

Direct Assessment Competency-Based Education: Using Effective Practices to Meet Accreditation Criteria and Federal Title IV Financial Aid Requirements



SACSCOC 2016 Annual Meeting Workshop

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<http://knowledgetowork.com>

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. Overview of direct assessment (DA), competency-based education (CBE)
2. Research & effective practices from the field
Exercise 1 – Current plans, ideas, & models at your institution
3. SACSCOC accreditation criteria & substantive change reporting
Exercise 2 – Review of related accreditation concerns
4. U.S. Dept. of Education requirements for Title IV aid
Exercise 3 – Review other concerns (interaction, LMS, SIS, financial aid)
5. Case study from Lord Fairfax Community College (LFCC)
6. Takeaways about DA CBE, SACSCOC, & Dept. of Ed planning
Exercise 4 – Identify takeaways & next steps

Presentation Outline

1. Overview of direct assessment (DA), competency-based education (CBE)

MOST PROMISING INNOVATIONS BASED ON THEIR POTENTIAL TO CONTROL COST OR IMPROVE THE QUALITY OF UNDERGRADUATE HIGHER EDUCATION

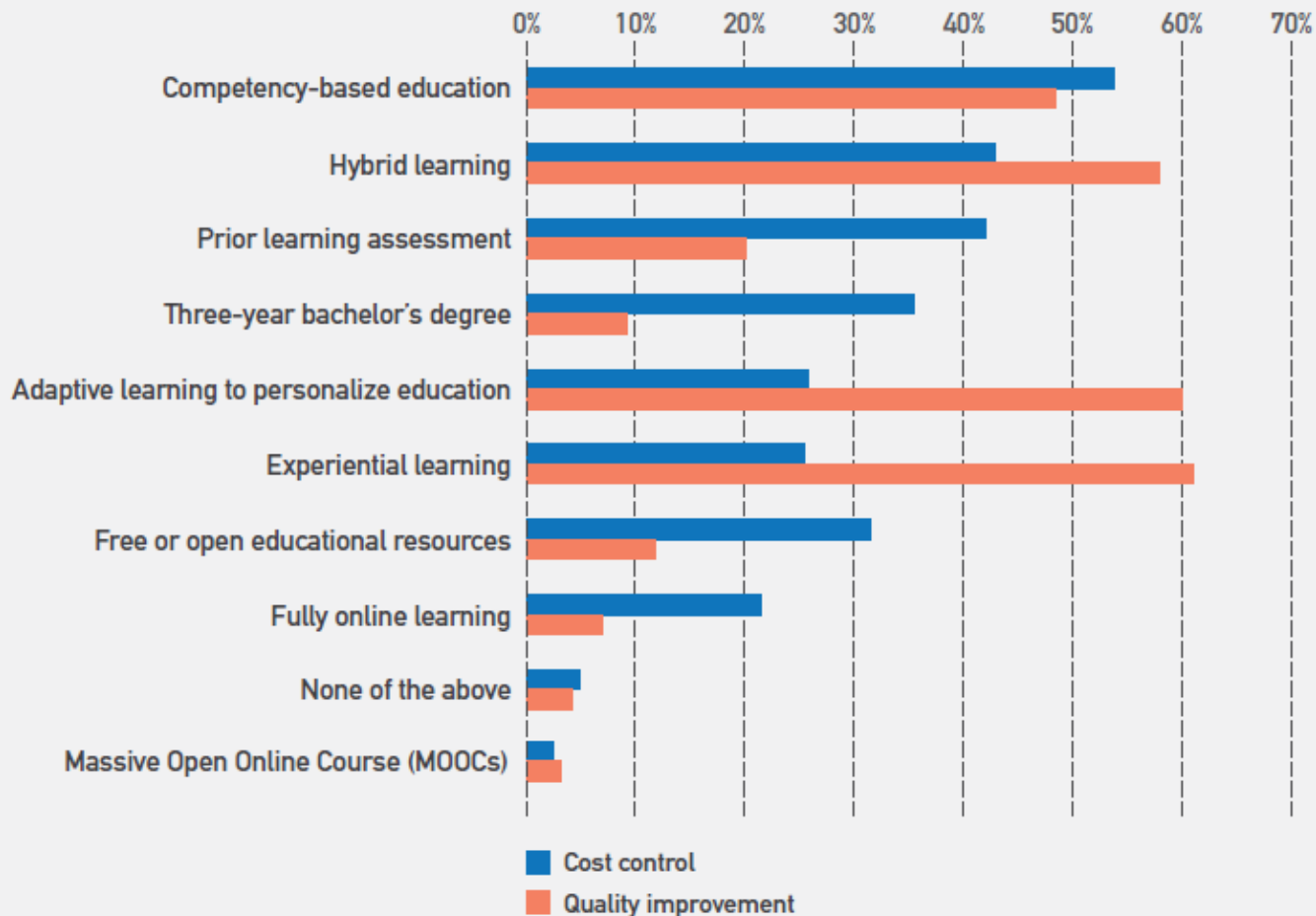
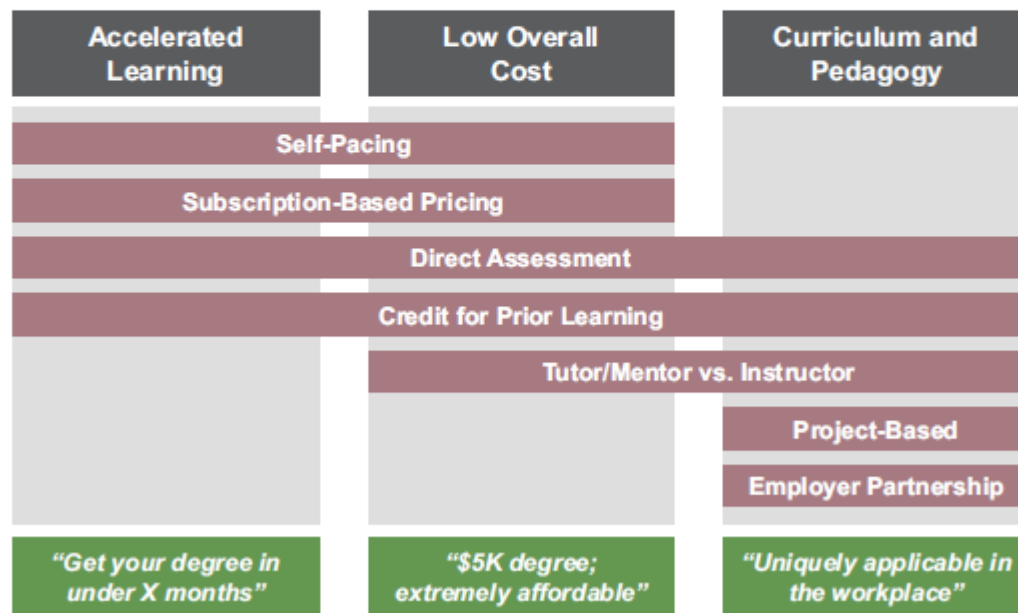


FIGURE 7
COMPETENCY-BASED EDUCATION'S VALUE PROPOSITION

What Is a Competency-Based Education Value Proposition?
Common value proposition themes and program elements are beginning to emerge.



