**WorkforceGPS**

**Transcript of Webinar**

**Competency-Based Education Webinar Series**

**Part 2: Addressing Financial Aid Barriers**

**Thursday, September 29, 2016**

*Transcript by*

*Noble Transcription Services*

*Murrieta, CA*

GARY GONZALEZ: So with that I'm going to turn things over to Samantha Brown. She's a workforce analyst for TAACCCT grants here at the Department of Labor. Samantha, take it away.

SAMANTHA BROWN: Hi, everyone. First, I just want to go over some of the technical assistance resources that we offer to TAACCCT grantees, and we want to be clear about what those resources are and where today's webinar is coming from. So briefly, DOL funds three sources of TA for you, which are on the left half of your screen. DOL offers TA directly, for example, through FPOs or when Kristen Milstead does a performance webinar.

Sometimes JFF or Jobs for the Future and their partners spearhead TA on a broad range of topics. CalState/MERLOT is responsible for creating the SkillsCommons repository and offering TA and support for it. In addition, the National Science Foundation funds some TA for TAACCCT grantees through ATE centers. And on the right you'll see some other sources of TA funded by foundations.

To facilitate today's webinar, I want to introduce Cheryl Martin, program manager for TAACCCT grants. Cheryl, take it away.

CHERYL MARTIN: Thank you, Samantha. So I wanted to take a look at the polls that we – before we dive into our agenda, I wanted to take a look at the polls that we had up there at the beginning. And actually, we didn't have them up there at the beginning.

Well, I'm going to give you a chance to tell us about yourselves right now. Let us know if you participated in part one of this webinar, and if you didn't and you want to, that information is available on the TAACCCT Learning Network on probably related to the site for this one. Tell us which round you represent of TAACCCT grants. Tell us about whether you are currently implementing a CBE model or curious or that kind of thing.

And let us know what your current role is on the grant, project manager and so forth, and finally, this is just to make sure that you're all awake and had coffee at least, if not your lunch. We know we're catching some of you at lunch, including us. What is your experience in working with federal financial aid regulations and requirements?

So it looks like we've got about half and half of folks who were on part one. Part one of this webinar series was a basic conversation about CBE, about competency-based education, and some really good examples from Sinclair, one of our round two grantees, their consortium. And so if you are interested in competency-based education, you will definitely want to take a look at those slides and that transcript. Looks like in terms of rounds, we've got about half and half round three and four, which is about where we would expect people to be at this point in time.

In terms of implementing a CBE model, it looks like we have about the same number of people who are curious as who have implemented and then another a third it looks like are interested or planning. So about a third are curious. About a third are in the planning stage, and about a third have already done something. Great. That's helpful. And let's see.

In terms of your role, we've got a lot of project managers here and then a scattering of people in other roles. Terrific. Your experience in working with this, OK. About half of you have never worked with financial aid and about a third have some experience and a few of you are experienced. So those of you who are experienced, if you have stories that you want to pop into the chat – as we go forward we are going to have a private chat room for this webinar, and if you have questions as we're going forward, you can put them into that. We'd invite your questions throughout the webinar today.

As I mentioned, it will be a private chat, but if you – if we can't answer all of your questions here today, for instance, if they're specific to a program, you can send them to cbe@ed.gov, and that will be on the last slide as well. But I am jumping ahead.

Let's move to the agenda right now, and then I will introduce David Musser who is our primary presenter today. David is going to be talking about what are competency-based education and direct assessment. He's going to be talking about federal issues in CBE or competency-based education and some federal resources for that. And we're really delighted to have David with us today. I got a preview of his slides, naturally, and I think you will find it very, very helpful because many of you have already encountered some of these issues.

And if you're just curious about CBE, then you should be aware that you will potentially be encountering these issues. So I am going to with that turn it over to David. When we get to the end of his presentation, we will have plenty of time for Qs and As. So type those questions in throughout, and then we will take as many of the questions as we can get to at the end. David, thank you for being with us here today.

DAVID MUSSER: All right. Thank you so much, Cheryl. As Cheryl mentioned, my name is David Musser, and I work with the Office of Federal Student Aid with the U.S. Department of Education.

