

# Direct Assessment CBE: Using Effective Practices to Meet Accreditation Criteria & Title IV Approval



CAEL 2016 International Conference

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<http://knowledgetowork.com>

<http://highered.org>

LFCC's direct assessment CBE programs are funded in part by a TAACCCT grant from the U.S. Department of Labor's Employment and Training Administration

# Presentation Outline

1. Introduction to direct assessment competency-based education and effective practices
2. Core issues and concerns for accreditation
3. Core issues and concerns for financial aid

# Presentation Outline

1. Introduction to direct assessment competency-based education and effective practices



U.S. Department of Education

Student Loans

Grants

Laws

## Competency-Based Learning or Personalized Learning

Transitioning away from seat time, in favor of a structure that creates flexibility, allows students to progress as they demonstrate mastery of academic content, regardless of time, place, or pace of learning. Competency-based strategies provide flexibility in the way that credit can be earned or awarded, and provide students with personalized learning opportunities. These strategies include online and blended learning, dual enrollment and early college high schools, project-based and community-based learning, and credit recovery, among others. This type of learning leads to better student engagement because the content is relevant to each student and tailored to their unique needs. It also leads to better student outcomes because the pace of learning is customized to each student.

By enabling students to master skills at their own pace, competency-based learning systems help to save both time and money. Depending on the strategy pursued, competency-based systems also create multiple pathways to graduation, make better use of technology, support new staffing patterns that utilize teacher skills and interests differently, take advantage of learning opportunities outside of school hours and walls, and help identify opportunities to target interventions to meet the specific learning needs of students. Each of these presents an opportunity to achieve greater efficiency and increase productivity.

<http://www.ed.gov/oii-news/competency-based-learning-or-personalized-learning>

## What started all this?

### U.S. Dept. of Education Dear Colleague Letter from David Bergeron 3/19/13

<https://ifap.ed.gov/dpcletters/GEN1310.html>



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION

THE ASSISTANT SECRETARY

**MAR 19 2013**

GEN-13-10

Subject: Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs

Summary: This letter provides guidance to institutions<sup>1</sup> that wish to have direct assessment (competency-based) programs considered for title IV, Higher Education Act (HEA) program eligibility. The letter outlines how institutions can have competency-based programs approved under the current regulations on direct assessment programs.

Dear Colleague:

Over the last several years, some institutions of higher education have developed new and creative program models in which students are provided with the means to acquire the knowledge and skills at an individual pace to demonstrate achievement of specific competencies identified as necessary to complete a program and earn a degree or other credential. A majority of these program models are offered in credit or clock hours and can be accommodated under the current title IV, student financial aid regulations as non-term programs. An increasing number, however, are not offered in credit or clock hours, and many of the institutions offering such programs want them approved for participation in the title IV, HEA programs.

Section 8020 of the Higher Education Reconciliation Act of 2005 (HERA) (Pub. L. 109-171) amended the Higher Education Act of 1965, as amended (HEA), and established the eligibility of direct assessment programs to participate in the title IV, HEA programs. Specifically, the HERA provided that instructional programs that use direct assessment of student learning, or that recognize the direct assessment by others of student learning, *in lieu of measuring student learning in credit hours or clock hours*, may qualify as eligible programs if the assessment is consistent with the institution's or program's accreditation. The HERA also provided that the Secretary of Education must initially determine whether each program for which an institution proposes to use direct assessment is an eligible program.

The Department of Education (the Department) published an interim final rule implementing the HERA provisions on August 9, 2006, and subsequently published a final rule on November 1, 2006. Those final regulations, located in 34 CFR 668.10, define a "direct assessment program," outline the procedures and requirements for an institution that offers such a program to apply for the program to be determined an eligible program, and specify limitations on the use of title IV,

<sup>1</sup> The guidance in this Dear Colleague Letter generally applies to institutions that currently participate in the title IV, HEA programs and wish to add a direct assessment program. Institutions that are not currently participating should contact their school participation division for instructions on how to complete the application process.

1990 K ST. N.W., WASHINGTON, DC 20006  
[www.ed.gov](http://www.ed.gov)

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

## U.S. Dept. of Education Dear Colleague Letter 1310

- Instead of using credit hours, uses direct assessment of student learning, or recognizes the direct assessment by others of student learning
- Examples of direct measures include projects, papers, examinations, presentations, performances, and portfolios
- Explain how determined the equivalent number of credit hours
- May use learning resources (e.g., courses or portions of courses) that are provided by entities other than the institution
- CBE has the potential for:
  - assuring the quality and extent of learning
  - shortening the time to degree/certificate completion
  - developing stackable credentials that ease student transitions
  - reducing the overall cost of education for both CTE & degree programs



# WHAT Competency-Based Education LOOKS LIKE

The shape and depth of competency-based education (CBE) shifts each time a college or university starts a CBE program, because each institution's needs are different. Generally speaking, however, CBE programs distinguish themselves by "clearly defining and communicating what their graduates are required to know and be able to do," according to a report for the National Institute for Learning Outcomes Assessment. What follow are cross-sections of postsecondary elements meant to illustrate a spectrum of CBE, from the more traditional to the more experimental. While necessarily non-exhaustive, the illustration is meant to give a quick introduction to how learning and other aspects of college and university work can differ according to how much CBE is applied.

## More conventional

## "Middle of the Road"

## Less conventional

### EDUCATIONAL MODEL



- Competencies embedded in courses
- Faculty and Textbooks



- Some classes
- Unbundled content
- Competencies and assessments



- No formal classes
- Referrals to open educational resources
- Prior-learning assessment

### FACULTY ROLE



Vertically Integrated Roles:  
Designing and Teaching and  
Assessing and Advising



Partially Disaggregated Roles:  
Designing and/or Teaching and/or  
Assessing and/or Advising



Disaggregated Roles:  
Designing or Teaching or  
Assessing or Advising

### LEARNING SUPPORT



Faculty-based advising



High level of coaching and  
mentoring at the institution or  
through a contracted service



- Online mentoring
- Informal learning groups

### TECHNOLOGY



Web enhancements to  
classroom-based course



Online delivery



Adaptive learning

### TYPICAL STUDENTS



- More traditional students
- May be employed part time



- Non-traditional
- Some postsecondary experience but no degree
- Some work experience
- School and work highly integrated

### FEE STRUCTURE



- Time-bound
- Pay per term or credit hour
- Title IV eligible

- Fully competency based
- Title IV eligible with special approval



- Subscription model (all you can learn within a given time)
- Direct assessment
- Not Title IV eligible

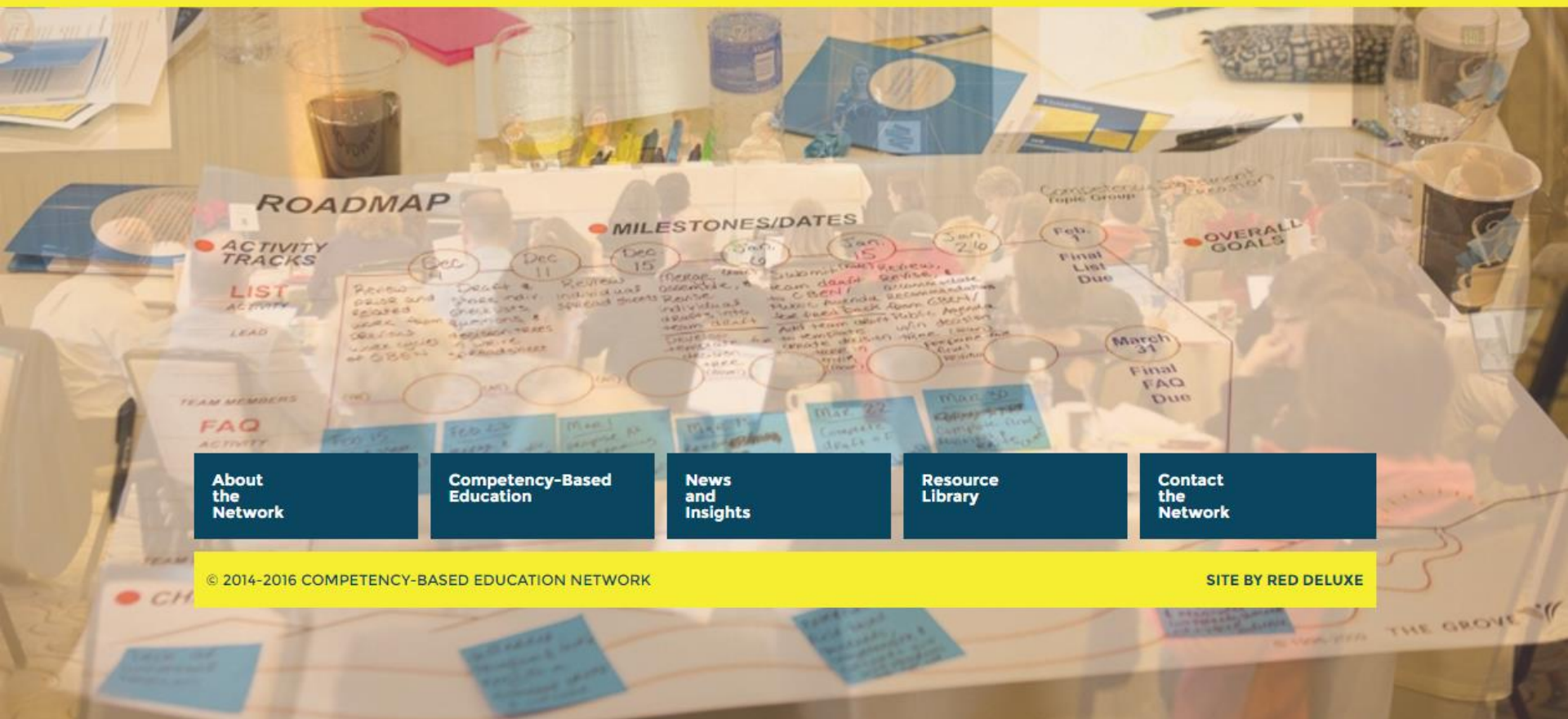
<https://www.acenet.edu/the-presidency/columns-and-features/Pages/What-Competency-Based-Education-Looks-Like.aspx>



