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LFCC
Lord Fairfax Community College

Direct Assessment Competency-
Based Education: A Case Study

SACSCOC Summer Institute 2016
John Milam, Ph.D.
Lord Fairfax Community College

<http://knowledge2work.com>

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

COMPETENCY-BASED
EDUCATION NETWORK LFCC

Presentation Outline

1. Overview of direct assessment (DA), competency-based education (CBE)
2. Research & effective practices from the field
3. SACSCOC accreditation criteria & substantive change reporting
4. U.S. Dept. of Education requirements for Title IV aid
5. Case study from Lord Fairfax Community College (LFCC)
6. Takeaways about DA CBE, SACSCOC, & Dept. of Ed planning

COMPETENCY-BASED
EDUCATION NETWORK LFCC

Presentation Outline

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

COMPETENCY-BASED
EDUCATION NETWORK LFCC

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

COMPETENCY-BASED EDUCATION NETWORK LFCC

WHAT Competency-Based Education LOOKS LIKE

The shape and depth of competency-based education (CBE) differs each time a college or university starts a CBE program, because each institution needs to do different things to get started. CBE programs do not look alike, according to a report for the National Institute for Learning Outcomes Assessment. What follows are some examples of program models that are used by the American Association of CBE. Note that the models are for illustrative purposes. While generally not exhaustive, the diagrams in each try to give a quick introduction to how learning and other aspects of college will ultimately work in the world of CBE as it evolves.

More conventional	"Middle of the Road"	Less conventional
EDUCATIONAL MODEL • Competencies embedded in courses, faculty and textbooks	• Online classes • Blended courses • Competency-based assessment	• No prerequisites • Ability to complete classes "anytime" • No class being required
FACULTY ROLE • Traditionally integrated roles: designing and teaching and assessing and advising	• Faculty management roles: designing and/or teaching and/or assessing and/or advising	• Design and/or teaching and/or assessing and/or advising
LEARNING SUPPORT • Faculty-based advising	• High level of coaching and mentoring of the individual or through a contracted service	• Online mentoring • Virtual 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 • Licensed and/or highly skilled
FEE STRUCTURE • Term-based • \$50 per credit or credit hour • \$10-15 per credit	• Fully competency-based • Flat fee/adaptive with special support	• Outcomes-based model: you will learn within a given time • Flat fee/adaptive • New time or degree

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

COMPETENCY-BASED EDUCATION NETWORK LFCC

PLA and CBE on the Competency Continuum (CAEL)

The diagram illustrates the Competency Continuum (CAEL) with four stages from left to right:


- Not competency based:** Course and credit-based program. Description: "with the caveat that credit only awarded for appropriate learning outcomes achieved by college students." Flexibility: Least flexible.
- Partly or wholly competency based:** Course-based + PLA. Description: "PLA shifts course-based programs towards CBE." Flexibility: Most flexible.
- Wholly competency based:** Hybrid CBE + PLA. Description: "CBE offered in credit format with multiple pathways to degree." Flexibility: Moderately flexible.
- Wholly competency based:** Direct Assessment. Description: "Students progress only by successful demonstration of competencies through program-designed assignments." Flexibility: Moderately flexible.

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

COMPETENCY-BASED EDUCATION NETWORK LFCC

Presentation Outline

- 2. Research & effective practices from the field





CBEinfo
About CBE Program Development Program Delivery Student Services Community Search

and 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




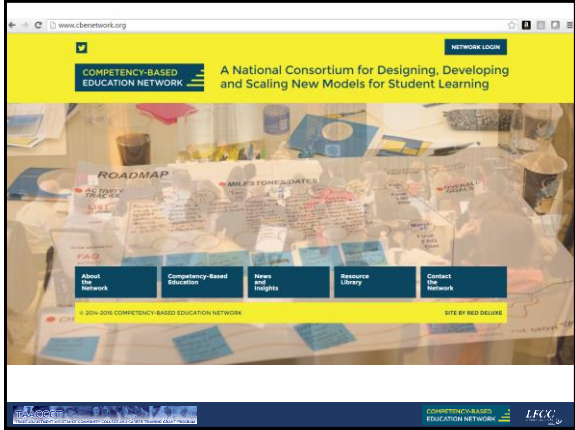
For Community Colleges Considering or Developing Programs in Competency-Based Education (CBE)