So I'm going to speak with you for a few minutes today about some of the financial aid regulatory issues for competency-based education programs and some questions that we've gotten from a lot of colleges all across the country as they attempt to implement these new programs and work within some old and some pretty strict financial aid requirements from the Department of Education.

Before I start, I'd actually like to make a couple of notes on some terminology that I'll use. I'm going to refer to competency-based programs as CBE just to make this a little bit easier on all of us. Then I'll also refer to the federal student aid programs. So that's Pell grants, direct loans, campus-based programs, and all of the kinds of aid programs that the Department of Education offers. I'm going to call those the Title IV programs, and that refers to Title IV of the Higher Education Act.

That's just to make this a little bit easier for everybody. One more note, today I'm going to go through some of the major issues that we've encountered with CBE programs and financial aid regulations, but as a note, a lot of what I'll discuss today was part of a larger presentation that I delivered at the 2015 Federal Student Aid Conference.

And we'll be providing a link to that as well as that we mentioned that we'll have the cbe@ed.gov e-mail address. We'll also have a link to that conference presentation at the end of this presentation, and you can go and see a video of that presentation as well as get the PowerPoint slides. And it includes a lot more detail on various financial aid issues that I didn't want to spend too much time on today. So with that I'm going to move to the first slide here that's up on your screens now.

One of the first things that I wanted to talk about with competency-based education is to mention that there really isn't a federal definition for competency-based education generally. There's no definition in the Higher Education Act, and there's no regulatory definition for CBE.

So because there are so many different types of CBE programs, that makes any discussion about CBE in general a little bit broad. So for our purposes today, I'm actually going to give you just a couple of outlines about what I'm talking about when I discuss CBE just so you have a sense that maybe it is similar to what you are thinking about, if you're thinking about CBE programs, and maybe it's not.

So competency-based programs, in our experience with the schools that we've talked to, generally organize academic content using competencies rather than traditional courses to break up subject matter. Competency-based programs also generally measure a student's academic progress based on assessments of how well the student fulfills a set of competency standards, and that usually involves a demonstration of both learning and the performance of certain skills.

And often the bar for completing a competency is what many schools call mastery but that's not always true and many schools define mastery in very different ways. Some of those things can have impacts on financial aid requirements and I'm not going to talk about that too much today but the way that you organize your CBE program does – is obviously very important, and these bullets here kind of give us a sense of what we mean when we talk about competency-based and some of the issues that surround such programs. With that I'll go on to the next slide here.

So competency-based programs have gotten a lot of attention recently, both in the news and even from the federal government's perspective in some of our guidance and experiments that we've published recently, but competency-based education isn't new. Forms of CBE have been around since the '60s, and many have been implemented in workforce training programs and other programs focused on the acquisition of skills in combination with learning. But in recent years some new models of CBE have emerged and become a little bit more prevalent in the public eye.

So we have some descriptions of these models. In these models instruction or academic material is often delivered to students who are separated from their instructors. In many cases there are no set class sessions in these models, and students have the flexibility to work at their own pace, and multiple faculty sometimes perform roles that may have been performed traditionally by a single instructor.

So, for example, you might have staff who are involved with designing the curriculum, other staff who end up assessing student learning, some who tutor, others who actually give lectures, all of that kind of thing. And so this is a characteristic that we've seen often in CBE programs of recent years. Then I'll move on to the next slide.

So remember that I said that there was no federal definition of a CBE program and that CBE programs take a variety of forms, including the ones I just described. But there are types of competency-based programs from the federal perspective, and there's a specific type that we've actually defined, which we call a direct assessment program. So for Title IV purposes, for federal student aid purposes, there are really just two types of competency-based programs, what we call direct assessment CBE programs and what we call credit- or clock-hour CBE programs. The difference between those two has to do with how an institution measures student progress within the program.

So in general, if an institution measures progress in a CBE program using credit hours or clock hours, then that program is not a direct assessment program. It's what we call a credit-hour or clock-hour competency-based program, and those programs are – they measure progress essentially just like any other program. They use the traditional credit hour or they use clock hours, so direct seat time, and they used exactly the same rules and requirements that we've set up for traditional programs.

So in some ways that can be helpful because it's something that's established and a little easier to use. In some ways that doesn't quite work because credit and clock hours have some restrictions around them that make it difficult to implement CBE programs in some cases. So schools have chosen both of these options and when they've implemented CBE programs, and neither of these are better in any particular way. They're both options that schools can use.