NETWORK LOGIN

COMPETENCY-BASED EDUCATION NETWORK

# A National Consortium for Designing, Developing and Scaling New Models for Student Learning



About the Network

Competency-Based Education

News and Insights

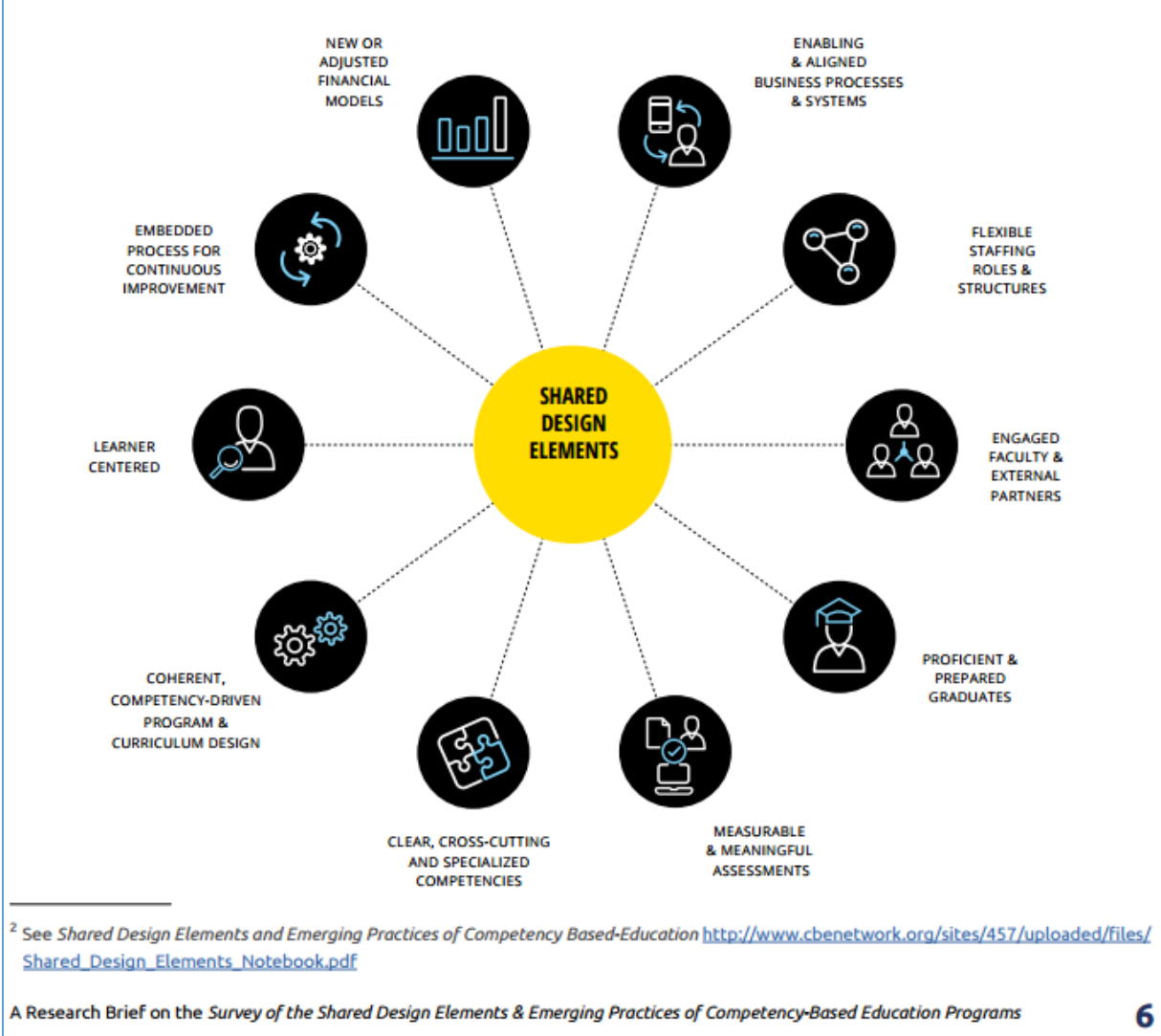
Resource Library

Contact the Network

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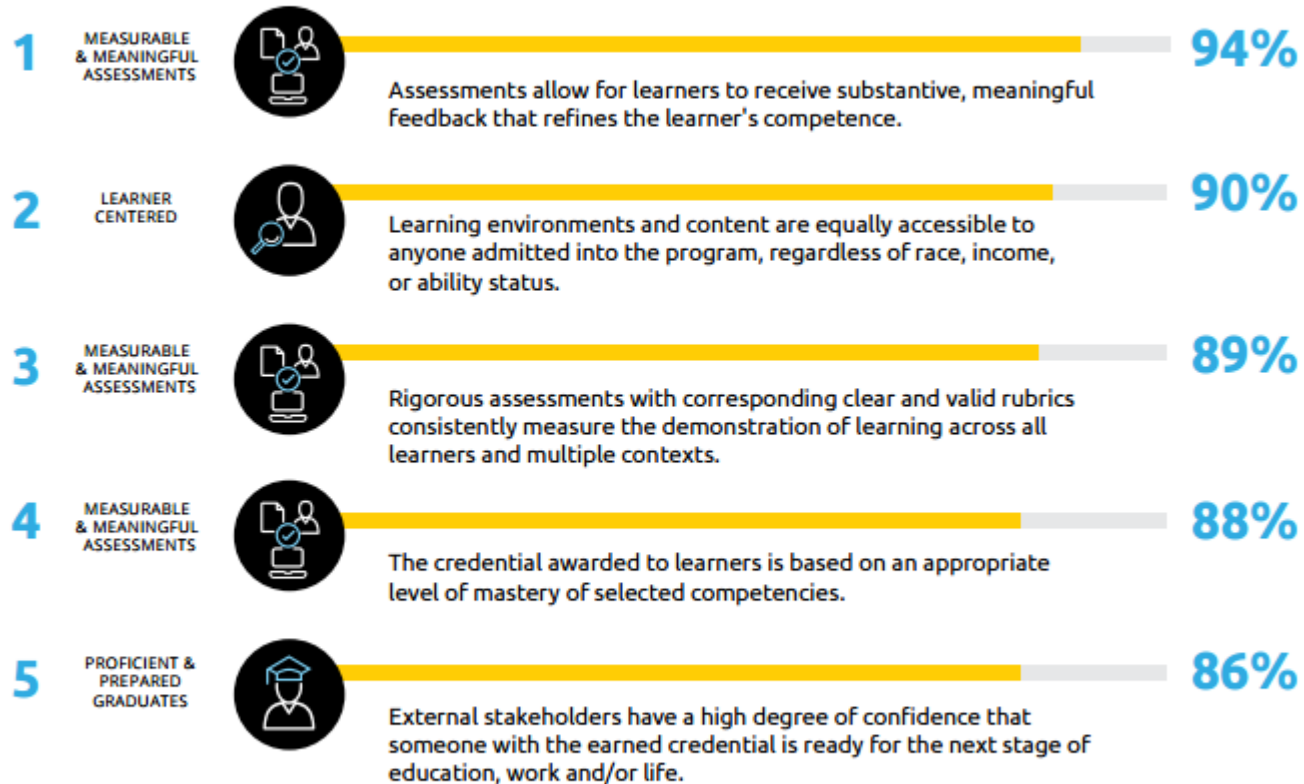
**Figure 2: Shared Design Elements**



[http://www.cbenetwork.org/sites/457/uploaded/files/Shared\\_Design\\_Elements\\_\\_Emerging\\_Practices\\_of\\_CBE.pdf](http://www.cbenetwork.org/sites/457/uploaded/files/Shared_Design_Elements__Emerging_Practices_of_CBE.pdf)

## Figure 4: Top Five Very Important Practices to Include When Starting a CBE Program

When starting a CBE program, is it very important to include the following practices?



A Research Brief on the *Survey of the Shared Design Elements & Emerging Practices of Competency-Based Education Programs*

8

[http://www.cbenetwork.org/sites/457/uploaded/files/Shared\\_Design\\_Elements\\_\\_Emerging\\_Practices\\_of\\_CBE.pdf](http://www.cbenetwork.org/sites/457/uploaded/files/Shared_Design_Elements__Emerging_Practices_of_CBE.pdf)

# Quality Standards for Competency-Based Educational Programs

**DRAFT**  
OCTOBER 2016

Provide feedback until December 1 at  
[www.surveymonkey.com/r/CBEQuality](http://www.surveymonkey.com/r/CBEQuality)

SurveyMonkey Inc. [US] | <https://www.surveymonkey.com/r/CBEQuality>

## COMPETENCY-BASED EDUCATION NETWORK

### Competency-Based Education Quality Standards Feedback

#### Quality Principles and Standards for Competency-Based Educational Programs

##### Introduction

Drawing on the Shared Design Elements and Emerging Practices of Competency-Based Education, leading program designers and system administrators from five C-BEN institutions representing an array of models have been working together over the last several months to create a first draft of Quality Principles and Standards for Competency-Based Programs. The C-BEN Quality Standards task force developed an iterative process and worked together throughout the spring and summer to achieve draft principles and standards that are universal enough to apply to all CBE programs, regardless of model variations. In the future, we envision these universal principles and standards will be augmented by additional stackable principles and standards based on model-specific, programmatic features.

Our aim with this work is to provide standards to the field that institutions can draw on to inform the design or scaling of high-quality programs, and that can provide guideposts and assurances to policymakers and accreditors tasked with regulating this vibrant, and still emerging, field of practice. The goal of this work has been to produce a draft to be vetted by the broader C-BEN community and the wider field. An online portal has been created to collect input on the draft and this feedback will inform the final version. Rubrics for each of the standards are currently in development and will be collaboratively developed by C-BEN members after the Standards themselves have been finalized through input from the field.

While the finalized Standards and associated rubrics will be released in early 2017, we know full well that the evolution of the field and evidence base will require that these standards be regularly reviewed and updated.

<https://www.surveymonkey.com/r/CBEQuality>

## C-BEN Quality Principles/Elements

1. Coherent, competency-driven program and curriculum design
2. Clear, measurable, meaningful and complete competencies
3. Credential-level assessment strategy with robust implementation
4. Intentionally designed and engaged student experience
5. Collaborative engagement with external partners
6. Transparency of student learning
7. Evidence-driven continuous improvement processes
8. Demonstrated institutional commitment to capacity for CBE innovation



Provide feedback until December 1 at  
[www.surveymonkey.com/r/CBEQuality](http://www.surveymonkey.com/r/CBEQuality)

# Clear, Measurable, Meaningful and Complete Competencies

## PRINCIPLE

Each competency is explicitly stated and unambiguously provides descriptions of what a learner must master before program completion. The set of credential-specific competencies represent the complete taxonomy of the knowledge, skills, abilities, attitudes and beliefs deemed relevant and required by a prepared and proficient credential holder. Each competency explicitly states the theory and application of theory required for mastery at the appropriate level for the credential being earned. Each competency is also clearly connected to content and learning activities designed to support learners in developing proficiencies required by the program to award a credential and is able to be reliably and validly assessed.

