CBE and Title IV

Presenter: Johnathan Button
Associate Vice Chancellor for Student and Financial Aid Services
Federal guidelines recognize the following approaches:

1. Credit-based approach using credit hour or clock hour
2. Direct assessment approach based on student’s demonstration of competencies, in lieu of credit hours or clock hours, as a measure of student learning
CBE—Credit Based Approach

- Program is organized by competency rather than by course but measures progress using clock or credit hours.
- Title IV aid must be administered using normal statutory and regulatory provisions for clock or credit hour programs.
- Credit hour institutions must ensure each credit hour requires sufficient educational activity to fulfill the federal definition of a credit hour.
- Can be offered as non-term, standard term, or nonstandard term.
  - If standard or nonstandard term, students must be required to start and finish competencies within established term dates.
Credit Hour Definition—34 CFR 600.2

• Except as provided in 34 CFR 668.8(k) and (l), a credit hour is an amount of student work defined by an institution, as approved by the institution’s accrediting agency or State approval agency, that is consistent with commonly accepted practice in postsecondary education and that—
  • (1) Reasonably approximates not less than—
    • (i) One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different period of time; or
    • (ii) At least an equivalent amount of work as required in paragraph (1)(i) of this definition for other academic activities as established by the institution, including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours; and
  • (2) Permits an institution, in determining the amount of work associated with a credit hour, to take into account a variety of delivery methods, measurements of student work, academic calendars, disciplines, and degree levels.
Clock Hour Definition—34 CFR 600.2

• (1) A period of time consisting of—
  • (i) A 50- to 60-minute class, lecture, or recitation in a 60-minute period;
  • (ii) A 50- to 60-minute faculty supervised laboratory, shop training, or internship in a 60-minute period;
  • (iii) Sixty minutes of preparation in a correspondence course; or
  • (iv) In distance education, 50 to 60 minutes in a 60-minute period of attendance in—
    • (A) A synchronous or asynchronous class, lecture, or recitation where there is opportunity for direct interaction between the instructor and students; or
    • (B) An asynchronous learning activity involving academic engagement in which the student interacts with technology that can monitor and document the amount of time that the student participates in the activity.

• (2) A clock hour in a distance education program does not meet the requirements of this definition if it does not meet all accrediting agency and State requirements or if it exceeds an agency’s or State’s restrictions on the number of clock hours in a program that may be offered through distance education.

• (3) An institution must be capable of monitoring a student’s attendance in 50 out of 60 minutes for each clock hour under this definition.
(a)(1) A direct assessment program is a program that, in lieu of credit or clock hours as the measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program utilizing the results of the assessment.

(2) Direct assessment of student learning means a measure of a student’s knowledge, skills, and abilities designed to provide evidence of the student’s proficiency in the relevant subject area.
• (3) An institution must establish a methodology to reasonably equate each module in the direct assessment program to either credit hours or clock hours. This methodology must be consistent with the requirements of the institution’s accrediting agency or State approval agency.

• (4) All regulatory requirements in this chapter that refer to credit or clock hours as a measurement apply to direct assessment programs according to whether they use credit or clock hour equivalencies, respectively.
(5) A direct assessment program that is not consistent with the requirements of the institution’s accrediting agency or State approval agency is not an eligible program as provided under § 668.8. In order for any direct assessment program to qualify as an eligible program, the accrediting agency must have—

• (i) Evaluated the program based on the agency’s accreditation standards and criteria, and included it in the institution’s grant of accreditation or preaccreditation; and

• (ii) Reviewed and approved the institution’s claim of each direct assessment program’s equivalence in terms of credit or clock hours.
(b)(1) An institution that wishes to offer a direct assessment program must apply to the Secretary to have its direct assessment program or programs determined to be eligible programs for title IV, HEA program purposes. Following the Secretary’s initial approval of a direct assessment program, additional direct assessment programs at an equivalent or lower academic level may be determined to be eligible without further approvals from the Secretary except as required by 34 CFR 600.10(c)(1)(iii), 600.20(c)(1), or 600.21(a), as applicable, if such programs are consistent with the institution’s accreditation or its State approval agency.
(2) The institution’s direct assessment application must provide information satisfactory to the Secretary that includes—

