COLLO

The Coalition Of Lifelong Learning Organizations

Prior Learning, Assessment & Recognition

COLLO Symposium
October 7, 2013

American Council on Education, Host
1 DuPont Circle
Washington, DC

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The Coalition of Lifelong Learning Organizations (COLLO) was started decades ago as a coalition of organizations working to advance adult and lifelong learning. We have brought together leaders of these organizations to advance knowledge, find common ground, and take collective action to benefit adult learners in areas like access, cost, and removal of barriers to participation in education at all levels.

With the growing importance of adult and continuing education to the United States, COLLO provides a forum for:

- exchanging information among member organizations
- building cooperation and collaborative action among member organizations
- developing, maintaining, and improving lifelong learning, adult, and continuing education throughout the United States and internationally
- reviewing new adult and continuing education programs, national policy, and innovative examples of the use of technology
- promoting the best practices of adult, continuing education and lifelong learning

COLLO has achieved these goals through awareness building, advocacy, input on and support of legislation at the state and national levels and in collective action where consensus can be achieved.

COLLO Leadership

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The Coalition Of Lifelong Learning Organizations

Introduction

As the name implies, the Coalition of Lifelong Learning Organizations is comprised of a number of organizations providing services in the diverse field of adult and lifelong learning. University extension, adult literacy, graduate programs, labor unions, professional associations, distance learning organizations, community colleges and others, which, although unique in their niches, have common issues and concerns regarding providing learning services for adults.

As colleagues in the broader field of Lifelong Learning, there is much to be learned from each other related to these common issues and concerns. Successful strategies found in community colleges can be tweaked to apply to university extension, for example. To support and enable that sharing of strategies, COLLO sponsors annual symposia to bring our colleagues together to learn from each other. We believe in adult learning for ourselves as well as for others.

2013 Topic: Prior Learning, Assessment & Recognition

The classroom is an excellent way for adults to learn. However, it is not the only way. With the expansion and increased access to learning via technology and the development of certificates, badges, and non-degree certificates, adults learn and their learning can be assessed and recognized in a variety of informal and formal ways.

2013 Presenters:

The 2013 COLLO Symposium on Prior Learning Assessment and Recognition brought together our colleagues who are on the cutting edge of this segment of our field to share what they have learned. They included:

> **Alan Tuckett (** alan@niace.org.uk), President of the International Council on Adult Education. Based in the UK, Alan's role in ICAE keeps him in touch with adult education activities around the globe. (page 5)

> **Mary Alice McCarthy (mccarthyma@newamerica.net)** was until recently with the US Department of Education, Office of Vocational and Adult Education where she worked on a variety of initiatives including the Higher Education Opportunity Act provisions for federal funding for non-classroom learning, the Western Governors University-an online learning institution, Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grant Program, and the Career and Technical Education certification projects. She currently is the Senior Policy Analyst for Education Policy at the New America Foundation. (page 6)

> **Mary Beth Lakin** (Marybeth_lakin@ACE.NCHE.EDU) is the Director of College and University Partnerships at the Center for Education Attainment and

Innovation at the American Council on Education in Washington, DC. The Center is the hub of innovation for colleges and universities throughout the United States. (page 7)

Laura Winters (lwinters@cael.org) is the Senior Project Director of LearningCounts.org at the Center for Adult and Experiential Learning. *Learning Counts* translates adults' prior learning into college credit. (page 7)

Nan Travers (Nan.Travers@esc.edu), Director of College Wide Academic Reviews and **Amy McQuigge (**Amy.McQuigge@esc.edu), Director for Open Learning, both at Empire State College in Saratoga Springs, NY are on the cutting edge of competency-based learning recognition. With a grant from the Lumina Foundation Nan and Amy are researching and developing a global learning qualifications framework. (page 12)

Symposium Format

Each of these experts offered their thoughts and experiences around a set of framing questions:

- Is recognition of prior learning experiencing a revival, and if so, why?
- What is new about prior learning?
- How is prior learning recognized?
  - Badges, certifications, non-degree credentials, industry credentials and others?

Following those presentations and responses to questions from the symposium participants, each of the symposium participants discussed prior learning assessment and recognition in their organizations.

The symposium concluded with a strategy session focused on how organizations can collaborate to build support for prior learning assessment and recognition in federal policy, state policy and institutional policy.

Symposium Notes

Alan Tuckett: The International Perspective: In addition to focusing on our particular jobs in our organizations and perhaps looking to our professional associations for information on how others are approaching the challenges we face, it is always informative to capture a glimpse of how our colleagues in other countries are confronting those same issues.

Alan Tuckett's role as President of ICAE provides our window to that world.   As he did last year at our Symposium on the concept and practice of collaboration, Alan came to our symposium via Skype which allowed him to participate the entire morning to present view his viewing point from around the globe and then react to the presentations and discussions that followed.

Alan acknowledged that many countries are discussing the same opportunities and the same challenges regarding prior learning assessment and recognition. Unfortunately, few of the discussions are happening at the national policy level but are left to individual institutions to create standards and policies. Alan proposed the need for a standardized process to recognize and capture skill levels and qualifications based upon prior learning.