## STANDARDS

- 1** The set of competencies are clearly specified and provide easy to understand instructions for what the learner must know and be able to do in order to progress in and complete a credential.
- 2** Competencies are co-constructed with input from diverse communities including employers, expert practitioners, advisory committees, and professional/licensing bodies.
- 3** Individual competencies are indexed to explicit knowledge, skills, abilities, attitudes and behaviors that are relevant, current, and accurately depict what is needed by the field.
- 4** Competencies anchor, specify and guide the curricular design, development of instructional content, activities, remediation offerings and the assessment strategy.
- 5** Individual competencies correspond to cognitive levels of learning on recognized taxonomies, such as Bloom's, and the set of competencies blends multiple stages of learning.
- 6** Competencies inform and guide the construction of the appropriate learner experiences.
- 7** Competencies dictate the assessment strategy and allow the learner to demonstrate measureable and meaningful proficiency of the needed competencies.



# The Journal of **COMPETENCY-BASED EDUCATION**

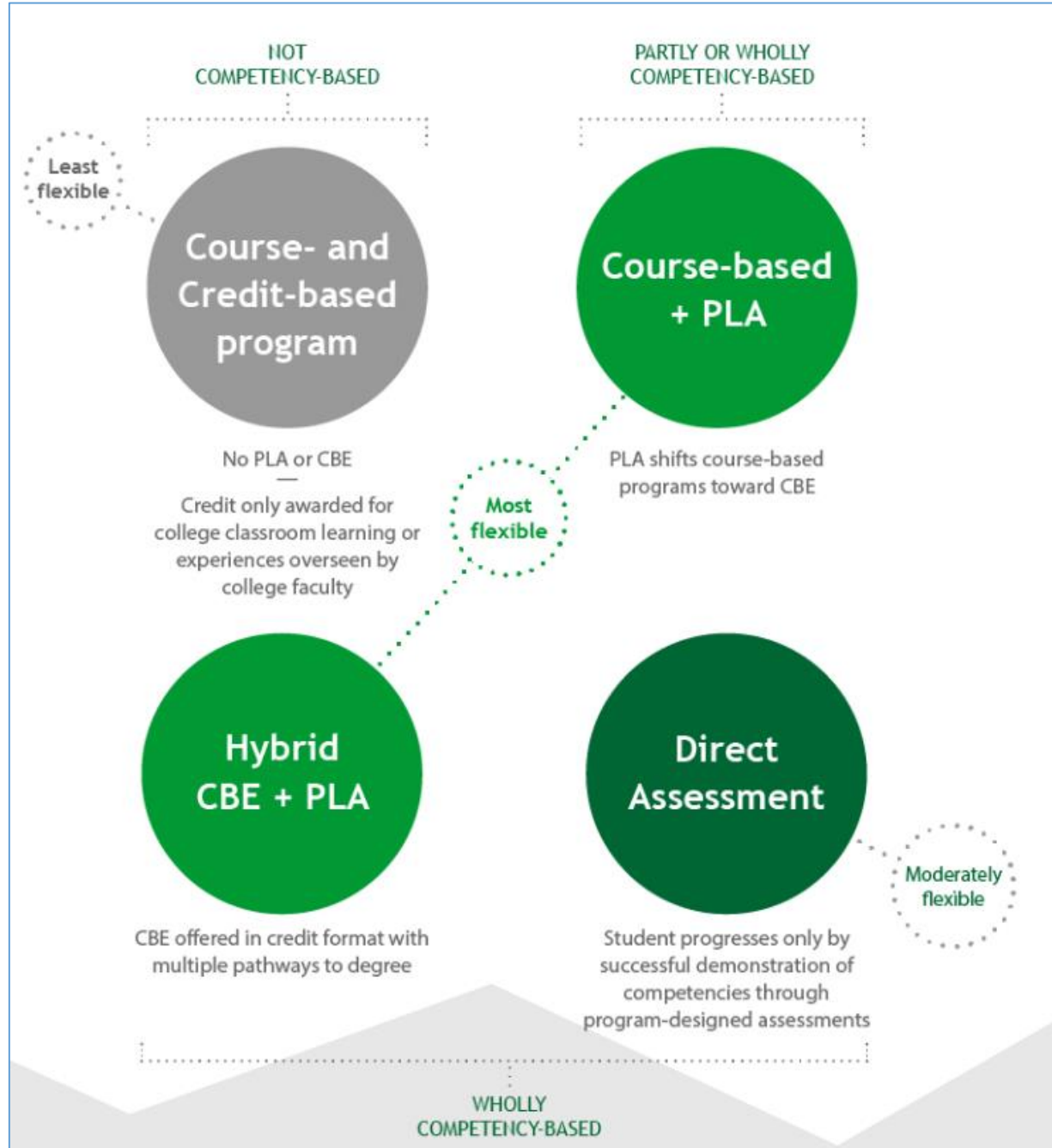
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[http://www.wgu.edu/about\\_WGU/competency\\_based\\_education\\_journal](http://www.wgu.edu/about_WGU/competency_based_education_journal)

# PLA and CBE on the Competency Continuum (CAEL)

<http://www.cael.org/higher-education/competency-based-education>



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## CBE Links

A curated list of CBE-related materials is provided below by category. These are made available as an activity of HigherEd.org and the Competency-Based Education Network.

Search 🔍 ⓘ

- **New CBE Links (37)** New  
Links added in the past 14 days.
- **Accreditation Resources (6)**  
Information from regional accrediting agencies about approval to offer CBE and direct assessment
- **Assessment and Quality (4)**  
Efforts to ensure quality and academic integrity in CBE program design and assessment
- **Case Studies (15)**  
Institutional case studies about implementing and managing CBE programs
- **CBE Design Models/Effective Practices (11)**  
Program design models and documentation of effective practices for creating CBE
- **CBE Institutions (3)**  
Institutions with CBE programs that are early adopters and incorporate effective practices
- **Competency Frameworks (5)**  
Nationally recognized competency frameworks
- **Conferences (7)**  
Conferences with significant CBE-related sessions
- **Costs, Finance, and Affordability (3)**  
Studies and models related to CBE costs, finances, and affordability
- **Credentials (2)**  
Connecting credentials and competencies
- **Data and Analytics (1)**  
Performance measures, metrics, analytics, and data structures for understanding CBE
- **Definitions, Terms, and Glossaries (1)**  
Efforts to clarify CBE-related terminology
- **Direct Assessment CBE Institutions (1)**  
Institutions currently offering direct assessment CBE programs
- **Employer Perspectives (4)**  
Studies and policy work related to employer needs and perspectives about CBE
- **Faculty and Staff Roles (5)**  
New and unbundled roles for faculty in CBE
- **Financial Aid (2)**  
Financial aid for CBE. See also U.S. Department of Education for Title IV aid for direct assessment and CBE








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## CBE Links – CBE Design Models/Effective Practices

[Return to Category List](#)

Program design models and documentation of effective practices for creating CBE

- [CBE Design Planner](#)
- [A Framework for Interactivity in Competency-Based Courses \(Hickey, 2015\)](#)
- [A Research Brief on the Survey of the Shared Design Elements & Emerging Practices of Competency-Based Education Programs \(Public Agenda, 2015\)](#) 
- [All Hands On Deck: Ten Lessons from Early Adopters of Competency-Based Education \(Book, 2014\)](#) 
- [Competency-Based Education In-Depth Session Resource \(WCET, 2014\)](#) 
- [Identifying and Breaking the Competency-based Education Barriers \(WCET Session\)](#) 
- [Implementing a CBE Program: Lessons Learned from Community Colleges](#)
- [NC-CBE Design Elements: Guide & Workplan \(North Carolina\)](#)
- [Principles for Developing Competency-Based Education Programs](#)
- [Understanding the Academic Calendar: A Resource Guide \(C-BEN, 2016\)](#) 
- [Why We Need to Stop Using 'Self-Paced' in CBE Descriptions](#)

Have a link to share? Email your link to John Milam at [jmilam@lfcc.edu](mailto:jmilam@lfcc.edu).

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# LFCC's Knowledge to Work Round 4 TAACCCT Grant for CBE



Offers direct assessment CBE programs in IT, HIM, & admin support technology



Uses free & low-cost OER, w/ digital librarian & curated resources



Includes work w/ AHIMA on a new, national credential and set of competencies (IT in HIM)



Faculty Direct Assessment Committee aligned programs w/national competency frameworks from AHIMA, ACM, & IAAP



Creates custom personalized learning plan software for CBE w/ competency tracking



Partnerships w/ AHIMA, Microsoft, others



Creates custom software for extended CBE transcripts & business processes for registrar



Provides career coaches, workforce navigator, ABE instructors; employability skills training; support to TAA eligible workers; pilot mapping of military job codes to HIM competencies



## Alignment w/ other CBE & OER efforts



### C-BEN

Competency-Based Education Network of institutional leaders sharing best practices, approaches, & Ideas; Annually sponsors CBExchange conference (October 2016)



### CBE4CC

Invitational group of 50 community colleges met in June 2015, funded by Gates & DOLETA/TAACCCT to promote CBE success. Offers webinars, new CBE journal hosted at WGU



### CCCOER

Community College Consortium for Open Educational Resources sharing best practices & models to leverage OER technology, train faculty, & reduce costs



### Merlot/Skills Commons

MOU w/ Merlot repository for API to access OER for portal. Special version of MERLOT for TAACCCT grantees to share/leverage resources



### IMS Global CBE Standards



## LFCC's Knowledge to Work Round 4 TAACCCT Grant

### Program Design Features



#### Personalized learning plans

Work with faculty to create a personalized learning plan. Select program competencies that are addressed in new educational activity for the semester. Document weekly momentum points show faculty-student engagement with regular and substantive interaction. Document milestones at the beginning, middle, and end of the semester.



#### Focused on competences

Program competencies are based on national frameworks from ACM, AHIMA, and IAAP, mapped by faculty to program student learning outcomes. Time during first semester spent reflecting on previously attained competencies, which are reviewed and where appropriate verified by faculty.



#### Using digital learning objects/open educational resources (OER)

Uses Blackboard LMS to serve OER to enrolled students, incorporated free and low-cost digital learning objects. Provides a portal with a new type of educational search engine to find resources tied to competencies, with filters by cost, delivery mode, language, complexity. Includes courses, Khan Academy, MOOCs, Merlot, and others.



#### Documented with direct assessment

Faculty in the discipline identify direct assessment methods to verify competency attainment. Includes assignments such as projects, exams, quizzes, and simulations. Faculty use rubrics to evaluate success. All competencies must be met and verified at the 80% level or higher. Incorporated peer review of artifact scoring for inter-rater reliability.



#### Wrap-around support services & alignment w/ workforce needs

Provides full-time career coach, outreach/recruiter, adult education instructor, and Workforce Navigator to ensure alignment between CBE program preparation & the competencies needed for real-time job openings in IT, HIM, and administrative support technology.



#### Building a *Linked In* profile with competencies tied to employment goals

Incorporating *Linked In* with occupational interests and competencies. Prior competency attainment is verified in the same way new educational activity for competencies are, through faculty-approved assessments, course equivalencies mapped to competency frameworks, & nationally-recognized exams..