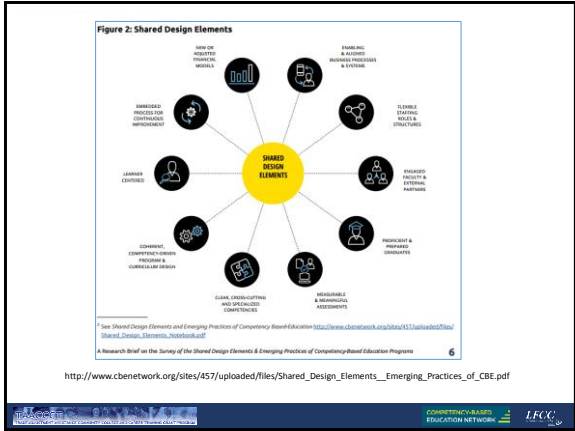
Over the past years, several community colleges have begun developing programs in competency based education (CBE). The following information may be useful for faculty and staff interested in the purposes and roles of CBE within a traditional college setting.

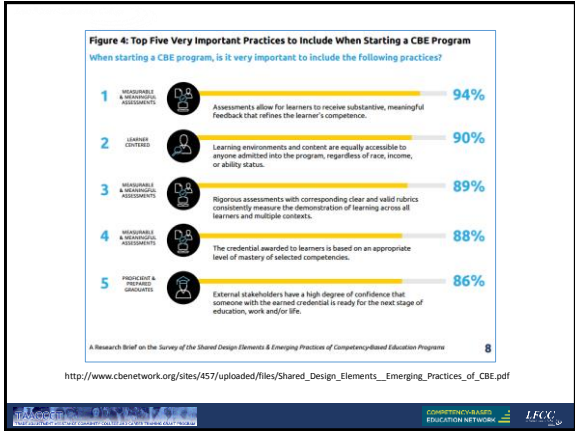
- How does a CBE course differ from a traditional college course?
- What is a CBE program?
- Why develop a course or a program that uses a CBE approach?
- Which community colleges are developing CBE programs?
- Which courses of study are appropriate for CBE?
- What is the role of faculty in developing 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/>











Welcome

Thursday, June 4, 2015

<http://cbeinfo.org/forums/cbe4cc/>






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

Online Resources:




- <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 – 10/18-21/16 in Phoenix)
- <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

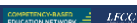
U.S. Department of Education Resources:

- <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).



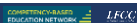
References - continued:

- 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. (in press). 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.



Presentation Outline

3. SACSCOC accreditation criteria & substantive change reporting



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>

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 to be entered with the substantive change policy with which required, seek approval prior to the initiation of changes.
2. Member institutions are required to take steps and provisions 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, major faculty positions, substantive change include:

- Any change in the established mission or objectives of the institution
- The creation of a new degree, level of degree, or emphasis in the curriculum
- The addition of courses or programs not previously approved programs, when in context in context of students from those that were affected when the institution was last evaluated
- The addition or deletion of programs of study at a degree or certificate level different from that which is included in the institution's current accreditation certificate
- A change from clock hours to credit hours
- A significant increase in the number of class 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 50% or more of its educational program
- The establishment of a branch campus
- Changing programs, eliminating the branch campus or institution
- Changing 100% credit hour institution, an institution that includes only the initiation of a dual or joint academic program with another institution
- Including a concurrent institution in a dual academic institution consisting of a shared program for a shared institution
- Changing this contract to which is no entry not eligible for five-yr funding after 20% to more or less 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 described through approved procedures and listed herein.

1



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

DIRECT ASSESSMENT COMPETENCY-BASED EDUCATIONAL PROGRAMS
Policy Statement

Academic credit has provided the basis for measuring the amount of program learning time reported of a typical student enrolled not only in traditional classroom settings, but also laboratories, studios, internships and other experiential learning and cooperative education, study, residence, and others, with their students from one institution to another. Credit is applied to a wide range of activities, including the transfer of credit from one institution to another for the completion of additional credit hours not included in the institution's accreditation.

In order to provide an alternative to the traditional assessment-based model, the Commission has approved programs that allow students the flexibility to earn at the pace that makes sense for them, with an instructional and program design. These programs are those that are designed to meet the needs of students who are seeking specific skills or knowledge. These programs, commonly called "competency-based" programs, are those that award credit to students for the successful completion of a program of study. These programs are designed to award credit for the successful completion of a program of study. These programs are designed to award credit for the successful completion of a program of study.

The purpose of this policy is to provide guidance to institutions and evaluate compliance with the Commission's expectations regarding the establishment and nature of direct assessment competency-based programs and to report to the Commission.