Korea, which has a 2008 Lifelong Learning Act to promote learning throughout the country, provides an interesting model entitled Lifelong Learning Connects (LLC) initiative. A complement to LLC is the Korean Learning Cities initiative in which 118 cities are creating "learning ecosystems" to support lifelong learning. A short video on the Learning Cities initiative is:
http://www.wise-qatar.org/content/amazing-growth-lifelong-learning-cities-korea

Some countries are establishing national qualification standards to guide education in a number of areas. Alan referenced the South African Framework as an excellent example. Here are two resources that provide information on the South African work:

> There are over 130 NQFs in various stages of development internationally. South Africa has established one of the first generation NQFs, under the auspices of the South African Qualifications Authority (SAQA), in order to promote equity, redress and social justice. NQFs are intimately linked to the fostering of lifelong learning.
>
> > Lifelong Learning and National Qualifications Frameworks: Leaders for Learning:
> > A University of Western Cape (UWC) Continuing Education course, in partnership with the South African Qualifications Authority (SAQA)
> > http://www.saqa.org.za/docs/brochures/lifelong_learning.pdf
>
> The South African Qualifications Authority (SAQA) can be found at
> http://www.saqa.org.za/#

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Mary Alice McCarthy

What are the forces driving the renewed emphasis on PLAR (Prior Learning Assessment and Recognition)?

- Labor markets and the demands for skills create greater demand by workers and employers for evidence of skills and competencies:
    - A high school diploma or equivalency is no longer enough to obtain a job with a family sustaining income. Bureau of Labor projections and Georgetown University studies note that post-secondary credentials are now required; not necessarily a BA, but a one- of two-year credential that meets the demands of many of the middle skilled jobs.
    - The pace of change in skill needs of employers has changed. Skill needs change as technology scales up the workplace. As a result, skills must be transferrable to multiple jobs in a career cluster.
    - Demographics: older workers and immigrants require training and education to meet the higher levels of skills needed on the job.

What's Changed: Education Delivery Models

- The "unbundling" of content, learning and assessment has changed
    - Technology-driven changes enable "unbundling"
    - Global reach of learning opportunities enables "unbundling"
- "Unbundling" creates new opportunities to acquire learning and new demand for learning to be recognized and credentialed.

What's Changed: Credentialing

- Growth in Supply and Demand for Non-Degree Credentials (certificates, certifications, licenses, badges)
- Emphasis on competency basis of non-degree credentials
- These changes create new opportunities to demonstrate learning and proficiency

Prior Learning about Prior Learning: The Challenges that Remain

- Cost (and time) of High Quality Assessments translating experience into competencies
- Scalability/Portability-moving beyond institutions
- Consumer protection (students and employers)

Moving Forward: Policy and Practice

- Removing the need for (unnecessary) PLA
    - State licensing policies
    - Credit transfer policies
    - Better credentialing (competency-based)
- Higher Education Act (HEA) reauthorization (financial aid)
    - The US Department of Education has issued a Dear Colleague letter describing the use of financial aid for non-traditional students (see Appendix A)

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- More evidence/experiments on return on investment (ROI) for PLAR
  - The Trade Adjustment Assistance Community College and Career Training (TAACCCT) /experimental sites are a good example

Laura Winters (CAEL) and Mary Beth Lakin (ACE)

PLAR includes the process for evaluating and demonstrating knowledge and skills in order to award college credit for learning from:
- On-the-job training
- Employer and workforce training
- Independent study and other learning options such as MOOCs
- Military service
- Volunteer service

PLAR challenges our assumptions about
- The relationship between teaching and learning
- Values of student's own knowledge
- The role of academic institutes in determining what kind of knowledge "counts"

Why PLAR now?
- Changing learners
- Economic pressures
- College completion focus
- Meeting public expectations
- Leveraging technologies
- New sources for learning
- Increasing persistence and retention
- Decreasing cost and time to degree
- Focus on competency

Who is using PLAR?
- 414 institutes responded to ACE's 2012 PLA survey
  - 92% approved use of one or more PLA methods
  - National proficiency exams most frequently used (83%) followed by ACE military credits.
  - Local portfolio and credit awards were used by over 25% of survey respondents
  - PLA used at all degree levels, associate to doctoral

"The PLA Effect" PLA does not discriminate. **<u>PLA students in this study had better graduation rates than non-PLA students</u>** regardless of:
- Institutional size, level (associate or baccalaureate) or control (private for-profit, non-profit or public)
- Individual student's academic ability or GPA
- Individual student's age, gender, or race/ethnicity

- Whether or not student receives financial aid.