Program (IST/AST/HIM w/ AAS, Cert, CSC)

Competencies (knowledge, skills, abilities)

Educational activities

Digital learning objects (OER)

Direct assessments

Rubrics

Artifacts/portfolio

Milestone

Milestone

Milestone



## Takeaways from LFCC's experience w/ direct assessment CBE

1. Learn from the field & CBE organizations like C-BEN & CB Exchange
2. Design programs to address the regulatory environment
3. Create a Faculty Direct Assessment Committee; CBE must be faculty-driven
4. Find & rely on CBE champions at all levels, especially president, CAO, IT
5. Address constraints of data systems, technology, finance, faculty interest, change
6. Use national competency frameworks if they can be aligned to SLOs
7. Start small, but not too small given the approval timelines. Any program addition takes a long process. Carefully select programs to offer based on faculty support, change management, budget, & enrollment potential
8. Write required policies & procedures soon & use tools like swim lane diagrams for complex student processes & assessments; revise catalog & handbooks
9. Don't be afraid to build an interim & simple tech solution if your LMS & SIS vendors don't fully support CBE yet, especially w/ non-term subscriptions
10. DA is much harder for people to grasp than just CBE, but it's the future
11. Prepare to wrestle w/using courses for registration & tuition & fees
12. Use by-products like improved PLA through CBE assessments & mapping

## Vision for a new type direct assessment CBE portal <http://highered.org>

- Takes everything created for DOL grant and makes it available for free to all  
*(value added by LFCC for accredited awards, faculty, career coach, & aid)*
- New kind of search engine to find free/low-cost open educational resources & learning objects, including online courses, YouTube, podcasts, e-books, textbooks, internships, mentors, Amazon, & MOOCs
- Filter searches by data such as cost, publication date, provider, rating, delivery mode, and alignment to standards (IMS Global metadata & CEDS)
- Create personalized learning plans tied to competencies
- Info on HIM and IT pathways presented, with links to relevant tools & sites
- Links to industry & occupational credentials tied to competencies *(coming)*
- Create custom user profile with notes, saved searches, & preferred content
- Promotes apprenticeships, including AHIMA's DOL grant, with links to its programs, job roles, and competencies tied to OER
- Adding new content (OER & courses) & credentials
- Opportunities to partner, co-brand, advertise, preferred content, affiliate sales



# Search for learning resources...

Free/Low-Cost Competency-Based Education Using Personalized Learning Plans

[Learn More](#) | [Login](#) | [Register](#)



[Advanced Search](#)



## Career Pathways



### Health Information Management (HIM)

- 🔍 HIM Competency Framework
- 🔍 AHIMA Apprenticeship Programs



### Information Technology (IT)

- 🔍 IT Competency Framework



### Administrative Support Technology (AST)

- 🔍 AST Competency Framework
- 🔍 IAAP Body of Knowledge

# Presentation Outline

2. Core issues and concerns for accreditation

## Substantive Change Policy

- Sometimes not clear about CBE programs that rely solely on the credit hour and course-based delivery without any DA
- Any amount of DA requires prior notification six months in advance
- DA requires prior approval before offering 100% or 50%+

<http://sacscoc.org/pdf/081705/SubstantiveChange.pdf>



*Southern Association of Colleges and Schools  
Commission on Colleges  
1866 Southern Lane  
Decatur, Georgia 30033-4097*

### **SUBSTANTIVE CHANGE FOR SACSCOC ACCREDITED INSTITUTIONS**

#### **Policy Statement**

#### **Institutional Obligations:**

1. Member institutions are required to notify the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) of changes in accordance with the substantive change policy and, when required, seek approval prior to the initiation of changes.
2. Member institutions are required to have a policy and procedure to ensure that all substantive changes are reported to the Commission in a timely fashion.

**Definition:** Substantive change is a significant modification or expansion of the nature and scope of an accredited institution. Under federal regulations, substantive change includes

- Any change in the established mission or objectives of the institution
- Any change in legal status, form of control, or ownership of the institution
- The addition of courses or programs that represent a significant departure, either in content or method of delivery, from those that were offered when the institution was last evaluated
- The addition of courses or programs of study at a degree or credential level different from that which is included in the institution's current accreditation or reaffirmation.
- A change from clock hours to credit hours
- A substantial increase in the number of clock or credit hours awarded for successful completion of a program
- The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program.
- The establishment of a branch campus
- Closing a program, off-campus site, branch campus or institution
- Entering into a collaborative academic arrangement that includes only the initiation of a dual or joint academic program with another institution
- Acquiring another institution or a program or location of another institution
- Adding a permanent location at a site where the institution is conducting a teach-out program for a closed institution
- Entering into a contract by which an entity not eligible for Title IV funding offers 25% or more of one or more of the accredited institution's programs

The SACSCOC Board of Trustees has approved additional substantive changes that require notification and, in some cases, approval prior to implementation. This policy and its procedures address substantive changes identified through Federal regulations and Board approval.

# Overview of direct assessment & competency-based education

## C-BEN Definition of CBE

Competency-based education combines an intentional and transparent approach to curricular design with an academic model in which the time it takes to demonstrate competencies varies and the expectations about learning are held constant. Students acquire and demonstrate their knowledge and skills by engaging in learning exercises, activities and experiences that align with clearly defined programmatic outcomes. Students receive proactive guidance and support from faculty and staff. Learners earn credentials by demonstrating mastery through multiple forms of assessment, often at a personalized pace.

<http://www.cbenetwork.org/competency-based-education/>

### Key points:

- Time varies, but expectations constant
- Competencies aligned with program outcomes
- Demonstrate mastery, often flexibly-paced

# Overview of direct assessment & competency-based education

## **SACSCOC Definition - Direct Assessment Competency-Based Educational Programs**

Federal regulations define a direct assessment competency-based educational program as an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, uses direct assessment of student learning relying solely on the attainment of defined competencies, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program using the results of the assessment.

<http://sacscoc.org/pdf/081705/SubstantiveChange.pdf>

### Key points:

- An instructional program
- In lieu of credit hours or clock hours
- Relying solely on the attainment of defined competencies



## DA CBE Policy Statement

- Submit screening form with letter of notification if 25%+ of a program is defined by the attainment of competencies in lieu of credit hours
- Commission staff determine whether a substantive change prospectus is required for DA or “Hybrid DA CBE” programs
- Substantive change prospectus due by April 8 or Sept 15 for consideration at next Board of Trustees meeting
- Prepare Committee Report/ Documentation for Program Expansion at Current Level
- Substantive Change Committee site visit
- Respond to recommendations
- Response reviewed by Compliance & Reports



Southern Association of Colleges and Schools  
Commission on Colleges  
1866 Southern Lane  
Decatur, Georgia 30033-4097

### **DIRECT ASSESSMENT COMPETENCY-BASED EDUCATIONAL PROGRAMS**

#### **Policy Statement**

Academic credit has provided the basis for measuring the amount of engaged learning time expected of a typical student enrolled not only in traditional classroom settings but also laboratories, studios, internships and other experiential learning, and distance and correspondence education. Students, institutions, employers, and others rely on the common currency of academic credit to support a wide range of activities, including the transfer of students from one institution to another.

In recent years, some institutions have recognized the potential of innovative learning models and have developed creative programs that allow students the flexibility to learn at the pace that makes sense for them, both in career-technical and degree programs. Students progress in these programs by demonstrating their achievement of specific skills or knowledge. These programs, commonly called competency-based programs, fit into traditional learning models that measure progress in credit or clock hours, but increasing numbers do not. Direct assessment competency-based educational programs use the direct assessment of student learning in lieu of measuring student learning in credit or clock hours.

The purpose of this policy is to provide guidance to institutions and evaluation committees on the Commission's expectations regarding the establishment and review of direct assessment competency-based programs and its hybrids as defined below.

**Definitions.** For the purpose of the application of this policy and in accord with federal regulations, the Commission uses the following definitions:

Competency: A competency is a clearly defined and measurable statement of the knowledge, skill, and ability a student has acquired in a designated program.

Competency-Based Educational Programs. A competency-based educational program is outcome-based and assesses a student's attainment of competencies as the sole means of determining whether the student earns a degree or a credential. Such programs may be organized around traditional course-based units (credit or clock hours) that students must earn to complete their educational program, or may depart from course-based units (credit or clock hours) to rely solely on the attainment of defined competencies.

Direct Assessment Competency-Based Educational Programs (also referred to in this policy as *direct assessment programs*). Federal regulations define a direct assessment competency-based educational program as an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, uses direct assessment of student learning relying solely on the attainment of defined competencies, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program using the results of the assessment.

Hybrid Direct Assessment Competency-Based Educational Programs (also referred to in this policy as *hybrid programs*). A hybrid competency-based educational program combines course-based competencies (clock and credit hours awarded) with non-course based competencies (no clock or credit hours awarded).

# DA CBE Prospectus Outline

1. Abstract (change, location, date, factors affecting date)
2. Background information
3. Assessment of need and program planning/approval
4. Description of program structure, content, coherence, and monitoring
5. Faculty
6. Library and learning resources
7. Student support services
8. Physical resources
9. Financial support
10. Evaluation and assessment
11. Additional information
12. Appendices

*Note: This document may change*

## SACSCOC

### The Content of the Substantive Change Prospectus [Direct Assessment Competency-Based Educational Programs]

*The Commission requires physical copies of the prospectus (no e-mail).* These may be submitted on paper or on a flash drive and must include all applicable information below regarding the change. The document should include a concisely worded narrative with the information specified in this Appendix. A prospectus normally does not exceed **25 pages** plus appendices. Please note that SACSCOC reserves the right to make amendments to the requirements outlined below for certain types of changes. Faculty qualifications must be documented using the Faculty Roster form. *Curriculum vitae* in lieu of a faculty roster will not be accepted.

The following guidelines are generic; **each prospectus should be tailored to focus on the specific change being proposed.**

#### Cover Sheet for Substantive Change Prospectus

- Include name, phone number, and e-mail address of person to be contacted with questions regarding the prospectus
- Degree Name and Major (e.g., B.A. in Organizational Management)
- List of related degrees offered as credit-based programs
- Date of Implementation (See Abstract below)

#### 1. **ABSTRACT (limit to one page or less)**

Describe the proposed change, the location, the projected date of implementation and factors affecting the final date. The date of implementation listed in the prospectus shall be the official effective date of change approved by the SACSCOC Board of Trustees. This date should take into consideration the proposed date of approval by the Commission's Board, the date of approval by the institution's governing board, and U.S. Department of Education reporting timelines affecting Title IV funding.

#### 2. **BACKGROUND INFORMATION**

Provide a clear statement of the nature and purpose of the change in the context of the institution's mission and goals and provide evidence of the legal authority for the change (if authorization is required by the governing board or the state).

