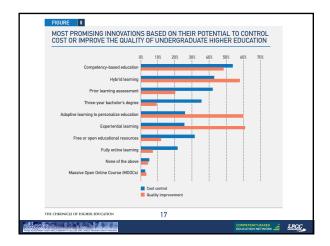
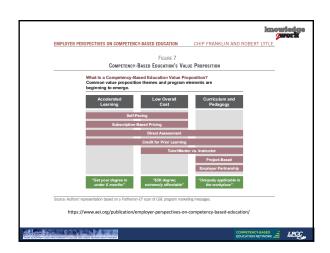
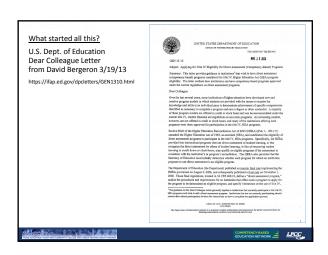
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John Milam, Ph.D. Lord Fairfax Community College				
http://knowledgetowork.com		-		
LFCC's direct assessment CBE programs are funded in part by a TAACCCT (U.S. Department of Labor's Employment and Training Administration	grant from the	-		
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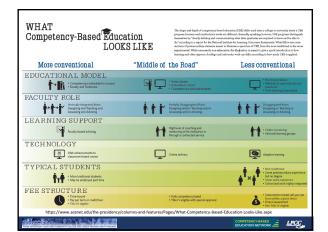


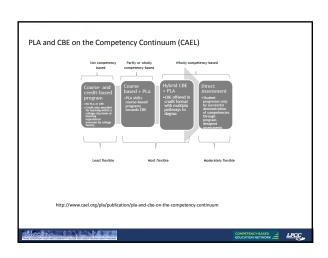
U.S. Dept. of Education Dear Colleague Letter 1310

- 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

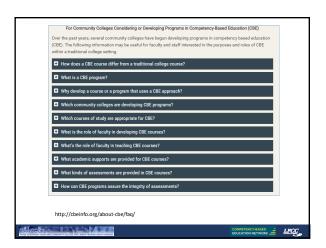
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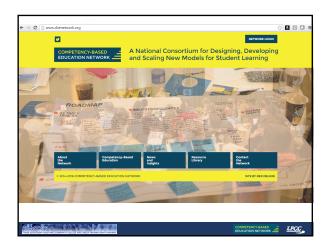


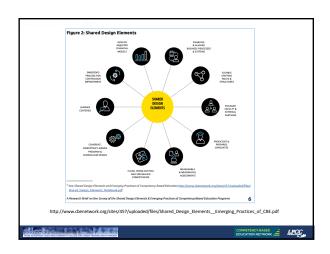


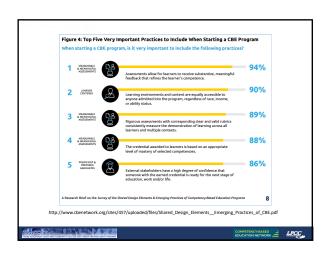




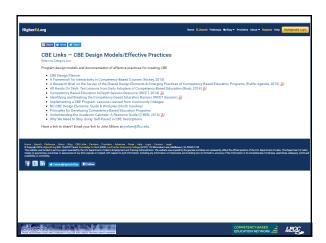
Degree reflects robust and valid competencies Students are able to learn at a variable pace & are supported in their learning Effective learning resources are available to students anytime/anywhere and are reusable The process for mapping competencies to courses/learning outcomes/assessments is explicit The assessments are secure and reliable http://www.changemag.org/Archives/Back/s20issues/2014/March-April/s202014/Principles_full.html