- (i) A description of the educational program, including the educational credential offered (degree level or certificate) and the field of study;
- (ii) 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 and how the institution excludes from consideration of a student’s eligibility for title IV, HEA program funds any credits or competencies earned on the basis of prior learning;
- (iii) A description of how learning is assessed and how the institution assists students in gaining the knowledge needed to pass the assessments;
- (iv) The number of semester, trimester, or quarter credit hours, or clock hours, that are equivalent to the amount of student learning being directly assessed for the certificate or degree;
- (v) The methodology the institution uses to determine the number of credit or clock hours to which the program or programs are equivalent; and
- (vi) Documentation from the institution’s accrediting agency or State approval agency indicating that the agency has evaluated the institution’s offering of direct assessment program(s) and has included the program(s) in the institution’s grant of accreditation and approval documentation from the accrediting agency or State approval agency indicating agreement with the institutions methodology for determining the direct assessment program’s equivalence in terms of credit or clock hours.

- (vii) Notwithstanding paragraphs (a) and (b) of this section, no program offered by a foreign institution that involves direct assessment will be considered to be an eligible program under § 668.8.
Direct Assessment — 34 CFR 668.10

• (c) A direct assessment program may use learning resources (e.g., courses or portions of courses) that are provided by entities other than the institution providing the direct assessment program without regard to the limitations on contracting for part of an educational program in § 668.5(c)(3).

• (d) Title IV, HEA program funds may be used to support instruction provided, or overseen, by the institution, except for the portion of the program that the student is awarded based on prior learning.
• (e) Unless an institution has received initial approval from the Secretary to offer direct assessment programs, and the institution’s offering of direct assessment coursework is consistent with the institution’s accreditation and State authorization, if applicable, title IV, HEA program funds may not be used for—
  • (1) The course of study described in §668.32(a)(1)(ii) and (iii) and (a)(2)(i)(B), if offered using direct assessment; or
  • (2) Remedial coursework described in §668.20, if offered using direct assessment.
• (f) Student progress in a direct assessment program may be measured using a combination of—
  • (1) Credit hours and credit hour equivalencies; or
  • (2) Clock hours and clock hour equivalencies.
34 CFR 668.10(a)(3) requires an institution to provide a factual basis, satisfactory to the Secretary, for its claim that the program or portion of the program is equivalent to a specific number of credit or clock hours, but this factual basis could take a variety of forms.
Direct Assessment Approach Example

- Identify the intended learning outcomes of a traditional course or courses that correspond to the competencies defined for the direct assessment program. The following example demonstrates an institution’s mapping of the program’s competencies to traditional courses or to components of traditional courses. Note that this example, while intended to illustrate this approach, does not include the level of detail that the institution would need to provide to establish a factual basis for its claim of clock or credit hour equivalency.

<table>
<thead>
<tr>
<th>Traditional Course</th>
<th>Credit Hours</th>
<th>Competency</th>
<th>Credit Equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marketing 101</td>
<td>3</td>
<td>Apply theories, models, and practices of marketing</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Analyze how a company uses marketing resources</td>
<td>2</td>
</tr>
<tr>
<td>Accounting 101</td>
<td>4</td>
<td>Apply theories, models, and practices of accounting in the analysis of financial statements</td>
<td>1.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Describe regulatory and ethical issues in accounting</td>
<td>0.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Integrate accounting theories, models, and practices across an organization</td>
<td>2</td>
</tr>
<tr>
<td>English 101</td>
<td>3</td>
<td>Write appropriately researched persuasive arguments</td>
<td>6</td>
</tr>
<tr>
<td>Communications 101</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Statistics 101</td>
<td>3</td>
<td>Perform complex statistical calculations</td>
<td>3</td>
</tr>
<tr>
<td>Management 101</td>
<td>4</td>
<td>Identify the recent major trends in leadership theory</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Analyze and critique leadership case studies</td>
<td>2</td>
</tr>
</tbody>
</table>

Total: 20

Note that this example, while intended to illustrate this approach, does not include the level of detail that the institution would need to provide to establish a factual basis for its claim of clock or credit hour equivalency.
Subscription-Based Program (34 CFR 668.2)

• A standard or nonstandard-term program in which the institution charges a student for each term on a subscription basis with the expectation that the student completes a specified number of credit hours (or the equivalent) during that term.

