Competency-Based and Direct Assessment Programs

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Agenda

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What are Competency-Based Education and Direct Assessment?

Competency-Based Education

- There is no Federal definition for competency-based education (CBE) in general

- Typical characteristics of CBE programs:
  - Organize academic content by competency, rather than more traditional methods, such as by course
  - Measure a student's academic progress by assessing learning outcomes, typically on the basis of mastery of a defined set of competency standards

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Competency-Based Education

- CBE programs have been in existence for many years
- In recent years, new models of CBE have emerged:
  - Instruction delivered to students who are separated from faculty
  - No set class sessions, which allows students to work according to their own schedules
  - Multiple faculty perform roles that a single instructor may have performed in the past (curriculum design, assessment, instruction, etc.)

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CBE and Direct Assessment

- For Federal purposes, there are two types of CBE programs:

  - Direct assessment CBE programs

  - Credit- or clock-hour CBE programs

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Direct Assessment Programs

Direct assessment programs:

- Do NOT measure student progress using credit- or clock-hours, but instead use credit- or clock-hour equivalencies for the purpose of calculating Title IV aid

- Measure student progress solely by assessing whether a student can demonstrate command of a specific subject, content area, skill, or quality

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Direct Assessment Programs

- Each direct assessment program must be approved by the institution's accrediting agency and the Department

- Each program's credit equivalency must also be approved by the institution's accrediting agency

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Direct Assessment Programs

- Programs must be offered 100% using direct assessment-- no portion of a program may be measured using credit- or clock-hours

- Exception: although Title IV funds may not be used to pay for remedial coursework (as described in §668.20) offered by direct assessment, remedial instruction that is offered in credit- or clock-hours in conjunction with a direct assessment program is Title IV-eligible

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Credit/Clock CBE Programs

Credit- or clock-hour CBE programs:

- Measure student progress using credit- or clock-hours, and are subject to Federal definitions for credit- or clock-hours

- Do not need program-specific approval from accrediting agencies or the Department unless otherwise required for a new program

Credit/Clock CBE Programs

- May be offered partially through traditional coursework and partially through competency-based coursework as long as all student progress is measured using credit- or clock-hours

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Establishing Credit-Hours and Equivalencies

Establishing Credit-Hours

- Credit-hour CBE programs are not required to use structured class sessions, but institutions must ensure that students are expected to complete an adequate amount of academic activity for each Title IV credit-hour

- An institution's policies for establishing credit-hours for a CBE program must also meet all requirements and standards set by the institution's accrediting agency

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Credit Hour Definition

- 34 CFR 600.2: Each credit hour must include an amount of expected academic activity that reasonably approximates not less than:

  - Approximately 45 hours of academic activity for one semester or trimester hour; or

  - Approximately 30 to 36 hours of academic activity for one quarter hour

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Credit/Clock Equivalencies

- Direct assessment programs do not measure students' progress using credit-hours, and are not subject to the requirements in the Federal definition of a credit hour

- Therefore, in direct assessment programs, students may receive credit for Title IV purposes after engaging in sufficient academic activity to be able to achieve the required learning outcome

Credit/Clock Equivalencies

- To be eligible for a Title IV Direct Loan, the student must have indicated a commitment to engage in the equivalent of half-time enrollment for the loan period

- Credit- or clock-hour equivalencies are used to ensure that the amount of learning in a direct assessment program is equivalent to the amount of learning in a traditional version of the program, thus assuring the appropriate amount of Title IV aid is disbursed

Credit/Clock Equivalencies

- Institutions providing direct assessment programs must provide a "factual basis," satisfactory to the Secretary, for its claim that the program or portion of the program to be funded under Title IV is equivalent to a specific number of credit- or clock-hours

- An institution's accrediting agency must also approve its claim of equivalency to credit- or clock-hours

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Credit/Clock Equivalencies

- A direct assessment program's credit- or clock-hour equivalencies are used for all aspects of determining a student's eligibility for Title IV aid, including:

  - Program eligibility
  - Enrollment status
  - Satisfactory academic progress

Equivalency Example

- The chart to the right shows one way an institution could develop equivalencies for a direct assessment program

- *Note: while intended to illustrate this approach, this example does not include the level of detail that the institution would need to provide to establish a factual basis for its claim of credit- or clock-hour equivalency*

Traditional Course	Credit Hours	Competency	Credit Equivalent
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	**13**	*Total*	**13**

Prior Learning Assessment

Prior Learning Assessment

- Many institutions provide academic credit based on "prior learning assessment," where a student is given the opportunity to display learning gained through past instruction or experience

- There is no prohibition on prior learning assessment in Title IV-eligible programs, including CBE programs

Prior Learning Assessment

- However, hours earned solely through prior learning assessment – without any instruction at the school – may not be included in determining Title IV eligibility

- Credit- or clock-hours that are awarded solely on the basis of prior learning may not be included in a student's:
  - Enrollment status (in a term-based program)
  - Completion of the credit or clock-hours in a payment period (in a non-term program)

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Prior Learning Assessment

- For satisfactory academic progress purposes, credit- or clock-hours earned solely through prior learning assessment are treated the same way as transfer credits. Prior learning credits:

    - Must be treated as both attempted and completed when performing the quantitative evaluation of the student's progress; and

    - Must be accounted for when determining whether the student has completed the program within the maximum timeframe

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Prior Learning Assessment

- CBE programs are often designed to help students build on prior knowledge and skills, and involve forms of prior learning assessment

- Institutions offering CBE programs must have a process for differentiating credits earned solely through prior learning and credits earned on the basis of coursework or instruction at the institution

Prior Learning Example

- An institution requires students beginning a competency in statistical analysis to take a "pre-test" before beginning work on the competency

- The pre-test is designed to ascertain the areas where the student is already proficient, and areas where the student needs work

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Prior Learning Example

- If a student takes the pre-test and displays full mastery of every aspect of the competency, the institution considers the student to have demonstrated the competency and the student receives full credit toward completion of the program

- However, the credit-hours or equivalencies associated with that competency do NOT count toward the student's Title IV enrollment status

Regular and Substantive Interaction

Regular and Substantive Interaction

- All Title IV eligible programs, except correspondence programs, must be designed to ensure that there is regular and substantive interaction between students and instructors

- CBE programs that do not include regular and substantive interaction between students and instructors are considered to be <u>correspondence programs</u>

Regular and Substantive Interaction

- Interactions that occur only upon the request of the student (either electronically or otherwise) are not considered regular and substantive interaction

- Interactions are considered to occur "regularly" if the program is designed to ensure that they occur on a predictable and regular basis

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Regular and Substantive Interaction

- Interactions are considered "substantive" if they are:

  - Substantial (i.e. more than just a grade) and relevant to the academic subject matter in which the student is engaged

  - Provided by a faculty member who meets accrediting agency requirements for instruction in the subject matter under discussion

Regular and Substantive Example

- An institution's CBE program does not necessarily include regular classes, but could meet the requirements for "regular and substantive interaction" by requiring, for example, one or more of the following:

  - Student attendance at weekly faculty-supervised discussion groups
  - Regular faculty-initiated conversations with students
  - Regular submissions of assignments where faculty provide substantive, written feedback

Regular and Substantive Interaction

- **An institution that considers its CBE programs to be offered using distance education must document how each program's design meets the requirement for regular and substantive interaction**

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Educational Activity in a Week of Instructional Time

Definition of a Week of Instruction

- The requirement for weeks of instruction is not the same as the requirement for regular and substantive interaction

- The Department does not consider an institution to be offering a week of instruction if academic resources and faculty are not available to students during the week

- There is no requirement that the institution be able to document that each student is engaged academically for every week of instructional time

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Definition of a Week of Instruction

