

**knowledge2work**

**LFCC**  
Lord Fairfax Community College

Direct Assessment Competency-Based Education:  
An Introduction to Effective Practices &  
Planning for Accreditation and  
Title IV Approval  
.....

SACSCOC 2016 Annual Meeting Session  
John Milam, Ph.D.  
Lord Fairfax Community College

<http://knowledgetowork.com>

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U.S. Department of Labor's Employment  
and Training Administration

TAACCT  
COMPEX  
COMPETENCY-BASED  
EDUCATION NETWORK  
LFCC

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Presentation Outline

1. Introduction to competency-based education (CBE) program design
2. Core issues and concerns for accreditation
3. Core issues and concerns for financial aid

TAACCT  
COMPETENCY-BASED  
EDUCATION NETWORK  
LFCC

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Presentation Outline

1. Introduction to competency-based education (CBE) program design

TAACCT  
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LFCC

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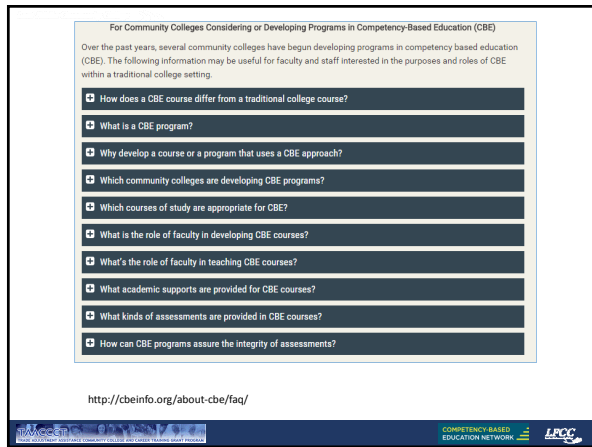
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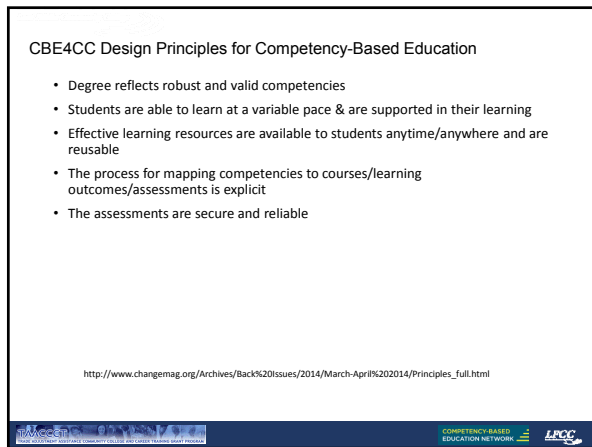
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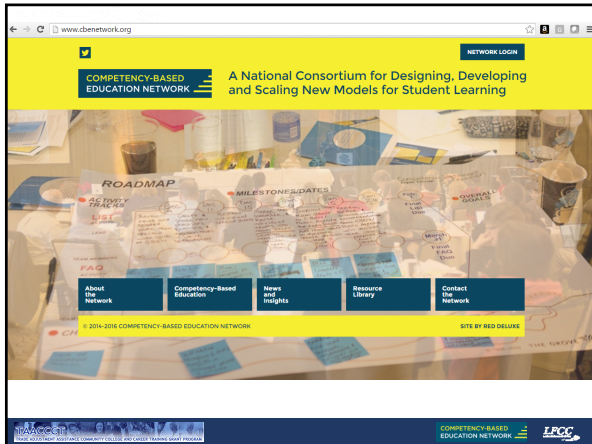
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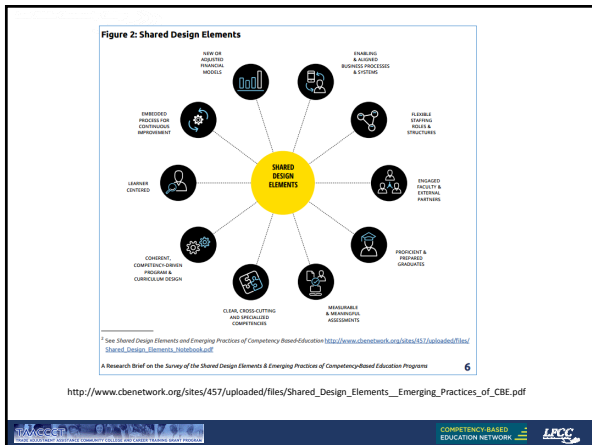
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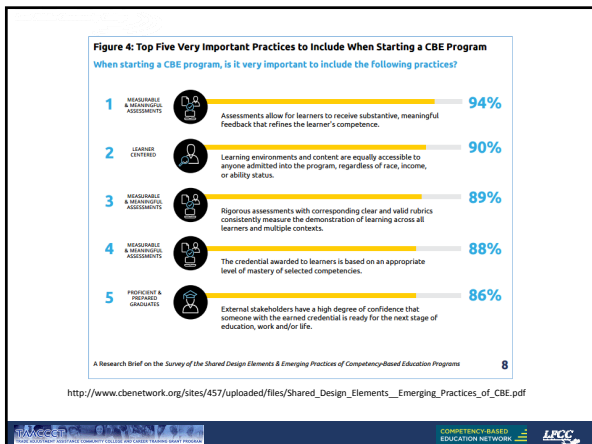
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References:

- Ford, K. (2014). "Competency-Based Education: History, Opportunities, and Challenges." (UMUC CILSS).
- Nodine, T.R. (2016). "How did we get here? A brief history of competency-based higher education in the United States." *Competency-based Education*; 1: 5–11.
- Expanding Competency-Based Education for All Learners. (Jobs for the Future, 2016)
- PLA and CBE on the Competency Continuum: The Relationship between Prior Learning Assessment and Competency-Based Education. (CAEL, 2015)
- Clarifying Competency Based Education Terms (ACE/BlackBoard, 2014)
- The Student Perspective on Competency-Based Education: Qualitative Research on Support, Skills, and Success (Wang, 2015)
- Employer Perspectives on Competency-Based Education (AEI, 2015)
- Making the Case for Competency-Based Education: Early Lessons From the Field (AIR, 2016)
- Faculty and Staff Roles and Responsibilities in the Design and Delivery of Competency-Based Programs: A C-BEN Snapshot (C-BEN, 2015)
- A Research Brief on the Survey of the Shared Design Elements & Emerging Practices of Competency-Based Education Programs. (Public Agenda, 2015).


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References - continued:

- Convening in Support of Federally Authorized Experimental Sites for Competency-Based Education (Lumina, 2015)
- Degree Qualifications Profile. (Lumina, 2014).
- Expanding Student Success: A Primer on Competency-Based Education from Kindergarten Through Higher Education. (NGA, 2015)
- Regular-and-Substantive Interaction in CBE Programs. (Bushway, In press).
- Johnstone, S.M. and Soares, L. (2014). "Principles for Developing Competency-Based Education Programs." *Change*; March-April 2014.
- Soares, L. (2012). "A 'Disruptive' Look at Competency-Based Education." (Center for American Progress).
- Voorhees, R.A., (Ed.). (2001). Measuring What Matters: Competency-Based Learning Models in Higher Education. *New Directions for Institutional Research; Issue 110*.
- Voorhees, R.A. & Bedard-Voorhees, A. (2016). Principles for competency based learning. In C. M. Reigeluth, B. J. Beatty, & R. D. Myers (Eds.) *Instructional Design Theories and Models: The Learner-Centered Paradigm of Education*. New York, NY: Routledge.


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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


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Presentation Outline

2. Core issues and concerns for accreditation




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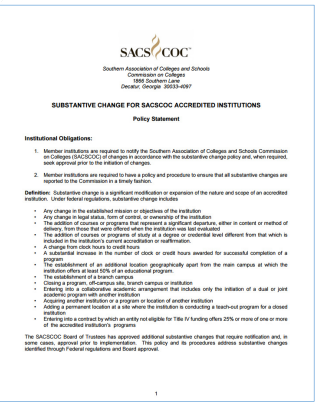

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**Substantive Change Policy**

- No mention of CBE programs that rely solely on the credit hour without any DA
- Any amount of DA requires prior notification six months in advance
- DA requires prior approval before offering 100% or 50%+

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


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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://sacsoc.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




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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




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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 (not the new program to a significant degree from current program)  
• Adding 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 documents 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: \_\_\_\_\_

Name 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 library information regarding compliance with the related sections of the Principles of Accreditation attached to 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




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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




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Takeaways from LFCC's experience w/ substantive change process

1. Meet with your SACSCOC VP early on & work with the sub change staff
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
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 3.3.1.1 for assessment of competency attainment & 3.4.6 for sound practices for credits regardless of format or delivery mode. ED expects 3.4.6 to be in place, even if it is not asked for.
8. Anticipate visit requests for other documents based on key concerns of CRAC, OIG, & ED for ensuring quality & the role of accreditors. ED is watching closely what accreditors do & could come observe the visit.



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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 even more explicit w/ cut points & clear rules for scoring
12. Need to understand inter-rater reliability in scoring artifacts & interpreting rubrics
13. Watch for C-BEN data quality initiative for CBE assessments



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Presentation Outline

3. Core issues and concerns for financial aid



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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



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<http://highered.org>



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**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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