So direct assessment programs don't use credit or clock hours. So because of that, there are really no standardized forms of progress measurement in direct assessment programs, and for that reason the department has requirements for creating equivalencies between what it is that you use to measure progress, which in many cases they call competencies or just units of competency, something like that.

We require that you have an equivalency between that unit and the traditional credit or clock hour. That's in order for us to sort of implement all the other rules that we have for federal student aid awarding and disbursement and all of those things that are based on the credit or clock hours that have been used for many, many years.

The practical difference between the two is that direct assessment programs are kind of a purer form of CBE. Direct assessment allows students to progress through coursework at their own pace. They can finish a competency as soon as they're ready to finish it. There's no requirement for them to complete a certain amount of work or time or seat time or anything like that. On the other hand, credit- or clock-hour programs have specific requirements for the amount of time that a student spends in the class.

Clock hours are just clock hours. They require students to be sort of in class and paying attention, etc., and credit-hour programs have their own requirements for an amount of academic work or activity that a student has to do, including readings, tests, etc., that schools have to pay attention to. So those are the biggest differences between the two, but this is a point of a lot of confusion. I wanted to spend some time on this.

There are other differences. There's a specific application process for direct assessment programs, and there's only a very small number of those that are actually approved right now. We have about six schools who have approved direct assessment programs, but it is still available to folks.

And if you're interested, we have a resource, again, at the end of this presentation that you can go to to figure out how to apply for a direct assessment program. And with that I'll move on to the next slid here where we'll start talking a little bit about federal issues in competency-based education.

So the first one I want to talk about is prior learning assessment. It's on the next slide here. So this is an important concept in CBE, and that's because many CBE programs use at least some form of prior learning assessment or assessment of learning is incorporated into CBE programs in such a way that what a student knows when they enter the program can be used to display that knowledge or skill as a student goes along.

I want to be very clear, actually, about one point. The Department of Education doesn't have any prohibition on prior learning assessments, including in competency-based programs, and in fact, we don't take any position on how institutions award credit to students. The schools all over the country have prior learning assessment programs, and that's perfectly fine and makes a lot of sense, especially for students who are coming back in from the workforce; but does have some restrictions on how prior learning credit can be used to determine eligibility for Title IV aid, and I'm going to explain that here on the next slide.

So when we talk about prior learning assessment, hours that a student earns through prior learning assessment, fully through prior learning assessment, so without any instruction by the institution, those hours can't be used to determine a student's eligibility for Title IV aid for Pell grants and direct loans, etc. And that's because Title IV funds are designed to pay for instruction, not just the assessment of learning that occurred elsewhere.

And you can imagine that we wouldn't necessarily want to pay someone a Pell grant that was intended to cover six months of academic work when a student already knows all the material and just has to take a single test at the very beginning. So some of the implications of this policy you can see at the bottom of the slide. So if you confer credit or clock hours based on prior learning assessment, those hours can't be included in the student's enrollment status, and you can't include those hours in the calculation of a student's completion of hours when you're trying to determine whether they've completed what we call a payment period, if you have a program that doesn't use terms.

As I mentioned before, because many competency-based programs are designed to assess what a student knows, prior learning assessment is built into those programs. But because of these restrictions that I'm describing here, it's important for colleges to find a way to differentiate credit that's earned solely based on prior learning and credit that's based part – at least in part on the instruction that the student received at your college. Some colleges have done this with pre-tests.

So students may take a test at the very beginning of their program to see what they know at the outset. And others have done it at the beginning of each competency. And there's many other ways that you might be able to do this as well but colleges have begun to do some very difficult thinking about how to do this for their CBE programs and there have been some creative options that we've heard about. So this is an important thing to think about as you start to implement federal aid policies in your CBE programs. And with that I'll move on to the second major topic I want to discuss, which is what we call regular and substantive interaction.

So regular and substantive interaction is something that's been discussed quite a bit in the CBE circles recently, and it has to do with the difference between – in online programs the difference between what we call distance ed programs and what we call correspondence programs. So you can see this first bullet here.

In general all Title IV eligible programs, educational programs, except for correspondence programs, have to be designed to ensure that the students have regular and substantive interaction with their instructors. So if any program does not have a mechanism for ensuring that regular and substantive interaction occurs, that program would be considered a correspondence program.