• Coursework in a subscription-based program is not required to begin or end within a specific timeframe in each term.
• Students in subscription-based programs must complete a cumulative number of credit hours (or the equivalent) during or following the end of each term before receiving subsequent disbursements of title IV, HEA program funds.

• An institution establishes an enrollment status (for example, full-time or half-time) that will apply to a student throughout the student’s enrollment in the program, except that a student may change his or her enrollment status no more often than once per academic year.
The number of credit hours (or the equivalent) a student must complete before receiving subsequent disbursements is calculated by:

- Determining for each term the number of credit hours (or the equivalent) associated with the institution’s minimum standard for the student’s enrollment status (for example, full-time, three-quarter time, or half-time) for that period commensurate with paragraph (8) in the definition of “full-time student,” adjusted for less than full-time students in light of the definitions of “half-time student” and “three-quarter time student,” and adjusted to at least one credit (or the equivalent) for a student who is enrolled less than half-time; and

- Adding together the number of credit hours (or the equivalent) determined under paragraph (1) for each term in which the student was enrolled in and attended that program, excluding the current and most recently attended terms.
Part of Term Flexibility

• Flexible course offerings such as the following have been gaining momentum toward student completion.
  • Default mini-mesters for Fall, Spring, and Summer (known as modules for Title IV)
  • Intersession Offerings such as Wintermester or Maymester
    • Needs separate dedicated communication
    • Align dates with federal financial aid regulations
  • Direct Assessment
  • Direct Assessment Subscription-Based
Add language specific to the Part-of-Term/Flexible Offerings to current institutional communications related to:

- **Refund Policy and Requirements for Withdrawal and Return of Federal Financial Aid**
  - Student Consumer Information Web Page: Higher Education Act Disclosure Requirements
  - Important Dates and Deadlines Calendar
  - Student Handbook
  - Catalog
As campuses consider implementing flexible course offerings such as intersession or program modules, there are several functional areas to engage in the discussion such as:

- Financial Aid - Policies & Procedures related to Federal requirements
- Records – Campus Specific Part-of-Term Calendar and Processes
- Bursar – Banner System configurations and alignment with Financial Aid
- Marketing – Communicating available offerings to new and returning students/internally
- Admissions – Promote new modalities of course offerings
- IT – Process associated with the many components
### Part of Term (Module) Example

### Standard term with modules and intercession

<table>
<thead>
<tr>
<th><strong>Fall 2020 Term</strong></th>
<th><strong>Spring 2021 Term</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>15 Weeks (Aug. 24-Dec. 12)</td>
<td>15 Weeks (Jan. 19-May 7)</td>
</tr>
<tr>
<td><strong>Module 1 (Fall A)</strong></td>
<td><strong>Module 1 (Spring A)</strong></td>
</tr>
<tr>
<td>13 Weeks (August 24-Nov. 22)</td>
<td>13 Weeks (Jan. 19-Apr. 18)</td>
</tr>
<tr>
<td><strong>Module 2 (Fall B)</strong></td>
<td><strong>Module 2 (Spring B)</strong></td>
</tr>
<tr>
<td>5 Weeks (Aug. 24-Oct 4)</td>
<td>5 Weeks (Jan. 19-Mar. 1)</td>
</tr>
<tr>
<td><strong>Module 3 (Fall C)</strong></td>
<td><strong>Module 3 (Spring C)</strong></td>
</tr>
<tr>
<td>5 Weeks (Oct. 12-Nov. 22)</td>
<td>6 Weeks (Mar. 22-May 2)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Winter Term 1</strong></th>
<th><strong>Winter Term II</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall Intercession</td>
<td>Spring Intercession</td>
</tr>
<tr>
<td>(Dec. 13-Jan. 9)</td>
<td>(Jan. 11-Jan. 31)</td>
</tr>
</tbody>
</table>
Disbursement