Source: Authors' representation based on a Parthenon-EY scan of CBE program marketing messages.

<https://www.aei.org/publication/employer-perspectives-on-competency-based-education/>

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 institutions¹ 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,

¹ 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

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

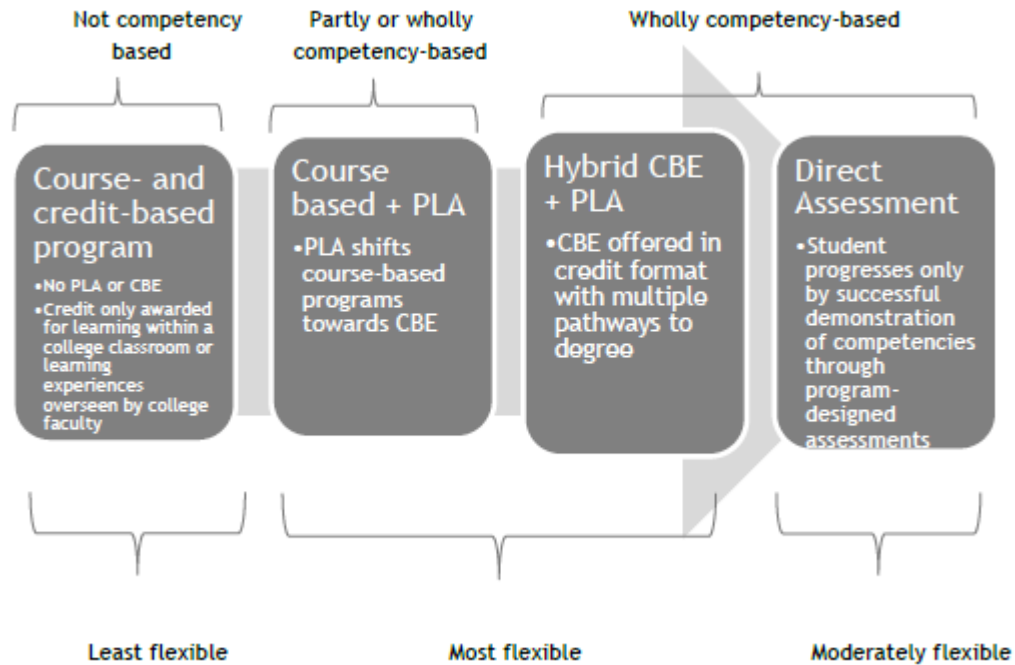
- Fully competency based
- Title IV eligible with special approval



- 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>

PLA and CBE on the Competency Continuum (CAEL)



<http://www.cael.org/pla/publication/pla-and-cbe-on-the-competency-continuum>

Presentation Outline

2. Research & effective practices from the field
Exercise 1 – Current plans, ideas, & models at your institution

Journal of Competency Based Education has been published. | Department of Education Clarifies Accreditation Standards |

COMPETENCY-BASED EDUCATION

for Higher Ed

Why it works and how to start »

For Community Colleges Considering or Developing Programs in Competency-Based Education (CBE)

Over the past years, several community colleges have begun developing programs in competency based education (CBE). The following information may be useful for faculty and staff interested in the purposes and roles of CBE within a traditional college setting.

+ How does a CBE course differ from a traditional college course?

+ What is a CBE program?

+ Why develop a course or a program that uses a CBE approach?

+ Which community colleges are developing CBE programs?

+ Which courses of study are appropriate for CBE?

+ What is the role of faculty in developing CBE courses?

+ What's the role of faculty in teaching CBE courses?

+ What academic supports are provided for CBE courses?

+ What kinds of assessments are provided in CBE courses?

+ How can CBE programs assure the integrity of assessments?