If you have any familiarity with correspondence programs, there's a lot of limitations that come along with those programs. Students can only get half-time Pell grant awards. So those are sort of half Pell grant awards. And there are limitations on the number of correspondence courses or students that an institution can have in any given year. So many colleges want to avoid having their programs classified as correspondence programs. We'll go on to the next slide here.

So because this is so important, what we mean when we say regular and substantive interaction is also very important. So what do we mean? Well, I'm going to say first what we don't mean. We don't mean interactions that occur based on a student's request. So if it just happens that you have really great students who happen to ask a lot of questions, that doesn't quite do it. The interactions that we're discussing have to be sort of built into the design of a program.

So some examples might include regularly scheduled discussion groups. They might include synchronous lecture sessions. They could include a number of different things, but they have to be built into the program, and we consider the interactions to occur regularly if the program is designed to ensure that they happen on a predictable and regular basis.

So again, you can think of various ways that you could do this. You could build in conversations between the student and the faculty member in charge of the competency or the course, etc. I'll move on here to the next slide, slide number 19.

So that's what we mean by regular, but what do we mean by substantive. So we consider interactions to be substantive if they're substantial. So it has to be more than just a check mark, and it has to be relevant to the subject matter in which the student is engaged. So we generally mean responses to a student's assessment. We could mean conversations with an instructor about the subject material in the class, etc. So it has to be something – it can't just be having the instructor ask the student, how are you doing today and what did you have for lunch?

So we also have a requirement that substantive interactions must be provided by faculty members that meet accrediting agency standards for instruction in the specific subject matter. So what that generally means is that you have to make sure that it's – your faculty are – have the appropriate credentials and they meet whatever requirements that your accreditor has set. And anyone who meets those requirements, then if your program is designed to ensure that students are interacting with that individual, then you probably would meet this requirement.

And we say this because some CBE programs have been designed to include a lot of work from academic advisors and tutors, and it may be that those staff could qualify for purposes of regular and substantive interaction if they meet accrediting agency standards for instruction. But many don't, if they don't meet those standards.

So, for example, if you had someone who only had a bachelor's degree and was providing tutoring to students who are also in a bachelor's degree program, if your accreditor did not allow such a person to teach the course material, then it's possible that that interaction between the student and that tutor wouldn't count toward regular and substantive interaction requirements. So this is just an important thing to remember, that this kind of interaction has to happen between students and credentialed or folks that meet accrediting agency standards for instruction.

And speaking of accreditors, one of the other big issues for CBE programs is how they're treated by accrediting agencies. So I wanted to spend just a moment to talk to you about accreditation requirements. Now, it's a little difficult for me to talk about accreditation generally because all accreditors have different standards, and they have different ways of enacting those standards.

But in general, in order for an institution and its programs to be eligible for federal student aid, they have to be accredited, and the same thing is true for institutions that offer CBE programs. But accreditors have have different standards that apply to CBE programs, or they may have substantive change requirements that look at specific things with CBE programs.

So remember that at the very beginning of my remarks here we talked about the direct assessment programs and credit- or clock-hour programs. That distinction is actually very important here. The Department of Education's regulations require an accreditor to specifically approve every direct assessment program, but we don't require that for credit- or clock-hour programs. And that's partially because direct assessment programs are sort of new, that we're still trying to learn a little bit about those programs and because credit- or clock-hour programs are a little bit more traditional in design, generally.

Usually an accreditor will require a college to submit a substantive change application the first time they offer a CBE program. And that's because most of the time CBE in that case is a divergence from the institution's academic programs to date, and that usually triggers a substantive change application. But keep in mind that all accreditors have their own requirements, as I mentioned, and you have to just be sure that you understand the requirements as they relate to your CBE programs and they could differ.

Last year the regional accrediting agencies released a shared vision of how to treat CBE programs. That was in June last year, but even those agencies have slightly different standards and requirements. So I'd recommend reading each of the policies that they have on CBE carefully. And if they don't have anything specific to CBE, take a look at their substantive change requirements because that's something that can give you an indication of whether a new CBE program might trigger a substantive change requirement.