Address the Institutional Mission in the context of this program. Explain how the mission supports the philosophy undergirding direct assessment and hybrid programs. (CR 2.4)

#### 3. **ASSESSMENT OF NEED AND PROGRAM PLANNING/APPROVAL**

Briefly discuss the rationale for the change, including an assessment of need; evidence of inclusion of the change in the institution's ongoing planning and evaluation processes; and documentation that faculty and other groups were involved in the review and approval of the change.

## DA CBE Sub Change Prospectus - *25 page limit plus appendices*

1. Abstract (change, location, date, factors affecting date) – 1 page or less
2. Background information, nature & purpose of change in context of the mission (CR 2.4), evidence of legal authority for change
3. Assessment of need & program planning/approval, including rationale, inclusion in ongoing evaluation & planning, documentation of faculty & other groups involvement in review & approval of the change
4. Description of program structure, content, coherence, & monitoring. (FR 4.9, FR 4.6, CR 2.7.2, CR 2.7.3, FR 4.2, FR 4.4, CS 3.4.3)
5. Faculty, with roster form (CR 2.8, CS 3.4.1, CS 3.4.10, CS 3.4.11, CS 3.7.1, CS 3.7.3)
6. Library and learning resources
7. Student support services (CR 2.10, CS 3.4.9)
8. Physical resources
9. Financial support, with budget specific to the proposed change, contingency plans
10. Evaluation and assessment (CR 2.7.1, CS 3.4.6, FR 4.1)

## DA CBE Sub Change Prospectus - continued

### 11. Additional information

- Institutional responsibility for awarding the credential (CS 3.5.2, CS 3.6.3)
- Application of academic policies (CS 3.4.5, CS 3.4.6)
- Acceptance and awarding of credit for a unit of competency (CS 3.4.6, FR 4.9, CS 3.4.4)
- Contractual arrangements (CS 3.4.7)
- Fees and Compliance with Title IV funding (FR 4.3, FR 4.7)

### 12. Appendices

# Documentation for Program Expansion

## Overview

- A. Describe expansion
- B. Discuss rationale
- C. Impact of delivery mode/location

## Programs

- CR 2.7.1 Program length
- CR 2.7.2 Program content
- CS 3.4.3 Admissions policies
- CS 3.4.11 Academic Program Coordination
- CS 3.5.3 UG Program requirements
- FR 4.4 Program length
- FR 4.9 Definition of credit hours

## Faculty

- CR 2.8 Faculty
- CS 3.7.1 Faculty competence

## Institutional Effectiveness

- CS 3.3.1.1 Educational programs

## Library/Learning Resources

- CR 2.9 Learning resources and services
- CS 3.8.1 Learning/Information resources
- CS 3.8.2 Instruction of library use
- CS 3.8.3 Qualified staff

## Student Services

- CR 2.10 Student support services
- CS 3.4.9 Academic support services
- FR 4.5 Student complaints

## Financial Resources

- CS 3.10.1 Financial Stability



### DOCUMENTATION FOR THE SUBSTANTIVE CHANGE COMMITTEE - Program Expansion at Current or Lower Degree Level -

*For use with the following types of changes:*

- *Expanding programs at current degree levels (when the new program is a significant departure from current programs)*
- *Initiating programs at a lower degree level*

#### Statement Regarding All Substantive Change Documentation Forms

*Please note that this and all of the SACSCOC Substantive Change Documentation forms contain the minimum information required. Additional standards may be added by SACSCOC staff as needed to provide the visiting team with relevant information necessary to making an informed determination regarding the change.*

**Name of the Institution:**

**Nature of the Substantive Change:**

**Date:**

By signing below, we attest to the following:

1. That \_\_\_\_\_ (*name of institution*) has attached a complete and accurate overview of the Substantive Change.
2. That \_\_\_\_\_ (*name of institution*) has provided complete and accurate disclosure of timely information regarding compliance with the selected sections of the *Principles of Accreditation* affected by this Substantive Change.

**Name and signature of the President:**

**Name and signature of the Accreditation Liaison:**

**SACSCOC Staff Member assigned to the Institution:**

*Form Updated: MAR 2012*

## Additional DA CBE documentation that may be requested for the visit

- Updated catalog with CBE program descriptions and CBE policies
- Disaggregated data on faculty in the new programs that make the case for faculty adequacy
- Program review documents for the programs
- Planned assessments to document IE within the programs—rubrics, planning frameworks, etc.
- Evidence of IE in the CBE program areas
- Examples of library instruction materials
- Examples of CBE versions or specific courses if courses are being used in the interim while direct assessments are still being created
- Faculty workload policy regarding CBE —current and proposed
- HR files of faculty teaching CBE
- Job descriptions specific to the CBE program
- Faculty handbook
- Sample copies of documents associated with self-assessment and learning plans
- Students self-assessments of the readiness for CBE
- Current audited information and the CBE-related grant budget
- Minutes of governance approval meetings
- Competency transcripts



## Takeaways from LFCC's experience w/ substantive change process

1. Meet with your accreditation & substantive change staff early on.
2. Memorize DA CBE policy statement, sub change process, DA CBE sub change prospectus, program expansion site report, & resource manual.
3. Carefully decide on the programs for notification.
4. Find models from early adopters for developing your prospectus.
5. Build in adequate time & review to prepare materials, policies, & procedures. Some will have to be written from scratch.
6. Understand the context of ED's review of the HLC, WGU, & WASC; Dear Colleague letters; ESI documentation; and CRAC about expectations for direct assessment, including issues like regular & substantive interaction & definitions of the credit hour regardless of delivery mode
7. Be aware of evolving standards, like IE for assessment of competency attainment & sound practices for credits regardless of format or delivery mode. ED expects these to be in place, even if not in reaffirmation docs.
8. Anticipate visit & requests for other documents based on concerns of CRAC, OIG, & ED for ensuring quality & the role of accreditors. ED is watching closely what accreditors do & could come observe a visit.

## Takeaways from LFCC's experience w/ substantive change process

9. Assessments are held to the highest standard, w/ more intense monitoring & processes than we may be used to w/ program SLOs
10. Rubrics need to be consistent across programs
11. Grading for Exceptional pass (A) & pass (B) needs to be explicit w/ cut points & clear rules for scoring
12. Need to understand inter-rater reliability in scoring artifacts & interpreting rubrics
13. See draft C-BEN data quality standards & identify those which have yet to be addressed. These have evolved based on current federal & accreditation expectations.

# Presentation Outline

3. Core issues and concerns for financial aid

# Council of Regional Accrediting Commissions

For Immediate Release: June 2, 2015

Contact: Barbara Brittingham: (781-425-7714)

## Regional Accreditors Announce Common Framework for Defining and Approving Competency-Based Education Programs

Middle States  
Commission  
on Higher Education  
MSCHE

Commission on  
Institutions of Higher  
Education, New  
England Association  
of Schools and  
Colleges  
CIHE, NEASC

Higher Learning  
Commission  
HLC

Northwest Commission  
on Colleges and  
Universities  
NWCCU

Southern Association  
of Colleges and  
Schools  
Commission on  
Colleges  
SACSCOC

Accrediting  
Commission  
for Community and  
Junior Colleges,  
Western Association of  
Schools and Colleges  
ACCJC/WASC

WASC Senior College  
and University  
Commission  
WSCUC

Washington, DC –The Council of Regional Accrediting Commissions (C-RAC) today released a joint statement outlining the criteria that accreditors will use in defining and approving competency-based education (CBE) programs.

“As accreditors, we have seen growing interest among institutions in developing competency-based education, including programs that use a direct assessment approach. However, there has been limited guidance to help institutions better understand the expectations for these programs, including for purposes of eligibility to participate in federal student aid programs.” said Barbara Brittingham, Chair of C-RAC and President of the Commission on Institutions of Higher Education, NEASC.

In addition, C-RAC understands that the Department of Education will soon release guidance, focused on CBE, for institutions seeking to participate in the recently announced “experimental sites” program. “This alignment and new level of collaboration are welcome signs and are good for all those involved – most importantly the many students who will benefit from the expansion of these new opportunities,” said Paul LeBlanc, President of Southern New Hampshire University and a member of the Steering Committee of C-BEN, the Competency-Based Education Network.

Although CBE is not new, enhanced interest has been propelled by increased expectations that college graduates meet the skill needs of employers and by the increasing capacity of institutions to assess student learning. “The key is to promote this expansion of CBE while also ensuring the quality and integrity of the academic program. Between our statement and the new guidance from the Department of Education, we believe these goals can be accomplished, thereby supporting increased innovation at our member institutions,” added Brittingham.

A copy of C-RAC’s statement follows.

[http://cbeinfo.org/site/uploads/2016/03/C-RAC-CBE-Statement-Press-Release-6\\_2.pdf](http://cbeinfo.org/site/uploads/2016/03/C-RAC-CBE-Statement-Press-Release-6_2.pdf)

## CRAC June 2, 2015 Letter - Topics

- The **first time an institution offers a credit-based CBE program, it must be approved by its regional accreditor** as a substantive change
- A **program is CBE when all of the courses** (for the program, for general education, for the major) **have learning goals expressed as competencies** approved at the program level and each student is required to demonstrate mastery of every competency in a course to earn credit for such course
- For DA, accreditors **must assess the sufficiency of faculty resources**
- For unbundled faculty roles (e.g., as subject matter experts, mentors, coaches, assessors), the school must demonstrate the **sufficiency of expertise in the content** or professional area, the **availability of content area experts and others to support student learning** and that the various **roles add up to perform the functions of traditional faculty**
- For DA, accreditors must evaluate and approve the institution's **methodology for determining the credit hour equivalence** of the direct assessment measures

## CRAC June 2, 2015 Letter – Evaluation considerations

- Whether most of the proposed learning outcomes **emphasize performance, not simply knowledge**
- Whether proposed competencies are **externally referenced**
- Whether the institution **ensures “regular and substantive interaction”**
- Demonstrates that the level and complexity of the competencies are **congruent with the achievement expected at a particular degree level**
- The quality of demonstration of the competence is judged to be **at or near the ‘excellent’ range for each competency.**
- **Whether a student must demonstrate each relevant competency** in order to earn the degree or certificate.
- The institution follows **good practices in assessment and measurement** (e.g., determines reliability and validity and has multiple forms or prompts for each competency).
- Whether a high proportion of the proposed competencies represent **authentic demonstrations.**
- Whether the institution validates the quality of its program through **feedback from students and graduates** as well as **measures appropriate to the external reference of the competencies**





UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION

June 9, 2015

Dear Accrediting Agency Executive Directors:

In recent years, competency-based education (CBE) programs have received a significant amount of attention in the postsecondary education community. To learn more about CBE programs and how they might be supported by changes to the Title IV, HEA student aid programs, the Department of Education is using its authority under its Experimental Sites Initiative (ESI) to provide waivers and modifications to statutory and/or regulatory requirements to allow a limited number of institutions to participate in experiments that will test alternative methods for administering Title IV aid programs for students enrolled in CBE programs.