• Payment of Title IV is determined according to payment period (Fall 16 Weeks)
• Earliest disbursement is 10 days before the first day of classes for a payment period.
• Subscription-Based Disbursement
  • The later of 10 days before the first day of classes in the payment period or the
date the student completes the cumulative number of credit hours associated
with student’s enrollment status in all prior terms attended.
Pell Grant

• Enrollment status includes all credits the student is enrolled for in the semester at the Pell Recalculation Date (PRD), which is census, or at the point of initial calculation for individuals whose Pell Grant is calculated after the PRD (census).

• A PRD policy should be established.
  • PRD policy may affect enrollment flexibilities.
  • One PRD is preferred if students can register for every module at the beginning of a term.
  • Student must begin every class used to determine enrollment status.

• For subscription-based programs, the enrollment status is determined at the start of the term; a PRD is not used.
Direct Loan

• Loan period is an entire semester, not only a module, no matter the enrollment.
• Enrollment status is checked at disbursement. Recalculation is not required.
Pell Grant and scholarship initial award amounts are based on a student’s enrollment status at census (14th calendar day of the semester). For the Pell Grant, this date is also referred to as the Pell Recalculation Date (PRD). Awards are adjusted due to enrollment changes up to this date including upward and downward adjustments. At census, enrollment is locked and awards will not be adjusted for any additional course enrollments or drops unless a Return of Title IV calculation is required for official or unofficial withdrawals. Grant and/or scholarship awards are adjusted for a student who drops a modular class prior to the beginning of a module, unless a student meets one of the exceptions in regulations.

If an initial Pell calculation is not completed prior to the census date, the student’s award is based on enrollment status at the initial calculation. The institution documents the date of the student’s initial Pell Grant calculation. Because a student in a subscription-based program is always treated as having the same enrollment status, there is no need to establish a PRD under § 690.80(b)(2)(i).

A student who enrolls as a half-time student as set forth by the Federal Student Aid Handbook establishes eligibility for a Federal Direct Loan. If the student is enrolled half-time at the time of the loan disbursement, and attends one day of at least one class, the student maintains eligibility for their loan regardless if their enrollment status changes, unless a Return of Title IV calculation is required for official or unofficial withdrawals.
Student enrolls in 12 credit hours between Fall, Fall A, and Fall B terms. The student is paid Pell Grant and a Subsidized Loan at a full-time rate at PRD. The student drops the Fall B credit hours on September 24. Since Pell requires a student begin attendance in each course, a billing for Pell is necessary. The student loan disbursement remains valid. *Cost of Attendance may change and require loan adjustment.*

<table>
<thead>
<tr>
<th>Term</th>
<th>Census Hours (PRD)</th>
<th>Date</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall, Fall A, Fall B</td>
<td>12 (6 Fall, 3 Fall A, 3 Fall B)</td>
<td>September 10</td>
<td>Pell: Full-Time&lt;br&gt;Loans: Disburses at minimum 6 hours (half-time).</td>
</tr>
<tr>
<td>Fall and Fall A</td>
<td>The student’s census hours were 12. However, Pell policy for starting all classes results in billing.</td>
<td>September 24</td>
<td>Pell: ¾ Time&lt;br&gt;Loans: No Change</td>
</tr>
</tbody>
</table>
**Scenario 2**

Student enrolls in 12 credit hours between Fall, Fall A, and Fall B terms. The student is paid Pell Grant and a Subsidized Loan at a full-time rate at PRD. The student drops the Fall A credit hours on September 24. Changes are not required since the student will have begun attendance in all courses.

