**Convening in Support of Federally Authorized
Experimental Sites for Competency-Based Education**

Summary Report
September 2015

Purpose and Overview

Lumina Foundation and the Bill & Melinda Gates Foundation co-hosted a convening on April 7 and 8, 2015, in Washington, D.C., to help 15 interested colleges and universities that met specific readiness criteria gain a better understanding of the U.S. Department of Education's[1] Competency-Based Experiment part of the Experimental Sites[2] Initiative (ESI).

In general terms, competency-based education (CBE) is a flexible way for students to earn credit for what they know and can do, build on their knowledge and skills by learning more at their own pace, and earn high-quality degrees, certificates, and other credentials that help them in their lives and careers. Students in these programs are able to show what they know and how well they can apply that knowledge through a variety of learning mechanisms and evaluations. Colleges and universities offer a wide range of competency-based programs and provide an array of support services, giving students options for learning beyond traditional, credit-based academic instruction.

The goals of the convening were to:

- Develop a shared understanding of competency-based models that could be tested;
- Determine what the Department and participating colleges and universities want to learn through well-structured experiments that address statutory and regulatory obstacles to Title IV support for competency-based programs;
- Foster the communication necessary to effectively promote responsible innovation;
- Explore approaches to generating knowledge about competency-based programs that inform a broad range of stakeholders, including policymakers; and

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[1] Also referred to as: 1) Education Department or 2) the Department
[2] The purpose of experimental sites are to test the effectiveness of statutory and regulatory flexibility for participating institutions disbursing Title IV student aid. https://experimentalsites.ed.gov/exp/index.html

- Establish a clear understanding of the experimental sites process, including roles and responsibilities of the Department, participating colleges and universities, and regional accreditors.

Convening participants included representatives from each of the regional accrediting organizations; leadership and staff of the Education Department; representatives of the American Council on Education (ACE), American Institutes for Research (AIR), and New America Foundation; foundation leaders; and academic leaders, financial aid officers, and institutional researchers from 15 institutions. (Please see the appendix for more information.) Institutions were encouraged to send representatives to the convening if the Department had invited them to discuss their potential participation in the Experimental Sites Initiative. These institutions were invited to participate based upon the presence of competency-based programs in which students were enrolled, and their expressed willingness to participate in a cross-institution, third-party evaluation using quasi-experimental design.

The institutions with attending representatives were:

- Austin Community College District
- Brandman University
- Broward College
- Capella University
- Davis Applied Technology College
- Indiana Wesleyan University
- Kentucky Community & Technical College
- Lipscomb University
- Monroe Community College
- Northern Arizona University
- Polk State College
- Rasmussen College
- Salt Lake Community College
- Southern New Hampshire University-College for America
- University of Wisconsin-Extension

CBE Experimental Sites

The Department's experimental site authority, first granted in 1992, has largely been used in the past to waive single requirements for postsecondary institutions to lessen administrative burdens in the disbursement of Title IV student aid. To date, experimental sites authority has not resulted in major federal policy changes. In the proposed CBE experiments, institutions hope to assist the federal government in figuring out how to move away from time-based instruction without opening Title IV up to fraud and abuse. A CBE experimental is likely to be far more extensive and complex than earlier federally authorized experiments, waiving many disbursement rules. Nonetheless, institutions are concerned that the experiment will not grant sufficient flexibility to fully test the promise of CBE. For example, a key barrier to the

implementation of innovative CBE programs is the Title I requirement of "regular and substantive interaction" is outside the scope of experimental site waiver authority.

The Department has made a serious effort to create flexibility for the experiments and also has made considerable progress in its conceptualization of CBE. One example of such progress is its interest in experimenting with separate Title IV disbursements for direct and indirect education costs. This experiment allows an institution to provide aid to cover a series of competencies, but then requires that students complete that set of competencies before receiving *additional* aid. Student aid related to the indirect costs that comprise a student's cost of attendance (COA), such as housing, books, personal expenses, and meal plans, could be distributed at regular calendar intervals (e.g., every two to three months). Student aid for direct costs (tuition, fees, portfolio review, etc.) could then be disbursed as each student completes a competency or set of competencies. For example, if a student is expected to demonstrate six competencies during a six-month period, the student could receive one-sixth of the student aid award for direct costs each time the student successfully demonstrates a competency. This would assure satisfactory academic progress before a portion of student aid is distributed—and it could offer an incentive for students to progress more rapidly.

In addition, the Department has engaged in limited, yet important, communications with schools offering CBE. This is a departure from past Department efforts, and it reflects a much greater openness and recognition of the work going on in the field to advance these models. However, the outlook for the success of experimental sites remains unclear.

Institutional Concerns

Interested colleges and universities share concerns in two areas: first, with regard to the specific parameters for the experiments, and second, with regard to whether the Department will broaden its interpretations of CBE, be clear and consistent, and be supportive of innovative institutional practice. The two concerns are related, because the language used in the Federal Register notice announcing the experiment has proven subject to varying interpretations, some of which Department officials attempted to clarify during the convening.

