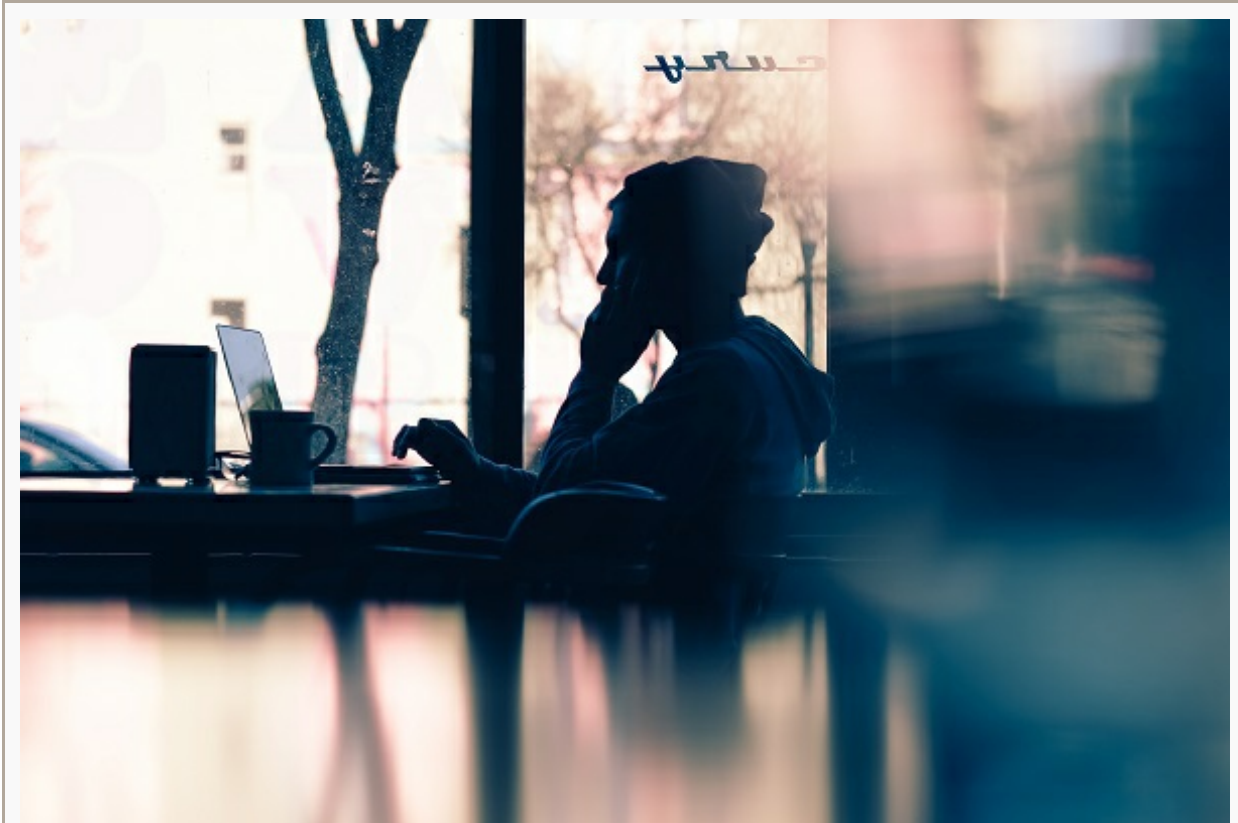


Navigating the CBE Frontier: Creative and Alternative Student Support for Creative and Alternative Models of Education

evollution.com/programming/applied-and-experiential-learning/navigating-the-cbe-frontier-creative-and-alternative-student-support-for-creative-and-alternative-models-of-education/

9/13/2016

As has been stated in many venues (including in [The EvoLLLution](#)), we simply need more alternative pathways to meet the nation's demand for people with



Though the Department of Education has taken steps to create more access to alternative and innovative programs for students, more must be done to get away from the faculty-centric model that underpins the federal regulatory standards.

postsecondary degrees.

Reaching the [President's goal](#) for 60 percent of the nation's citizens to be college educated by 2025 will require almost 64 million *more* people with postsecondary degrees in the United States, an increase of 20 percent from where we are now. In Wisconsin alone, where we (the authors) live and work, this 20-percent increase (about 39 percent of Wisconsin residents currently have college degrees) will require 1.2 million more people to receive degrees by 2025. Yet, in Wisconsin, only about 350,000 "seats" are available each year across all Wisconsin's public, private, and technical colleges. Given that Wisconsin's average six-year graduation rate is less than 50 percent, we simply cannot graduate 1.2 million more people by 2025 using the seats available in current traditional education. A similar picture exists across the nation.