And with that I'm going to turn next to some resources that we have from the department that supports CBE programs. And the first set of things is here on the slide, the Experimental Sites Initiative. So this is some statutory authority that the department has to test out new forms of either financial aid procedures, academic programs, things like that.

We waive certain statutory or regulatory requirements and in order for those institutions approved to participate in the experiments and then we contrast the results that are achieved through the experiment with the results under the current regulations and we hope to find data to support changes to policy in the future. So that's generally what the Experimental Sites Initiative is designed to do.

So we actually had three different experiments announced in 2014 on the next slide here that are directly related to CBE programs, and those experiments are called prior learning assessment, limited direct assessment, and competency-based education. I'm not going to spend too much time discussing how those work, but suffice to say that prior learning assessment gives a little bit of flexibility about incorporating the cost of prior learning assessment in the calculation of federal aid awards so you can include it in the student's cost of attendance.

Limited direct assessment allows schools to have direct assessment programs that are less than 100 percent direct assessment, which isn't allowed normally. And competency-based education offers a whole host of regulatory and statutory waivers to allow for a different kind of disbursement in competency-based programs, one form being a sort of non-term very open form of competency-based, and we also have an option for subscription period programs where a school charges a flat rate for students to take as many competencies as they choose.

So all of these things in – unfortunately, I didn't get it on the slide. You can find information about each of these experiments at the department's website for experimental sites, which is experimentalsites.ed.go. So it's pretty straightforward. If you have – if you're interested in these, you can go to that website, and you can also give us an e-mail at experimentalsites@ed.gov if you're interested in any of these. And I should mention all three of these experiments are still open. So if you're interested, you can still join and participate in the next few years.

And on the next slide just a few more resources that we've provided here. All of these are links. So if you've downloaded the presentation, you can click on these links, and it should take you directly to the resources themselves. We've got regulations for direct assessment programs at the top. We've got the instructions for applying for a direct assessment program in what we call Dear Colleague Letter GEN 13-10.

And then the third bullet we have a Dear Colleague Letter that we issued that included a lot of guidance about competency-based programs. That's Dear Colleague Letter GEN 14-23. We published that in 2014. You can also access the Federal Student Aid Handbook. That's 2016-2017, Volume 2.

And finally, here at the bottom there's a link to the presentation that I gave with Julie Arthur, one of my colleagues, at the 2015 Federal Student Aid Conference. It includes a reference to all of the issues that we just discussed as well as a great deal of other information about return of Title IV funds, satisfactory academic progress requirements, and other very financial aid related things that I won't spend too much more time talking to you about today, unless you have questions about it.

And with that there's another slide here with some contact information on the next slide. That's my e-mail. If you have any questions, you should feel free to send that to me at – including after this presentation.

And then the general mailbox for CBE questions at the department, as Cheryl mentioned, is cbe@ed.gov, and we will try to get back to you very quickly. You may get a quicker response from cbe@ed.gov. I do my best, but there's a lot of e-mail that comes my way on any given day. So either one of those, though, we will do our best to get you an answer as soon as we can. And with that I'll turn it back over to Cheryl.

MS. MARTIN: All right. Thank you so much, David. That was really a lot to cover in a very short time, and I'm sure that people who have listened to this are still chewing on that. So we have a few questions but not a lot. So if you have questions, please do take this opportunity to type them into the Q&A box, and we will see if we can get to those in terms of whether they work on this kind of a setting.

If they're very specific to your institution, we may not be able to answer them in this setting. But right now, we've put a few poll questions up there. We're going to take a pause. David's going to take a pause and we'll take a look at your questions and then we'll go to any new questions that folks add and we'll be back with you shortly.

MR. GONZALEZ: And while we're waiting, just want to remind you that we are recording today's event. That recording will be posted to WorkforceGPS in approximately two business days, along with the written transcript of everything that was said. PowerPoint is already there for you to access, but again, we're taking a brief moment so that you can participate in the two polls that are on your screen right now.

The first poll is, going forward, to what extent do you feel you will be successful addressing financial aid barriers at your college? One is easy, and five is difficult. So there's a spectrum there. Three would be middle of the road.

The second question is, is your institution an experimental site with Department of Ed? And the options are PLA, LDA, CBE, yes but I don't know which, and not that I know of.