For example, the experimental sites Federal Register notice cited existing concepts that are troubling to institutions seeking to move beyond traditional instruction and the accumulation of time-based credit as a measure of progress. One such concept is "instructional time." Competency-based programs promote learning, but do not necessarily rely only on instruction and many of these programs are trying to move away from time as the primary factor in determining academic progress. The Department's interest in discussing "instructional time" is about calculating student's living expenses, which accrue over time. Without

the concept of "instructional time" it is very difficult to calculate the amount of aid necessary to support a student's living expenses. Although the Department proposed some changes to the experimental sites initiative that were meant to provide greater flexibility, they are subtle and open to interpretation. As a result, colleges and universities lack clarity for disbursement procedures suited to their programs. In terms of how things turn out, the key will be how these other Department officials interpret the phrasing.

The Potential

CBE has received attention among federal policymakers, in part, because the price of obtaining a college degree is rising, completion rates are stagnant, and student population demographics are changing. CBE offers the potential to address these concerns by allowing students to move through programs at their own pace (with encouragement to accelerate progress), providing clear expectations for students, and reducing amounts they would otherwise have to pay. Emerging evidence suggests that competency-based programs could offer clearer, cost-effective pathways and foster creative, flexible approaches to learning that will increase the number of students who are able to affordably prepare themselves for further education and employment. Many competency-based programs incorporate the liberal arts and competency-based degrees are offered at the associate, bachelor's, master's, and doctoral degree levels. There are even some traditional higher education institutions converting their degree and certificate programs to CBE in order to better meet the needs of students, including displaced workers served through U.S. Department of Labor-Administered Trade Adjustment Assistance Community College and Career Training (TACCCT) grant program.

Meeting Structure and Major Themes

Participants heard from Jamie Merisotis, President and CEO of Lumina Foundation; representatives of an array of competency-based programs; Under Secretary of Education Ted Mitchell and key staff representatives of the Education Department; and evaluators from AIR.

The themes that emerged included:

1. *The importance and relevance of this experimentation for achieving national higher education attainment goals;*
2. *The conditions necessary to support more widespread competency-based education offerings;*
3. *Barriers to scaling competency-based education that must be addressed; and*

4. **Ongoing needs to support the development and scaling of effective competency-based models.**

Each theme is highlighted in this summary report.

The importance and relevance of this experimentation for achieving national higher education attainment goals

The nation needs higher education options that promote increased attainment generally and lead to fairer educational outcomes specifically for students of color. During the meeting, Under Secretary Mitchell articulated goals of 1) improving educational quality; 2) increasing attainment of credentials that develop high-demand skills; and 3) reducing the cost and price of postsecondary credentials. The Experimental Sites Initiative would waive certain regulatory barriers in an effort to explore the potential of these programs to affordably serve students from all backgrounds equally well. CBE holds promise as an option for many students, especially those who do not perform well in traditional academic instruction and those with substantial knowledge and experience not gained in an academic setting.
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The conditions necessary to support more widespread competency-based education offerings

An opportunity. Participants understood the Experimental Sites Initiative as an effort to enhance the ability of colleges and universities to offer (at scale) CBE for students seeking college credentials and an opportunity to use federal financial aid to support student enrollment in CBE programs with the achievement of program-level learning outcomes as a key metric.

A safe space. The relationship between interested colleges and universities and the Education Department was collaborative. The Department committed to creating a "safe space" for experimentation that mitigates compliance risks. Department officials recommended that institutions document their actions and inform Title IV auditors of reasons behind any variances from standard practice. The Department also committed to providing auditors with training regarding implementation of the CBE Experimental Sites Initiative.

> One attendee said, "*CBE is new, and the Department of Education has been great at helping us deal with ambiguity... (something we) financial aid directors aren't necessarily terribly good at. … What I am going to take away from this is that it's a safe space. There is room for leniency. It's OK to make mistakes, but we have to go about our work in a responsible way.*"

A mental shift. Department officials acknowledged that developing guidelines for experiments was leading them to think differently about their regulatory work and their approach to problem solving. One federal representative said, "When we talk about these new types of modalities that are not as dependent on the credit-hour, then we need to think differently, and there's a need to ask many, many more questions."

Points of emphasis. Representatives of colleges and universities who shared details of their CBE program structures for the benefit of other institutions, the Department, and regional accreditors noted the following: 1) CBE focuses on how students learn, retain, and use their knowledge—not on how much time they spend in the classroom. 2) CBE programs offer another choice in higher education for students who find that traditional instruction doesn't meet their needs. 3) CBE programs combine state-of-the art curriculum, creative learning opportunities, clear learning objectives, authentic "real-life" assessments, and a full array of support services so that, step by step, students can improve their knowledge, skills, and abilities. 4) Student progress is measured by demonstrating the achievement of competencies, or mastery of required learning, through assessments that are embedded in courses, modules, and other structured learning experiences. Some students will finish more quickly; others will take more time. 5) CBE programs combine state-of-the art curriculum with creative learning opportunities for students. These programs are designed to build knowledge, skills, and abilities around clearly communicated learning objectives. 6) Student learning and achievement is measured using tools that test knowledge, skills, and abilities. These tools, including tests, projects, papers, and clinical demonstrations, are both objective and performance-based to reinforce the rigor and quality of programs. 7) Competency-based programs are especially helpful to students who face barriers to accessing traditional higher education, including family responsibilities, affordability, and the length of time to completion. 8) CBE allows colleges, universities, and other providers to engage students they might not otherwise reach, and it opens doors to new ways of learning. 9) Through more flexible degree options, CBE offers a variety of benefits to students, employers, and colleges and universities. 10) CBE programs give employers a clear picture of what graduates are ready to do when they are hired.