<table>
<thead>
<tr>
<th>Term</th>
<th>Census Hours (PRD)</th>
<th>Date</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall, Fall A, Fall B</td>
<td>12 (6 Fall, 3 Fall A, 3 Fall B)</td>
<td>September 10</td>
<td>Pell: Full-Time</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Loans: Disburses at minimum 6 hours (half-time).</td>
</tr>
<tr>
<td>Fall and Fall B</td>
<td>No Change</td>
<td>September 24</td>
<td>No Change</td>
</tr>
<tr>
<td></td>
<td>• Student drops 3 hours for Fall A after PRD.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Scenario 3

Student initially enrolls in 9 credit hours for Fall and Fall A. The student is paid ¾ Pell Grant and a full Subsidized Loan disbursement at PRD. The student subsequently decides to add a Fall B course. The student is not eligible for additional Pell Grant since the enrollment occurred after the PRD.

<table>
<thead>
<tr>
<th>Term</th>
<th>Census Hours (PRD)</th>
<th>Date</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall and Fall A</td>
<td>9 (6 Fall and 3 Fall A)</td>
<td>September 10</td>
<td>Pell: ¾ Time (Loans: Disburses at minimum 6 hours (half-time).)</td>
</tr>
<tr>
<td>Fall, Fall A, and Fall B</td>
<td>No Change</td>
<td>September 24</td>
<td>Pell: No Change (Loans: No Change)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
Scenario 4

Student initially enrolls in 9 credit hours for Fall and Fall A. The student was not initially awarded the Pell Grant, because she did not complete verification requirements. The student subsequently decides to add a Fall B course and completes verification. The student is then eligible for full-time Pell since her initial calculation is for full-time enrollment. Since the initial calculation is after the PRD, no further recalculation is necessary.

<table>
<thead>
<tr>
<th>Term</th>
<th>Census Hours (PRD)</th>
<th>Date</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall and Fall A</td>
<td>9 (6 Fall and 3 Fall A)</td>
<td>September 10</td>
<td>No Pell or loan disbursement due to incomplete verification requirements.</td>
</tr>
<tr>
<td>Fall, Fall A, and Fall B</td>
<td>12 hours for initial Pell calculation</td>
<td>September 24</td>
<td>Pell: Full-Time</td>
</tr>
<tr>
<td></td>
<td><strong>• Student adds a Fall B course after PRD and completes verification.</strong></td>
<td></td>
<td>Loans: Disburses at minimum 6 hours (half-time).</td>
</tr>
</tbody>
</table>
### Scenario 5—Direct Assessment

Student enrolls in 12 CUs (credit equivalents) between Fall, Fall A, and Fall B terms. The student is paid Pell Grant and a Subsidized Loan at a full-time rate at PRD. The student drops the Fall B CUs on September 24. Since Pell requires a student begin attendance in each course, a billing for Pell is necessary. The student loan disbursement remains valid. *Cost of Attendance may change and require loan adjustment.*

<table>
<thead>
<tr>
<th>Term</th>
<th>Census Competency Units (CU) (PRD)</th>
<th>Date</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall, Fall A, Fall B</td>
<td>12 (6 Fall, 3 Fall A, 3 Fall B)</td>
<td>September 10</td>
<td>Pell: Full-Time</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Loans: Disburses at minimum 6 CUs (half-time).</td>
</tr>
<tr>
<td>Fall and Fall A</td>
<td></td>
<td>September 24</td>
<td>Pell: ¾ Time</td>
</tr>
<tr>
<td>• Student drops 3 CUs for Fall B before the beginning of the term but after PRD.</td>
<td></td>
<td></td>
<td>Loans: No Change</td>
</tr>
<tr>
<td>The student’s census CUs were 12. However, Pell policy for starting all classes results in billing.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Student initially enrolls in 15 CUs (credit equivalents) for the standard fall term. The student’s subscription period is based on a FT status (12 CUs). No PRD is required for subscription-based model. The student only completes 12 CUs in the term. Since the student completed the minimum CUs for FT status, a subsequent disbursement of aid can be made for the next term.