So again, we're taking a brief pause so we can review some of the questions that are rolling in right now and to give you time to participate in these two polls. We'll be back shortly. Thanks for waiting.

All right. We're coming back. Thanks for waiting. I'm going to turn things over to Cheryl Martin and David Musser. Cheryl?

MS. MARTIN: OK. Thanks. So we've gotten in about five questions so far that we are going to start answering, and we'll put the question up there as David is going through them. But please feel free to continue adding questions to the question box below, and if we have time and we get to them, we will.

So the first question, David, we'll just go ahead with these in order that they came in for the sake of ease even though that might not make the most sense in all cases. But the first question is, "On slide 18 it states that program-specific approval is required for direct assessment programs but not for clock- and credit-hour CBE programs. Can you clarify what we need to do in terms of accreditations, i.e. do we need a substantive change for CBE from the submission of the letter of interest to approval for experimental sites? How much time should we set aside?" David?

MR. MUSSER: Sure. And these are very good questions. I can't answer the substantive change question with a very firm answer, and that's partially because the requirements are different among accrediting agencies. But what I would say is, in my experience, most accreditors, if they're looking at credit- or clock-hour competency-based programs, they tend to treat programs that are at least 50 percent competency-based.

And if an institution has never offered competency-based education before, they tend to treat those two things combined as a substantive change and generally require a full substantive change application that an institution needs to go through with the accreditor. And then again, the substantive change process at the accreditor can be different between different accrediting agencies, but in some cases it does require a site visit by the accreditor staff to the college when they do a substantive change at that level.

And that obviously is a time-consuming process that can take up to three to six months, depending on what the accreditor needs and what the kinds of things that they're looking for. So it is important to remember that there's a lot of time that's built into this process when you're starting CBE for the first time, even if you don't have a direct assessment program.

With that, the accreditor has to do the substantive change approval. If it's a degree program and it's a credit or clock-hour program, it's not required necessarily for you to submit that program to the Department of Education. We require submission of non-degree programs, so certificate programs and those sorts of things, but not degree programs unless – and this is important – unless it's one of the programs that's part of the – one of the Experimental Sites Initiative experiments that I just mentioned, whether a direct assessment or competency-based education or if it's a direct assessment program.

So in those cases we would require an approval of the program before you can offer aid in it, but if it's just a regular degree program and you went through your substantive change process with your accreditor, it's not necessarily required for you to submit it to the department. Those programs you can self-certify are Title IV eligible. So I wish that was a simpler answer, but in that case it is important to know that there are a number of layer – there are sometimes layers of approval that you do need to go through when you get your program first approved.

MS. MARTIN: OK, David. Thank you. I hope that answers the question from the person who answered question number one, and thank you for the comment that was added by another individual.

Let's go to a second question. "After approval as a credit-based CBE experimental site with a subscription waiver in a standard term structure" – still with me here – "can we offer a start date that starts in a term but finishes between terms, for example, over Christmas break? Can we start a course break between terms, for example, Christmas break, and have it finish during the winter term? Can we start and finish a course between breaks?" David? I'm glad you're answering these questions.

MR. MUSSER: Yeah. I don't know if I can give a final answer here, and this one might be a good one to send me to my e-mail address. But I want to just speak generally about this one. So this is a question about the CBE experiment that the department is offering and the subscription period set of waivers that we've offered in that experiment.

And essentially what that experiment does is it allows a school to consider a term to be a period of time during which a student can take whatever competencies they want to, and the school makes a determination about how much the student is expected to complete during that time. And that's how they determine the student's enrollment status, and they figure out how much the student is eligible for, for example, in Pell grant funds as well as direct loan funds, etc.

This question is sort of asking, well, from what I can tell, either can a student start in the middle of one of those periods or – and the other option is maybe it's asking, can a subscription period start at a time that's different from the institution's regular academic terms? So to the first question, you can allow a student to start in the middle of a subscription period, but there's certain requirements that we've placed on subscription periods in that experiment that says everybody has to essentially be charged the same thing, at least based on how much they're expected to work on during the period.

So a student who starts in the middle of the subscription period would seem to have a lot less time to finish competencies. But we don't have any restrictions on how you set up your enrollment and how you set up your subscription period. So you could do what you wanted in that sense.

