



All Wrapped Up in CBE Regulations

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Unique Characteristics of Competency-Based Education

- Students learn at their own pace, demonstrating mastery of competencies
- Flexible entry and exit points
- Students may take longer to master competencies that are difficult for them
- Credit for mastery of competencies, not time in class
- Academic coaches often highly involved in monitoring CBE student progress and intervening as needed. At some schools this is faculty, at others it is a Student Services employee

Direct Assessment vs. Credit Equivalent CBE Programs

- Student attainment of competencies are the sole means of advancement in the educational program
 - A direct assessment approach
 - Disregards courses, students advance solely through mastery of competencies at their own pace
 - A course/credit based approach
 - Competencies are embedded into a conventional curriculum comprised of courses
 - CBE and regular courses can be taken concurrently in a blended schedule
- No correspondence courses allowed- faculty and students must have regular and meaningful interaction each week for the entire period of enrollment- WGU finding

Credit Equivalent CBE Programs

- Organizes competencies by course, but measures student progress using credit hours
- Must meet the federal definition of the credit hour (1 credit hour = 37.5 hours or 2,250 minutes)
- Must provide proof of credit equivalent
- Some call a CBE credit hour a competency unit

Federal Definition of a Credit Hour

- Educational activity must approximate not less than one hour of classroom instruction and two hours of out of class work each week
- CBE coursework must equal instruction, student work, and demonstrated knowledge expected in the equivalent traditional program
- Must have sufficient academic activity, such as reading and writing assignments, with feedback from an instructor
- Cannot include prior learning, mastery of competencies that occurred prior to enrollment in the program, or from credit by exam in the student's aid enrollment level

CBE Program Approval

- Since CBE considered a substantive change, must obtain accrediting agency approval before Title IV aid provided
 - Direct assessment programs approved by the Department through application to the Secretary
 - CBE credit-based programs approved through the Title IV Program Participation Agreement revision process
 - HLC site visit team will closely review CBE program
- Sept. 30, 2014 OIG Audit of ED found “Direct Assessment Programs: Processes for Identifying Risks and Evaluating Applications for Title IV Eligibility Need Strengthening to Better Mitigate Risks Posed to the Title IV Programs”

Non-Term CBE Programs

- If the CBE program is non-term, Pell Formula 4 used and a payment period is defined as the period in which a student successfully completes half of the number of credit hour equivalents and half of the weeks in the academic year
- Some non-term CBE programs are subscription based where students pay a flat fee for a defined calendar time period in which a student may enroll in as many competencies as they choose during that period. Some subscription costs include all required textbooks and materials. The subscription period is considered a payment period