Because CBE is still an emerging form of postsecondary education, the Department seeks assurance from accrediting agencies regarding the quality of the educational programs that will be included by participating institutions in these experiments. In order for an institution to include an educational program in an experiment, the institution is required to provide documentation to the Department that its accrediting agency has performed some activities to ensure the quality of the institution's approach to CBE. Those specific activities are included and described in the enclosed document.

If you have any questions regarding this letter and instructional document, my staff and I are available, as always, to discuss them with you.

Sincerely,

Herman Bounds Jr. Ed.S  
Director, Accreditation Group

Enclosure

1990 K St., N.W., WASHINGTON, DC 20006  
www.ed.gov

Our mission is to ensure equal access to education and to promote educational excellence throughout the nation.

[https://www.insidehighered.com/sites/default/server\\_files/files/ED%20letter%20to%20accreditors.pdf](https://www.insidehighered.com/sites/default/server_files/files/ED%20letter%20to%20accreditors.pdf)

## ED June 5, 2015 Response to CRAC Topics

- The **first time an institution offers a CBE program, the accrediting agency would have performed a substantive change evaluation (which could have occurred during the institution’s reaccreditation)** of, generally, the design and implementation of CBE programs. Such an evaluation must ensure:
  - **Assignment of credit hours** or equivalencies conforms with general practice
  - Devoting **sufficient faculty and other resources** to its CBE programs and the students in those programs, and that it includes policies and procedures for meeting the requirement for **regular and substantive interaction**
- Regarding “regular and substantive interaction,”
  - Students must have access to **qualified faculty**
  - Programs must be **designed to ensure this interaction**
- Refers to ESI documentation as source of guidance

# More Guidance from ED

Dear Colleague Letter 12/18/14

With examples & FAQs

<https://ifap.ed.gov/dpcletters/GEN1423.html>



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION

THE ASSISTANT SECRETARY

DEC 18 2014

GEN-14-23

Subject: Competency-Based Education Programs - Questions and Answers

Summary: The attachment to this letter provides, in a Question and Answer (Q&A) format, guidance to institutions regarding the eligibility of competency-based education programs, which include direct assessment programs, under existing statutory and regulatory requirements for the Title IV, Higher Education Act of 1965, as amended (HEA) student assistance programs.

Dear Colleague:

On March 19, 2013, the U.S. Department of Education published a Dear Colleague Letter (DCL GEN 13-10) titled "Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs." That letter described the statutory and regulatory authority for Title IV eligibility of competency-based education programs where student progress is measured by direct assessment.

The letter also explained the process by which an institution may apply for approval to award Title IV, HEA student assistance to students enrolled in a direct assessment program. An institution that wishes to apply for approval to provide Title IV, HEA program assistance to students enrolled in a direct assessment program should follow the instructions included in DCL GEN 13-10, and should continue to send supporting materials to [CaseTeams@ed.gov](mailto:CaseTeams@ed.gov).

Since the March 19, 2013, letter was published, we have received numerous questions regarding the requirements for providing Title IV, HEA student assistance to students enrolled in competency-based education programs more generally. The Q&As in the attachment to this letter address these questions, including –

- The distinction between credit hour competency-based education and direct assessment;
- Requirements for establishing credit hour equivalencies in direct assessment programs;
- Requirements for regular and substantive interaction between students and faculty;
- Prohibitions on paying Title IV aid for credit earned through prior learning assessments;
- Satisfactory academic progress;
- Return of Title IV Funds provisions; and
- Accrediting agencies' roles in reviewing competency-based education programs.

The attachment to this letter will primarily address competency-based education programs that are offered using credit hours or using direct assessment with credit hour equivalencies.

1990 K ST. N.W., WASHINGTON, DC 20006  
[www.ed.gov](http://www.ed.gov)

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

## Dear Colleague Letter GEN1423

- Student **progress in a direct assessment program is measured solely by assessing whether the student can demonstrate** that he or she has a command of a specific subject, content area, or skill, or can demonstrate a specific quality associated with the subject matter of the program.
- Therefore, unlike a CBE program measured in credit hours, a direct assessment program **does not specify the level of educational activity** in which a student is expected to engage in order to complete the program.
- However, the program must provide students with **sufficient educational resources, including substantive interaction** with instructors, for students to develop each competency required for completion.
- Additionally, **before an institution may provide Title IV aid to students in a direct assessment program, that program must be approved under the regulatory provisions** at 34 CFR 668.10.
- The following **example demonstrates an institution's mapping of the program's competencies to traditional courses** or to components of traditional courses.

## Dear Colleague Letter GEN1423 – page 2

Traditional Course	Credit Hours	Competency	Credit Equivalent
Marketing 101	3	Apply theories, models, and practices of marketing	1
		Analyze how a company uses marketing resources	2
Accounting 101	4	Apply theories, models, and practices of accounting in the analysis of financial statements	1.5
		Describe regulatory and ethical issues in accounting	0.5
		Integrate accounting theories, models, and practices across an organization	2
English 101	3	Write appropriately researched persuasive arguments	6
Communications 101	3		
Statistics 101	3	Perform complex statistical calculations	3
Management 101	4	Identify the recent major trends in leadership theory	2
		Analyze and critique leadership case studies	2
<b>Total</b>	<b>20</b>	<b>Total</b>	<b>20</b>

## Dear Colleague Letter GEN1423 – page 3

- While it is expected that students will generally be academically engaged throughout an educational program, **there is no requirement that the institution be able to document academic engagement for each student for every week** of instructional time.
- However, institutions **must ensure that the instructional materials and faculty support necessary for academic engagement are available to students every week** that the institution counts toward its definition of a payment period or an academic year.
- For all CBE programs, including direct assessment programs, **educational activity includes (but is not limited to):**
- Participating in regularly scheduled learning sessions (where there is an opportunity for direct interaction between the student and the faculty member);
  - Submitting an academic assignment;
  - Taking an exam, an interactive tutorial, or computer-assisted instruction;
  - Attending a study group that is assigned by the institution;
  - Participating in an online discussion about academic matters;
  - Consultations with a faculty mentor to discuss academic course content;
  - Participation in faculty-guided independent study



## Dear Colleague Letter GEN1423 – page 4

- For direct assessment programs only, **educational activity also includes development of an academic action plan** developed in consultation with a qualified faculty member that addresses competencies identified by the institution.
- Any CBE program, including a direct assessment program, that does not include regular and substantive interaction between students and instructors would be considered to be a correspondence program with the significant limitations and restrictions on Title IV eligibility that apply to such programs.
- **We do not consider interaction that is wholly optional or initiated primarily by the student to be regular and substantive** interaction between students and instructors. **Interaction that occurs only upon the request of the student (either electronically or otherwise) would not be considered regular** and substantive interaction.
- **Because of the self-paced nature of CBE programs, we consider the time when a student is enrolled in a competency to be, for Title IV R2T4 purposes, a module.** We consider a CBE module to have begun when the student began working toward demonstrating mastery of the competency and ending when the student has successfully demonstrated mastery.

## Dear Colleague Letter GEN1423 – Focus on role of accreditors

### **Q15 What are accrediting agencies' roles with respect to CBE programs?**

**A15** Since offering a program using competency-based education for the first time would be considered a substantive change to an institution's offerings of educational programs, pursuant to the regulations at 34 CFR 602.22, the **institution must first obtain its accrediting agency's approval of the change before Title IV aid can be provided** to students enrolled in a competency-based program.

Additionally, as described in Q&A #3, under 34 CFR 602.24(f), when an institution's accrediting agency reviews an institution for initial accreditation, renewal of accreditation, or for a substantive change under 34 CFR 602.22, the **agency must include in that review, the institution's policy for determining credit hours for its CBE programs to ensure that those policies conform to commonly accepted practice** in higher education. Accrediting agencies should also ensure during such reviews that the **instructors used in a CBE program meet accrediting agency standards** and that the institution devotes **sufficient faculty resources** to the program.

**A16** ...the accrediting agency **must review and approve the institution's methodology for determining the credit hour equivalence for the institution's direct assessment measures.**

# Experimental Sites Initiative

## 7/31/14 Federal Register Notice Four experiments, 3 related to CBE and direct assessment

<http://ifap.ed.gov/eannouncements/073114FederalRegisterNoticeforExpSitesInit.htm>

## 11/18/15 Federal Register Notice Three versions of CBE experiments, including potential for direct assessment

<http://www.ifap.ed.gov/fregisters/attachments/FR111815.pdf>

or via postal mail, commercial delivery, or hand delivery. If the regulations.gov site is not available to the public for any reason, ED will temporarily accept comments at [ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov). Please note that comments submitted by fax or email and those submitted after the comment period will not be accepted; ED will ONLY accept comments during the comment period in this mailbox when the regulations.gov site is not available. Written requests for information or comments submitted by postal mail or delivery should be addressed to the Director of the Information Collection Clearance Division, U.S. Department of Education, 400 Maryland Avenue SW., LBJ, Mailstop L-OM-2-2E319, Room 2E103, Washington, DC 20202.

**FOR FURTHER INFORMATION CONTACT:** For specific questions related to collection activities, please contact Beth Grebeldinger, 202-377-4018.

**SUPPLEMENTARY INFORMATION:** The Department of Education (ED), in accordance with the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3506(c)(2)(A)), provides the general public and Federal agencies with an opportunity to comment on proposed, revised, and continuing collections of information. This helps the Department assess the impact of its information collection requirements and minimize the public's reporting burden. It also helps the public understand the Department's information collection requirements and provide the requested data in the desired format. ED is soliciting comments on the proposed information collection request (ICR) that is described below. The Department of Education is especially interested in public comment addressing the following issues: (1) Is this collection necessary to the proper functions of the Department; (2) will this information be processed and used in a timely manner; (3) is the estimate of burden accurate; (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology. Please note that written comments received in response to this notice will be considered public records.

*Title of Collection:* Health Education Assistance Loan (HEAL) Program: Lender's Application for Insurance Claim Form and Request for Collection Assistance Form.

*OMB Control Number:* 1845-0127.

*Type of Review:* A revision of an existing information collection.

**Respondents/Affected Public:** Private Sector.

**Total Estimated Number of Annual Responses:** 6,149.

**Total Estimated Number of Annual Burden Hours:** 1,165.

**Abstract:** The HEAL Lender's Application for Insurance Claim and the Request for Collection Assistance forms are used in the administration of the Health Education Assistant Loan (HEAL) program. The HEAL program provided federally insured loans to students in certain health professions disciplines, and these forms are used in the administration of the HEAL program. The Lender's Application for Insurance Claim is used by the lending institution to request payment of a claim by the Federal Government. The Request for Collection Assistance form is used by the lender to request pre-claim assistance from the Department. Section 525 of the Consolidated Appropriations Act, 2014, transferred the collection of the Health Education Assistance Loan (HEAL) program loans from the U.S. Department of Health and Human Services (HHS) to the U.S. Department of Education (ED).

