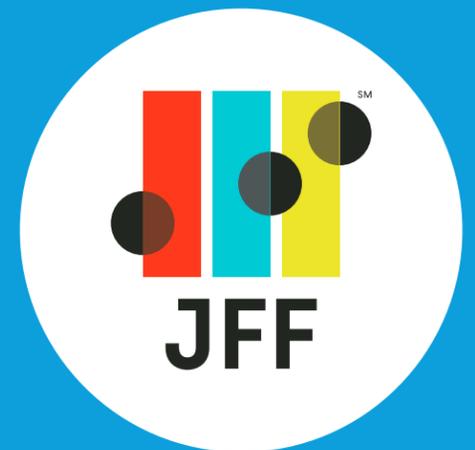# Direct Assessment CBE:
A Blueprint for Community College Leaders

SUMMER 2020

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JFF

ACKNOWLEDGMENTS

ABOUT

JFF is a national nonprofit that drives transformation in the American workforce and education systems. For 35 years, JFF has led the way in designing innovative and scalable solutions that create access to economic advancement for all. Join us as we build a future that works. **www.JFF.org**

INTRODUCTION

Competency-based education (CBE) is flexible for working adults, reduces costs for institutions, and provides learners with portable skills, certificates and degrees in high demand by employers. There is great latitude in how institutions design and execute CBE based on institutional needs, mission and context. The most flexible CBE approach is direct assessment, which in lieu of the credit or clock-hour, measures all student learning by assessment. Direct assessment programs allow learners to determine when, and at what pace, they can learn and earn certificates and degrees. While direct assessment offers the greatest flexibility for students, it requires tremendous transformation to policy, instruction, and business and support processes.
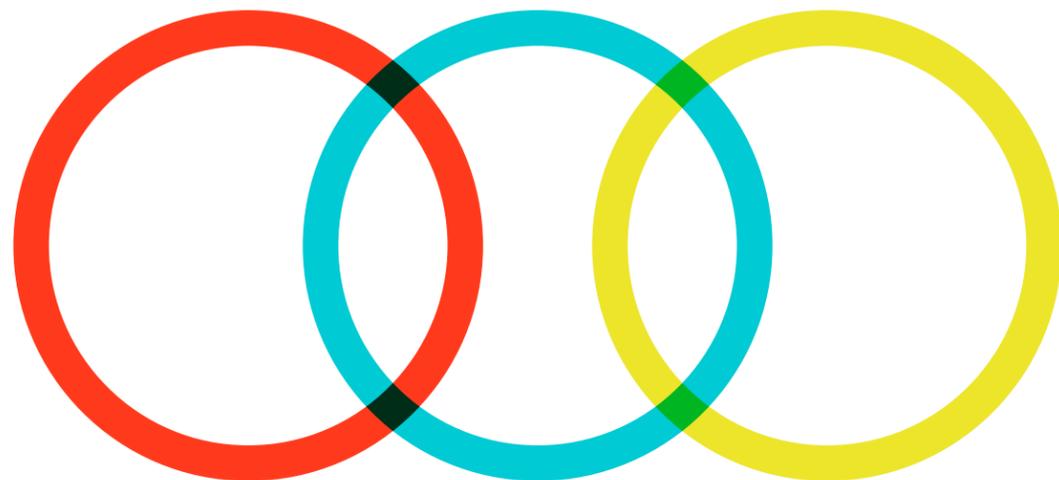
HOW TO READ

Direct assessment CBE requires significant changes to teaching, learning, and business operations that must be addressed strategically. We designed this document to support community college leaders in managing the complexity of the implementation process.

The document is divided into three major sections:

1. A timeline that outlines the seven phases of implementation.

2. Key activities for each phase of CBE design and development.

3. Curated resources and frameworks to support site-level implementation.

Policy and regulation shifts may also be needed at the state or system-level around areas such as program and module approval, funding, academic calendar, academic symbols, withdrawal, repetition, credit hour equivalencies, faculty and staff roles, and data reporting. State and system-leaders can play a strong and proactive role in fostering collaboration, providing guidance and support, and scaling effective practices.