Example: 6 month Subscription Based Term



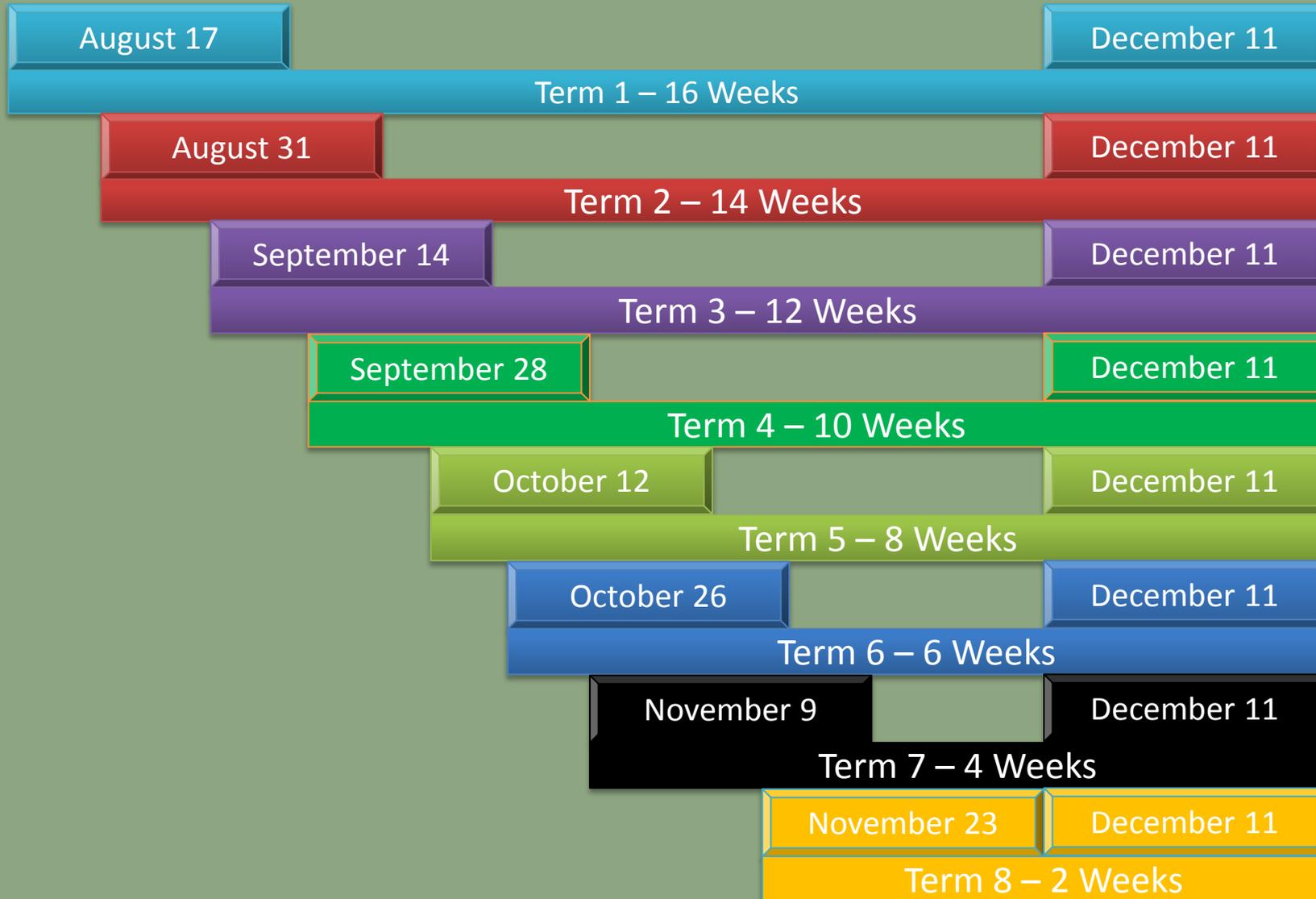
Term-Based CBE Programs

- If students are required to start and finish competencies within established term dates, the CBE program can be offered as standard term or non-standard term
 - If full-time enrollment is defined as 12 credit hrs., can combine modules into a standard term that meets the requirements of Pell Formula 1
 - Registration is combined for the term and then grades evaluated at the end of term
 - Module examples: four 4-week modules equaling a 16 week term or two 8-week modules equaling a 16 week term

Starts of Term

- Some CBE programs students begin monthly, others begin bi-weekly or weekly
- There are both multiple start and end dates to monitor
- Must define multiple refund periods and periods to withdraw for each part of term
- Within each term are unique freeze/census dates, disbursement dates, and 30 day delay periods for new borrowers
- Each student's period of enrollment is unique

Example: Bi-weekly Start of Modules within a Standard Term



Disbursement Dates

- Can disburse the sum of the student's financial aid based on their total enrollment for the term or disburse as modules begin to avoid overpayments
- Regular disbursement rules still apply such as waiting until 10 days prior to the start of the student's term to disburse
- Like other programs, CBE students cannot be enrolled in overlapping terms (not even for 1 day)
- Consider “aid like a paycheck” - October 20, 2011 DCL: GEN 11-17

Financial Aid Enrollment Level

- Some schools require full-time enrollment, others do not
 - WGU CBE program- non-standard term; required to complete 24 credits per year; semester is 6 months long; students begin on 1st of each month
 - Sinclair CBE program- standard term; part-time enrollment permitted; 16 week semesters with courses in modules; students begin every 2 weeks (week 1, 3, 5, 7, 9, and 11)
Sinclair recently moved students beginning every 4 weeks (so 4 starts of term within the 16 week semester- week 1, 4, 8, and 12), since every 2 weeks was too labor intensive

Cost of Attendance

- If the student is enrolled at least half-time, the student's cost of attendance budget must include allowances for room and board, transportation, and personal expenses
- Must not include costs in the student's budget for a module for which the student is not expected to be enrolled

Attendance Tracking

- Must document that the student began attendance
- Some schools require the student take at least one proctored exam in person to confirm the student's identity; others require students attend a CBE orientation
- Multiple modules to monitor to confirm student participation began, determine loan periods, to recognize when students have withdrawn or ceased participation in coursework, to identify when loan exit materials need mailing, etc.

Return of Title IV

(currently a top financial aid regulatory issue for CBE)

- When a student ceases participation in all competencies without beginning another competency during a period of enrollment, follow the same R2T4 rules that apply to students in modules
- When the competencies within the CBE program do not have specified start and end dates, students are considered to be scheduled to attend the entire term or payment period, so the total days in the R2T4 calculation would include all of the days in the term or payment period, minus any scheduled breaks
- For some CBE programs, the student cannot see new assignments related to the next competency until the student has mastered the previous competency with an 80% or greater (could prevent a student from continuing, therefore requiring an R2T4)

Satisfactory Academic Progress (SAP)

GPA:

- Some schools issue A, B, or F grades only; others issue Pass/Fail grades (For most, competency mastery is a B or better)
- If the necessary mastery to complete a competency equals or exceeds the equivalent of a “C” grade, then the student is considered to have met the SAP measure