<http://cbeinfo.org/about-cbe/faq/>

CBE4CC Design Principles for Competency-Based Education

- 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

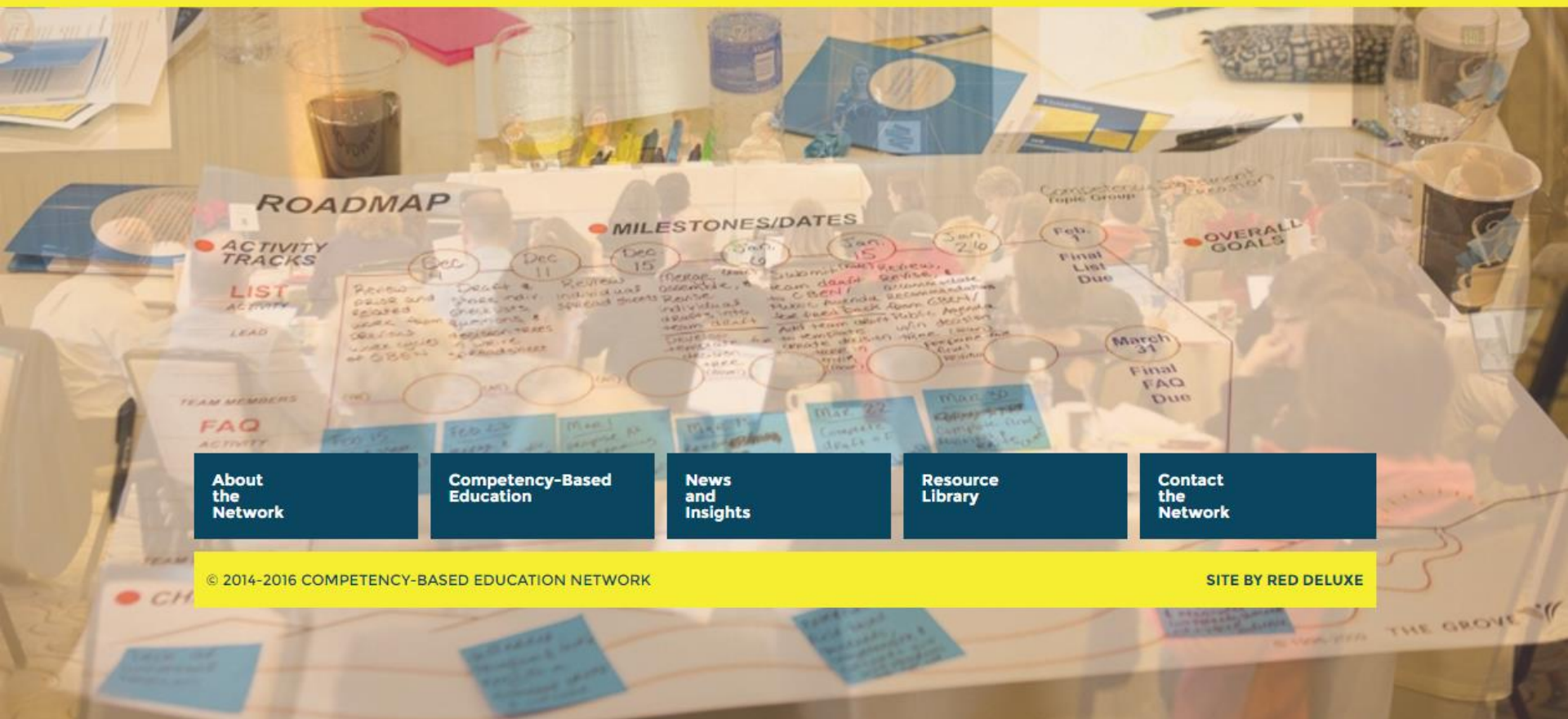
http://www.changemag.org/Archives/Back%20Issues/2014/March-April%202014/Principles_full.html