Throughout this blueprint we have highlighted areas within each phase of implementing CBE where state or system-leaders can support institutions through specific actions and activities.

THE TIMELINE

This high-level timeline consists of seven phases, each of which include major activities and decisions required for launching a direct assessment competency-based education program. As represented in the timeline, activities within phases 1–2, phases 3–5, and phases 6–7 will overlap. The specific length of time required for each phase will vary by institution.

Establish Local Infrastructure for Innovation
6 Months

Design the Program
12 Months

Obtain Regional Accreditation & Federal Program Approval
12 Months

Launch Program
12 Months

| Phase 1 | Phase 3 | Phase 4 | | Phase 6 | |
| Phase 2 | | Phase 5 | | | Phase 7 |

Select the Program
3 Months

Build Operational Model
12 Months

Continued Action Research & Scalability
12 Months

Start   Year 1   Year 2   Year 3

PHASE 1

Establish Local Infrastructure For Innovation

Phase 1

PHASE 1: Establish Local Infrastructure For Innovation

*Spread local awareness, gather support, and establish a CBE workgroup.*

It is critical to gain the understanding and support of leaders across units to successfully drive work forward.

ACTIVITIES 1 OF 2

- Inform stakeholders of this effort.

- Gain the support of local institutional leaders and stakeholders.

- Establish a CBE workgroup with diverse perspectives and representation including institutional research, financial aid, faculty, registrar, admissions, and marketing.

- Identify resources to implement CBE.

- Develop a roadmap or workplan for implementing direct assessment CBE at the institution.

KEY STAKEHOLDERS

- Institutional leaders
- Administrators
- Faculty from target program's department
- Students
- Industry and workforce partners
- Four-year institutional partners
- Instructional designers
- Institutional researchers
- Counseling and student services staff
- IT
- Finance
- Financial aid
- Registrar
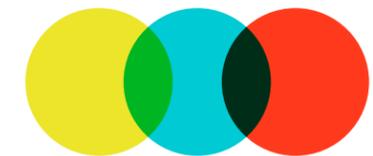- Marketing
- Guided Pathway teams
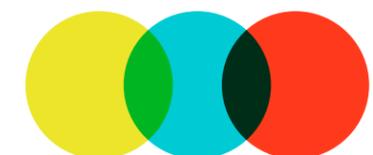
- Determine operational roles and responsibilities for concurrent CBE planning and implementation committees.

STATE OR SYSTEM-LEVEL SUPPORTS

- Launch direct assessment CBE strategic communications campaign.

- Partner with districts and institutions to determine readiness for direct assessment CBE.

- Establish a partnership with state and national subject matter experts or technical assistance providers to support institutions.

- Identify and coordinate a professional development plan that includes faculty and staff trainings and direct support to institutions.

Example CBE Implementation Committee Structure: Brandman University

Academic Team *Responsible for creating and building CBE program*	Institutional CBE Lead
	Faculty
	Instructional Designer(s)
	Assessment Expert(s)
Business Operations *Responsible for infrastructure for CBE implementation*	Financial Aid
	IT
	Admissions
	Registrar
	Advising
	Marketing And Outreach
	Business Office
Program Council *Responsible for advising and recommending improvements in the development and maintenance of CBE program*	CBE Faculty
	Credit-Hour Faculty
	Deans/ Department Chairs
	Provost
	Assessment Office
	Institutional Research

PHASE 2

Select the Program

Phase 2

Phase 2

PHASE 2: Select the Program

*Make a data-informed decision about the CBE program(s) to be developed.*

Programs should be selected to align with opportunities in the regional labor market and provide opportunities for transfer to four-year institutions.

ACTIVITIES
1 OF 2

- Survey students to identify high-interest program areas.

- Form an industry-led advisory board to support the direct assessment CBE program development.

- Select credit-bearing certificates and/or degrees.

- Determine if the direct assessment program will be a new offering or if an existing credit-hour program will be redesigned as a CBE program.

- Work with local four-year institutions to develop degree pathways.

