dual credit is among the better-evidenced strategies supporting the transition to college³², and national analysis associates participation with stronger postsecondary outcomes³³, which is reason to protect the alignment on which its value rests.

Staff plan to add a small number of questions to the annual dual credit reporting already collected from public institutions, to use existing dual credit coordinator meetings for follow-up, and to learn from connections around assessment-based learning credit. Findings would be reported in the 2027 edition of this report.

²⁹ Shakman, K., Foster, B., Khanani, N., Marcus, J., & Cox, J. (2018). *"In theory it's a good idea": Understanding implementation of proficiency-based education in Maine*. Education Development Center. Conducted as part of the Student-Centered Learning Research Collaborative and funded by the Nellie Mae Education Foundation. <https://files.eric.ed.gov/fulltext/ED603186.pdf> (ERIC ED603186)

³⁰ Evans, C. (2018, December 18). *A post-mortem on Maine's proficiency-based graduation requirement* [Blog post]. National Center for the Improvement of Educational Assessment. <https://www.nciea.org/blog/a-post-mortem-on-maines-proficiency-based-graduation-requirement/>

³¹ National Alliance of Concurrent Enrollment Partnerships, Accreditation Standards, Assessment Standard A1, and Aligning Assessment Practices guidance, <https://www.nacep.org>

³² What Works Clearinghouse. (2017). *Dual enrollment programs* (Transition to College intervention report). Institute of Education Sciences, U.S. Department of Education. https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc_dual_enrollment_022817.pdf

³³ Griffin, S., Steiger, J., Garcia Tulloch, A., Fink, J., & Jenkins, D. (2024). Dual enrollment equity pathways: A research-based framework for expanding college and career opportunity for underserved students. In K. Lowry & L. Hardman (Eds.), *Dual enrollment: A story of access, equity and opportunity*. *New Directions for Community Colleges*, 2024, 47–60. John Wiley & Sons, Inc. <https://doi.org/10.1002/cc.20637>

RECOMMENDATIONS AND FUNDING STRATEGIES

The funding recommendations of prior reports continue to apply. Expanding CBE beyond individual programs will eventually require several changes. Funding elements would need to recognize demonstrated mastery, postsecondary credit awarded, and credential completion alongside credit hours. Institutions would need dedicated innovation resources for curriculum redesign, faculty professional development, and technology, along with flexibility to blend funds. New investments would need to be grounded in equity, reaching adult learners and historically underserved populations first. Sustained faculty professional learning and institutional champions remain the human infrastructure on which any of this depends. As the EMS experience this year shows, that investment recurs with staffing turnover rather than ending once a program is established, and budgeting for it accordingly is a precondition for any competency-based model to hold.

This year, the report adds three recommendations, none of which require new funding.

- Continue to support the statewide EMS competency-based assessment program as it enters its second full year of operation, recognizing that professional development for new and part-time instructors is a recurring operating cost rather than a one-time cost of adoption. Staff will also work with OHA during the 2026-2027 academic year to identify which measures the agency is positioned to track, so that the baseline described in the Student Outcomes section can begin to be established within existing reporting.
- Examine the relationship between proficiency-based grading and college credit earned in high school through the annual dual credit reporting already collected from public institutions, supplemented by conversations at existing dual credit coordinator meetings and innovation practices seen in assessment-based learning credit. Staff will report findings in the 2027 edition of this report.
- Consolidate this report with the Credit for Prior Learning report required under ORS 350.110, and carry that proposal forward through the reporting requirements study directed by House Bill 3026 (2025), section 8³⁴. That study directs the Commission, in consultation with community colleges and public universities, to inventory the reporting required of institutions and of the Commission. It also directs the Commission to recommend improvements to the efficiency, relevance, and quality of higher education reporting, expressly including proposals to eliminate or consolidate reports. Its findings are due to the interim committees of the Legislative Assembly related to higher education by November 15, 2026, two months after this report is submitted. Competency-based education and Credit for Prior Learning are treated in agency practice as complementary strategies for promoting a student's progress to a credential, and reporting on them together makes sense. The House Bill 3026 study provides an

³⁴ House Bill 3026 (2025), section 8,
<https://olis.oregonlegislature.gov/liz/2025R1/Downloads/MeasureDocument/HB3026/Enrolled>. Section 9 of the Act repeals section 8 on January 2, 2027.

opportunity for this recommendation. Consolidation would require a statutory change and would reduce staff time without reducing the information available to the Legislature.

Taken together, these steps would sustain the state's most developed competency-based program, produce Oregon evidence on an emerging question before the state considers whether any response is warranted, and simplify the reporting through which the Legislature receives this information.

CONCLUSION

Competency-based education in Oregon continues to advance, where it is most concrete. The statewide EMS competency-based assessment program was adopted in rule in January 2025 and completed its first full year of operation, with statewide reporting underway and quality improvement work beginning to move from technical setup toward instructional practice. That is genuine progress. The absence of a baseline against which to measure the program's effect on student outcomes marks what remains to be built, and the professional development needed to sustain the model as staffing turns over marks what remains to be funded. Competency-based elements also continue in Career and Technical Education programs that pair mastery-based progression with Credit for Prior Learning. This year also surfaced a question about how proficiency-based grading in Oregon high schools relates to college credit earned in high school. The HECC looks forward to reporting findings to the Legislature in 2027.