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

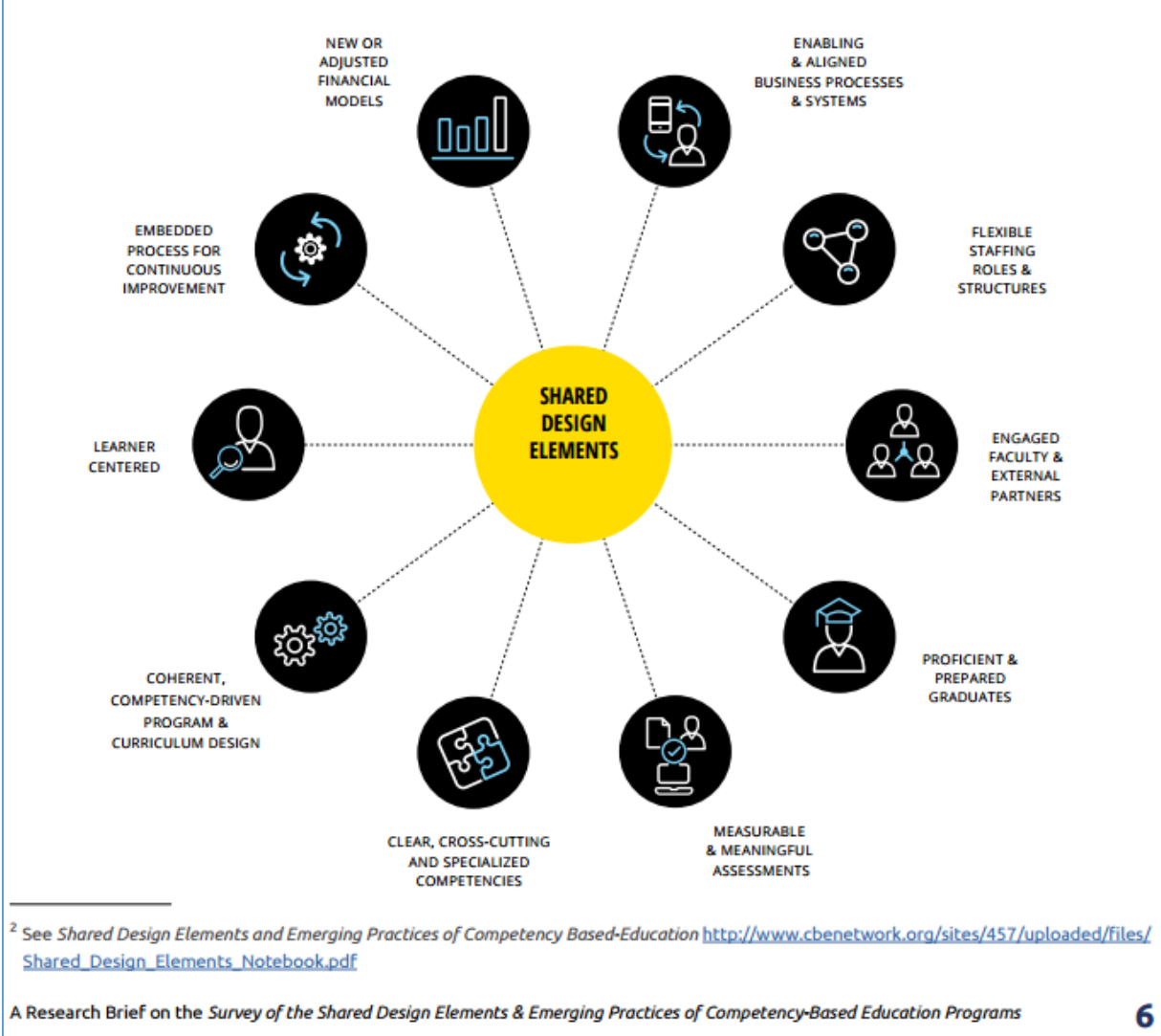
News and Insights

Resource Library

Contact the Network

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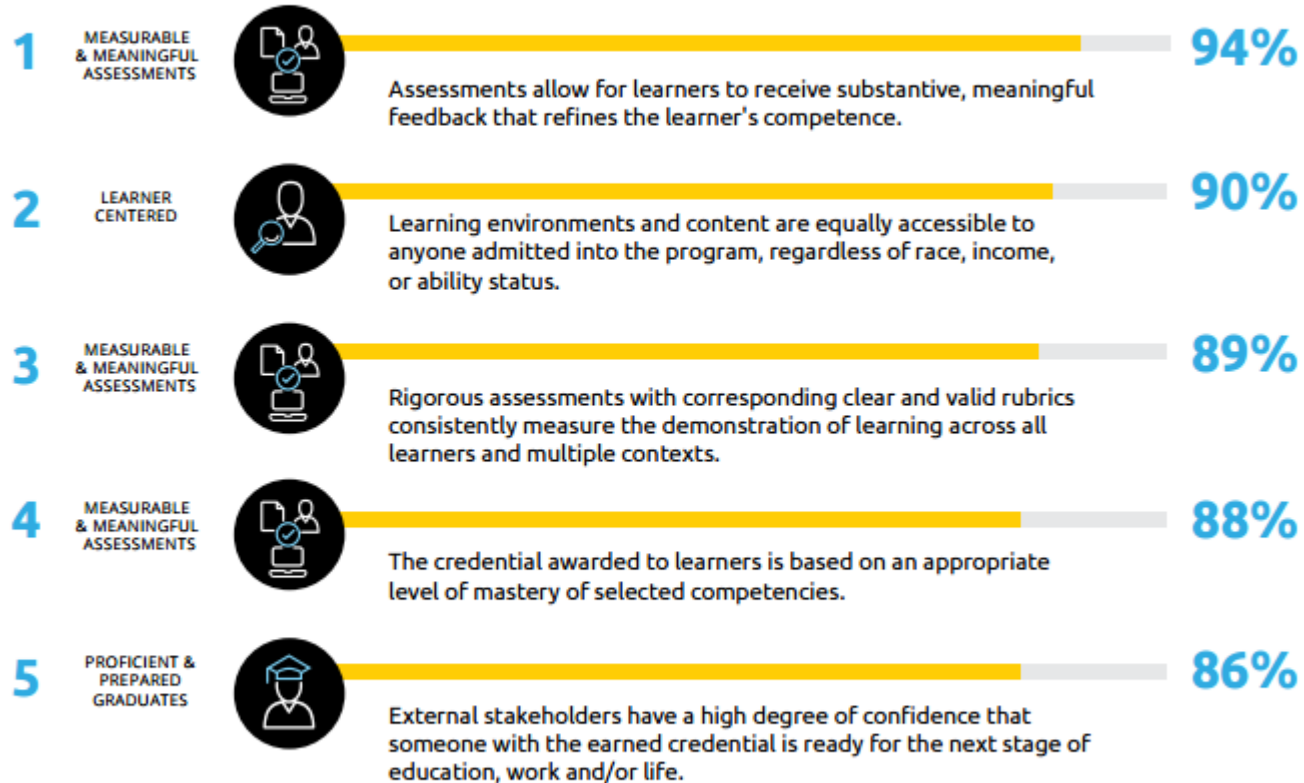
Figure 2: Shared Design Elements



http://www.cbenetwork.org/sites/457/uploaded/files/Shared_Design_Elements__Emerging_Practices_of_CBE.pdf

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

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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.

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Online Resources: (<http://highered.org/cbe>)

- <http://cbeinfo.org/> (WGU/DOL TAACCCT Site)
- <http://www.cbenetwork.org/> (Competency-Based Education Network)
- http://www.wgu.edu/about_WGU/competency_based_education_journal
Journal of Competency-Based Education
- <http://www.cbexchange.org/> (National CBE conference)
- <http://www.competencyworks.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)

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).

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.

Exercise 1 – Current plans, ideas, & models at your institution

Presentation Outline

3. SACSCOC accreditation criteria & substantive change reporting
Exercise 2 – Review of related accreditation concerns

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://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

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

Exercise 2 – Review of related accreditation concerns

Presentation Outline

4. U.S. Dept. of Education requirements for Title IV aid
Exercise 3 – Review of concerns (interaction, LMS, SIS, 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

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

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.

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

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
Total	20	Total	20

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.html>

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. 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. 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.

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.

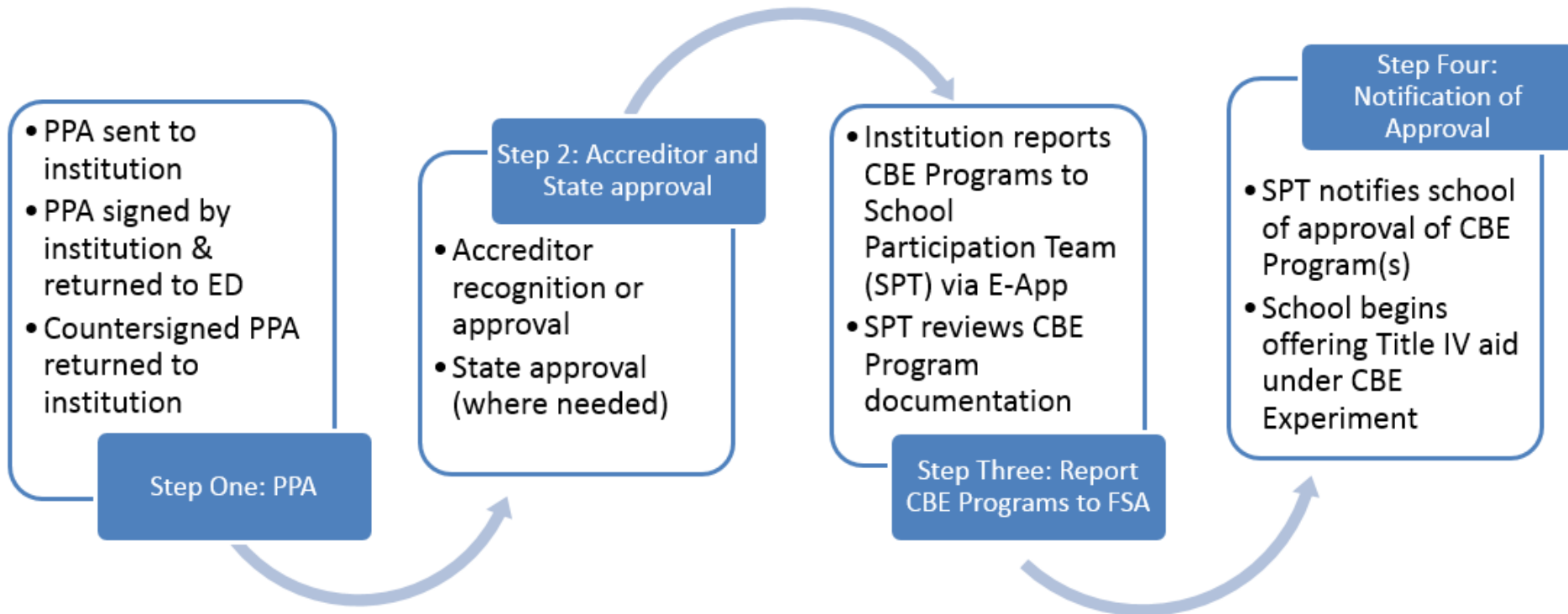
(i) An academic year in a direct assessment program is a period of instructional time that consists of a minimum of 30 weeks of instructional time during which, for an undergraduate educational program, a full-time student is expected to complete the equivalent of at least 24 semester or trimester credit 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.¹