Competency-based education (CBE) has emerged as one response to educate more people, using flexible methods, while maintaining high quality.[1] CBE puts student learning front and center, with progress towards a degree measured through students' demonstration of their mastery of the skills, knowledge and abilities required to earn their degrees. Arguably, the "purest" and most flexible version of CBE is *direct-assessment* CBE, where programs are not tied to credits, semesters or courses. Instead, programs are entirely structured around a series of

competency assessments—projects, papers, exams, or other ways to directly evaluate specific learning outcomes—that students complete. Students must complete each competency assessment—and at a pre-determined mastery level—to demonstrate that they have fulfilled the full complement of skills, knowledge and abilities required for their degrees. Direct-assessment CBE is particularly well suited to adult learners who wish to fit their education around their lives and work.

Direct-assessment CBE makes use of a stratified approach to provide education, support and services to students. It is not a surprise that students require many types of supports in order to succeed. Just looking at the student support side alone, “these services include, but are not limited to, academic tutorial programs, faculty and peer mentoring programs, academic and career advising, and social and personal adjustment initiatives.”[2]

No one person should be expected to provide education and support in all areas, let alone be expert in them all. Yet, this is exactly what we assume from faculty, particularly in a traditional image of how education is delivered by college and university faculty.[3] Despite the fact that student affairs and advising has become professionalized and split off from the “real” educational work of faculty, what stubbornly remains is a notion that students only learn when they are in the direct presence of faculty. The image of faculty working with students formally in the classroom and providing mentoring and advice informally at “teas” or in local coffee shops remains emblematic of this traditional faculty-centric view of college life.[4] Research shows, of course, that students have agency over their own learning, interacting with an environment structured to facilitate their learning, with direct faculty interaction playing an important role, but only one role within this richer environment.[5] As we will describe later, federal regulation and regional accreditation remains mired in the faculty-centric view of how students learn. And the real problem with this is that this regulatory straightjacket presents major roadblocks in the nation’s ability to provide high-quality innovative education.

In contrast, think about healthcare, a field that has embraced a stratified service model. When we seek health care, patients are referred to doctors for specific ailments, while routine patient contacts, diagnostics, and evaluations are performed by clerical and technical staff. The education equivalent of the healthcare team would consist of faculty or tutors who address students’ academic needs, while routine progress checks and regular contact with students is performed by student coaches, and financial aid, registration and related issues are addressed by staff with expertise in those areas.

We use this stratified education-and-support approach in the [University of Wisconsin Flexible Option](#), the suite of direct-assessment CBE programs that we have developed within and across the UW System. In UW Flex, students register for three-month subscription periods during which they complete as much academic work as they like without being confined to quarter or semester structures. This works well for adult students who have experience to bring to their studies and who have work and family schedules that require flexibility. To ensure that students are making progress and succeeding, each student is assigned an Academic Success Coach (ASC) who connects with the student on a weekly basis and helps address most of the student’s concerns—in areas as diverse as traditional advising, to mentoring, to life coaching, to student support, and even in some aspects, low-level tutoring. Each ASC supports about 85 students, allowing the coach the time and energy to devote to proactive engagement with their students. In this way, our ASCs provide the kind of wraparound and proactive advising that is recommended as a best practice for the type of student that UW Flex attracts.[6] When the student has needs beyond the ASC’s expertise, such as academic content questions or detailed help with financial aid, the ASC connects the student to faculty or financial aid experts or others who can best address those needs.

Regulatory Challenges of this Model

The stratified education-and-support model that we use in the UW Flexible Option is a very effective approach to higher education, especially for the adult student. Unfortunately, there are regulatory obstacles that make executing this model very difficult.

The most vexing challenge has to do with how the regulatory environment defines who “counts” as faculty and what

“counts” as an interaction between faculty and students.

The U.S. Department of Education requires that students in competency-based programs have “regular and substantive interaction between students and instructors.”[7] Any program “that does not include regular and substantive interaction between students and instructors is considered to be a correspondence program with the significant limitations and restrictions on Title IV eligibility that apply to such programs.”[8] Students in programs that are not eligible for Title IV funds are not eligible to receive federal financial aid. Nearly all degree programs must have access to Title IV funds to reach the students that need education most.