Many models. The first types of competency-based programs were developed more than 50 years ago. Innovative, newer programs are emerging that build upon these models, but they have been modified to meet 21st century higher education needs. Convening participants said they came away with a greater understanding of the many diverse approaches to CBE programming that institutions are taking. Before the convening, 41 percent of meeting participants were "not at all" clear about the differences among CBE programs that institutions were proposing. After the meeting, nearly everyone was very clear or at least somewhat clear. More than 200 institutions across the country, including public and private colleges and universities, community colleges, for-profit universities, and nonprofits, are either offering or have

expressed interest in developing competency-based programs. While it may not be for everyone, this learning model represents a tremendous opportunity to support students looking for different ways to go about receiving their education. Often, these students face barriers to accessing traditional higher education because of family responsibilities, affordability, and the length of time to completion. In emerging CBE programs, faculty members remain at the heart of the learning process. Faculty responsibilities differ across all higher education programs, and faculty play a critical role in CBE by developing curriculum and supporting and evaluating student learning.

Barriers to scaling competency-based education that must be addressed

Institutions and accreditors highlighted a number of challenges to participation.

Initial confusion. Confusion about the objectives of experimental sites, participation requirements, and implementation processes diminished during the course of the convening. The areas in which participants had questions included:

- The types of federal waivers the Department was prepared to make available (for example, the "regular and substantive" faculty interaction requirement is included in Title I and cannot be waived;
- The process for final approvals to participate (representatives of some institutions incorrectly assumed they already had been approved as experimental sites because the Department had included them on an initial list of institutions that federal officials were interested in speaking with further);
- The distinctions among CBE, direct assessment, and prior-learning assessment clarifying that direct assessment[3] is a form of CBE, but not all CBE is direct assessment. Prior-learning assessment (PLA) directly measures what a student has learned previously and is often a part of CBE models. PLA allows students to earn college credit for learning acquired at work or elsewhere. Some competency-based programs measure students' existing knowledge and skills, but most competency-based degree programs do not rely solely on prior learning; and,
- The Department's reporting requirements for participation in CBE experimental sites that will be associated with participation in CBE experimental sites.

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[3] Direct assessment provides flexibility for an institution to provide a mix of direct assessment coursework and credit or clock hour coursework in the same program. 34 CFR 668.10(a), and in the HEA, Sec. 481(b)(4)

After the convening, nearly half of survey respondents said they came away with a clearer understanding of the experimental sites process, including the roles and responsibilities of the Department, of participating colleges and universities, and of the regional accreditors. More than half the participants—64 percent—said they came away with a better understanding of what the experimental sites waivers would allow their institutions to do differently.

Technology barriers. Information technology systems in higher education—from those supporting institutional back-office processes to those at the Department tracking financial aid eligibility and distribution—all assume traditional modes of academic delivery: that is, credit hours, standard academic terms, courses, etc. For institutions participating in the Experimental Sites Initiative and planning to scale CBE programs, technology systems remain a primary barrier. Many questions were raised about the Department's ability to absorb data generated by the sites, particularly in the Common Origination and Disbursement (COD) reporting system.

Similarly, the interoperability of institutional-level systems and new technology solutions capable of better supporting CBE was raised as a barrier to scaling operations. The Technical Interoperability Pilot (TIP), supported by the Gates Foundation and managed by Public Agenda, was cited as a potential pathway for institutions and vendors to collaboratively resolve some of the outstanding technological challenges.

Other agency approvals. Although it did not consume a significant amount of discussion time, approval by other regulators and agencies also was mentioned as a barrier to scaling CBE generally, but not as a barrier to experimental sites participation. Other groups include state higher education boards, the U.S. Department of Defense and the U.S. Department of Veterans Affairs.

Ongoing needs to support the development and scaling of effective competency-based models

Tight vs. loose. A recurring theme emerged regarding the need to balance the freedom to try new things with the need to demonstrate responsible stewardship of tax dollars. The challenge will be to maintain an effective balance, as stated by one participant:

> *What I am afraid of is that one failure screws up the whole deal. We must inoculate against that fear by emphasizing that experiments are experiments. A single failure doesn't mean that CBE is a failure.*

Continuing collaboration. Convening participants were eager to find ways of increasing collaboration among institutions, the Department, and accreditors. One specific recommendation was for the Department and accreditors to consider concurrent (or

overlapping) approval processes rather than the existing sequential processes required for direct assessment and experimental sites.