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;

¹ 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

Page 67 of 83

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.¹ 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 ceased to evaluate competency-based education programs.

Exercise 3 – Review other concerns (interaction, LMS, SIS, financial aid)

Presentation Outline

5. Case study from Lord Fairfax Community College (LFCC)

LFCC's Knowledge to Work Round 4 TAACCCT Grant – 10/1/14 Kickoff

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



CBE4CC

Invitational group of 50 community colleges met in June 2015, funded by Gates & DOLETA



CCCOER

Community College Consortium for Open Educational Resources sharing best practices



Merlot/Skills Commons

MOU w/ Merlot repository for API to access OER for portal. Special MERLOT for TAACCCT grantees



IMS Global CBE Standards

Workgroups for CBE Record data standard and for extended transcripts



Competency Frameworks for “Credit Equivalent” CBE programs

Adapted by LFCC Faculty Direct Assessment Committee

Association for Computing Machinery Committee for Computing Education in Community Colleges

AAS in Information Systems Technology

Career Studies Certificate in Networking Specialist

Career Studies Certificate in Cyber Security

American Health Information Management Association

AAS in Health Information Management

Career Studies Certificate in Hospital Facility Coding

International Association of Administrative Professionals

Certificate in Office Systems Assistant

Career Studies Certificate in Information Processing Technician

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

Will incorporate *Linked In* features, 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..

Competency Frameworks for CBE programs

HIM Competency Mapping to Courses for AAS Degree

Health Information Management Degree Domains	Knowledge Clusters	Assessed in Courses
Domain: Health Data Management		
I.A. Subdomain: Health Data Structure, Content, and Standards <ol style="list-style-type: none"> 1. Collect and maintain health data (such as data elements, data sets, and databases). 2. Conduct analysis to ensure that documentation in the health record supports the diagnosis and reflects the patient's progress, clinical findings, and discharge status. 3. Apply policies and procedures to ensure the accuracy of health data. 4. Verify timeliness, completeness, accuracy, and appropriateness of data and data sources for patient care, management, billing reports, registries, and/or databases. 	Health Data Structure, Content, and Standards* <ul style="list-style-type: none"> • Data versus information (Analyzing, 4) • Health information media (such as paper, computer, web-based) (Analyzing, 4) • Structure and use of health information (individual, comparative, aggregate) (Analyzing, 4) • Health record data collection tools (forms, screens, etc.) (Analyzing, 4) • Data sources (primary/secondary) (Analyzing, 4) • Data storage and retrieval (Analyzing, 4) • Healthcare data sets (such as OASIS, HEDIS, DEEDS, UHDDS) (Understanding, 2) 	HIM141 Fundamentals of Health Information Management HIM130 Healthcare Information Systems HIM250 Health Data Classification Systems I (ICD Coding)
I.B. Subdomain: Healthcare Information Requirements and Standards <ol style="list-style-type: none"> 1. Monitor and apply organization-wide health record documentation guidelines. 2. Apply policies and procedures to ensure organizational compliance with regulations and standards. 3. Maintain the accuracy and completeness of the patient record as defined by organizational policy and external regulations and standards. 4. Assist in preparing the organization for accreditation, licensing, and/or certification surveys. 	Healthcare Information Requirements and Standards <ul style="list-style-type: none"> • Type and content of health record (paper, electronic, computer-based, e-health-personal, web-based) (Evaluating, 5) • Health record documentation requirements (such as accreditation, certification, licensure) (Evaluating, 5) • Data quality and integrity (Analyzing, 4) 	HIM141 Fundamentals of Health Information Management HIM130 Healthcare Information Systems HIM231 Health Records Applications I

*** Denotes the highest Bloom's Taxonomy level at which the competency is assessed.**
1 = Remembering 2 = Understanding 3 = Applying 4 = Analyzing 5 = Evaluating

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

M1 > M2 > M3 > M4 > M5 > M6 > M7 > M8 > M9 > M10 > M11 > M12 > M13 > M14 > M15

Weekly Momentum Points

[Return To Student List View](#)

[Switch to... Notes For Test Student](#)

Click To Toggle Panel: Create New Learning Plan For Test Student 1234567

Create New Learning Plan For Test Student

Summer 2016

[Add New Learning Plan For Test Student](#)

Personalized Learning Plans For Test Student 1234567 (Enrolled Active Student)

Established	Setup By	Semester	Program	Full Competency Summary (All Programs)
12/23/2015	Hartman, Virginia	Fall 2015	Certificate in Office Systems Assista	
03/19/2016	Hartman, Virginia	Spring 2016	Certificate in Office Systems Assista	

[Return To Student List View](#)

[Return to... Plans For Test Student](#)

[Switch to... Notes For Test Student](#)

Edit Personalized Learning Plan For Test Student 1234567 (Enrolled Active Student)
Fall 2015 : Certificate in Office Systems Assistant