Pace:

- For credit-based CBE, divide the cumulative hours the student has successfully completed by the cumulative hours the student has attempted (example: 9/12)
- For students who add too many courses within the term, whether subscription model or regular, if the student cannot complete the required hours by the end of the term, the student’s SAP is impacted

Satisfactory Academic Progress (SAP) continued

- Repeat coursework: a previously passed course may only be repeated once to be considered in the federal aid enrollment level
- Schools with Pass/Fail grades often have an institutional policy to prevent students from repeating failed competencies over and over
- CBE should be referred to as “accelerated” not self-paced, or students will procrastinate
- Recommend students follow pacing charts that identify where to be during each week or at least at the midpoint and by the last day to withdraw

Jefferson College

- MoSTEMWINs (TAACCCT) Grant funded CBE professional development and faculty time for CBE course development
 - WGU workshop, CBE4CC conference, and CBExchange conference
- Jefferson College developed a CBE workgroup to compose a CBE Discovery Document that includes the potential benefits and challenges associated with a CBE delivery model and, where appropriate, offer suggested solutions
- Title IV assistance to CBE students a critical component
 - Struggling with manual efforts required for CBE/cost of CBE software and “A” grade equivalent CBE students with potential R2T4 balances
 - Quote from “Lessons Learned in Design of CBE”
It is impossible to overestimate the challenges with financial aid
- Working on implementation of first CBE program- an Electronics Certificate for 2017, 2018 or 2019 pending campus support and then HLC approval

Northwest Missouri State University

- Hawthorn Grant
- Decided against pursuing experimental site
- Credit equivalent approach
- Start and stops are within existing term structure
- Flat-rate (subscription) tuition model, not experimental site
- Expected HLC approval at December 12 meeting
- Expected program launch in March or May 2017
- Will begin ED approval process after receiving HLC letter
- Plan to begin program without Title IV, first students funded with Hawthorn Grant

Department of Education CBE Guidance

- March 19, 2013 DCL: GEN 13-10
Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs
- Dec. 19, 2014 DCL: GEN 14-23
Competency-Based Education Programs- Question and Answers
- Volume 2- School Eligibility and Operations
- Volume 3- Calculating Awards & Packaging

Experimental Sites Initiatives

experimentalsites.ed.gov

- Prior Learning Assessment (PLA)
- Limited Direct Assessment (LDA)
- Competency-Based Education (CBE)
 - Split Disbursement (July 2014 Federal Register)
 - SAP only (November 2015 Federal Register)
 - Subscription Period Disbursement (Nov 2015 Federal Register)

Prior Learning Assessment (PLA) Experiment

- Not a CBE experiment but often paired with CBE programs
- COA can include reasonable costs incurred by a student for assessments of prior learning
- Federal Pell Grant enrollment status may include up to three credit hours associated with a student's efforts to prepare materials for a prior learning assessment
 - Example: Preparing for a portfolio assessment

Limited Direct Assessment (LDA) Experiment

- Programs offering a combination of direct assessment and credit/clock hours are allowed
- An institution may include remedial coursework offered in credit hours or using direct assessment in a student's enrollment status

Competency-Based Education (CBE) Split Disbursement Experiment

- Disbursements for direct and indirect costs may occur at different times
- Disbursements may be made for direct costs when competencies have been mastered
- Disbursements for indirect costs must be made at regular intervals
- Two types of payment periods: direct cost payment periods and indirect cost payment periods
- Payment periods are no more than 25% of the defined Title IV academic year component
- Must check a student's satisfactory academic progress in a CBE program at least once when the student finishes the weeks in the program's Title IV academic year, but can check more often
- Quantitative evaluation is whether student is on pace to complete the program within 150% of the normal time over a given calendar period
- R2T4 calculations are not required for CBE programs included in the experiment
- Institutions must pay grant funds or notify students of loan funds that could have been disbursed as of the withdrawal date

Competency-Based Education (CBE) SAP Experiment

- Must check a student's satisfactory academic progress in a CBE program at least once when the student finishes the weeks in the program's Title IV academic year, but can check more often
- Quantitative evaluation is whether student is on pace to complete the program within 150% of the normal time over a given calendar period (not calculated by dividing credits completed over credits attempted)

Competency-Based Education (CBE) Subscription Period Experiment

- Subscription periods are considered standard or nonstandard "terms"
- Competencies in a term may begin before the term begins
- A student's enrollment status is determined using all the competencies a student is expected to complete during the term
- Disbursements are made each subscription period in accordance with rules for disbursement for the type of term the institution uses (standard and nonstandard)
- Direct Loan disbursements are prorated based on length of payment period in the same way as Pell or TEACH Grants
- Must check satisfactory academic progress at least once each term
- Each evaluation must include a review of the student's progress cumulatively and within the prior term
- Quantitative evaluation is whether student is on pace to complete the program within 150% of normal time (SAP Waiver)

Questions

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