Online Resources: • http://www.benetwork.org/ (Competency-Based Education Network) • http://www.wbenetwork.org/ (Competency-Based Education Network) • http://www.wbenetwork.org/ (Competency-Based Education journal Journal of Competency-Based Education • http://www.cbexchange.org/ (National CBE conference) • http://www.cbexchange.org/ (National CBE conference) • http://www.competency-works.org/ (CBE for K-12 with Higher Ed blog) • http://www.wgu.edu/ (Western Governors University) • Competency-L listserv. Subscribe with email to Competency-L-on@mail-list.com SACSCOC Resources: • http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf Substantive Change for SACSCOC Accredited Institutions: Policy Statement • http://www.sacscoc.org/pdf/081705/DirectAssessmentCompetencyBased.pdf Direct Assessment Competency-Based Education Programs: Policy Statement U.S. Department of Education Resources: • https://experimentalsites.ed.gov/exp/index.html (Experimental Sites) • https://experimentalsites.ed.gov/exp/pdf/CBEGuideComplete.pdf (CBE Guide) • Session 28: Competency-Based and Direct Assessment Programs (FSA Training Conference for Financial Aid Professionals – PPT Dec 2015)

SACSCOC Annual Meeting 2016 Session **Direct Assessment CBE**

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- Expanding Competency-Based Education for All Learners. (Jobs for the Future,
- 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
- 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).
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- Voorhees, R.A., (Ed.). (2001). Measuring What Matters: Competency-Based Learning Models in Higher Education. New Directions for Institutional Research;
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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 a fraid 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

Presentation Outline 2. Core issues and concerns for accreditation

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%+



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



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DA CBE Prospectus Outline

- Abstract (change, location, date, factors affecting date)
- Background information 2.
- Assessment of need and program planning/approval
- 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

- 12. Appendices

Note: This document may change

Address the Institutional Mission in the context of this program. Explain 1 orbitation and market in street researched and hybrid programs. ICR 2.41

- DA CBE Sub Change Prospectus 25 page limit plus appendices 1. Abstract (change, location, date, factors affecting date) - 1 page or less
- Background information, nature & purpose of change in context of the mission (CR 2.4), evidence of legal authority for change
- 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
- 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)
- 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



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 LFCC

SACSCOC Annual Meeting 2016 Session Direct Assessment CBE

Takeaways from LFCC's experience w/ substantive change process	
Meet with your SACSCOC VP early on & work with the sub change staff 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	-
Find models from early adopters for developing your prospectus 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.	
 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. 	
CONTENTION AND EXCEPTION NETWORK #	
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Takeaways from LFCC's experience w/ substantive change process	
 Assessments are held to the highest standard, w/ more intense monitoring & processes than we may be used to w/ program SLOs 	
 Rubrics need to be consistent across programs 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	
Core issues and concerns for financial aid	
COMPETENCYBASED EDUCATION NETWORK = LPCC	



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 $\operatorname{\textbf{program}}$ 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 $\label{eq:methodology} \mbox{ for determining the credit hour equivalence of the direct}$

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CRAC June 2, 2015 Letter – Evaluation considerations

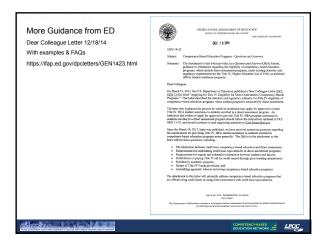
- Whether most of the proposed learning outcomes emphasize performance, not simply knowledge
- Whether proposed competencies are externally referenced
- Whether the institution ensures "regular and substantive interaction"
- Demonstrates that the level and complexity of the competencies are congruent 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



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.



SACSCOC Annual Meeting 2016 Session Direct Assessment CBE

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.

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Dear Colleague Letter GEN1423 – page 2 Traditional Course (credit Hours) Marketing 101 Marketing 101 Accounting 101 Accou

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

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SACSCOC Annual Meeting 2016 Session Direct Assessment CBE

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.

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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.