Click To Toggle Panel: Competencies For Test Student 1234567

Competencies

Domain	Subdomain	Competency	Does the student believe they have attained this competency?	Work on attaining this competency this semester?	Do faculty verify attainment of this competency?
Technical Skills	Document Production	Format documents using generally accepted business practices	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Document Production	Efficiently create business correspondence using advanced formatting features.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical Skills	Proofreading and Editing Skills	Demonstrate proficiency in proofreading and editing skills, including grammar, spelling, sentence structure, and punctuation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Proofreading and Editing Skills	Compose clearly written business correspondence using correct grammar, punctuation, and sentence construction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Proofreading and Editing Skills	Write business letters, reports, and memorandums following correct format and creating a good impression on the reader	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Proofreading and Editing Skills	Edit business manuscripts using the revision symbols used by professional editors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Database and Records Management	Research and discuss records management need for maintaining records and recorded information	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Database and Records Management	Develop skills in using the systems and procedures required in the information cycle	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Database and Records Management	Apply the principles of filing as they apply to records management systems	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Technical Skills	Database and Records Management	Apply problem solving skills to select appropriate technology involved in records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

knowledge personalized learning plan

[Return To Student List View](#)

[Return to... Plans For Test Student](#)

[Switch to... Notes For Test Student](#)

[Edit Personalized Learning Plan For Test Student 1234567](#) (Enrolled Active Student)
Fall 2015 : Certificate in Office Systems Assistant

▼ [Click To Toggle Panel: Competencies For Test Student 1234567](#)

▲ [Click To Toggle Panel: Semester Milestones For Test Student 1234567](#)

Semester Milestones

Milestone 1: How will you know you are on track with the start of the semester?

Submit VoiceBoard introduction with reply from Faculty Mentor of successful completion. Submit Learning Log Week 1 (to be submitted each week) identifying progress and questions with reply from Faculty Mentor of successful receipt and additional explanation or instruction for completion of competencies (as needed).

Milestone 2: When you reach the halfway point in your plan, what do you hope to have accomplished so far?

Completion of Technical Skills: Database Management Competencies and Technical Skills: Document Production. Begin Interpersonal Skills competencies and Office Administration/Business competencies.

Milestone 3: How will you know that you have met your goals for this semester?

Successful completion of competencies of Domains, SubDomains, and Modules identified for this certificate.

knowledge **personalized learning plan** 2work

[Return To Student List View](#)
[Return to... Plans For Test Student](#)
[Switch to... Notes For Test Student](#)

Edit Personalized Learning Plan For Test Student 1234567 (Enrolled Active Student)
Fall 2015 : Certificate in Office Systems Assistant

▼ Click To Toggle Panel: Competencies For Test Student 1234567

▼ Click To Toggle Panel: Semester Milestones For Test Student 1234567

▲ Click To Toggle Panel: Weekly Momentum Points For Test Student 1234567

Weekly Momentum Points

What do you plan to do each week to ensure that you are on track with your educational activities?

Week	Planning Educational Activity
1:	Submission of VoiceBoard and reply from Faculty Mentor of successful receipt. Submission of Learning Log (weekly Learning Logs to be submitted) detailing progress and questions/comments with reply from Faculty Mentor of successful receipt and additional instructions for completion of competencies (as needed)
2:	Begin competencies for Technical Skills, Database Management. Submit weekly learning log.
3:	Complete Module 1 of Technical Skills, Database Management.
4:	Module 1 of Technical Skills, Database Management.
5:	Module 2 of Technical Skills, Database Management.
6:	Module 2 of Technical Skills, Database Management.
7:	Module 2 of Technical Skills, Database Management.
8:	Module 3 of Technical Skills, Database Management.
9:	Module 3 of Technical Skills, Database Management.

knowledge personalized learning plan **2work**

Return To Student List View

Switch to... Learning Plans For Test Student

Click To Toggle Panel: Enter New Note For Test Student 1234567

Enter New Note For Test Student

Spring 2016

Most current/active Semester selected by default.

Momentum point week 1

Momentum point week 1 content from their Plan for the Semester you selected:

Contact Professor to identify competencies and direct assessments required. Begin working on competencies. Weekly contact with Professor.

Save Note For Test Student

Bold border fields are required.

Test Student current Milestones and Momentum Points in the Plan for Semester selected

Milestone 1 (Start semester)

Contact Professor of Record to identify direct assessments and competencies required for the semester. Starting the competencies as assigned.

Milestone 2 (Mid semester)

Complete at least half of the competencies required.

Milestone 3 (End semester)

Complete all competencies with an 80% or better score.

Momentum Point Week 1

Contact Professor to identify competencies and direct assessments required. Begin working on

ALL Personalized Learning Plan Notes For Test Student 1234567 (Enrolled Active Student)

Note Type	Recorded	By	Semester	Note
Coach case notes	03/21/2016 12:01 PM	Fishback, Pam	Spring 2016	I contacted Sample on 3/18/16 she reports that she is still working on completing the assignments for the last class AST 230 for her two certificates and while she is feeling a little overloaded she is pushing through to complete the work and is staying focused. She does not need anything from me at this time.
Momentum point week 6	03/19/2016 3:03 PM	Hartman, Virginia	Spring 2016	Sample is still working on Project 2. She will need another week or so, but she reports that she will still be able to complete all six projects before end of semester. She had no questions in our weekly discussion via email.
Momentum point week 4	03/19/2016 3:00 PM	Hartman, Virginia	Spring 2016	Sample is back on track and has completed her Prezi Project No. 1 earning an 80% or higher on the Direct Assessment. (actual score 93%). She has completed her weekly check in with me (throughout the month of February), and we have identified areas for clarification on future direct assessment project competencies. Sample is doing well. She is now ready to begin Project 2 competencies (Research Report/Survey Monkey/Excel Analysis Charting/Analysis Report).
Momentum point week 3	03/19/2016 2:55 PM	Hartman, Virginia	Spring 2016	Sample is not going to finish this as intended. She needs another week or so. She is doing OK, just some personal responsibilities have curtailed her time to work on the projects.