Approaches to PLA:
- Standardized Exams:
    - AP
    - CLEP
    - DSST
    - Excelsior College Examinations
    - UEscel Exams
- Challenge Exams: developed by faculty
- Evaluated Training Programs
    - American Council on Education college credit recommendations for military training and occupations and workforce training
    - National College Credit Recommendation Service (NCCRS) college credit recommendations
    - College faculty credit awards based on evaluation of local workforce training, industry certifications and articulation of non-credit college programs
- Individualized Assessments
    - Portfolio Assessment
    - Performance Assessment

What are the emerging trends?
- More state and system PLA initiatives to align policies, procedures and transfer and articulation
- New accreditation models: course-sized, competency-focused, etc.
- New sources of learning for prior learning assessment
- Increased interest and support from government and philanthropy
- Creation of degree pathways that incorporate prior learning credits
- Evolving strategies to scale up PLA and extend application across broader range of program and disciplines

The Council for Adult and Experiential Learning (CAEL)'s Learning Counts is on the for front of establishing recognition for prior learning both with students who are affiliated with an institution and with unaffiliated students

Expanding the sources of PLA
- MOOCs
- Noncredit courses and stackable certificates
- Just-in-time training
- Chunks, modules and granular learning
- Badges
- Competencies

PLA Challenges
- Institutional commitment
- Program alignment: transfer and articulation
- Faculty ownership, engagement and recognition
- Templates for policy and practice
- Outreach to learners
- Professional development
- Allocation of time and resources
- ACE 2012 survey found
  - Learner confusion about options, processes, and points of contact
  - Need for more easily accessible policies and practices
  - Lack of awareness resulted in low demand and perceptions of low need
  - Information sharing gaps across employers, colleges and students

CAEL 2010 student of 88 community colleges:
- 46% indicated greater use of CPL at their institution if they could evaluate technical training and map to courses
- 72% said they thought there would be increased demand for CPL options in the future
  - http://www.cael.org/pdf/PLA_CommunityColleges.pdf
  - http://www.cael.org/pdfs/123_pla_communitycolleges
  - http://www.cael.org/pdfs/PLA_Executive-Summary

Faculty Concerns
- Rigor: giving away credits
- Quality: learning is not college-level and/or equivalent
- Lost course enrollments and tuition $$

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- Not "my" course
- Credit for experience rather than learning

Participant Discussion:

Milan Hayward, At Northern Virginia Community College discussed his dissertation research on PLAR and his institution use of PLAR.

http://www.nvcc.edu/academics/additional-learning-opportunities/cpl/overview/index.html

Sandy Goodman with the National College Transition Network (http://www.collegetransition.org/home.html) provides resources for adult basic, adult secondary and adult ESOL programs to support their students' transition to postsecondary. The high school equivalency tests (GED ®, HiSET, and TASC) provide opportunities for prior learning assessment and recognition for adults who did not complete high school. Sandy was interested in how some of the postsecondary strategies discussed could apply to the population that adult education and family literacy act programs serve.

Competency-Based Education:

Nan Travers and Amy McQuigge from Empire State University are national leaders in competency-based education. Here are notes from their presentation.

Global Learning Qualification Framework (GLQF)

Emergent Learning Assessment
- How to recognize and assess university-level learning, especially for:
    - OER learning: Open Education Resource (e.g., MOOC)
    - Untethered Learning
    - Self-authored Learning

- Develop an assessment tool that focuses on learning as it develops and can be used by all constituents

- Use ePortfolios for both learning and assessment environments

What we are hoping to do
- Recognize university-level learning as primary assessment

- Topic specific assessment is integrated rather than the key goal

- Create a tool that is scalable and easy to use

- Content agnostic

Lumina Grant Goal
- To develop a framework that assesses university-level learning gained through open educational resources

- Two years:
- September 14, 2012 – September 14, 2014

- Year 1: Just Completing
- Academic Team:
    - Researched international policies and practices
    - Drafted framework
- Expert Panel
    - Reviewed framework and recommended revisions

Year 2- Pilot Framework

- Use Empire State College faculty/students/evaluators to test GLQF and gain feedback through focus groups

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- Pilot GLQF to assess student learning gained through Saylor OERs:
  - Four OERs: 2 Humanities and 2 STEM
  - Additional OERs: 1 IT and 1 Social Science through UPCEA sub-grant

- Pilot additional identified learning sources to validate process and GLQF
  - Openly share framework and research

Supporting Research

- Lumina's Degree Qualifications Profile
- AAC&U's LEAP Essential Outcomes & VALUE Rubrics
- 90 (+) qualifications frameworks from across the world
  - National, Regional, International, or Transnational
  - Organizational (Labor, Non-profit)
- Additional research related to outcomes assessment, competency-based learning and university-level learning.

- Some qualifications frameworks included:
  - High school equivalencies
  - Vocational certifications
  - Graduate level learning

Developing the Global Learning Qualifications Framework (GLQF)

Audience

- Students
- Faculty
  - Advisors
  - Curriculum/Training Designers
  - Instructors/ Workplace Trainers
- Instructional Designers (online/ePortfolios)
- Evaluators

Principles
- There are different proportions of knowledge within and across each area
  - Learning can be >, <, = or ≠ Predetermined concepts
- Adaptable Assessment – recognizes knowledge within any context/content area
- University-level learning can be assessed prior to topic area
- Must address different audiences' needs
  - Needs to have usability without much explanation
  - Needs to be accessible to students, faculty, and evaluators
- Captures learning story through a multiple-media, interactive platform (e.g., ePortfolios)