- The regulations at 34 CFR 668.3(b) define a "week of instructional time" as a consecutive seven-day period in which in which at least one day of instruction or examinations occurs

- The Department interprets the regulation, as applied to CBE programs, to mean that students are expected to engage in academic activity each week and that the instructional materials and faculty support necessary for them to do so are available for every week of instructional time

Definition of a Week of Instruction

- If instructional services supporting educational activity are not offered at any time during a seven-day period, that week would not count toward:

  - The institution's definition of a payment period
  - The institution's definition of an academic year
  - Minimum program length requirements in 34 CFR 668.8

Types of Educational Activities

- For all CBE 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

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Types of Educational Activities

- For all CBE programs, "educational activity" includes (but is not limited to):

  - 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; and

  - Participation in faculty-guided independent study

  - For direct assessment programs only, development of an academic action plan developed in consultation with a faculty member

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Academic Calendars

Academic Calendars for CBE

- When the institution builds its academic calendar, it must ensure that each week included provides the education resources and faculty availability required for instruction

- It is important that the institution has clearly documented the weeks of instruction for the CBE program as weeks without instruction cannot be included in the academic calendar

Academic Calendars—Term-Based

- For a term-based program, work associated with mastery of competencies must start and end within the term

- Many CBE programs are self-paced and may be difficult to fit into a term-based calendar

- Institutions often use subscription periods to assess tuition charges for term-based CBE programs

Academic Calendars—Term-Based

- If students are not required to complete competencies within the term, the program must be treated as a non-term program

- If students are allowed to begin new competencies so late in the term that it is not reasonable to expect that the competencies can be completed by the end of the term, the program does not meet the requirements of a term-based program

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Academic Calendars—Non-Term

- Non-term academic calendars provide flexibility for self-paced programs, allowing students to begin and complete competencies without a set schedule

- Institutions also sometimes use subscription periods to assess tuition charges for non-term CBE programs

Academic Calendars—Non-Term

- Payment period ends after student completes the weeks and demonstrates mastery of the competencies equal to the required number of credit- or clock-hours in the payment period

- Payment periods are half the weeks and half the competencies equal to the required number of credit- or clock-hours in the program's definition of academic year

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Academic Calendars—Challenges

- Many institutions have found that CBE programs pose challenges for existing computer systems

- Some institutions have created different academic calendars for CBE programs rather than conform to the institution's standard academic calendar

- Institutions should consider whether their computer systems are capable of supporting alternate academic calendars

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Academic Calendars—Term-Based

- ABC University has a credit-hour BS in Accounting program taught via CBE methods and charges students using a six month subscription period

- Students can complete any number of competencies during the subscription period for a fixed tuition charge

- ABC U has defined the academic year as 48 weeks and 24 semester credit-hours, with nonstandard terms that are 24 weeks in length; full time is 12 credit-hours/term

Academic Calendars—Term-Based

- ABC U uses standard semesters for non-CBE programs
- The institutional computer system does not have the capability to track multiple calendar types, so alternate methods are used for the CBE program
- The nonstandard term is the payment period, which coincides with the subscription period

Academic Calendars—Term-Based

- ABC U assumed that students would want to accelerate pace and would all be at least full time, but the majority of the students are working adults and not able to attend full time

- The school needs to determine at the beginning of each term what each student's enrollment status will be

- If students do not begin work in enough competencies to equal to the credit equivalencies used for the enrollment status, Pell Grant must be adjusted

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Academic Calendars—Non-Term

- XYZ University creates a direct assessment program leading to a BS in Homeland Security

- Program is non-term and the academic year is defined as 30 weeks and 48 competencies (XYZ has established that two competencies are equivalent to one semester credit-hour)

- Payment periods are at least 15 weeks and 24 competencies; both weeks and competencies must be completed to complete the payment period

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Academic Calendars—Non-Term

- XYZ U charges tuition using a six month subscription period
- Students can begin the program at the beginning of any month
- Not all students will work quickly enough complete 24 competencies within six months, so additional tuition charges may occur prior to the beginning of the next payment period and the student's COA for the payment would increase