LFCC's CBE Extended Transcript



Lord Fairfax Community College
173 Skirmisher Lane
Middletown, VA 22645-1745
United States

Competency Based Education Extended Transcript

Date Issued: 04/06/2016 4:41 PM
Name: Student, Test
Student ID: 1234567

Programs

Catalog	Program Code	Program Name
15-16	OSA.CERT	Certificate in Office Systems Assistant

Certificate in Office Systems Assistant

Fall 2015 (2154)

New Educational Activity Completed

Competency Domain	Competency SubDomain	Competency Name	Mark
Technical Skills	Document Production	Format documents using generally accepted business practices	Pass
Technical Skills	Database and Records Management	Research and discuss records management need for maintaining records and recorded information	Pass
Technical Skills	Database and Records Management	Develop skills in using the systems and procedures required in the information cycle	Pass
Technical Skills	Database and Records Management	Apply the principles of filing as they apply to records management systems	Pass
Technical Skills	Database and Records Management	Apply problem solving skills to select appropriate technology involved in records management specialized functions	Pass
Interpersonal Skills	Develop the knowledge, skills, and understanding to make informed academic, social, personal, career, and interpersonal decision	Maintain high standards for quality work and responsiveness in providing office administrative services	Pass
Interpersonal Skills	Select career goals with thought and care, value work and the benefits it brings, and adjust to the inevitable changes in the working world.	Apply new technical and business information/knowledge to practical use on the job	Pass

Prior Competency Verified

Competency Domain	Competency SubDomain	Competency Name	Mark
Technical Skills	Proofreading and Editing Skills	Demonstrate proficiency in proofreading and editing skills, including grammar, spelling, sentence structure, and punctuation	Pass
Technical Skills	Proofreading and Editing Skills	Compose clearly written business correspondence using correct grammar, punctuation, and sentence construction	Pass
Technical Skills	Proofreading and Editing Skills	Write business letters, reports, and memorandums following correct format and creating a good impression on the reader	Pass

LFCC's CBE Extended Transcript (eT) – course credit equivalencies

Technical Skills	Proofreading and Editing Skills	Edit business manuscripts using the revision symbols used by professional editors	Pass
Interpersonal Skills	Develop the knowledge, skills, and understanding to make informed academic, social, personal, career, and interpersonal decision	Display high standards of ethical conduct and behaviors	Pass
Interpersonal Skills	Develop the knowledge, skills, and understanding to make informed academic, social, personal, career, and interpersonal decision	Pursue appropriate learning activities contributing to lifelong professional growth	Pass
Office Administration Procedures & Theory/Business	Constantly Changing Workplace/Business	Describe the environment of business in the United States	Pass
Office Administration Procedures & Theory/Business	Constantly Changing Workplace/Business	Identify the role of organization in the achievement of business goals	Pass
Office Administration Procedures & Theory/Business	Constantly Changing Workplace/Business	Determine the role of automation in achieving a firm's objectives	Pass
Office Administration Procedures & Theory/Business	Constantly Changing Workplace/Business	Explore the fundamentals of small business	Pass
Office Administration Procedures & Theory/Business	Constantly Changing Workplace/Business	Explore the realm of international business	Pass
Other Program Requirements		College Composition I (ENG 111) Competencies	Pass
Other Program Requirements		Approved Social/Behavioral Science Elective Competencies	Pass
Other Program Requirements		Introduction to Business (BUS 100) Competencies	Pass
Other Program Requirements		Orientation to Virtual Assistance (SDV 101) Competencies	Pass
Other Program Requirements		Introduction to Mathematics (MTH 120) Competencies	Pass

New Educational Activity Verified Course Credit Equivalence

Course	Course Description	Total Competencies	Verified	% Verified	Course Credit	Credit Equivalency
AST 234	Records and Database Management	4	4	100.0%	3	3.0
AST 206	Professional Development	24	2	8.3%	3	0.2
AST 102	Keyboarding II	1	1	100.0%	3	3.0

Prior Competency Verified Course Credit Equivalence

Course	Course Description	Total Competencies	Verified	% Verified	Course Credit	Credit Equivalency
SDV 101	College Success Skills	11	1	9.1%	1	0.0
PSY 120	Human Relations	1	1	100.0%	3	3.0
MTH 120	Introduction to Mathematics	1	1	100.0%	3	3.0
ENG 111	College Composition I	2	2	100.0%	3	3.0
BUS 100	Introduction to Business	7	7	100.0%	3	3.0
AST 206	Professional Development	24	2	8.3%	3	0.2
AST 107	Editing and Proofreading Skills	4	4	100.0%	3	3.0





Spring 2016 (2162)

New Educational Activity Completed

- Nothing to Report -

Documentation prepared for Sub Change Committee

HTML, PDF, USB drives, print
version of narrative

   		
LFCC Substantive Change - Program Expansion		
LFCC Documentation for the Substantive Change Committee Direct Assessment Competency-Based Education		
Part	Item	Status
	Signatures Attesting to Integrity	
I: Overview	A. Describe the program expansion. Include the location, initial date of implementation, projected number of students, primary target audience, projected life of the program (single cohort or ongoing), and instructional delivery methods. Provide specific outcomes and learning objectives for each new program, a schedule of course offerings for the first year, and copies of syllabi for new courses	
	B. Discuss the rationale for the change, including assessment of need. List currently offered certificate and/or degree programs that are related to the program expansion. Provide evidence of the legal authority for the change. List institutional strengths that facilitate implementing the change.	
	C. Impact of delivery mode or location. If the new program(s) will be delivered via distance or correspondence education or offered at an off-site location, address the impact of delivery mode or location, as appropriate, when addressing compliance with the following standards.	
II: Principles of Accreditation B. Programs	CR 2.7.1 Program Length The institution offers one or more degree programs based on at least 60 semester credit hours or the equivalent at the associate level; at least 120 semester credit hours or the equivalent at the baccalaureate level; or at least 30 semester credit hours or the equivalent at the post-baccalaureate, graduate, or professional level. If an institution uses a unit other than semester credit hours, it provides an explanation for the equivalency. The institution also provides a justification for all degrees that include fewer than the required number of semester credit hours or its equivalent unit.	Compliance
	CR 2.7.2 Program Content The institution offers degree programs that embody a coherent course of study that is compatible with its stated mission and is based upon fields of study appropriate to higher education.	Compliance
	CS 3.4.3 Admissions Policies The institution publishes admissions policies that are consistent with its mission.	Compliance
	CS 3.4.11 Academic Program Coordination For each major in a degree program, the institution assigns responsibility for program coordination, as well as for curriculum development and review, to persons academically qualified in the field. In those degree programs for which the institution does not identify a major, this requirement applies to a curricular area or concentration.	Compliance
	CS 3.5.3 Undergraduate program requirements The institution publishes requirements for its undergraduate programs, including its general education components. These requirements conform to commonly accepted standards and practices for degree programs.	Compliance
	FR 4.4 Program Length Program length is appropriate for each of the institution's educational programs.	Compliance
	FR 4.9 Definition of Credit Hours The institution has policies and procedures for determining the credit hours awarded for courses and programs that conform to commonly accepted practices in higher education and to	Compliance

Things that went right with the SACSCOC sub change committee visit

- **Direct assessment CBE approach** is intact, though needing more consistent rubric structures, peer review, & inter-rater reliability to calibrate and present results.
- Model of **personalized learning plans tied to competencies and using OER** is intact, including use of custom created middleware for PLPs and case management.
- Creation of **extended transcripts** including course credit equivalencies is intact and business processes for listing on traditional transcripts.
- **Library services, resources, & staff; student services; academic support services; and student complaint** policies/documentation are intact for serving direct assessment CBE students.
- Model of **wrap-around student support** with career coaches & workforce navigator is intact.
- Work of **Workforce Navigator with employer partners** and curriculum advisory committee is intact.
- **Faculty credentials** and position descriptions for K2W staff, along with organizational chart and separation of academic and administrative responsibility are maintained.