The Global Learning Qualifications Framework

- Gathered learning constructs and descriptors from researched frameworks, policies, and procedures.
- Clustered, themed, and defined into:
  - Overarching Constructs
  - Learning Domains
  - Descriptors at Introductory and Advanced Levels
  - Student prompts
  - Examples of Evidence

Global Learning Qualifications Framework
for
University Level Learning
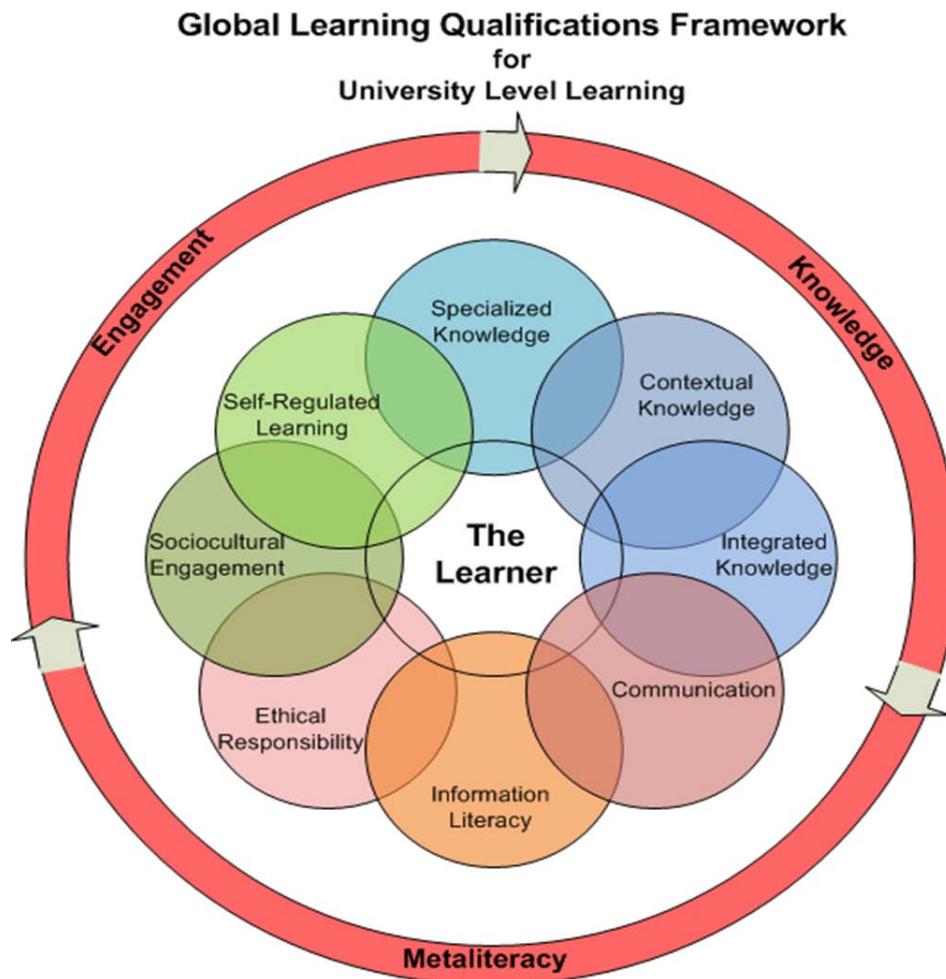
Overarching Constructs

- Knowledge
- Metaliteracy
- Engagement

Global Learning Qualifications Framework for University Level Learning
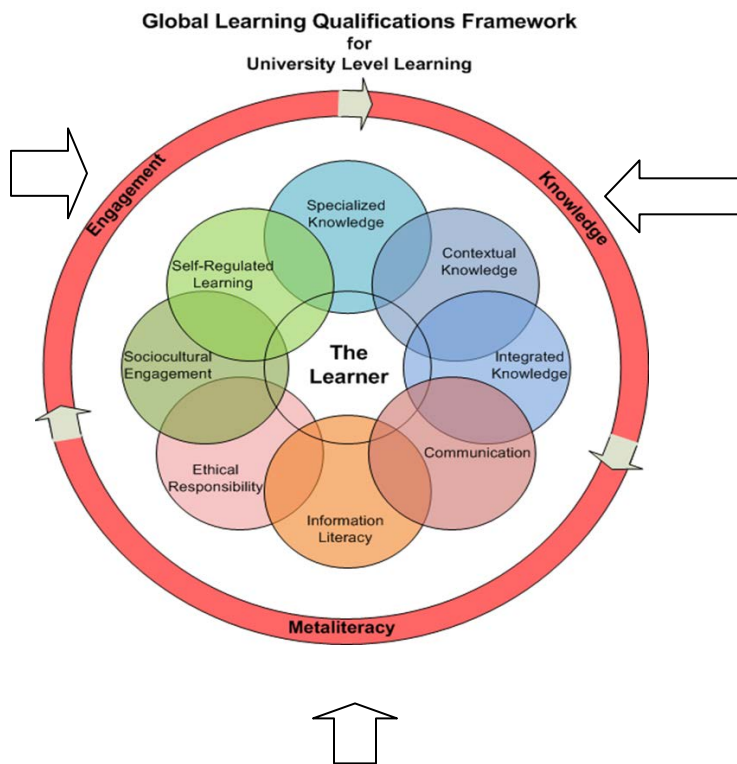
Learning Domains