Dated: July 28, 2014.

**Kate Mullan,**

*Acting Director, Information Collection Clearance Division, Privacy, Information and Records Management Services, Office of Management.*

[FR Doc. 2014-18001 Filed 7-30-14; 8:45 am]

**BILLING CODE 4000-01-P**

### DEPARTMENT OF EDUCATION

#### Notice Inviting Postsecondary Educational Institutions To Participate in Experiments Under the Experimental Sites Initiative; Federal Student Financial Assistance Programs Under Title IV of the Higher Education Act of 1965, as Amended

**AGENCY:** Office of Postsecondary Education, Department of Education.

**ACTION:** Notice.

**SUMMARY:** The Secretary invites postsecondary educational institutions (institutions) that participate in the student financial assistance programs authorized under title IV of the Higher Education Act of 1965, as amended (the HEA), to apply to participate in new institutionally-based experiments under the Experimental Sites Initiative (ESI). Under the ESI, the Secretary has authority to grant waivers from certain title IV, HEA statutory or regulatory requirements to allow a limited number of institutions to participate in experiments to test alternative methods

for administering the title IV, HEA programs. The alternative methods of title IV HEA administration that the Secretary is permitting under the ESI are designed to facilitate efforts by institutions to test certain innovative practices aimed at improving student outcomes.

**DATES:** Letters of application to participate in any of the proposed experiments described in this notice must be received by the Department no later than September 29, 2014 in order for an institution to receive priority to be considered for participation in the experiment. Letters received after September 29, 2014 may still, at the discretion of the Secretary, be considered for participation.

**ADDRESSES:** Letters of application must be submitted by electronic mail to the following email address: [experimentalsites@ed.gov](mailto:experimentalsites@ed.gov). For formats and other required information, see "Instructions for Submitting Letters of Application" under **SUPPLEMENTARY INFORMATION**.

**FOR FURTHER INFORMATION CONTACT:**

Warren Farr, U.S. Department of Education, Federal Student Aid, 830 First Street NE., Washington, DC 20002. Telephone: (202) 377-4380 or by email at: [Warren.Farr@ed.gov](mailto:Warren.Farr@ed.gov).

If you use a telecommunications device for the deaf (TDD) or a text telephone (TTY), call the Federal Relay Service (FRS), toll free, at 1-800-877-8339.

**SUPPLEMENTARY INFORMATION:**

**Instructions for Submitting Letters of Application**

Letters of application should take the form of a PDF attachment to an email message sent to the email address provided in the **ADDRESSES** section of this notice. The subject line of the email should read "ESI 2014—Request to Participate." The text of the email should identify the experiment, or experiments, the institution wishes to participate in by the title used in the "The Experiments" section under **SUPPLEMENTARY INFORMATION** (e.g., "Experiment—Prior Learning Assessment"). The letter of application should be on institutional letterhead and be signed by at least two officials of the institution—one of these officials should be the institution's financial aid administrator, and the other should be an academic official of the institution. The letter of application must include the institution's official name and Department of Education Office of Postsecondary Education Identification (OPEID), as well as a mailing address,

## Guidance

### CBE Guide - Enhanced Version

- [Competency-Based Education Experiment Reference Guide - Complete Enhanced Version - \(September 2015\)](#)
- [Competency-Based Education Experiment Reference Guide - Enhanced Version - Table of Contents \(September 2015\)](#)
- [Competency-Based Education Experiment Reference Guide - Enhanced Version - Introduction \(September 2015\)](#)
- [Competency-Based Education Experiment Reference Guide - Enhanced Version - Section One \(September 2015\)](#)
- [Competency-Based Education Experiment Reference Guide - Enhanced Version - Section Two \(September 2015\)](#)
- [Competency-Based Education Experiment Reference Guide - Enhanced Version - Section Three \(September 2015\)](#)
- [Competency-Based Education Experiment Reference Guide - Enhanced Version - Section Four \(September 2015\)](#)

### CBE Guide - Text Version

[Competency-Based Education Experiment Reference Guide - Text Version \(September 2015\)](#)

### Policies and Procedures

- [Prior Learning Assessment](#)
- [Limited Direct Assessment](#)
- [Competency-Based Education](#)

### Pell Experiments

Pell Information Sheet (Spring 2014): [2014 ESI Pell Info Sheet](#)

<https://experimentalsites.ed.gov/exp/guidance.html>

# Regular and Substantive Interaction per U.S. Dept. of Education

“For institutions providing CBE programs under the CBE Experiment, there are two important considerations regarding the “regular and substantive interaction” requirements:

- ▶ Students must have access to qualified faculty; and
- ▶ Programs must be designed to ensure regular and substantive interaction between students and those faculty members.”

**“Access to qualified faculty** – Qualified means that the **faculty possesses the appropriate academic credentials and experience** in the applicable knowledge domain, as determined by the accrediting agency. This **faculty access must be available to students who are struggling** to master learning materials or objectives **or for any reason when the student wants to interact** with a faculty member (e.g. seeking explanation of feedback on an assessment or assignment, career advice, desire for more information on a topic). **Learning coaches, online tutoring, and other support can be offered and used** and may even account for the majority of students’ support (and success), **but programs must, as discussed above, include access to an academically qualified faculty member at least when students need or want it.**

If a faculty member is not the primary monitor of student engagement with learning (as in traditional instructional models), the institution **must have some combination of staffing and systems to monitor student engagement, level of performance, and to provide proactive support.** It is incumbent on the institution to **demonstrate that students are not left to educate themselves, a chief characteristic of correspondence programs.**

**Program design** – A program must be designed with the expectation that **regular and substantive interaction between students and faculty is an integral part of an educational program.”**

<https://experimentalsites.ed.gov/exp/pdf/CBEGuideComplete.pdf>



## Regular and Substantive Interaction - continued

The term **regular** means periodic and while it can be broadly interpreted, it should be understood as **predictable regularity** and built into program design. Recognizing that most (though not all) CBE programs are self-paced at least to some extent, predicted regularity **can be event driven** and include, but is not limited to, completion of certain key competencies, a percentage of competencies, or the submission of assessments. While individual students may elect not to initiate contact with qualified faculty, program design must include periodic contact by qualified faculty with the students. Those **contacts could be made through the use of email or other social media**, but must create the opportunity for substantive interaction. Note that **while an automated system for initiating contact with students could be one aspect of program design, such a system in and of itself could not meet the requirement for *regular and substantive interaction***.

The term **substantive** can also be broadly interpreted, but refers specifically to interaction, or the opportunity for interaction, with a student that is **relevant to the academic subject matter** in which the student is engaged. Substantive interaction could include direct instruction, substantive feedback to assessments, or, as described above, contacts with students that create the opportunity for relevant discussion of academic subject matter.

Assessment is an important part of the educational equation in all instances, but takes on particular importance in outcomes-focused programs like CBE. The statutory language pertaining to ***regular and substantive interaction* does not require that faculty administer and/or grade all assignments**, though faculty feedback on student assignments may be a very effective form of substantive interaction. Some assessments might be **exam-based and machine graded, but those forms of assessment would not be considered substantive interaction**. Traditional higher education has long used **teaching assistants, such as graduate students within the discipline, to assess and grade student work, and this is acceptable** in CBE programs.



# Title IV Application Process for Approval of DA

Program Participation Agreement  
Modification document asks about  
measuring student progress in  
programs by direct assessment  
instead of credit or clock hours

## Section E

### Section E. Please provide the following information for each educational program that you are requesting be eligible to participate in federal student financial aid programs.

26. Please check each box that describes the educational programs that you provide as of the date you submit this application or that you will provide during the current award year. Provide information only on programs that you wish to be eligible for federal student financial aid.  
(You may check more than one box.)

**Note:** The institution must be able to demonstrate a reasonable relationship between the length of the program and the entry-level requirement for the recognized occupation for which the program prepares the student. The Secretary considers the relationship to be reasonable if the number of clock hours provided in the program does not exceed by more than 50 percent the minimum number of clock hours required for training in the recognized occupation for which the program prepares the student, as established by the State in which the program is offered, if the State has established such a requirement, or as established by any Federal agency. If the program exceeds by more than 50 percent of the State or Federal minimum number of clock hours, please explain in Section K, Question 69.

**Note:** Post-baccalaureate students pursuing prerequisite coursework (such as prerequisite courses for medical school) have their eligibility determined on the basis of *student* eligibility for federal student financial aid criteria rather than *program* eligibility criteria. Therefore, these types of programs are not included here.

- a.  associate degree programs
- b.  bachelor's degree programs
- c.  master's degree programs or doctoral degree programs
- d.  first professional degree programs

Do you measure student's progress in any of these degree programs by direct assessment instead of credit or clock hours?  Yes  No

- e.  graduate or professional programs that
  - do not lead to a post-baccalaureate degree,
  - are at least 10 weeks, and

## §668.10

### Direct assessment programs

Explains application process, including:

(1) Direct Assessment CBE Detailed Description of Financial Aid Administration

(2) Direct Assessment CBE Program Description

Follow ups in Response to Questions, including additional documentation

#### §668.10 Direct assessment programs.

(a)(1) A *direct assessment program* is an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program utilizing the results of the assessment.

(2) Direct assessment of student learning means a measure by the institution of what a student knows and can do in terms of the body of knowledge making up the educational program. These measures provide evidence that a student has command of a specific subject, content area, or skill or that the student demonstrates a specific quality such as creativity, analysis or synthesis associated with the subject matter of the program. Examples of direct measures include projects, papers, examinations, presentations, performances, and portfolios.

(3) All regulatory requirements in this chapter that refer to credit or clock hours as a measurement apply to direct assessment programs. Because a direct assessment program does not utilize credit or clock hours as a measure of student learning, an institution must establish a methodology to reasonably equate the direct assessment program (or the direct assessment portion of any program, as applicable) to credit or clock hours for the purpose of complying with applicable regulatory requirements. The institution must provide a factual basis satisfactory to the Secretary for its claim that the program or portion of the program is equivalent to a specific number of credit or clock hours.