KEY STAKEHOLDERS

- Institutional leaders
- Administrators
- Faculty
- Students
- Industry and workforce partners
- Four-year institution partners
- Community-based organizations
- Institutional researchers
- Guided Pathway teams
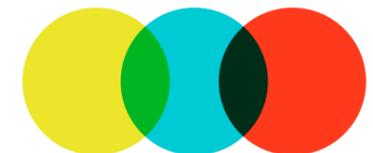
ACTIVITIES
2 OF 2

- Conduct labor market analysis and evaluate which programs lead to the greatest outcomes for students.

STATE OR SYSTEM-LEVEL SUPPORTS

- Establish funding mechanism to support sites in targeted industries aligned to local labor market needs.

- Coordinate planning and resources support with local districts and institutions.

- Support development of a faculty manual for direct assessment CBE.

Where to find labor market information?

Data Sources

- Unemployment Insurance
- Bureau of Labor Statistics
- Census Bureau Longitudinal Employer-Household Dynamics Program
- Burning Glass

- LinkedIn
- Payscale.com
- Esmi
- O*NET
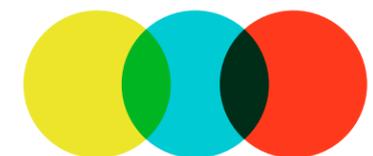
PHASE 3

Design the Program

Phase 3

PHASE 3: Design the Program

Develop curricula, assessments, learning resources and faculty model.

The processes for system program approval, regional accreditation, and program approval from the U.S. Department of Education will begin during the second half of this phase. Some components of this phase will be necessary for regional and federal program submission, while other components may occur while awaiting accreditor approval.

ACTIVITIES 1 OF 2

Onboarding

- Hold onboarding meeting for all stakeholders to explain CBE, share goals, and answer questions.

Calendar

- Identify academic calendar model.

Competencies and Modules

- Identify competency framework to support program design.

- Develop competency statements and objectives informed by employers, professional advisory committees, and/or licensure requirements.

- Create formative and summative assessments.

- Develop curricula and learning activities, including culturally relevant learning resources and metacognitive learning strategies.

- Determine work-based learning opportunities.

- Crosswalk competencies to credit-hours.

KEY STAKEHOLDERS

- Faculty
- Students
- Instructional designers
- Subject matter experts/field experts
- State licensing boards
- Experts in personalized learning technology and accessibility
- Industry and workforce partners
- Four-year institution partners
- Career Technical Education and/or work-based learning coordinators
- Academic support services
- Librarians
- Counseling and student services staff
- Guided Pathway teams
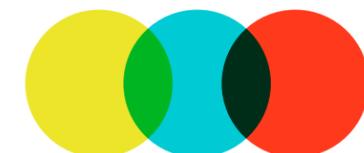
ACTIVITIES
2 OF 2

Faculty model

- Establish faculty roles, responsibilities, selection criteria and workload based on regulatory guidance. The faculty model should allow for a team-based approach to various aspects of instruction, assessment and advising.

- Establish standards for instructor contact and availability based on regulatory guidance for 'regular and substantive interaction.'

- Plan professional development for faculty and administration that address individualized online learning and culturally responsive instructional practices.

Inclusive learning environment

- Establish a coaching model to provide dynamic student support services.

- Create structures for accessible peer-group and informal learning opportunities.

- Design wraparound services and supports.

- Design postgraduate transition and placement supports.

STATE OR SYSTEM-LEVEL SUPPORTS

- Establish review and approval process for direct assessment CBE programs.

- Develop guidelines for faculty/staff selection and workload.

- Support the creation of a competency development guide.

- Provide best practices and credit-hour equivalency models for local use.

- Develop competency-to-credit-hour equivalency models and crosswalk maps.

- Collaborate with four-year partners to ensure credits transfer.
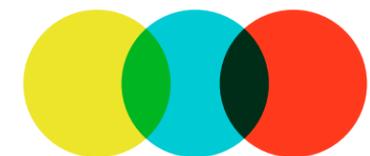
PHASE 4

Obtain Regional Accreditation and Federal Program Approval

Phase 4

PHASE 4: Obtain Regional Accreditation and Federal Program Approval

Gain program approval from regional accreditors and the U.S. Department of Education to ensure that direct assessment CBE students will be eligible for financial aid, and that CBE certificates and degrees carry the same value as an institution's traditional programs.