Need for further clarity. Participants acknowledged the progress made during the convening, but there was still a desire for increased clarity regarding the project's design, definitions of terms, etc. Topics of interest included:

- Unclear terminology: CBE vs. Direct Assessment; or, Direct Assessment vs. PLA.
- Equivalencies of CBE degrees/credentials: The credit hour is better understood, and some wondered how to calibrate the "weights and measures" of CBE programs to ensure transparency and quality.
- Faculty roles: Further clarity is needed regarding what constitutes regular-and-substantive interaction within CBE programs, especially given the enforcement actions of the Department's independent Office of the Inspector General in this topic.
- Quality: What constitutes a quality CBE program?
- What's variable: If learning is constant and time is variable in CBE programs, how is this accomplished while meeting regulatory expectations?

Aid disbursement. Questions regarding federal waivers of law and regulations and acceptable financial aid disbursement practices were raised, including:

- Direct and indirect cost unbundling implications—disbursements of student aid could be made at different times according to an individual's progress in the program, but how is this effectively communicated to students?
- Satisfactory Academic Progress (SAP)—how will the Department approve new policies for measuring and ensuring students make reasonable progress?

Post Convening Survey Findings

In response to a Lumina Foundation post-convening survey, participants said the meeting gave them a better sense of what the Department and higher education institutions want to learn from experimenting with competency-based programs. Many representatives of the colleges and universities said they also gained a better understanding of how the experiments will move ahead, including the Department's expectations; the different types of experiments that institutions were proposing; the Department's evaluation plan; and the issues likely to be explored in a complementary third-party evaluation funded by foundations. One of the 44 participants who responded wrote:

> *I feel that voluntary, supplemental evaluation will provide information on the efficacy of CBE programs beyond the Federal Student Aid (FSA) impacts that will be evaluated by the Education*

Department. Furthermore, I hope that supplemental evaluation will provide greater context in relation to the various implementations of CBE programs across institutions.

Prior to the convening, 51 percent of those who responded had said the Department's expectations and requirements for participation were "not at all clear," but by the time the event ended more than one-third were "very clear" and the other two-thirds were "somewhat clear." The Department's point person for CBE experimental sites, David Musser, Program Specialist for Federal Student Aid's Policy Liaison and Implementation Staff (david.musser@ed.gov), marshaled the Department's resources to respond to questions and take note of questions that would require further investigation.

Three-quarters of convening participants who responded to the post-convening survey indicated they left the meeting with a better understanding of how the Department's ability to waive Title IV laws and regulations could allow their institutions to try new approaches. However the survey indicated that significant confusion remains about how the Department will operate the sites.

A majority of convening participants said they were awaiting further clarification from the Department as a result of questions raised about the roles and responsibilities of the Department, participating colleges and universities, and regional accreditors. Following the convening, on June 2, 2015, regional accreditors provided guidance aimed at clarifying their roles.

A significant number of participants were also still unclear after the convening about how the Experimental Sites Initiative would be used to inform a broad range of stakeholders, including policymakers, about CBE.

Next Steps

Continued engagement. Convening participants stated that the insights they gleaned will inform their work in coming months. They want to continue to focus on ensuring program quality during the experiments, networking to learn more about what is working or not working for students, creating a map of experimental sites, developing an online community, and opening future meetings to other experimental sites**.**

Document the outcomes of CBE. Participants said there is a need for ongoing emphasis on the rigor and quality of CBE programs. One participant said, "It works for the student, now we just need to figure out the rules and regulations so it can work administratively."

Voluntary, third-party evaluation. In the post convening survey, about two-thirds of respondents agreed their institution would benefit from a voluntary supplemental evaluation proposed by Lumina Foundation and the Gates Foundation. One respondent explained, "I feel that voluntary supplemental evaluation will provide more information on the efficacy of CBE programs beyond the federal student aid impacts that will be evaluated by the U.S. Department of Education. Furthermore, I hope that supplemental evaluation will provide greater context in relation to the various implementations of CBE programs across institutions."

Early results suggest these programs work, and a national research agenda is being constructed to ensure that the effectiveness of CBE programs will be rigorously evaluated. The participants agreed a better understanding of what works for different types of students, and under what circumstances, would benefit students, families, employers, and taxpayers.

Following the convening, the Department issued guidance to accreditors and the Council of Regional Accrediting Commissions (C-RAC) issued a joint statement regarding CBE (the statement is attached as an addendum.) Convening participants praised the willingness of Department officials to provide immediate answers to some questions and said they appreciated the Department's commitment to providing responses to unresolved issues. Representatives of colleges and universities also were reassured by the presence of their regional accreditors during the discussions, which occurred at both a high level for policymakers and academic leaders and at a more detailed level for financial aid officers, who sought answers to more specific questions of aid administration, such as how satisfactory academic progress (SAP) would be calculated for students enrolled in CBE programs.