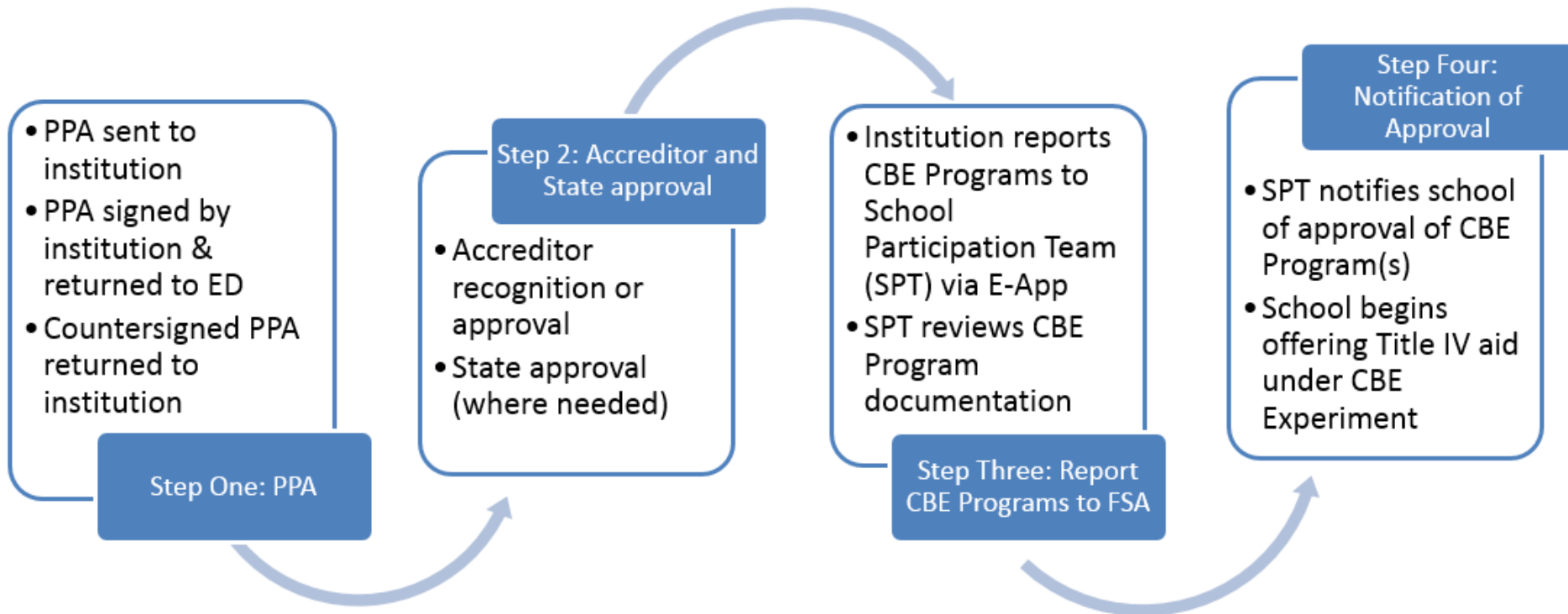
(i) An academic year in a direct assessment program is a period of instructional time that consists of a minimum of 30 weeks of instructional time during which, for an undergraduate educational program, a full-time student is expected to complete the equivalent of at least 24 semester or trimester credit hours, 36 quarter credit hours or 900 clock hours.

(ii) A payment period in a direct assessment program for which equivalence in credit hours has been established must be determined under the requirements in §668.4(a), (b), or (c), as applicable, using the academic year determined in accordance with paragraph (a)(3)(i) of this section (or the portion of that academic year comprising or remaining in the program). A payment period in a direct assessment program for which equivalence in clock hours has been established must be determined under the requirements in §668.4(c), using the academic year determined in accordance with paragraph (a)(3)(i) of this section (or the portion of that academic year comprising or remaining in the program).

(iii) A week of instructional time in a direct assessment program is any seven-day period in which at least one day of educational activity occurs. Educational activity in a direct assessment program includes regularly scheduled learning sessions, faculty-guided independent study, consultations with a faculty mentor, development of an academic action plan addressed to the competencies identified by the institution, or, in combination with any of the foregoing, assessments. It does not include credit for life experience. For purposes of direct assessment programs, independent study occurs when a student follows a course of study with predefined objectives but works with a faculty member to decide how the student is going to meet those objectives. The student and faculty member agree on what the student will do (e.g., required readings, research, and work products), how the student's work will be evaluated, and on what the relative timeframe for completion of the work will be. The student must interact with the faculty member on a regular and substantive basis to assure progress within the course or program.

<https://www.gpo.gov/fdsys/granule/CFR-2011-title34-vol3/CFR-2011-title34-vol3-sec668-10/content-detail.html>

# Application and Approval Process



# More Guidance from ED

## 9/30/15 Inspector General Audit of HLC

<https://www2.ed.gov/about/offices/list/oig/auditreports/fy2015/a05o0010.pdf>



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES  
Chicago/Kansas City Audit Region

September 30, 2015

**Control Number**  
**ED-OIG/A05O0010**

Dr. Barbara Gellman-Danley  
President  
The Higher Learning Commission  
230 South LaSalle Street, Suite 7-500  
Chicago, Illinois 60604

Dear Dr. Gellman-Danley:

This final audit report, “The Higher Learning Commission Could Improve Its Evaluation of Competency-Based Education Programs to Help the Department Ensure the Programs Are Properly Classified for Title IV Purposes,” presents the results of our audit. The objective of our audit was to determine whether the Higher Learning Commission established a system of internal control that provided reasonable assurance that schools’ classifications of delivery methods and measurements of student learning for competency-based education programs, including direct assessment programs, were sufficient and appropriate to help the U.S. Department of Education (Department) ensure that it properly classified the schools’ programs for Title IV of the Higher Education Act of 1965, as amended (Title IV), purposes.<sup>1</sup>

We evaluated operations related to the Higher Learning Commission’s reviews of competency-based education programs, including direct assessment programs, as of December 31, 2014. We concluded that the Higher Learning Commission did not establish a system of internal control that provided reasonable assurance that schools’ classifications of delivery methods and measurements of student learning for competency-based education programs, including direct assessment programs, were sufficient and appropriate to help the Department ensure that it properly classified the schools’ programs for Title IV purposes. Specifically, we found that the Higher Learning Commission did not

- consistently apply its standards when reviewing competency-based education programs, including direct assessment programs, and determining the proposed programs’ delivery methods and measurements of student learning;

<sup>1</sup> Throughout this report, we use the term “direct assessment program” to refer to a competency-based education program that measures a student’s learning through direct assessment, not credit or clock hours.

The Department of Education’s mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.



# More Guidance from ED

## Inspector General Audit of WGU

<http://www2.ed.gov/about/offices/list/oig/auditreports/fy2014/a07l0001.pdf>

<http://www2.ed.gov/about/offices/list/oig/misc/wp2016.pdf>

Final Audit Report  
ED-OIG/A07L0001

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### Appendix H: Western Governors University

Private nonprofit school

Western Governors University was incorporated in 1997 and is headquartered in Salt Lake City, Utah. The school is nationally accredited by the Distance Education and Training Council and regionally accredited by the Northwest Commission on Colleges and Universities. Western Governors University offers all its programs and courses entirely through distance education. During award year 2010–2011, Western Governors University disbursed more than \$243 million in Title IV funds to about 24,000 students.

#### Continuing Work

- **Western Governors University’s Administration of the Title IV Programs**—Continue our work to determine whether Western Governors University complied with the Higher Education Act of 1965, as amended, and selected regulations governing institutional eligibility, program eligibility, disbursements, and return of Title IV aid.

# More Guidance from ED

## 8/2/16 Inspector General Audit of WASC

<https://www2.ed.gov/about/offices/list/oig/auditreports/fy2016/a05p0013.pdf>



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES  
Chicago/Kansas City Audit Region

August 2, 2016

**Control Number**  
**ED-OIG/A05P0013**

Dr. Mary Ellen Petrisko  
President  
Western Association of Schools and Colleges  
Senior College and University Commission  
985 Atlantic Avenue, Suite 100  
Alameda, California 94501

Dear Dr. Petrisko:

This final audit report, “The Western Association of Schools and Colleges Senior College and University Commission Could Improve Its Evaluation of Competency-Based Education Programs to Help the Department Ensure Programs Are Properly Classified for Title IV Purposes,” presents the results of our audit. The objective of our audit was to determine whether the Western Association of Schools and Colleges Senior College and University Commission (Commission) established control activities that provided reasonable assurance that schools properly classified, for Title IV of the Higher Education Act of 1965, as amended, (Title IV) purposes, the methods of delivery and measurements of student learning for competency-based education programs.<sup>1</sup> We evaluated the Commission’s processes over reviewing schools’ proposed competency-based education programs as of November 13, 2015.

We concluded that the Commission’s control activities did not provide reasonable assurance that schools properly classified the methods of delivery for competency-based education programs. As a result, the Commission’s evaluations of the schools’ classifications of the methods of delivery will not help the U.S. Department of Education (Department) ensure that proposed competency-based education programs are properly classified for Title IV purposes. We found that the Commission did not evaluate whether proposed competency-based education programs were designed to ensure faculty-initiated, regular, and substantive interaction between faculty and students. According to Title IV regulations, programs that are not designed to ensure such interaction should be classified as programs delivered via correspondence, not distance education. The Commission did not implement processes to provide reasonable assurance that schools properly classified competency-based education programs’ methods of delivery because correspondence education was not within its scope of recognition by the Secretary. After the Department notified the Commission that correspondence was no longer included under its scope of recognition, the Commission’s control activities did not provide reasonable assurance that schools properly classified the methods of delivery for competency-based education programs.



## Takeaways from LFCC's experience w/ getting Title IV financial aid

1. Prepare for a very lengthy process with multiple rounds of calls & requests for documentation; only 5 institutions have 100% DA approval & no new ones have been approved in a while (SNHU, Brandman, Capella, Walden, U. Wisc. x2)
2. Understand the PPA modification process is with the regional assigned ED office vs. the national approval process for DA
3. Rely on C-BEN to keep up on changes in expectations coming out of ESI, Dear Colleague letters, CRAC communication, & OIG audits
4. Participate in the Experimental Sites Initiative and/or calls if they're still open, though it requires the same level of scrutiny for DA
5. While SACSCOC may allow limited DA and Limited DA is one of the ESI experiments, Title IV is not currently available for it without ESI participation
6. Ensure that your financial aid director & software are prepared for CBE
7. While subscription-based models are appealing, know their risks & increased demands for SAP, disbursements, R2T4, and data systems
8. Understand that the law & regulations may change for DA, CBE, & for online learning per the uproar over regular & substantive interaction

## Knowledge to Work – Contact information



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<http://highered.org>



**Knowledge to Work (K2W):**

## **A Portal for Competencies and Individualized Learning**

**Lord Fairfax Community College (LFCC)**

173 Skirmisher Lane

Middletown, VA 22645-1745

[KnowledgeToWork.com](http://KnowledgeToWork.com)

[HigherEd.org](http://HigherEd.org)

[LFCC.edu](http://LFCC.edu)



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