Definition: For the purpose of the application of this policy and in accord with federal regulations, the Commission uses the following definition:

Competency: A competency is a clearly defined and measurable statement of the knowledge, skill, and ability in context that is required in a targeted program.

Competency-Based Educational Programs: A competency-based educational program is outcome-based and awarded credit based on the student's demonstration of the ability to demonstrate the student meets a degree or a certificate. Such programs may be organized around traditional institutional units (credit or clock hours) that are not to be confused with traditional programs of study that have been organized around clock hours for the award of academic credit.

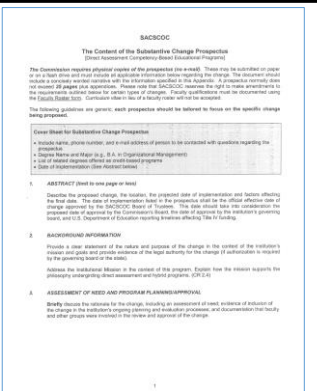
Direct Assessment, Competency-Based Educational Programs: Also referred to as this policy as direct assessment programs, are instructional programs that in lieu of credit hours or clock hours as a measure of student learning, uses direct assessment of student learning relying solely on the attainment of defined competencies. To recognize 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 as this policy as hybrid programs, is those competency-based educational programs that are organized around competency-based and clock hours awarded with non-course based completion (no clock or credit hours awarded).

1



- 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



- 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

- CS 2.7.1 Program length
- CR 2.7.2 Program content
- CS 3.4.3 Admissions policies
- CS 3.3.1.1 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 SUBSTITUTIVE CHANGE COMMITTEE
- Program Expansion at Current or Lower Degree Level -

For use with the following type of change:
• Expanding operation of current degree levels below the new program to a significant degree
• Adding programs at a lower degree level

Statement Regarding All Substitutive Change Documentation Forms

Please note that the use of all of the SACSCOC Substitutive Change Documentation Forms contain the minimum information required. Additional information 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 Substitutive Change: _____

Date: _____

By signing below, we attest to the following:


1. That _____ (name of institution) has attached a complete and accurate statement of this Substitutive Change.
2. That _____ (name of institution) has provided complete and accurate disclosure of every consideration regarding compliance with the selection sections of the Principles of Accreditation affected by this Substitutive Change.

Name and signature of the President: _____

Name and signature of the Accreditation Liaison: _____


SACSCOC Staff Member assigned to the institution: _____ Form Update: MAY 2012

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Additional DA CBE documentation that may be requested for the visit

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



Presentation Outline

- 4. U.S. Dept. of Education requirements for Title IV aid



**Council of
Regional Accrediting Commissions**

For Informational Purposes June 2, 2015
 Contact: Barbara Bolognani (301-425-7716)

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

Washington, DC – The Council of Regional Accrediting Commissions (CRAC) 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 Bolognani, Chair of CRAC and President of the Commission on Institutions of Higher Education, NEASC.

In addition, CRAC understands that the Department of Education will soon release guidance, focused on CBE, for institutions seeking to participate in the recently announced "segmental aid" program. "This alignment and new level of collaboration are welcome steps and are good for all those involved – most importantly the many students who will benefit from the expansion of these new opportunities," said Phil Collins, President of Southern New Hampshire University and a member of the Steering Committee of C-ABEN, 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 for 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 programs relevant to our students and the guidance from the Department of Education, so that these goals can be accomplished," stated Bolognani.


A copy of CRAC'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 5, 2015

Dear Accrediting Agency Executive Director:

In order to ensure competency-based education (CBE) programs that received a significant amount of attention for the previous education ombudsman, the Bureau of Education for the Handicapped (BEH) provides special and additional attention to ensure your regulatory requirements align with the requirements for Title IV eligibility for institutions offering CBE programs.

Under ESEA, Title IV institutions are required to demonstrate that they meet the criteria for an educational program in an institution. The institution is required to provide documentation to the Department. Such documentation may be submitted over electronic media or by hard copy. The Department's response to CBE, these specific sections are included and described in the enclosed document.

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

Sincerely,
Thomas W. Bishop, A.E.D.
Director, Accreditation Group

Enclosure

OFFICE OF POSTSECONDARY EDUCATION
1950 MICHIGAN AVENUE, NE, WASHINGTON, DC 20002-4242

https://www.insidehighered.com/sites/default/server_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://app.ed.gov/dpclatters/GEN1423.html>

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

DEC 18 2014

ED14-14-23

Subject: Competency-Based Education Programs – Questions and Answers

Summary: The attachment to this letter provides an updated and revised (Q&A) format, guidance to institutions regarding the eligibility of competency-based education programs, which fall under Title IV assessment programs, when existing criteria and regulatory requirements for the Title IV, Higher Education Act of 1965, as amended (ESEA) apply to those programs.