The combined regional accreditation and U.S. Department of Education approval process is estimated to take a total of 12–18 months upon date of submission to the accrediting agency. Institutions must establish a point of contact to shepherd these approval processes and coordinate responses.

REGIONAL ACCREDITATION

Components of regional accreditation submission for direct assessment CBE program approval under the substantive change process

- Competency to credit-hour crosswalk maps and methodology.

- Program and module competencies, including the number of competencies per program and overarching competency statements, external framework references, and evidence of confirming to degree level.

- Quality formative and summative assessments for competencies in accordance with system guidance and best practices in assessment development. This requires demonstration of expertise in assessment to establish reliability and validity, authentic demonstrations, and include multiple prompts for each competency.

- Regular and substantive interaction with faculty per federal guidelines and appropriate services for students.

- Student mastery of each competency in order to earn the degree.

Federal requirements for direct assessment CBE program accreditation

- Submit an Electronic Application for Approval to Participate in the Title IV Federal Student Aid Programs (E-App) with a description of three key program components:

  ○ A detailed program description, a detailed description of financial aid administration, and documentation that the college's accrediting agency has evaluated and approved the credit hour equivalency as outlined in 34 CFR 668.10 (a) and (b).[1]

Program description must include

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 (a).

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.

FEDERAL **PROGRAM APPROVAL** 2 OF 2

In addition, institutions must provide information on the following:

- Plans for ensuring learners are meeting Satisfactory Academic Progress (SAP).

- Process for withdrawing a student or changing enrollment status.

- Programmatic capacity for administering financial aid.

- Definition of a full-time student.

- Plans for ensuring faculty-initiated regular and substantive interaction.

- Students must meet satisfactory academic progress (SAP) in terms of qualitative measures (grades) and quantitative (time).

STATE OR SYSTEM-LEVEL SUPPORTS

- Communicate efforts to regional accreditors and work towards a collaborative approach to direct assessment CBE program approval.

- Collaborate with institutions to prepare for regional accreditation.

- Approve institutions direct assessment CBE program.
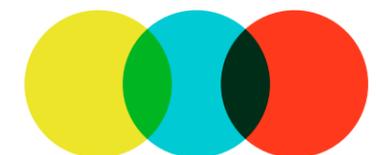
PHASE 5

Build Operational Model

Phase 5

PHASE 5: Build Operational Model

Establish the administrative policy, operational infrastructure, and technological tools necessary to implement direct assessment CBE.

The majority of up-front investment from colleges will be focused on building the infrastructure to support direct assessment programs. Key decisions must be made around program administration, financial aid, professional development plans, student services, and the technology required to support teaching, learning and reporting. The entire student journey, from enrollment to completion, must be built with processes and systems that prioritize the equitable achievement of historically underserved students. This phase overlaps with Phase 3 (Design the Program) and will take place while the institution is awaiting regional and federal program approval.
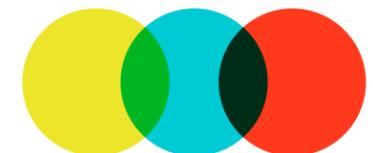
ACTIVITIES 1 OF 3

Professional Development

- Hold meeting for all relevant stakeholders to discuss status of CBE plans, describe local program design, and answer questions.
- Provide training to faculty and staff relevant to their administrative or instructional roles.

Business

- Determine local/district approach to managing the direct assessment CBE program.
- Operationalize new academic calendar model in business operations including student registration, tracking, and reporting requirements.
- Determine enrollment periods, pricing model, and timing for financial aid disbursements.
- Develop process for CBE students to access financial aid resources, including requirements for active military and veterans.
- Plan strategy for student recruitment, enrollment, and retention.
- Establish roles and responsibilities to support unbundled faculty and staff roles.

KEY STAKEHOLDERS

- Faculty
- Financial aid
- Business office
- Human resources
- IT
- Tutors, coaches, and other academic support services
- Counselors and student services
- Librarians
- Accessibility experts

Academics

- Include CBE program in internal department and institution program review processes.