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Return of Title IV Funds

Return of Title IV Funds

- Both direct assessment CBE programs and credit- or clock-hour CBE programs must follow the R2T4 requirements

- Institutions must define the process for official withdrawals in the context of the CBE program

- Institutions must be able to identify unofficial withdrawals

Return of Title IV Funds—Terms

- Because many CBE programs are extremely flexible, a student may complete the work related to a competency in less than the length of the term, so the time working on a competency is considered a module for R2T4

- Module begins when student begins work on a competency and ends when student demonstrates mastery of the competency

- Institution must have a way to determine and document student has begun attendance in payment period by working on one or more competencies

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Return of Title IV Funds—Terms

- When student demonstrates mastery or ceases enrollment in all competencies without beginning new competencies during payment period or period of enrollment, institution must follow R2T4 requirements applicable to modules to determine if withdrawal has occurred

- For more information on this process, attend Session 34: R2T4 and Credit-Hour Programs

Return of Title IV Funds—Terms

- If the competencies in a term-based CBE program do not have specified start and end dates, and students are enrolled to complete as many as they can during the term, students are considered to be scheduled to attend entire term

- Calendar days counted for R2T4 calculation exclude scheduled breaks of five days or more and days when student is not enrolled in any competency/module during the term

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Return of Title IV Funds—Terms

- Example: John is enrolled in the CBE program at ABC U and officially withdraws from the program during a term

- When John withdrew, he was enrolled in 12 credits and had mastered five credits worth of competencies

- The subscription period and the payment period coincide and John had paid for the entire subscription period, so ABC U considers John to have been scheduled to attend for the full term/subscription period

Return of Title IV Funds—Terms

- The competencies in ABC U's CBE program can be taken consecutively or concurrently, and there is some variation possible in the order in which students take the competencies

- Each competency is equivalent to one credit in this CBE program

Return of Title IV Funds—Terms

John's Progress During Term	# of Competencies Started	# of Competencies Mastered	Total Competencies Completed in Term
Week 1	1	0	0
Week 3	1	0	0
Week 4	0	1	1
Week 7	2	0	1
Week 8	0	1	2
Week 9	1	0	2
Week 10	0	1	3
Week 11	2	2	5

Return of Title IV Funds—Terms

- John officially withdrew at the end of week 11, leaving two competencies he had started but not mastered

- The days in the term are used to calculate the amount of the return

- There are no scheduled breaks of five days or longer during the term and there were no breaks in John's enrollment

- John withdrew on day 76 of the 168 days in the nonstandard term

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Return of Title IV Funds—Terms

- Same example, but an unofficial withdrawal
- ABC U is "attendance taking" for the CBE program
- The institution considers that an unofficial withdrawal has taken place when a student fails to participate in an educational activity for 14 days
- The LMS software tracks student activity and reports run on a daily basis provide information for students who have not engaged in educational activities for 7 or more days; coaches contact students who haven't been active

Return of Title IV Funds—Terms

- John's last educational activity is on May 10

- After seven days of no activity, an academic coach contacts John; coach leaves messages for John, but John doesn't respond

- On May 24, the institution determines that John has unofficially withdrawn; that is the date of determination

- The last day of attendance is May 10 and is used for the date of withdrawal in the R2T4 calculation

- Scheduled end date is the last day of the term

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Return of Title IV Funds—Terms

- Another example: Eleanor is enrolled at ABC U and needs only nine credits to complete the CBE program

- During her last term of enrollment, Eleanor works very quickly and demonstrates mastery of all the competencies associated with the nine credits in 10 weeks

- Because Eleanor was scheduled to attend for the full term, an R2T4 calculation is required to determine how much of the aid she received was earned in 10 weeks

Return of Title IV Funds—Non-Term

- For a **non-term** CBE program, institution must establish a policy for determining the timeframe a withdrawn student would have needed to complete the payment period or period of enrollment