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COMPETENCY-BASED EDUCATION NETWORK

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Experimental Sites Initiative

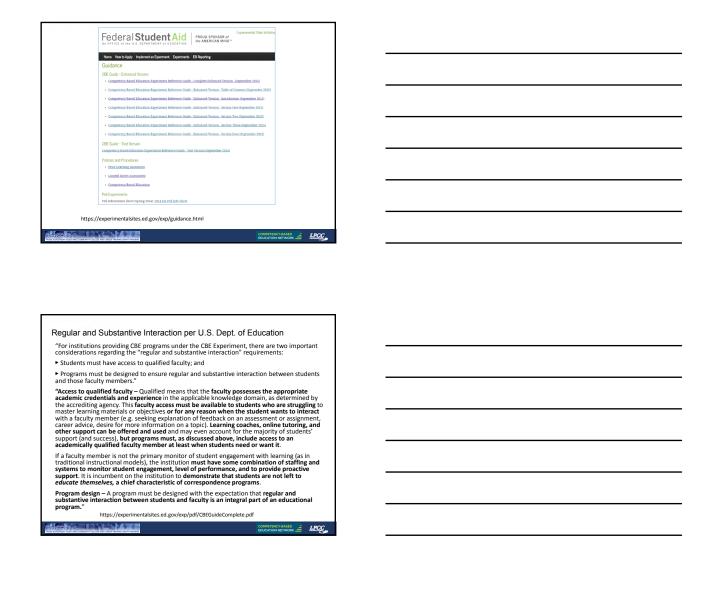
7/31/14 Federal Register Notice Four experiments, 3 related to CBE and direct assessment

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



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Regular and Substantive Interaction - continued

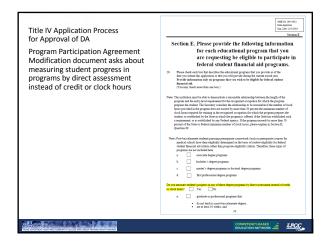
The term regular means periodic and while it can be broadly interpreted, it should be understood as predictable regularity and built into program design. Recognizing that most (though not all) CB programs are self-paced at least to some extent, predicted regularity can be event driven and include, but 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.

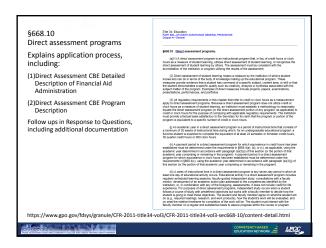
The term *substantive* can also be broadly interpreted, but refers specifically to interaction, or the opportunity for interaction, with a student that is relevant to the academic subject matter in which the student is engaged. Substantive interaction could include direct instruction, substantive feedback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

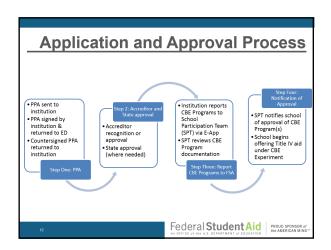
opportunity for relevant discussion of academic subject matter.

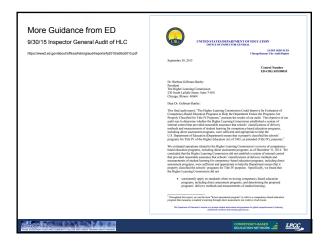
Assessment is an important part of the educational equation in all instances, but takes on particular importance in outcomes-focused programs like CBE. The statutory language pertaining to regular and substantive interaction does not require that faculty administer and/or grade all assignments, though 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.

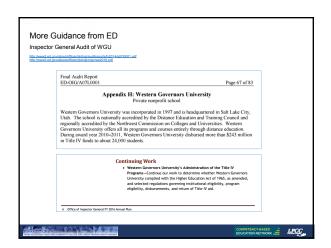
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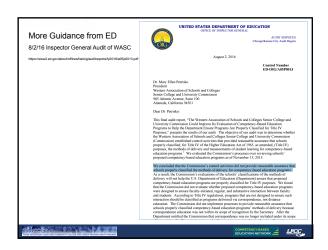












Takeaways from LFCC's experience w/ getting Title IV financial aid

- 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 $\ensuremath{\mathsf{ED}}$ 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 $\dot{\text{IV}}$ 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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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

HigherEd.org

LFCC.edu



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