Dear Colleague:

On March 19, 2015, the U.S. Department of Education published a Dear Colleague Letter (DCL), GEN15-001 and "Guidance for Title IV Eligibility for Direct Assessment (Competency-Based) Programs." That letter described the criteria and regulatory authority for Title IV eligibility of competency-based education programs when credit programs are included in 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 direct assessment programs. 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 GEN15-001 and should continue to send supporting materials to CaseData@ed.gov.

Since the March 19, 2015, 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&A in the attachment to this letter address those questions, including:

- The distinction between credit-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;
- Additional considerations for Title IV, HEA for credit-based foreign prior learning assessments;
- Additional accreditation programs;
- Status of Title IV IVF funds provisions; and
- Additional support roles in serving 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.

ED14-14-23 (REVISED) DE 14/14
1/15/15

The Department of Education's mission is to ensure all students have the opportunity for a quality education by setting and assessing national and state education goals.




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.


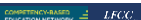

Dear Colleague Letter GEN1423 – Focus on role of accreditors

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://www.federalregister.gov/documents/2014/07/31/35468r01-experimental-sites-initiative>

11/18/15 Federal Register Notice
 Three versions of CBE experiments, including potential for direct assessment
<http://www.federalregister.gov/documents/2015/11/18/2015-23114-experimental-sites-initiative>

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.

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

-  Offers direct assessment CBE programs in IT, HIM, & admin support technology
-  Includes work w/ AHIMA on a new, national credential and set of competencies (IT in HIM)
-  Creates custom personalized learning plan software for CBE w/ competency tracking
-  Creates custom software for extended CBE transcripts & business processes for registrar
-  Uses free & low-cost OER, w/ digital librarian
-  Uses national competency frameworks from AHIMA, ACM, & IAAP
-  Partnerships w/ AHIMA & Microsoft  
-  Creates portal to share program-related competencies & OER as additional resources. Free to use at: <http://higherled.org>


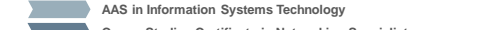


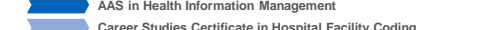

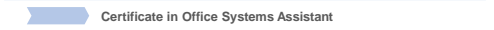
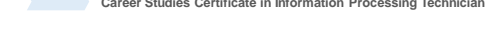


  




Alignment w/ other CBE & OER efforts 

-  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
MDU w/ Merlot repository for OER 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 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 competencies**
Program competencies are based on national frameworks from ACM, AHMA, and IAP, 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, MOOC, 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. Incorporating peer review for reliability.
- Wrap-around support services & alignment w/ workforce needs**
Provides full-time career coach, career/development, adult education instructor, and Workforce Navigator to ensure alignment between CBE program preparation & the competencies needed for real-time job openings in IT, HR, administrative support technology, & advanced manufacturing.
- Building a Linked in profile with competencies tied to employment goals**
Incorporates 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-BASED EDUCATION NETWORK | LFCC

Competency Frameworks for CBE programs
 HIM Competency Mapping to Courses for AAS Degree

Health Information Management Degree Domains	Knowledge Clusters	Assessed in Courses
<p>I.A. Subdomain: Health Data Structures, Content, and Standards</p> <ol style="list-style-type: none"> Collect and maintain health data (both as data elements, data sets, and databases). Conduct analysis to ensure that documentation in the health record supports the diagnosis and reflects the patient's progress, clinical findings, and discharge status. Apply policies and procedures to ensure the accuracy of health data. Verify timeliness, completeness, accuracy, and appropriateness of data and data sources for patient care, management, billing reports, registries, and/or databases. 	<p>Health Data Structure, Content, and Standards*</p> <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, aggregated) (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, REDOL, ICD10) (Understanding, 2) 	<p>HIM141: Fundamentals of health information management systems</p> <p>HIM130: Healthcare information systems (ICD Coding)</p>
<p>I.B. Subdomain: Healthcare Information Requirements and Standards</p> <ol style="list-style-type: none"> Monitor and apply organization-wide health record documentation guidelines. Apply policies and procedures to ensure organizational compliance with regulations and standards. Maintain the accuracy and completeness of the patient record as defined by organizational policy and external regulations and standards. Assist in preparing the organization for accreditation, licensing, and/or certification surveys. 	<p>Healthcare Information Requirements and Standards*</p> <ul style="list-style-type: none"> Type and content of health record (paper, electronic, computer-based, a health personnel, web-based) (Evaluating, 3) Health record documentation requirements (such as accreditation, certification, licensure) (Evaluating, 3) Data quality and integrity (Analyzing, 4) 	<p>HIM141: Fundamentals of health information management systems</p> <p>HIM130: Healthcare information systems</p> <p>HIM231: Health Records Applications</p>