Education Department data collection and independent evaluation information collection and independent evaluation

During the convening representatives of the Department described the information that they planned to collect from institutions participating in the experimental sites. They indicated that participating institutions would be asked to provide qualitative and descriptive evidence about program design and administration, and that Department would implement an analysis of title-IV aided recipients enrolled in CBE programs. This analysis of students receiving Title IV aid who enroll in CBE programs will be based upon data available to the Department in Federal Student Aid data systems (e.g., the Common Origination and Disbursement System); it will principally describe student charges and payments, federal student loan borrowing, progression, and completion for federally aided students in CBE programs; and it will eschew comparisons to non-CBE programs. It will not make comparisons against non-CBE programs

In addition, Lumina and Gates are in discussions with the AIR to field an evaluation that will identify whether and how outcomes for students in CBE programs differ from those for students in traditionally delivered instructional programs. AIR anticipates the evaluation will examine the effects of CBE on three types of outcomes: (a) program completion; (b) learning; and (c) earning.

The research questions will include: 1) Do students who enroll in CBE differ from their peers in similar, non-CBE programs on measures of: time to, and rate of, completion (or their leading indicators); the rate of industry certification or professional licensure; and, wages, measured both at completion and operationalized as change in wage pre- and post-schooling. 2) Do any differences observed vary systematically by student or program characteristics? Data for each question will be principally derived from administrative sources, although these data could be supplemented with student survey data to collect additional information about students that might affect their selection of CBE or non-CBE programs. Program completion data will be based on data maintained by participating institutions and, if needed, the National Student Clearinghouse (NSC). To build evidence related to student learning, AIR will seek to secure data related to student success on industry certification examinations and professional licensing tests. Finally, AIR will use state unemployment insurance system data to calculate post-completion wage (or change in wage) and quantify students' earning gains.

The proposed evaluation implements a quasi-experimental design. AIR anticipates the use of propensity-score matching to achieve comparability between students in CBE and non-CBE programs, attenuating bias associated with self-selection. Matching will be conducted both on the basis of observable characteristics believed to be associated with both students' outcomes and their choice of instructional programs, as well as unobserved characteristics (e.g., student motivation for selecting a CBE program) that can be elicited via a survey. With the guidance of participating institutions, AIR will explore the use of both prospective and retrospective cohorts. The former allows more robust controls in matching models; the latter the possibility of more rapidly observing student outcomes.

In sum, the research project will help the CBE community and external stakeholders understand whether CBE programs work as well as (or better) than traditional academic programs, provide an evaluation model that can be implemented by institutions offering or launching CBE programs, and identify opportunities for the implementation of future evaluations that identify the effects that program design features have on student outcomes.

Appendix

The following materials are included in the appendix:

1. Experimental Sites Convening Agenda
2. Experimental Sites Convening Participant List
3. Common Framework for Defining and Approving Competency-Based Education Programs from the Council of Regional Accrediting Commissions
4. Letter from the U.S. Department of Education to Accreditors

COMPETENCY-BASED EDUCATION:
EXPERIMENTAL SITE DESIGN AND EVALUATION
April 7-8, 2015

Objectives

- Develop a shared understanding of competency-based models that could be tested.
- Determine what the Department and colleges and institutions want to learn through well-structured experiments that address statutory and regulatory obstacles to Title IV support for competency-based programs.
- Foster communication necessary to effectively promote responsible innovation.
- Explore approaches to generating knowledge about competency-based programs that informs a broad range of stakeholders, including policymakers.
- Establish a clear understanding of the experimental sites process, including roles and responsibilities of the Department, participating colleges and universities, and regional accreditors.

Wireless Internet Information

Username: Lumina Foundation
Password: Goal2025

Tuesday, April 7, 2015

11:30 am EDT *The Loews Madison* *Mount Vernon Foyer, 2nd Floor*	**Registration**
12:00 pm *Adams Room, 2nd Floor*	**Lunch**
12:45 pm	**Welcome** **Jamie Merisotis**, President and Chief Executive Officer, *Lumina Foundation*
1:00 pm	**Convening Overview** **Alison Kadlec**, Senior Vice President, *Public Agenda* **Amy Laitinen**, Director, Higher Education Policy, *New America Foundation* • The Prologue • Convening Objectives • Agenda Review • Key Introductions

1:30 pm	**Overview: Competency-Based Programs**
	Thomas Weko, Managing Researcher, Education Program, *American Institutes for Research*
	Deborah Bushway, Competency-Based Education Consultant
	
	• Summary of Pre-Convening Survey Findings
	• Moderated Panels
	    o Panel One: Curricula, Student Supports, and the Student Experience
	    o Panel Two: Assessment, Alignment, and Performance Measurement

3:30 pm	**Break**
3:45 pm	**Education Department Update**
	Paul LeBlanc, Senior Advisor to the Under Secretary, *U.S. Department of Education*
	• Review of Ex-Sites Process
	• Update on New Developments
	• Identify High-level Experimental Sites Issues
	• Commit to Delivering Responses
5:00 pm	**Break**
6:00 pm *Montpelier Room, 2ⁿᵈ Floor*	**Reception and Dinner**