- Specialized Knowledge
- Applied Knowledge
- Integrated Knowledge
- Communication
- Information Literacy
- Ethical Responsibility
- Sociocultural Engagement
- Self-Regulated Learning

All Learning Domains
- Articulate the Overarching Constructs
- Intersect with each other through the learner
- Collectively encompass all university level learning
- There are different proportions of each depending on the learning and topic

Not all domains have the same weight:

Global Learning Qualifications Framework for University Level Learning
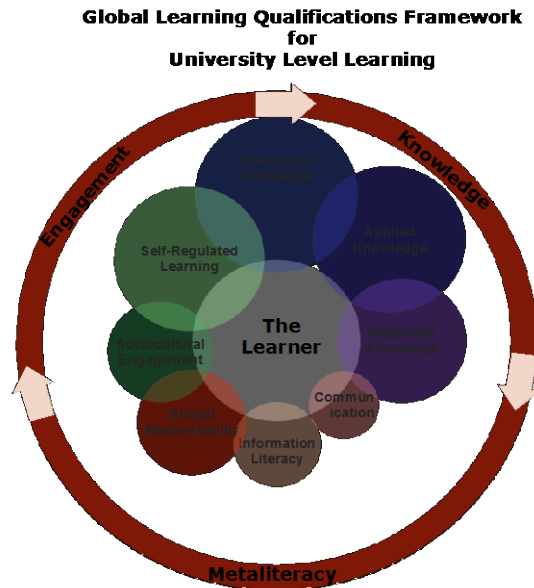
Descriptors, Prompts & Evidence

Advisors & Evaluators

Transparent to Learners

- **Descriptors** characterize learning outcomes– they describe the learning that would be expected
  - Introductory Level
  - Advanced Level
- **Evidence** is a distinct behavior or product that can be directly observed and/or measured. Evidence is an indicator that the learning outcomes (descriptors) exists.
  - Introductory Level
  - Advanced Level

Learners

Transparent to Advisors & Evaluators

- **Descriptor Prompts** are questions that ask learners to address particular descriptors. Learners will pick to which prompts they respond.
- **Evidence Prompts** are questions and/or suggestions to guide learners to provide appropriate evidence of their learning.

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Example- Communication

- **Descriptor:** Identifies an appropriate mode of delivery, based on the purpose of the communication and the intended audience.
- **Evidence:** Has examples of presentations given to a variety of audiences
- **Prompts:**
  - How have I shared information with others around this topic?
  - What types of reports or presentations have I prepared to share information about this topic?
  - How have I taught other people procedures, tasks or concepts around this topic and explain why they are used or thought about in these ways?
  - If I haven't taught, in what ways would I frame my knowledge to teach the topic?

Students

- Needed a different approach
- A Flipped Model
- Use prompts, worksheet and examples of evidence

Ways GLQF is Unique

- Comprehensive study with global perspective
- Student and Academic Side
- Prompts student through process
- Open ePortfolio development
- Student choose where to have the ePortfolio assessed, SUNY REAL is one option
- Adaptable for multi-use
- Different institutions
- Can modify for different purposes

Next Steps

- Focus Groups – Faculty, Students and Evaluators at SUNY Empire State College
- Pilot – Students taking Saylor EORs (≈120)
- Create ePortfolio environment for Evidence of Learning
- Communication and Dissemination
- Conferences
- Website
- Webinars
- Institute
- Sustainability
- Sharing with other institutions
- Open ePortfolio system

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Discussion – Policy issues

The concluding discussion focused on policy issues that inhibit expansion of PLAR on the national, state and institutional/program levels. Here is a listing.

- Language for this conversation:
  - With any initiative, it is important to develop a vocabulary with agreed upon meanings of critical elements.
- Faculty buy-in
  - Faculty are paid to teach classes. FTE that supports them and the institution is derived from students in class. Policies to reward faculty and the institution/program need to be in place
  - Faculty question the learning if the student was not in "my course." How do you convince faculty that the learning is "good enough?"
- Nomenclature at Community Colleges
- College completion rates
  - Policy model – Kentucky gives 1.4 FTE for each college student
- Stackable credentials, e.g., Canada – 1 year degree, 2-year degree, 3-year degree, 4-year degree
  - Adult education and programs in Canada have stackable certificates that document learning (e.g., Certified Nursing Assistant, Licensed Practical Nurse, and Registered Nurse). Policy to support stackable certificates would be helpful.
- Administrative or legislative policy issues
  - Title IV funding for direct assessment cannot be used for PLA
    - Create a policy supporting federal financial support for PLA
  - Create policy to allow WIA funds to support PLA, currently doesn't restrict, but doesn't state allowed
  - Secure federal statement supporting and encouraging PLA
  - Aggregate all associations to submit policy position to submit to congress
    - Start with ACE president statement
    - Distribute to COLLO members for support
    - Prepare COLLO position to take to the "Hill"
  - Look to South Africa for PLA for placement rather than credit for existing programs., e.g., students enter a program at the level at which they test