<table>
<thead>
<tr>
<th>Term</th>
<th>Competency Units (CU)—PRD Not Relevant for Subscription-Based Model</th>
<th>CUs Completed by EOT</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard Fall Term</td>
<td>15 (FT status used for subscription)</td>
<td>12</td>
<td>Pell: Full Time—Initial Term</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Loans: Disburses at minimum 6 CUs (half-time).</td>
</tr>
</tbody>
</table>
Student initially enrolls in 12 CUs (credit equivalents) for the standard fall term. The student’s subscription period is based on a FT status (12 CUs). Student only completes 9 CUs by the end of the payment period. Because the student did not complete the number of CUs required for his or her enrollment status, the financial aid office cannot make a subsequent disbursement of aid until 12 CUs are complete. The chart below illustrates how a disbursement could occur for the next term.

<table>
<thead>
<tr>
<th>Term</th>
<th>Competency Units (CU)—PRD Not Relevant for Subscription-Based Model</th>
<th>Pell Disbursement Date</th>
<th>CUs Completed by EOT</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard Fall Term</td>
<td>12 (FT status used for subscription)</td>
<td>As early as 10 days prior to the term start date</td>
<td>9</td>
<td>Pell: Full Time—Initial Term</td>
</tr>
</tbody>
</table>
Since the student completed the remaining 3 CUs for the fall disbursement FT status and an additional 12 CUs for the spring term FT status, a normal disbursement schedule can resume for the next term. If the student had not completed at least 15 CUs during the spring term, the disbursement schedule would not align with the beginning of the next term.

<table>
<thead>
<tr>
<th>Term</th>
<th>Competency Units (CU)—PRD Not Relevant for Subscription-Based Model</th>
<th>Pell Disbursement Date</th>
<th>CUs Completed by EOT</th>
<th>Aid Payment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard Spring Term</td>
<td>15 (FT status used for subscription)</td>
<td>February 3 (Once 12 CUs were completed for the previous term’s disbursement)</td>
<td>15</td>
<td>Pell: Full Time—Following Completion of FT Status for Previous Term</td>
</tr>
</tbody>
</table>
Active Engagement—34 CFR 600.2

- Active participation by a student in an instructional activity related to the student’s course of study that—
  - (1) Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;
  - (2) Includes, but is not limited to—
    - (i) Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;
    - (ii) Submitting an academic assignment;
    - (iii) Taking an assessment or an exam;
    - (iv) Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;
    - (v) Participating in a study group, group project, or an online discussion that is assigned by the institution; or
    - (vi) Interacting with an instructor about academic matters; and
  - (3) Does not include, for example—
    - (i) Living in institutional housing;
    - (ii) Participating in the institution’s meal plan;
    - (iii) Logging into an online class or tutorial without any further participation; or
    - (iv) Participating in academic counseling or advisement.
Active Engagement—34 CFR 600.2

34 CFR 600.2—No requirement to document academic engagement for each student for every week of instructional time. Must ensure that the instructional materials and faculty support necessary for academic engagement are available to students every week that the institution counts toward its definition of a payment period or an academic year.

34 CFR 668.3—Week of Instructional Time:

A week of instructional time is any week in which:

1. At least one day of regularly scheduled instruction or examination occurs, or, after the last scheduled day of classes for a term or payment period, at least one day of study for final examinations occurs; or
2. In a program offered using asynchronous coursework or correspondence courses, the institution makes available the instructional materials, other resources, and instructor support necessary for academic engagement during the week; and
3. In a program using asynchronous coursework through distance education, the institution expects enrolled students to perform educational activities demonstrating academic engagement during the week; and
4. Instructional time does not include any scheduled breaks and activities not included in the definition of "academic engagement" in 34 CFR 600.2, or periods of orientation or counseling.
Regular and Substantive Interaction

- All Title IV eligible programs, except correspondence programs, must be designed to ensure that there is regular and substantive interaction between students and instructors. Such interaction must occur as a required part of the program. Therefore, any CBE program, including a direct assessment program, that does not include regular and substantive interaction between students and instructors is considered a correspondence program with the significant limitations and restrictions on Title IV eligibility that apply to such programs.