Wednesday, April 8, 2015

8:00 am *Mount Vernon, 2ⁿᵈ Floor*	**Breakfast and Recap**
	Alison Kadlec, *Public Agenda*
	Amy Laitinen, *New America Foundation*
8:15 am	**Deep Dive into Financial Aid Issues**
	Moderator: Amy Laitinen, *New America Foundation*
	Jeff Baker, Director, Policy Liaison and Implementation, *U.S. Department of Education*
	David Musser, Program Specialist, *U.S. Department of Education*
10:15 am	**Break**
10:30 am	**The Department's Evaluation of Experimental Sites**
	Moderator: Tom Weko, *American Institutes for Research*
	David Musser, *U.S. Department of Education*
	Marsha Silverberg, Economist, Institute of Education Sciences, *U.S. Department of Education*
	• What the Department Wants to Know
	• How the Evaluation Will Be Structured
11:00 am	**Is There a Role for Further Evaluation in Advancing Competency-Based Education?**
	Facilitator: Deborah Bushway, Consultant
	Matthew Soldner, Senior Researcher, *American Institutes for Research*
	Thomas Weko, *American Institutes for Research*
	• What Do You Need to Learn About Your Program Through Rigorous Evaluation?
	• What Evidence Do You Believe External Stakeholders Must Have to Create a Supportive Policy Environment?
	• What Data Are Available—or Could Be Developed—to Build the Evidence Base?
	• What Are the Potential Benefits of Participating in a Deeper, Voluntary Evaluation?
12:30 pm	**Lunch**

1:00 pm	**Launching Experimental Sites: A Federal Priority**
	Ted Mitchell, Under Secretary, *U.S. Department of Education*
	Paul LeBlanc, *U.S. Department of Education*

2:30 pm	**Institutions Reflect on What They Have Heard**
	Alison Kadlec, *Public Agenda*
	Mike Offerman, Consultant, *Lumina Foundation*

| 3:15 pm | **Working Relationships** |
| | **Paul LeBlanc**, *U.S. Department of Education* |

- How the Department Will Manage the Sites
- Remaining Questions
- Further Communications

3:45 pm	**Final Thoughts, Next Steps, and Closing Comments**
	Alison Kadlec, *Public Agenda*
	Amy Laitinen, *New America Foundation*

| 4:00 pm | **Adjourn** |

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Council of
Regional Accrediting Commissions

For Immediate Release: June 2, 2015

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Higher Learning
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HLC

Northwest Commission
on Colleges and
Universities
NWCCU

Southern Association
of Colleges and
Schools
Commission on
Colleges
SACSCOC

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Junior Colleges,
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WASC Senior College
and University
Commission
WSCUC

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

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.

Statement of the Council of Regional Accrediting Commissions (C-RAC)

Framework for Competency-Based Education

The seven regional accrediting commissions share a common understanding of terms used to define competency-based education and competency-based education's most recent application in programs that use direct assessment as the means of measuring and recognizing student learning.

<u>Definition</u>

In general, competency-based education (CBE) is an outcomes-based approach to earning a college degree or other credential. Competencies are statements of what students can do as a result of their learning[1] at an institution of higher education. While competencies can include knowledge or understanding, they primarily emphasize what students can do with their knowledge. Students progress through degree or credential programs by demonstrating competencies specified at the course and/or program level. The curriculum is structured around these specified competencies, and satisfactory academic progress is expressed as the attainment or mastery of the identified competencies. Because competencies are often anchored to external expectations, such as those of employers, to pass a competency students must generally perform at a level considered to be very good or excellent.

<u>Structure</u>

Competency-based education has two principal approaches:

1. A course/credit-based approach, and
2. A direct assessment approach.

In a <u>course/credit-based approach</u>, the demonstration of competencies is embedded into a conventional curriculum comprised of courses to be completed to earn credits toward a degree or credential. Course/ credit-based programs generally enroll students in traditional academic terms and award credits for courses successfully completed. Students may accelerate their learning and they receive credit for the course when they have demonstrated mastery of the competencies by passing a summative assessment. Institutions may elect to create two academic transcripts, one that displays the credits earned (and grade point average or GPA) and one that specifies the competencies attained.

<u>Direct assessment</u>, a term used by the U.S. Department of Education, represents a subset of competency-based education, one that is not based on semesters (or academic terms) or credits. The direct assessment approach thus disregards conventional courses and bases both the evaluation of student achievement and the award of a degree or credential solely on the demonstration of competencies. Direct assessment programs allow students to proceed at their own pace rather than to progress through courses offered in a traditional academic term. Because conventional

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[1] Students who are awarded credit or advanced into a program based on demonstrated knowledge or competencies attained before enrollment as identified through a prior-learning assessment (PLA)

grades are not assigned and no term length is imposed, the transcript reflects competencies attained rather than grades or credit hours earned. As with all competency-based education, students are expected to demonstrate the competency at a high level of achievement. Students demonstrate the competencies while they are enrolled in the program; transfer credit or prior learning assessment is not permitted in direct assessment programs or in the direct assessment portion of a "partial direct assessment" program. Direct assessment programs establish "credit-hour equivalencies" for the student learning outcomes they evaluate and may choose to provide a transcript indicating course/ credit equivalencies in addition to the competency transcript.