- Need to ask for State/federal policy for PLA
- Identify policies for Higher Ed Act, Workforce Investment Act
- Influence National Governors' Conference to secure their support
  - Bring together governors to speak about this issue
  - Find the champions among governors to speak on behalf of PLA
  - Bring in higher ed reps and business reps to a meeting of this group to key in buy-in
- PLA can be tied to the higher education affordability issue
- CAEL has testified before Congress for PLA. COLLO should get behind CAEL's efforts

Topics for future COLLO symposia:

- Future role of institutions of higher education given changes underway now?
  - Evaluation, content development, OER's, unbundling services
- What is purpose of higher education? Is it undergoing a change?
- What is the future role of higher education faculty?
- Navigator's approach in adult education including higher education?
- Bring in someone to speak about UNESCO policies for higher education and adult learning and how they overlap
- Read document out of the UNESCO higher education conference
- Common Core, college and career readiness

Thank You:

We appreciate our colleagues who shared their lessons learned and their visions of the future. Also, thank you to the symposium participants who contributed much to our discussions.

Participants:
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M.B. Lakin (ACE)
M.A. McCarthy (New America Foundation)
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Appendix A: Dear Colleague letter enabling use of federal funds for non-classroom financial aid.

Publication Date: March 19, 2013

DCL ID: GEN-13-10

Subject: Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs

Summary: This letter provides guidance to institutions[1] that wish to have direct assessment (competency-based) programs considered for title IV, Higher Education Act (HEA) program eligibility. The letter outlines how institutions can have competency-based programs approved under the current regulations on direct assessment programs.

Dear Colleague:

Over the last several years, some institutions of higher education have developed new and creative program models in which students are provided with the means to acquire the knowledge and skills at an individual pace to demonstrate achievement of specific competencies identified as necessary to complete a program and earn a degree or other credential. A majority of these program models are offered in credit or clock hours and can be accommodated under the current title IV, student financial aid regulations as non-term programs. An increasing number, however, are not offered in credit or clock hours, and many of the institutions offering such programs want them approved for participation in the title IV, HEA programs.

Section 8020 of the Higher Education Reconciliation Act of 2005 (HERA) (Pub. L. 109-171) amended the Higher Education Act of 1965, as amended (HEA), and established the eligibility of direct assessment programs to participate in the title IV, HEA programs. Specifically, the HERA provided that instructional programs that use direct assessment of student learning, or that recognize the direct assessment by others of student learning, *in lieu of measuring student learning in credit hours or clock hours*, may qualify as eligible programs if the assessment is consistent with the institution's or program's accreditation. The HERA also provided that the Secretary of Education must initially determine whether each program for which an institution proposes to use direct assessment is an eligible program.

The Department of Education (the Department) published an [interim final rule](#) implementing the HERA provisions on August 9, 2006, and subsequently published a [final rule](#) on November 1, 2006. Those final regulations, located in 34 CFR 668.10, define a "direct assessment program," outline the procedures and requirements for an institution that offers such a program to apply for the program to be determined an eligible program, and specify limitations on the use of title IV, HEA program funds. Under current regulations, the entire program must be provided by direct assessment. Those offered partially with credit or clock hours and partially via direct assessment are not eligible programs.

Generally, 34 CFR 668.10 includes the following requirements:

- Instead of using credit hours or clock hours as a measure of student learning, instructional programs may use direct assessment of student learning, or recognize the direct assessment by others of student learning. Examples of direct measures include projects, papers, examinations, presentations, performances, and portfolios.

- An institution that wishes to award Federal Student Aid (FSA) funds in a program using direct assessment must apply for approval from the Department. The application must specify the equivalent number of credit or clock hours for a direct assessment program (including how equivalencies will be established if students are permitted to take less than the entire program based on an assessment conducted at the outset). The Secretary will use these equivalencies to determine whether the program meets the minimum requirements for an academic year and as the basis for payment period and award calculations.

- As a part of its application, the institution must explain how it determined the equivalent number of credit or clock hours for the program, i.e., its methodology for determining these equivalencies.

- An institution must demonstrate that its institutional accrediting agency has reviewed and approved its offering of the direct assessment program.

- An institution must demonstrate that its institutional accrediting agency or State licensing body has agreed with the institution's assessment of its credit or clock hour equivalencies.

- A direct assessment program may use learning resources (e.g., courses or portions of courses) that are provided by entities other than the institution providing the direct assessment program without regard to the limitations on written arrangements between an eligible institution and an ineligible institution or organization under 34 CFR 668.5(c).

- Federal Student Assistance (FSA) funds may be awarded only for learning that results from instruction provided, or overseen, by the institution. FSA funds cannot be awarded for any portion of the program based on study or mastery obtained prior to enrollment in the program, or based on tests of learning that are not associated with educational activities overseen by the institution.