- Develop system and processes to support dual transcripts.

- Create online student supports including tutoring, counseling, library services, writing center, peer support, and IT help desk.

- Evaluate policy and supporting infrastructure to support credit for prior learning.

Evaluation

- Design process and mechanism for validating program quality, including feedback from students, alumni and continuous alignment to employer demands.

- Establish data collection plan for continuous learning and improvement.

STATE OR SYSTEM-LEVEL SUPPORTS

- Develop dual transcript model (layout, reporting format) to ensure consistency across institutions.

- Create a system-wide landing page for students that explains CBE in an accessible, transparent manner.

- Provide guidance on student financial aid and student support services.
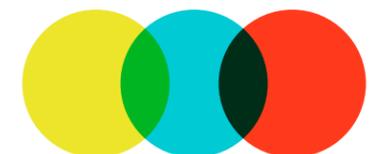
Technology

- Develop technological infrastructure to deliver online instruction and assessments.
- Identify and design supports for mitigating the digital divide (bandwidth and device access).
- Establish external vendor partnerships and copyright clearance for learning resource content.

Determining Your CBE Technology Needs

A key decision will be around whether to keep your institution's technology platforms or implement a new system to support the unique needs of the direct assessment CBE program. Many institutions do not have "one solution" to meet all CBE tech needs.

Step 1: Determine functions needed for your direct assessment CBE system, which will include three main components:

- **Learning Management System** – This must support the unique needs of personalized, asynchronous instruction. Its flexibility, user interface, and functionality will have a significant impact on faculty and student satisfaction with the program.

- **Assessment Management System** – The robust, individually administered assessments at the core of CBE must be securely housed, organized, and authenticated.

- **Student Information System** – Institutions will need to have integration or incorporation to an SIS.

Step 2: Determine the availability and ease of integrating desired functionality into your institution's existing technology platforms. Considerations may include:

- Ease of use for faculty, staff, and students, including load time, navigation, communication, and accessibility on mobile devices.

- Ability to track regular and substantive interaction between faculty and students.

- Integration across platforms/vendors.

- Ability to create and access assessments.

- Secure student authentication.

- Early warning alerts.

- Ease and robustness of data extraction.

- Ability to generate dual transcripts.

- ADA compliance.

Step 3: Modify existing platforms or explore partnerships with additional vendors for a new CBE tech solution. Prioritize the attainment of a high quality LMS, as it is critical to the success of CBE programs.

PHASE 6

Launch Program

Phase 6

PHASE 6: Launch Program

Recruit and enroll the first student cohort and launch program.

This phase continues the necessary supports for faculty and staff, such as professional development and training.

ACTIVITIES 1 OF 2

### Marketing and Recruitment

- Identify target population of students and determine size of first cohort.

- Collaborate with industry partners on strategic communication and recruitment.

- Implement a student outreach plan that promotes and clearly explains program structure and policies for students.

- Create a clear, mobile friendly website that includes withdrawal, transfer and program policies, financial aid information, and program outcomes.

Inclusive Entry and Orientation

- Assist prospective students in determining if program is right for them such as consultations with counselors/advisors, previewing the program modules, or prospective student orientations.

- Conduct prior learning assessments if appropriate.

KEY STAKEHOLDERS

- Marketing
- Registration and eEnrollment
- Faculty
- Students
- Counselors and student services
- Tutors, coaches, and other academic support services
- Industry and workforce partners
- IT
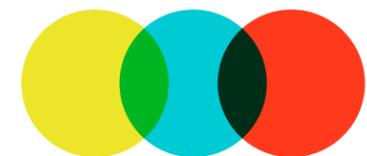
ACTIVITIES
2 OF 2

Enrollment

- Conduct pre-enrollment survey and/or informational interviews to proactively identify personalized student supports.

- Design and implement an inclusive program orientation that builds a sense of belonging and community.

- Provide ongoing professional development to faculty, staff and students.

Launch

- Monitor initial cohorts closely and ensure that students are receiving adequate guidance and support.