If it's the other question so that you may be asking about can you have subscription periods start at different times than your academic terms, that's completely fine. We allow you to have different kinds of terms for each program, if you choose, and it's just a matter of how you would set it up in your system and how you arrange it in terms of when the disbursements of Title IV aid are made. But like I said, this is one where we might want to have a longer chat offline, and I'd be happy to do that if we want to talk through your question.

MS. MARTIN: OK. Great. Thank you, David. And you saw the slides earlier that had David's e-mail on them and also the general cbe@ed.gov e-mail address that you can use if you come up with questions after this.

Another question, "For the experimental sides approved by credit-based" – sorry. "For the experimental sites approved for credit-based CBE, how much of the financial aid processing can follow normal process, and how much has to be done manually?"

MR. MUSSER: So that's a good question, though it depends. I'm not sure whether you mean the non-term version of the experiment or the subscription period version of the experiment. So there's the two major different types of waivers that we provided. It really depends on how your financial aid system is set up. So each college probably has a financial aid system that is designed to support its normal term-based financial aid for students in traditional programs, but not every college has a system that's designed to provide aid in the experimental arrangement that we've provided.

So it depends. If you're using the subscription model, we've heard a lot of schools have been able to modify their systems to accommodate the subscription version because it looks more like a term than the other version. The non-term version, as we've heard from a lot of schools, that's more manual, and almost all of them have said that they're going to start out doing manual processing with a small number of students.

But it would depend on how your system is set up, and again, if you'd like to send me an e-mail, we could talk about that a little bit more offline.

MS. MARTIN: OK. Great. Thank you, David. So the next question I know David said – you said you could answer this one more generally, but the question was, "Do you have any guidance navigating state-specific barriers, specifically New York?" So what can you say about that, David?

MR. MUSSER: So this is an important question. Unfortunately, I don't know enough about the New York requirements to speak to that specifically, and here's another instance where we might want to have an offline discussion. But I've talked a lot about accrediting agencies and the state requirements are also extremely important and it's just something that we don't always get into because not all states have requirements about competency-based education.

But if they do, then it's important to make sure that you get whatever approvals are needed and that you ensure that you're fulfilling whatever requirements that they've set for how these programs need to operate, how you need to charge students, etc., if, again – if your state has any of those requirements. And as far as we know, only a few do right now.

MS. MARTIN: OK. Thank you. So we have a question that relates to eligibility to qualify for an experimental site. David, are you aware of or is this something that they should go elsewhere for this? Are there any minimum requirements for a college's eligibility to qualify as an experimental site? You said that those experiments were still open. By the way, are all three of those experiments still open or just some of them?

MR. MUSSER: All three of them are.

MS. MARTIN: OK. So are there any minimum requirements like default rates or other metrics or is that something you can speak to or is there another source that they should go to for that?

MR. MUSSER: We actually have not specified any cutoffs in terms of, for example, default rates or financial responsibility scores. There's a lot of different metrics that the department uses to look at institutions, but we try to look at every institution in a holistic way. So what we'll do generally is look at the school's – we will look at things like default rate. We will look at things like financial responsibility scores, and we will look at things like compliance audits, program reviews over the last few years.

And we try to put all of that into context when we look at each institution, but I can't tell you a specific set of things that we would say absolutely not about. It is case specific, and it depends in part on the experiment itself. So if you're interested, we do recommend that you apply. It's probably worth at least submitting a letter of interest, even if you don't want to go too much further than that, because that way we could at least give you a heads up about whether you – we would consider you for the experiment.

MS. MARTIN: OK. Great. Thank you. We're going to take a small pause here to just see if anybody else has any additional questions. This is your chance to get David's attention, which is a hard thing to do. He has many people who need his attention and if you have additional questions, we will try to answer them today and if not, you can talk to him afterwards. So just a brief pause here.

OK. One other question that has come in and maybe there's a couple more that I'm seeing – OK. So one is, "Can you share which six direct assessment schools are participating?"

MR. MUSSER: So in the past couple of years we've approved applications from Brandman University, Capella University, Southern New Hampshire University, the University of Wisconsin Colleges, University of Wisconsin Milwaukee, and Walden University. Those are the ones that have approved direct assessment programs right now.

MS. MARTIN: Great. Great. Thank you for that. Let's take another quick pause, and I'll see what we've got coming in.