- USDOE does not consider interaction that is wholly optional or initiated primarily by the student to be regular and substantive interaction between students and instructors. Interaction that occurs only upon the request of the student (either electronically or otherwise) would not be considered regular and substantive interaction.
Regular and Substantive Interaction

• An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student’s completion of a course or competency:
  • Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and
  • Monitoring the student’s academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.
Regular and Substantive Interaction

• For purposes of the *distance education* definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following—
  • (i) Providing direct instruction;
  • (ii) Assessing or providing feedback on a student’s coursework;
  • (iii) Providing information or responding to questions about the content of a course or competency;
  • (iv) Facilitating a group discussion regarding the content of a course or competency; or
  • (v) Other instructional activities approved by the institution’s or program’s accrediting agency.
Repeat Courses

- Review General Definitions 34 CFR 668.2 (Full-time student)
  - For a term-based program that is not subscription-based, the student’s workload may include repeating any coursework previously taken in the program; however, the workload may not include more than one repetition of a previously passed course.
  - Aid cannot be paid towards repeats in subscription-based programs.
• The time when a student is enrolled in a competency, for Title IV R2T4 purposes, is a module.
  • CBE module begins when the student starts working toward demonstrating mastery of the competency and ends when the student successfully demonstrates mastery.
    • An institution must have a mechanism for determining and documenting that a student begins attendance in a payment period by working toward one or more competencies.
• When a student demonstrates mastery or otherwise ceases enrollment in all competencies without beginning another competency during a payment period or period of enrollment, the institution must follow R2T4 provisions in 34 CFR 668.22.
• Subscription Model
  • When the competencies in a term-based CBE program do not have specified start and end dates and students are enrolled to complete as many competencies as they can during the term, students are considered scheduled to attend for the entire term/payment period.
  • When, for R2T4 purposes, an institution determines the total number of calendar days in the payment period or period of enrollment for a program offered in modules, that calculation does not include any scheduled breaks of at least five consecutive days and days when the student is not enrolled in any competency/module or in any other course offered during that period of time (34 CFR 668.22(f)(2)(ii)(B)).
  • Therefore, when a student withdraws from a CBE program where the student is expected to complete as many competencies as possible in a term, the total number of calendar days in the denominator of the R2T4 calculation would include all of the days in the term/payment period, less any institutionally scheduled breaks of at least five consecutive days and any days during which the student was not enrolled in any particular competency, module, or course.
    • **Be careful to review new R2T4 guidance in 34 CFR 668.22((ii)(A)(1-4)).
  • Important to note that the next module a student indicates they will enroll in must be within 60 calendar days of when the student ceased attending rather than the 45 days for non-subscription-based programs.
Satisfactory academic progress (SAP) is treated the same way in a CBE program as it would be for other Title IV-eligible programs under 34 CFR 668.34. **Pace requirements are eliminated for subscription-based programs.**

An institution’s SAP policy must specify the pace at which a student is expected to progress through the CBE program to ensure that the student will complete the program within 150% of the published length of the educational program (also known as the “quantitative measure”). Because CBE programs are generally self-paced, students may graduate earlier than the published length of the program, but the institution must make a reasonable determination regarding the normal time to completion and use that determination as its published length.
Satisfactory Academic Progress

- If a CBE program is measured in credit hours, or if the institution uses credit hour equivalencies for a direct assessment program, then the institution must evaluate a student’s pace under the requirements for credit hour programs in 34 CFR 668.34(a)(5) and 668.34(b). Pace in a credit hour program must be calculated by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted. **Pace requirements are eliminated for subscription-based programs.**

- An institution’s SAP policy must also specify a qualitative measure that a student must achieve at each evaluation. If grade point average is not an appropriate qualitative measure, a comparable assessment measured against a norm may fulfill this requirement. If an institution documents that the degree of mastery necessary to complete a competency in a CBE program equals or exceeds the equivalent of a “C” grade in a traditional program, then it may consider a student to have met the SAP qualitative measure as long as that student has an academic standing consistent with the institution’s requirements for graduation from the program.
References


References

• Dear Colleague Letter (DCL) GEN-14-23
• Distance Learning and Innovation Regulation
• Federal Student Aid Handbook, Volume Two
• The Engine Behind WGU Configuration of a Competency-Based Information System
• 2016 NASFAA Conference PowerPoint Presentation
• LASFAA Conferences FSA Module PowerPoint Presentation