Accreditors will expect institutions, in establishing credit-hour equivalencies, to:

1. Draw upon their previously defined policies for the credit hour (consistent with federal regulation); and
2. Focus on the amount of learning that has occurred rather than the time component of learning.

A third, hybrid approach, combines the course-based approach and the direct assessment approach. Hybrid programs allow students to complete a degree or credential through a combination of direct assessment of competencies and credit hours.

Approval of a Competency-Based Education Program by the Accrediting Agency

Course/credit-based programs: The first time an institution offers a credit-based CBE program, it must be approved by its regional accreditor as a substantive change; the accreditor will then provide guidance about the submission of future CBE programs for approval. An accreditor will consider a program to be competency-based 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 (i.e., any instructor teaching a course will teach it as a competency-based course) and each student is required to demonstrate mastery of every competency in a course to earn credit for such course.

Direct assessment programs: Because a degree/credential is awarded only on the basis of the attainment of competencies and not on the award of credit, per federal regulations, direct assessment programs must be approved by the accreditor. Therefore, institutions proposing to offer direct assessment programs must submit their plans to their accrediting agency for approval prior to implementation. Federal regulations require accreditors to incorporate into their substantive change review an assessment of the sufficiency of faculty resources to support the program, including the qualifications of instructional staff[2]. In addition, the federal regulations require accreditors to evaluate and approve the institution's methodology for determining the credit hour equivalence of the direct assessment measures.

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[2] Institutions that disaggregate the faculty roles (e.g., as subject matter experts, mentors, coaches, assessors) 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.

Hybrid programs: When an institution proposes to offer a program 50% or more of which can be completed via direct assessment (as defined above), it must submit its plans for approval as a substantive change prior to implementation.[3]

Institutions are directed to their regional accreditor for specific substantive change policies and guidelines and application directions.

Evaluation Considerations: In evaluating competency-based and direct assessment programs, regional accreditors will include the following considerations:

1. Whether the institution demonstrates the capacity to offer competency-based or direct assessment programs, including administrative capacity and significant expertise in assessment that will ensure the reliability and validity of the assessments.
2. Whether most of the proposed learning outcomes emphasize performance, not simply knowledge.
3. Whether proposed competencies are externally referenced (e.g., referenced by convened groups of employers, professional advisory committees, or licensure requirements).
4. Whether the institution ensures "regular and substantive interaction" with faculty, as defined by the Department of Education, and appropriate services for students.
5. Whether the institution demonstrates that the competencies for a degree cohere to the claims that the institution makes for the qualifications of graduates, including at the undergraduate level those qualifications traditionally associated with general education and the major or concentration.
6. Whether the institution demonstrates that the level and complexity of the competencies are congruent with the achievement expected at a particular degree level (e.g., a competency in oral presentation skills for a B.S. in management is demonstrated at the baccalaureate level).
7. The quality of demonstration of the competence is judged to be at or near the 'excellent' range for each competency.
8. Whether a student must demonstrate each relevant competency in order to earn the degree or certificate.
9. The institution follows good practices in assessment and measurement (e.g., determines reliability and validity and has multiple forms or prompts for each competency).
10. Whether a high proportion of the proposed competencies represent authentic demonstrations.
11. 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 (e.g., licensure passage rates, earnings of graduates, feedback from employers who helped articulate the desired competencies).

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[3] The Department of Education also requires accreditor approval for any partial direct assessment program. Institutions should check with their accreditor regarding specifics.

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

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

Role of Accrediting Agencies in Experimental Sites

Overview

In recent years, competency-based education (CBE) programs have received a significant amount of attention in the postsecondary education community. Competency-based education is an evolving delivery model and while there is not yet any widely agreed upon taxonomy of programs or agreed upon nomenclature, generally, CBE programs have very clear claims for student learning, stress what students *can do* with the knowledge and skills they acquire, and have assessments that provide measurable evidence of competency. Student progress is determined by mastery of each competency.

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. These waivers are intended to help institutions more effectively implement CBE programs, while providing the Department with an opportunity to understand the process by which institutions conceive, develop, and operate those programs.

The Experiments

On July 31, 2014, the Department published a *Federal Register* notice inviting institutions to apply to participate in one or more of four new experiments under the ESI. Two of those experiments, "Competency-Based Education" and "Limited Direct Assessment," apply specifically to CBE programs.

The Competency-Based Education experiment provides waivers and modifications to the requirements for disbursement of Title IV aid in CBE programs to permit an institution to disburse Title IV aid in two separate "streams": payments for direct costs (tuition, fees, and books/supplies) and indirect costs (living expenses), since those costs may not occur at the same time. The experiment also waives Return of Title IV aid requirements and modifies satisfactory academic progress rules to better align with CBE programs.

The Limited Direct Assessment experiment provides two different waivers. Under that experiment, institutions may provide Title IV aid to students in a direct assessment program that measures student progress using both direct assessment and credit or clock hours – referred to in this letter as a "hybrid direct assessment program" – and institutions may provide Title IV aid to students for remedial coursework offered using direct assessment.

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.