All right. So couple more questions. "Are there any other Inspector General reports coming out soon that we should watch for like the ones of WASC, HLC, and WGU?"

MR. MUSSER: So that was a good question and just want to give a little bit of context for the question. In the past couple of years, the department's Office of Inspector General has done audits on a number of organizations that have been working in the CBE area or are least related to CBE, and that includes WASC and HLC, two regional accrediting agencies. And we understand that the Office of Inspector General is working on an audit of Western Governors University, but as far as we know at the department that that audit is not yet complete.

So we don't have any other information about that right now. And the Office of Inspector General is actually a separate office from the department that conducts its own work in terms of audits and reviews of both the department itself and other agencies that are related to the department's business. And we don't have any other information about new audits coming up, but that doesn't mean that the inspector general isn't working on them. So, unfortunately, I don't have much more information about that.

MS. MARTIN: OK. That's sometimes how it goes. We get surprised by those too.

So another question, "Does the subscription waiver allow 52 subscription periods in a standard term format, i.e. once every week during the year?"

MR. MUSSER: Wow, that's an interesting question. So I have to think about that for a second. So there's – this is a yes and no kind of question, and I say yes. Technically the experiment would allow you to do that, to have a subscription period every week. There are some limitations in the department's systems. We have a system called the Common Origination and Disbursement System that processes disbursements that you make to students, and I can foresee some problems with having 52 different disbursements that go to students.

And for those who are familiar with financial aid, remember that, if you have what we call a term, then you're supposed to generally make a disbursement of Title IV aid once per term. So if you had 52 terms in a year, you'd have to make 52 different disbursements to students, and that could – I think that there may be some limitations in our system that don't allow you to do that. So we'd have to look a little bit further into that. I'm not sure that it would work. I think the system allows for at least 20 different disbursements to students.

Beyond that, we might have to make some special changes, and I'm not sure if we can do that or not. So again, if you'd like to pursue that, you can certainly get in touch with me, but at the outset I would say just that may not work for us just because of the number of payments you'd have to make to students.

MS. MARTIN: OK. Thank you. One more brief pause while we check the questions here.

Great. OK. So we have one question, and I'm going to make this the last question today. Thank you for your participation. "Can you share the schools who have been approved for the subscription waiver credit-based CBE?"

MR. MUSSER: So I'd like to thank you guys for that question. Unfortunately, the approvals for this are still a little bit in flux, and I can't give you the schools who have been approved for that one. I will say that, if you join the CBE experiment or if you're already part of the CBE experiment, one of the things that we have planned is to connect the schools that are in the experiment by sharing more information about which experiment is – each institution is participating in.

We should have some final information about that over the next few months that we can post on our website or potentially send to institutions directly. So I wanted to thank the questioner for asking this. Even though I can't give an answer today, we'll do our best to get that list together and post it and make sure that folks have access to it. Part of what we're waiting for is for schools to finalize with their accrediting agencies and get everything up and running and finalize their participation, but many – there are a few schools that are already at that stage. So we can start giving some information about that. So thank you.

MS. MARTIN: All right. Well, thank you so much, David, for spending this hour with us today and answering a lot of questions that folks had and I'm sure creating a few more questions. So as we mentioned, there are places to get additional answers, some of these resources that are up here, including I mentioned early on that the CBE webinar series part one that has general information about that and some really good examples from Sinclair.

That's the first link up there. And the rest of these are resources that we – that we're making available in addition to the resources that David had on the other slide. So you have lots and lots of resources that you can tap here, if you are interested in learning more about CBE. And in addition to that, of course you can contact David or the cbe@ed.gov e-mail, if you have other questions.

Couple of announcements before we end today. Upcoming for the TAACCCT Learning Network there are a couple of events that, if they fit in with your statement of work and your grant, you might want to consider participating in, the NCWE Annual Conference, which will be coming up in just a couple of weeks here in Atlanta and then the Workforce Development Institute in January in 2017 where there's a TAACCCT private meet-up on Wednesday.

So if you're interested in either of those, there's information on that. Thank you again, David, and thank you to all of you who participated today. Really appreciate it, and we'll talk to you again soon.

MR. GONZALEZ: Thanks, Cheryl. Thanks, Dave.

(END)