According to the Department of Education, here’s who “counts” as a faculty member eligible to provide education:

Qualified faculty members are identified primarily by credentials, but other factors, including but not limited to equivalent experience, may be considered by the institution in determining whether a faculty member is qualified. Instructors (excluding for this requirement teaching assistants enrolled in a graduate program and supervised by faculty) possess an academic degree relevant to what they are teaching and at least one level above the level at which they teach, except in programs for terminal degrees or when equivalent experience is established.[9]

Further, here’s what “counts” as educational interaction according to the Department of Education:

[It 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.[10]

The Department recognizes that some institutions use stratified educational models, but in those cases, to satisfy the regular and substantive requirement, an institution must ensure that the individuals who initiate contact with students meet the faculty standards above:

In applying such a model, an institution must ensure that the interaction is provided by institutional staff who meet accrediting agency standards for providing instruction in the subject matter being discussed, that the interaction is regular, and that the amount of faculty resources dedicated to the program is sufficient in the judgment of the accrediting agency. Interactions between a student and personnel who do not meet accrediting agency standards for providing instruction in the subject area would not be considered substantive interaction with an instructor.[11]

Simply put, a stratified-education-and-support model is fine for the U.S. Department of Education, but the only contact between students and faculty that counts to meet their requirements is contact that initiated by an employee who qualifies as “faculty” based on their standards. Even though an ASC in an undergraduate business program who has a master’s degree in counseling contacts a student weekly to evaluate the student’s progress, connects the student to additional resources such as faculty or tutoring—even if under the guidance of qualifying faculty—the ASC does not count as faculty and thus that interaction does not satisfy the regular and substantive requirement. Furthermore, whenever a student contacts a faculty member, this also does not count as regular and substantive interaction.

Thus, unlike the range of qualified healthcare professionals who routinely provide insurance-funded care to patients, in higher education only faculty can provide fundable support to students, and only when they initiate contact with students. Imagine if the only reimbursable healthcare expenses were those where the doctor contacts the patient. Such a requirement would completely alter the model of healthcare, and would neither improve patient outcomes nor manage costs.

Fixing the regulations is not simple, but it is straightforward. It requires writing regulations that allow qualified regular-and-substantive interactions to take place within a highly structured *educational environment* composed of readily accessible and high-quality learning materials and experiences, and in interaction with the range of readily accessible and high-quality people with whom students learn (including faculty, but also coaches, advisors, and yes, even other students). The structured educational environment includes the evaluation of student learning through a

range of high-quality assessments that best assess the skills, knowledge, and abilities that we need students to learn. The focus should be on outcomes, and if regulation is needed, that is where it should be focused.

We encourage legislators to engage higher education to draft legislation that supports learning outcomes while minimizing fraud and abuse of taxpayer funds. Real political will is needed to get this done.

We understand that the regulatory requirements are in place to protect consumers (students and tax payers). At the same time, we must find a way to be released from the regulatory straightjacket that prevents us from reaching our goal to graduate more people with postsecondary degrees. Institutions across the country are innovating to provide high-quality education in cost-effective ways. If the only kind of contact that counts to satisfy regulatory requirements is contact between students and faculty that is initiated by the faculty, and if the only educators who count are narrowly defined faculty, then it is highly unlikely that education can scale to meet the needs of the nation in cost-effective ways that do not compromise quality.

If we are going to have even a fighting chance to educate the number of citizens who need higher education, we need a new set of regulations that promote the type of high-quality and flexible programs that the nation needs. The regulatory focus, first and foremost, should be on student success, student learning, and good learning outcomes. Are students learning in a program? Can they apply what they learn to the world around them? And is a program providing a coherent learning environment for students that fosters learning? These should be the foundations upon which regulations—and quality education—are built.

References and Footnotes

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[2] Brian K. Bridges, “Student Support Services: A Practice Brief Based On Beams Project Outcomes.” Accessed at http://www.ihep.org/sites/default/files/uploads/docs/pubs/beams_student_support_services.pdf

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[4] *Ibid*

[5] Mayhew, M.J., Rockenbach, A.N., Bowman, N.A., Seifert, T.A.D., Wolniak, G.C., Pascarella, E.T., Terenzini, P.T. *How College Affects Students: 21st Century Evidence that Higher Education Works*. San Francisco: Jossey-Bass, 2016.

[6] See: NACADA. Proactive (intrusive) advising resource links. Clearinghouse Academic Advising Resources. Accessible at [http://www.nacada.ksu.edu/Resources/Clearinghouse/View-Articles/Proactive-\(intrusive\)-advising-resource-links.aspx](http://www.nacada.ksu.edu/Resources/Clearinghouse/View-Articles/Proactive-(intrusive)-advising-resource-links.aspx)

[7] U.S. Department of Education. “Dear Colleague Letter.” GEN-14-23. Dec. 19, 2014. <https://ifap.ed.gov/dpccletters/GEN1423.html>

[8] *Ibid*

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[10] U.S. Department of Education. “Dear Colleague Letter.” GEN-14-23. Dec. 19, 2014.

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[11] *Ibid*