The Role of Accrediting Agencies

An accrediting agency is expected to perform some activities to ensure the quality of the institution's approach to CBE before the institution provides Title IV aid to students in the institution's CBE programs. In addition, in order for an institution to include an educational program in either the Competency-Based Education or the Limited Direct Assessment experiment, the institution is required to provide documentation to the Department that its accrediting agency has performed those activities. The documentation required will depend on whether the program is a course/credit CBE program or a direct assessment program.

In general, the Department expects that *the first time an institution offers a CBE program*[1], the institution's accrediting agency would have performed a substantive change evaluation (which could have occurred during the institution's reaccreditation) of, generally, the institution's design and implementation of CBE programs. Such an evaluation, for purposes of the Competency-Based Education and Limited Direct Assessment experiments, must ensure:

- That the institution's assignment of credit hours or credit hour equivalencies for the competencies in its CBE programs conforms with general practice in higher education; and

- That the institution is devoting sufficient faculty and other resources to its CBE programs and to the students enrolled in those programs, and that the program includes policies and procedures for meeting the requirement for "regular and substantive interaction" between students and instructors.

For purposes of these experiments, there are two important considerations for accrediting agencies to consider 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

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[1] The Department does not expect agencies to retroactively conduct full substantive change evaluations for previously-approved CBE programs, but does expect, for purposes of the ESI, that institutions provide agency documentation that the aspects of the program discussed in this guidance have been reviewed.

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: The term "regular" means periodic and can be broadly interpreted, but 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.

The term "substantive" can also be broadly interpreted, but refers 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, but is not limited to, 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. We would note, however, that accrediting agencies have long asserted a faculty role in designing assessment and an ongoing role in monitoring the efficacy of those assessments and making improvements when necessary. This might occur as a result of periodic reviews of assessment, occasional auditing or sampling of completed assessments and grading, or some other form of monitoring that satisfies the accrediting agency that faculty are appropriately involved in ensuring the efficacy of assessments.

The remaining actions required to be performed by institutions' accrediting agencies for the ESI are program-specific, and differ depending on whether the program under consideration is a course/credit CBE program or a direct assessment program.

Course/Credit CBE Programs

For the ESI, an agency must include a course/credit CBE program in the institution's grant of accreditation and must specifically recognize the educational program as a CBE program. For the ESI, there is no requirement for a site visit, nor is a full substantive change evaluation of each individual CBE program required as long as the agency has already approved at least one CBE program for the institution. The "recognition" requirement could be fulfilled by a substantive change evaluation that included a review of the CBE program, or if the CBE program was specifically included in the agency's last renewal of accreditation. CBE program recognition could involve a staff-level paper review process.

Direct Assessment Programs

For the ESI, an agency must specifically approve programs that are offered wholly through direct assessment or "hybrid" direct assessment programs where 50% or more of the program can be completed via direct assessment. For these programs, the agency must also review and approve the institution's claim of each program's equivalence in terms of credit or clock hours. The requirements for documentation of these reviews are described in detail in Dear Colleague Letter GEN 13-10. The Department expects the agency to conduct a substantive change evaluation for these programs.

Hybrid direct assessment programs where less than 50% of the program can be completed using direct assessment must be included in an institution's overall grant of accreditation. Such programs must be specifically recognized as CBE programs, and an agency must have evaluated and approved the institution's general approach for determining the equivalence of the institution's direct assessment coursework and credit or clock hours. There is no requirement for a site visit or a full substantive change evaluation of each individual hybrid direct assessment program in which less than 50% of the program can be completed using direct assessment.

Documentation Requirements for Participating Institutions

To begin participating in either of the experiments, an institution will need to provide documentation of its accrediting agency's activities. The documentation required depends, in part, on the type of CBE program that the institution offers.

To include a course/credit or a direct assessment program in either of the experiments, an institution must provide documentation to the Department that its accrediting agency has evaluated its general approach to CBE.

To include a course/credit CBE program in either of the experiments, an institution must provide documentation to the Department that its program(s) are recognized as CBE programs by its accrediting agency (to include the specific elements related to the institution's approach to CBE as stated in the "Overview" above) and are included in the institution's grant of accreditation.

To include a direct assessment program in either of the experiments, the institution must provide documentation to the Department that:

- For a program where 50% or more of the program can be completed using direct assessment, the program and the institution's claim of equivalence in terms of credit or clock hours has been approved by the institution's accrediting agency; or

- For a program where less than 50% of the program can be completed using direct assessment, the program is included in the institution's grant of accreditation, and the program is recognized as a CBE program by its accrediting agency.

Chart of Required Documentation

Type of Program	Documentation Required from Participating Institutions		
Course/Credit CBE Program	Agency's evaluation of institution's approach to CBE	Program's inclusion in institution's grant of accreditation	Agency's recognition as a CBE program
Direct Assessment Program - 50% or more	Agency's evaluation of institution's approach to CBE	Agency's approval of DA program and clock/credit hour equivalency	
Direct Assessment Program - less than 50%	Agency's evaluation of institution's approach to CBE	Program's inclusion in institution's grant of accreditation	Agency's recognition as a CBE program