STATE OR SYSTEM-LEVEL SUPPORTS

- Provide guidelines for inclusive entry and orientation processes.
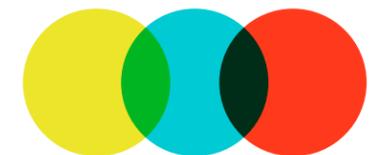
PHASE 7

Continued Action Research And Scalability

Phase 7

PHASE 7: Continued Action Research And Scalability

Conduct ongoing research to measure impact, learn lessons, and continuously improve as direct assessment CBE programs expand.

Despite overwhelming interest in direct assessment CBE across the country, further research is needed to understand effective practices that meet the needs of diverse learners.

ACTIVITIES
1 OF 2

- Identify data metrics and definitions in alignment with systems-office including disaggregated data within CBE programs, across CBE modules, and between CBE and traditional programs.

- Establish data reporting timeline and milestones, modify existing reporting requirements to accommodate direct assessment CBE programs.

- Align program evaluation with local goals and equity plans.

- Solicit student, faculty, staff, employer and alumni feedback through surveys, focus groups, and/or interviews.

- Establish process for gathering student stories.

- Utilize data to drive continuous program improvement.

KEY STAKEHOLDERS

- Institutional researchers
- Faculty
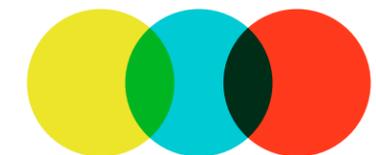- Students
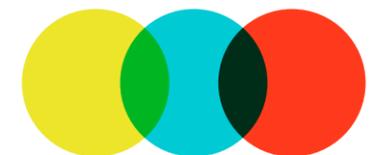
ACTIVITIES
2 OF 2

- Provide ongoing professional development guided by research findings.
- Share lessons learned.

STATE OR SYSTEM-LEVEL SUPPORTS

- Establish state-wide learning agenda for direct assessment CBE programs.
- Modify data collection and reporting to accommodate CBE metrics.
- Share lessons learned across the system and nationwide.

Potential Topics For Continued Action Research

- Access and equity
- Affordability
- Employment and earnings outcomes
- Educational advancement

- Persistence and retention
- Social learning and inclusive community
- Virtual learning student supports
- Faculty and staff model

RESOURCES

FEDERAL GUIDELINES

34 CFR 668 Direct Assessment Programs. Federal regulations for direct assessment programs, including a list of materials that must be submitted to the Secretary for Title IV eligibility.

Federal Student Aid Handbook, Volume 2. This detailed handbook includes program eligibility requirements for financial aid.
Dear Colleague Letter GEN-13-10. This letter provides guidance to institutions 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.

CBE FRAMEWORKS AND DEFINITIONS

Clarifying Competency-Based Education Terms. American Council on Education, Blackboard. 2014. A glossary of CBE terms and definitions.

Connecting Credentials Framework. Lumina Foundation. 2017. The framework provides a rubric with which to assess the level of knowledge and skills found in competencies, includes step-by-step instructions and a guidebook.

Designing Quality into Direct-Assessment Competency-Based Education Programs. Aaron Brower et. al. 2017. This study applies design principles using the Association of American Colleges & Universities quality framework to direct-assessment CBE to promote a vision of quality based upon Proficiency, Agency and Self-Direction, Integrative Learning and Problem-Based Inquiry, Transparency and Assessment, and Equity.

Measuring Student Success in Postsecondary Competency-Based Education Programs: Toward a Student Outcomes Metrics Framework. American Institutes for Research. 2017. Drawing on other early research, the Framework articulates metrics that can be used across many CBE program types to build toward a common language about CBE students and outcomes.

Quality Framework for Competency-Based Education Programs. Competency-Based Education Network. 2017. This work provides principles, standards, and definitions that apply across a wide variety of CBE program models. It is informed by feedback from CBEN members from 30 institutions and four state university systems.

COMPREHENSIVE GUIDES

A Leader's Guide to Competency-Based Education: From Inception to Implementation. Deborah Bushway, Laurie Dodge, Charla Long. 2018. This book provides context, guidelines, and processes to help institutional leaders become more competent in designing, building, and scaling high-quality competency-based education (CBE) programs.