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

COMPETENCY-BASED EDUCATION NETWORK | LFCC

LFCC's Personalized Learning Plan
 Semester Plan

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

Competencies (knowledge, skills, abilities)

Educational activities

Digital learning objects (OER)

Direct assessments

Rubrics

Artifacts/portfolio

Milestones

Weekly Momentum Points

COMPETENCY-BASED EDUCATION NETWORK | LFCC

knowledge 2work personalized learning plan

Return to Student List View | Return to Plan 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	Assessment	Completion	How the student has met the competency	Assess or re-assess this competency	Assess or re-assess this competency	Assess or re-assess this competency
Technical Skills: Document Production	Document Production	Innovative work using generally accepted office procedures.				
Technical Skills: Document Production	Document Production	Efficiently create business correspondence using software business hardware.				
Technical Skills: Proofreading and Editing Skills	Proofreading and Editing Skills	Examine and prepare a proofreading and editing skills checklist using a software document and hardware.				
Technical Skills: Proofreading and Editing Skills	Proofreading and Editing Skills	Compare and create business correspondence using software hardware, and prepare for document production.				
Technical Skills: Proofreading and Editing Skills	Proofreading and Editing Skills	Manipulate and create business correspondence using software hardware and hardware.				
Technical Skills: Proofreading and Editing Skills	Proofreading and Editing Skills	Identify and correct errors in business correspondence using software hardware and hardware.				
Technical Skills: Database and Records Management	Database and Records Management	Research and document the management team for maintaining records and records management.				
Technical Skills: Database and Records Management	Database and Records Management	Identify and document the management team for maintaining records and records management.				
Technical Skills: Database and Records Management	Database and Records Management	Identify and document the management team for maintaining records and records management.				
Technical Skills: Database and Records Management	Database and Records Management	Identify and document the management team for maintaining records and records management.				

COMPETENCY-BASED EDUCATION NETWORK | LFCC

knowledge 2work personalized learning plan

Return to Student List View | Return to Plan 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: 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 milestone production with help from Faculty Mentor at assigned 2 completion. Submit Learning Log Week 1 (to be submitted each week) identifying progress and questions with help 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.

COMPETENCY-BASED EDUCATION NETWORK | LFCC

knowledge 2work personalized learning plan

Return to Student List View | Return to Plan 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: 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	Weekly Momentum Points	Submission Date
1	Submission of Weekfirst and sign from Faculty Mentor of successful receipt. Submission of Learning Log (weekly Learning Log) to be submitted) detailing progress and questions/competencies with help from Faculty Mentor of successful receipt and additional instructions for completion of competencies (as needed). Begin competencies for Technical Skills, Database Management. Submit weekly learning log.	
2	Complete Module 1 of Technical Skills, Database Management.	
3	Module 1 of Technical Skills, Database Management.	
4	Module 2 of Technical Skills, Database Management.	
5	Module 2 of Technical Skills, Database Management.	
6	Module 2 of Technical Skills, Database Management.	
7	Module 3 of Technical Skills, Database Management.	
8	Module 3 of Technical Skills, Database Management.	
9	Module 3 of Technical Skills, Database Management.	

COMPETENCY-BASED EDUCATION NETWORK | LFCC




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.




Presentation Outline

6. Takeaways about DA CBE, SACSCOC, & Dept. of Ed planning




Takeaways from LFCC's experience w/ direct assessment CBE

1. Learn from the field & CBE organizations like C-BEN & practitioners at the CB Exchange conference; do the research, especially on tough issues
2. Design the 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, & institutional readiness to embrace 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/marketing plan
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



Takeaways from LFCC's experience w/ substantive change process

1. Meet with your SACSCOCVP 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, 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/ getting Title IV financial aid

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



Knowledge to Work – Contact information

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<http://higherred.org>





 Questions?



Knowledge to Work (K2W):

A Portal for Competencies and Individualized Learning

Lord Fairfax Community College (LFCC)

173 Skirmisher Lane

Middletown, VA 22645-1745

KnowledgeToWork.com

HigherEd.org

LFCC.edu



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