- See *Percentage of Title IV aid earned for withdrawal from a credit-hour non-term program*, *FSA Handbook 2015-16,* Volume 5, Chapter 1

Return of Title IV Funds—Non-Term

- Example: XYZ U student officially withdraws from the direct assessment program during the payment period that began at the beginning of March

- Student had demonstrated mastery of two competencies after four weeks of work

- XYZ U's policy extrapolates to determine when the student would have completed the payment period based on the rate of completion of competencies in the payment period prior to withdrawal

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Return of Title IV Funds—Non-Term

- XYZ U makes available instructional resources and faculty Monday through Friday, every week of the year, with no breaks greater than four consecutive days

- Student completed two competencies in four weeks (4 weeks x 7 days/week = 28 days)

- Payment period consists of 24 competencies and a minimum of 15 weeks

- 28 days/2 competencies = 14 days/competency

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Return of Title IV Funds—Non-Term

- 24 competencies x 14 days/competency = 336 days to complete payment period for purposes of R2T4 calc

- Note: if the number of days calculated is less than the definition of the payment period, the length of the defined payment period is used

- Example: Payment period is a minimum of 15 weeks; 15 weeks x 7 days/week = 105 days

- If extrapolation calculation yields a projected completion timeframe of less than 105 days, 105 days is used

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Satisfactory Academic Progress

Satisfactory Academic Progress

- Both the qualitative and quantitative components of the satisfactory academic progress (SAP) requirements must be applied for all types of CBE programs

- If program does not use standard grading measures (i.e., A, B, C, D, F), qualitative measure may be satisfied if completion of a competency requires equivalent of "C" or above

Satisfactory Academic Progress

- If CBE program is measured in credit-hours, or direct assessment program uses credit-hour equivalencies, institution must evaluate pace using requirements for credit-hour programs in 34 C.F.R. § 668.34(a)(5) and (b)

- Pace in credit-hour program is calculated by dividing cumulative credit-hours successfully completed by cumulative credit-hours attempted

- Institution must define what constitutes attempting a competency in CBE program

Satisfactory Academic Progress

- Example: XYZ U's SAP policy for its direct assessment program requires students to demonstrate mastery of competencies at a level equivalent to a grade of A

- If students do not demonstrate mastery, they must continue working on the competency until mastery is demonstrated; students have either the equivalent of a 4.0 cumulative GPA or 0.0 GPA

- Program length is 48 months (four years); maximum time frame for completion is six years

Satisfactory Academic Progress

- Pace requirement is 67%
- Student is considered to have attempted a competency after opening the course materials for the competency in the learning management system (LMS)
- Sam begins the BS in Homeland Security direct assessment program in January
- At the end of 26 weeks, Sam has demonstrated mastery of 20 competencies

Satisfactory Academic Progress

- At the SAP evaluation point, Sam has attempted 30 competencies, but completed only 20 for a pace of 20/30=67%

- Sam has met the SAP standards

- Note: non-term credit-hour (or direct assessment credit-hour equivalency) programs may set their SAP evaluation points using the guidance provided for clock-hour programs in Electronic Announcement (EA) published 6/6/2011

Direct Assessment Applications

- Regulatory requirements: 34 C.F.R. 668.10(b)

- Application process: described in DCL GEN 13-10

Direct Assessment Applications

- Two parts to the application:
  - Narrative application submitted to CaseTeams@ed.gov, including accreditor documentation, and
  - Electronic Application to Participate (E-App)

- Application reviewed by a special workgroup and by School Participation Division with oversight for institution

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Resources

- Direct assessment regulations: 34 C.F.R. § 668.10
- Direct assessment application instructions: DCL GEN 13-10, March 19, 2013
- Competency-Based Education Programs—Questions and Answers: DCL GEN 14-23, December 18, 2014
- *Federal Student Aid Handbook*, 2015-16, Volume 2, Chapter 2

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QUESTIONS?

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