More things that went right with the SACSCOC sub change committee visit

- Use of **national competency frameworks** is intact.
- **Adequacy of full-time faculty** for the program is intact.
- **Financial support** for K2W and plans for expansion are intact.
- Approach to **hopeful awarding of Title IV** financial aid for direct assessment CBE through personalized learning plans left intact, with need to better document eligibility relative to time based learning.
- Approach to prior learning assessment with **language of previously attainment competencies** and separation from new educational activity is intact.
- Approach to **general education** requirements for program is intact.
- Use of **program reviews and program SLOs** for these 7 CBE programs intact.
- Program descriptions of **CBE competencies in catalog** intact.
- **Grading** system for competencies and CBE registration courses intact.
- **Substance of CBE policies and procedures** in catalog and handbook intact, but needs to be more student-friendly and more explicit about estimated time to degree.

Recommendations from the SACSCOC sub change committee visit

Communication

- Revise text to better explain transferability of CBE programs within the college and stacked/latticed.
- Revise text to be clear about co-enrollment in direct and non-direct assessment in related programs.
- Put new/forthcoming 2016-17 catalog policy and program updates in the current 2015-16 catalog
- Put CBE materials together in the catalog/handbook with terms, definitions, explanations, and considerations in language less terse and more understandable by prospective students.
- Ensure website has same text as other pubs with expanded information and assistance to help.

Program length

- Provide completion estimates for online part-time students that are more realistic and not at the upper end of performance, including where there is room for acceleration. Document program length accordingly.

Recommendations from the SACSCOC sub change committee visit - 2

Assessment

- Document how rubrics are used to calibrate assessment of student learning to the amount of academically engaged time for student learning. In other words, show how assessments of competencies with grades are comparable to the results of traditional class managed time.
- Collect evidence of varied types of assessments where rubrics include associated levels of expected mastery.
- Use rubrics that have detailed scoring and are validated by peer review for inter-rater reliability.
- Continue to monitor the use of rubrics across programs and make them more consistent.
- Provide more attention to assessment policies, processes, and practices of CBE to validate mastery and to ensure financial aid eligibility.
- Use techniques such as the swim lane diagram to document steps in the assessment of mastery and multiple assessment points if used to validate a competency.

Recommendations from the SACSCOC sub change committee visit - 3

Personnel





- Submit faculty workload policy for CBE when completed.
- Provide job description for CBE Administrator.

Credits

- Revise text across formats so that communication of policies and procedures are consistent in the way credit equivalency is defined.
- Respond to CS 3.4.6 with documentation of practices for determining the amount and level of credit awarded for courses regardless of format or mode of delivery.

Report submitted in response to Committee recommendations

HTML, PDF, USB drives, print version of narrative

LFCC Substantive Change - Program Expansion

LFCC Response to the SACSCOC Substantive Change Committee Report Direct Assessment, Competency-Based Education

Item	Status
<p><u>CR 2.7.1 (Program Length)</u> The Committee recommends that the institution review and revise, where applicable, all CBE related policies, procedures, degree plans, and promotional materials to ensure that there is consistency with the manner in which the credit equivalency is defined and characterized to align with the SACSCOC direct assessment competency based policy.</p>	Compliant
<p><u>CS 3.4.3 (Admissions Policies)</u> The Committee recommends that the institution amend the current 2015-2016 LFCC Catalog and Student Handbook to ensure that the current CBE enrolled students have access to the related policies, particularly in the area of transfer credit equivalencies, financial aid and satisfactory academic progress, career coaches, special academic policies related to direct assessment CBE, and grading.</p>	Compliant
<p><u>CS 3.5.3 (Undergraduate Curriculum Requirements)</u> The Committee recommends that the institution ensure that information about each CBE program is clear, complete, and consistent across all appropriate publications and the K2W website.</p>	Compliant
<p><u>FR 4.4 (Program Length)</u> As the lengths of the CBE programs differ from accepted practices, the Committee recommends the recalculation of the estimated program length based upon the revisions proposed in the recommendation for CS 2.7.1.</p>	Compliant
<p><u>FR 4.9 (Definition of Credit Hours)</u> The Committee recommends that the institution provide evidence to demonstrate the process and criteria used that calibrates documented student learning to the amount of academically engaged time for a typical student.</p>	Compliant
<p><u>CS 3.3.1.1 (IE: Educational Programs)</u> The Committee recommends that the institution identifies expected outcomes, assesses the extent to which it achieves these outcomes, and provides evidence of improvement based on analysis of the results in educational programs.</p>	Compliant
<p><u>CS 3.10.1 (Financial Stability)</u> The Committee recommends that the institution provide a summarized narrative of recent institutional financial history that demonstrates financial stability.</p>	Compliant
<p><u>CS 3.4.6 (Practices for awarding credit)</u> The Committee recommends the institution employs sound and acceptable practices for determining the amount and level of credit awarded for courses, regardless of format or mode of delivery.</p>	Compliant
<p><u>Other Notes and Observations</u> Review of two administrator's credentials relative to their position descriptions in CBE-related roles, position description for TAACCCT grant director, and final CBE faculty workload policy.</p>	Compliant

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Presentation Outline

6. Takeaways about DA CBE, SACSCOC, & Dept. of Ed planning
Exercise 4 – Identify takeaways & next steps

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

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.

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

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

Exercise 4 – Identify takeaways & next steps

Knowledge to Work – Contact information



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Knowledge to Work (K2W):

A Portal for Competencies and Individualized Learning

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KnowledgeToWork.com

HigherEd.org

LFCC.edu



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