- Several types of programs and coursework that might otherwise be eligible for FSA purposes are not eligible if they involve direct assessment, including:

1. Programs at foreign schools;

2. Preparatory coursework required for entry into an eligible program; and

3. Courses necessary for an elementary or secondary school teaching credential or certificate.

- Remedial coursework measured through direct assessment is not eligible for title IV, HEA program funds. However, remedial coursework offered in credit or clock hours in conjunction with a direct assessment program is eligible for FSA funds.

- If the institution plans to make changes to the program that would affect any of the information provided in its application to add a direct assessment program, it must obtain prior approval from the Department by reapplying.

It is imperative that faculty and academic officials work closely with their institution's financial aid administrators throughout the process of developing a direct assessment program and completing the application for title IV, program eligibility to ensure that all applicable aspects of title IV, program eligibility are addressed and that the program can be operationalized for title IV, HEA purposes. In addition to the criteria in 34 CFR 668.10 listed above, an institution must demonstrate that the program meets the financial aid-related components in §668.10(a). In its application, an institution must explain the method for reasonably equating the direct assessment program to credit or clock hours and related parameters of the program, including minimum weeks of instructional time, payment period, how an academic activity will take place during each week, and the definition of a full-time student. An institution should also address issues such as how it plans to measure satisfactory academic progress (SAP) for students in the direct assessment program and how or whether the financial aid system will be configured to process aid for students in the program.

For more detailed information on the eligibility requirements for a direct assessment program, please refer to the regulations at 34 CFR 668.10 and to Volume 2, Chapter 2 of the FSA Handbook. In addition, the attachment to this Dear Colleague Letter contains

step-by-step instructions that an institution should follow in completing the E-App to apply to have a competency-based program approved to participate in the title IV, HEA programs. While there is no prescribed, uniform competency-based education model or approach, the Department will work closely with interested institutions as they move through the approval process. We encourage institutions with competency-based program models to apply for title IV, program eligibility under the existing framework for direct assessment programs.

Competency-based approaches to education have the potential for assuring the quality and extent of learning, shortening the time to degree/certificate completion, developing stackable credentials that ease student transitions between school and work, and reducing the overall cost of education for both career-technical and degree programs. The Department plans to collaborate with both accrediting agencies and the higher education community to encourage the use of this innovative approach when appropriate, to identify the most promising practices in this arena, and to gather information to inform future policy regarding competency-based education. Currently, the direct assessment authority in the HEA is the mechanism through which title IV, HEA funds can be provided for competency-based education, and we understand that it may not adequately accommodate this educational model. The Department intends to use what we learn from participating institutions to inform future discussions regarding the reauthorization of the HEA.

For general questions about direct assessment programs, please contact Kay Gilcher by telephone at 202-219-7011 or by e-mail at Kay.Gilcher@ed.gov.

Sincerely,

David A. Bergeron
 Acting Assistant Secretary
for Postsecondary Education

Application for Title IV Approval of a Direct Assessment Program

If your institution wishes to have a direct assessment program determined to be an eligible program for title IV, HEA program purposes, you must submit an updated Electronic Application for Approval to Participate in the Title IV Federal Student Aid Programs (E-App) including the new program. The E-App can be accessed at

(http://www.eligcert.ed.gov/). After submitting the E-App, please mail the required supporting documentation to the Department as instructed in Section M of the E-App, and submit, via e-mail, a detailed description of the program that fully addresses each of the 10 required elements outlined in 34 CFR 668.10(b) and a detailed description of financial aid administration that addresses the financial aid requirements in §668.10(a).

Application Process Overview

The Department accepts applications for approval online and on a rolling basis. Institutional applications will be reviewed by the Department to ensure that the application is properly completed, to determine whether the institution has any restrictions on adding additional programs, and to evaluate whether the narrative adequately demonstrates that the program satisfies the requirements in 34 CFR 668.10. Please include the names and contact information of the institutional program contact who can answer specific questions about the direct assessment program, as the Department may need to contact the institution to ascertain or clarify information during the review of the application.

Institutions must reapply to the Department when any reported aspect of the program changes. Examples that could warrant reapplication include, but are not limited to: changes in the program's equivalence in terms of credit or clock hours, changes in how the assessments of student learning are conducted, changes in how the program is structured, and changes in the educational credential offered.

Application Process

Below are step-by-step instructions that institutions must follow when completing the E-App to request title IV approval of a direct assessment program.

In applying for approval of a direct assessment program, it is critical that you make only changes to the E-App that are relevant to the direct assessment program. Institutions should <u>not</u> make any other changes, such as, for example, updating the institution's address, adding other programs, or updating accreditation information, as doing so will delay the approval process.

- <u>Step 1</u> – Access the institution's E-App at http://www.eligcert.ed.gov/ . In Question 1, check "Other" as the reason you are submitting the application and specify in the box that the purpose is "Direct Assessment Program."

- <u>Step 2</u> – Scroll to the bottom of the page and select "Go to Section," enter "E" in the box, and click "OK/Save Data."

Step 3 – In Question 26, if the direct assessment program is being added at a program level not currently approved for title IV, check the box that corresponds to the type of educational program that will be offered via direct assessment.