CBE Playbook. Pearson. 2016. This short "playbook" provides a high-level overview of the components and key decisions associated with launching a new CBE program.

Measuring Mastery: Best Practices for Assessment in Competency-Based Education. Katie Larsen McClarty and Matthew N. Gaertner. 2015. This paper outlines a set of best practices for high-stakes assessment in CBE, drawing from both the educational-measurement literature and current practices in prior-learning and CBE assessment.

Quality Framework for Competency-Based Education Programs: User's Guide. Competency-Based Education Network. 2018. This framework provides elements, principles and standards to inform the design, implementation or scaling of high-quality programs. The guide is based off feedback from over 30 institutions, four state university systems, and over a hundred individuals.

Questions Financial Aid Professionals Should Ask About Competency-Based Education Programs. Competency-Based Education Network. 2016. This resource guide is for financial aid professionals and outlines key questions and considerations around student eligibility, program eligibility, FSA requirements, consumer and safety information, record keeping, payment periods and disbursements and calculating Pell and military grant awards.

LESSONS LEARNED

A Delphi Study of Effective Practices for Developing Competency-Based Learning Models in Higher Education. Lisa Monica McIntyre-Hite. 2016. This dissertation gathers expert opinions about effective practices for developing competencies, assessments, and learning resources in CBE programs.

All Hands on Deck: Ten Lessons from Early Adopters of Competency-Based Education. Patricia A. Book. 2014. This brief provides a snapshot of seven competency-based postsecondary programs and highlights ten lessons learned related to administration, faculty and student support, data systems, choice of model, business model, and structure. 16 pages.

Competency-Based Education: A Study of Four New Models and Their Implications for Bending the Higher Education Cost Curve. rpk Group. 2016. Four business models address different approaches to implementation around business models, start-up investment, operating costs, and benchmark metrics.

Moving Competency-Based Education Forward: Lessons from Five Years of Direct Assessment Implementation. Capella University and Whiteboard Advisors. 2019. With this report, Capella University shares both outcomes and critical lessons learned from the first five years of offering direct assessment through its FlexPath model.

National Survey of Postsecondary Competency-Based Education. American Institute of Research. 2019. The National Survey of Postsecondary Competency-Based Education (NSPCBE) is an annual, web-based survey of postsecondary institutions in the United States, geared toward assessing the state of the CBE field, including both institutions that are interested in adopting CBE and those already on the adoption pathway.

EQUITY

How Competency-Based Education May Help Reduce Our Nation's Toughest Inequities. Stephanie Krauss. 2017. This paper considers how CBE can be used to educate, equip, and empower learners who struggle in postsecondary learning programs because of who they are and where they live. Recommended starting points — places and programs — are provided throughout the paper to highlight where and how CBE providers can prioritize equity.

Next Generation CBE: Solving the Four Big Problems Facing CBE for Underprepared College Learners. Tom Hilliard, Deb Bushway, Stephanie Krauss, Nate Anderson. 2018. This report identifies and discusses four major barriers that CBE presents for underprepared learners.

Next Generation CBE: Paving the Way, Remaking entry for postsecondary success. Amy Girardi. 2017. This paper focuses on the types of effective intake, placement, and orientation activities that are especially critical for success in CBE programs, both because of the unique delivery model and because students often begin lessons at an individualized starting point.

Next Generation CBE: Building on a Strong Foundation: Linking CBE with Innovations in Developmental Education Redesign. Nate Anderson. 2017. This paper proposes merging the best practices of developmental education redesign models with competency-based education to increase success for underprepared learners.

ENDNOTES FROM PG 16, PHASE 4

[1]   The application process is complex, and can best be understood by reviewing the following documents:

1. 2019-2020 FSA Handbook Volume 2: https://ifap.ed.gov/sites/default/files/attachments/2020- 01/1920FSAHbkVol2Master.pdf.

2. 34 CFR 668 https://www.law.cornell.edu/cfr/text/34/668.10.

3. Dear Colleague Letter GEN-13-10, https://ifap.ed.gov/dear-colleague-letters/03-19-2013-gen-13-10-subject-applying-title-iv-eligibility-direct-assessment.