- Step 4 – In Question 26 between d. and e., there is a question that asks "Do you measure a student's progress in any of these degree programs by direct assessment instead of credit or clock hours?" **Check "Yes" to this question regardless of whether the program is a degree or certificate program.**

- Step 5 – If the direct assessment program is one that must lead to gainful employment in a recognized occupation under 34 CFR 668.8, or if your institution has been instructed to provide details of other types of programs in its provisional Program Participation Agreement (PPA), then you must provide details of the program in the applicable sections of Question 27. When completing this section, you must include "Direct Assessment" in the program name field and ensure that all information provided matches the information that you will provide in your e-mailed narrative description of the direct assessment program (see below).

- Step 6 – If the direct assessment program is not one that must lead to gainful employment in a recognized occupation under 34 CFR 668.8, and your institution has not been instructed to provide details of other types of programs in its PPA, go to the bottom of the page and select "Go to Section," enter "K" in the box, and click "OK/Save Data." Then, scroll to Question 69 and enter the name of the degree program being offered via direct assessment.

- Step 7 – Scroll to the bottom of the page and select "Go to Section," enter "L" in the box, and then click "OK/Save Data."

- Step 8 – In Section L, check the box indicating that "the President/CEO/Chancellor in Question 10 will sign the signature page" and then print the required signature page.

- Step 9 – Scroll to the bottom of the page and select "Submit the Application" then click "OK/Save Data."

- Step 10 – The system will tell you if all required entries have been made on your application. If complete, click on "Submit Application." If not, make any necessary corrections and then submit the application.

- Step 11 – The system will advise you that your application has been received by the Department. It will indicate any documents that must be submitted and provide you with the address to which you should send these documents.

Step 12 – Mail the signed and dated signature page and other required supporting documents to the Department at the address provided in Section M.

- Step 13 – E-mail the Detailed Program Description and the Detailed Description of Financial Aid Administration of your direct assessment program (see below) to: CaseTeams@ed.gov. Complete the subject line of the e-mail using the following format:

  [Name of your institution, State, and OPEID] - Documentation for Direct Assessment program application

  Example: XYZ University, Idaho, 00999900 - Documentation for Direct Assessment program application

Detailed Program Description

The detailed description of the program, (recommended length not to exceed 20 pages), should be a succinct narrative that clearly indicates the name of the program and how the program meets each of the regulatory requirements below (the regulatory element that each part of the narrative addresses must be clearly identified). Be sure to include the name and contact information of the institutional program contact who can answer specific questions about the direct assessment program.

(1) A description of the educational program, including the educational credential offered (degree level or certificate) and the field of study.

(2) A description of how the assessment of student learning is done.

(3) A description of how the direct assessment program is structured, including information about how and when the institution determines on an individual basis what each student enrolled in the program needs to learn.

(4) A description of how the institution assists students in gaining the knowledge needed to pass the assessments.

(5) The number of semester or quarter credit hours, or clock hours, that are equivalent to the amount of student learning being directly assessed for the certificate or degree, as required by 34 CFR 668.10(b)(3).

(6) The methodology the institution uses to determine the number of credit or clock hours to which the program is equivalent.

(7) The methodology the institution uses to determine the number of credit or clock hours to which the portion of a program an individual student will need to

complete is equivalent.

(8)   Documentation from the institution's accrediting agency indicating that the agency has evaluated the institution's offering of the direct assessment program(s) and has included the program(s) in the institution's grant of accreditation.

(9)   Documentation from the accrediting agency or relevant state licensing body indicating agreement with the institution's claim of the direct assessment program's equivalence in terms of credit or clock hours.

(10) Any other information the Secretary may require to determine whether to approve the institution's application.

Detailed Description of Financial Aid Administration

The detailed description of financial aid administration for the program (recommended length not to exceed five pages) should explain how the program meets the requirements for administering title IV aid. Critically, because a direct assessment program does not utilize credit or clock hours as a measure of student learning, you must establish a methodology to reasonably equate the direct assessment program to credit or clock hours for the purpose of complying with applicable regulatory requirements. You must provide a factual basis for your claim that the program or portion of the program is equivalent to a specific number of credit or clock hours. In your description, please describe how you have established equivalencies for credit or clock hours. Based on that equivalency, you should also explain—

- How you determined the minimum weeks of instructional time;

- How you define the payment period;

- How you will document that an academic activity takes place on a weekly basis;

- How the student will interact with a faculty member on a regular and substantive basis; and

- How you define a full-time student.

In addition to the items above, please address how you will measure whether a student is making satisfactory academic progress in the program, and how you will determine when a student has withdrawn or changed his or her enrollment status. Please also provide evidence that your institution has considered whether your financial aid systems are configured to handle the management of a direct assessment program and whether you anticipate any challenges related to these systems. Finally, be sure to include the name

of the program and the name and contact information of the financial aid contact who can answer specific questions about the direct assessment program.

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[1] The guidance in this Dear Colleague Letter generally applies to institutions that currently participate in the title IV, HEA programs and wish to add a direct assessment program. Institutions that are not currently participating should contact their school participation division for instructions on how to complete the application process.

Attachments/Enclosures:

[GEN-13-10: Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs in PDF Format, 234KB, 9 Pages](#)