

## **Limited Direct Assessment (LDA) Transcript**

**August 6, 2015  
12:30 pm CT**

Coordinator: Welcome and thank you for standing by. At this time, all participants are in a listen-only mode until the question-and-answer session of today's conference. At that time, you may press star 1 if you'd like to ask a question.

Today's conference is being recorded. If you have any objections, you may disconnect at this time. Now I would like to turn the call over to your host, Mrs. Holly Langer-Evans. Ma'am, you may begin.

Holly Langer-Evans: Thank you, (Jay), and good afternoon and welcome to the Limited Direct Assessment Training. Once again, my name is Holly Langer-Evans and I am one of your trainers today.

Before we begin, I would like to go over just a few housekeeping items. You all should have had a copy of today's PowerPoint presentation sent to you from Michael Cagle. If not, you can access it from the MLM Training site by clicking on the handouts icon. It looks like the three sheets of paper which is located on the top right hand corner on the screen, just left of the yellow folder icon.

Also, you might want to go there anyway because we added an additional handout for you which is a policy and procedures document on the LDA experiment and we'd really like for you to pull that down and take a look at that document as well. So there's just an added little bonus feature there for you.

I would also like to ask you to hold your questions to the end of the presentation today and not to use the Q&A feature of the MLM class. This way we can record all of your questions and answers and type them up and place them on our ESI Web site which we're actually going to go out and visit at the end of the session today.

The operator will coordinate the call for us at the end of the session. And we really want to thank you all for understanding and cooperating with that request. So let's move onto the next slide which is Slide 2, and let's go over our agenda for today.

First, we will discuss the experiment itself, including an overview of the waivers that are part of this experiment. Then we're going to talk about some of the steps that you will need to take as you begin participation in the experiment.

And finally, we will describe some of the reporting requirements for the experiment to let you know some of the things that we will anticipate. Schools will report to the Department regarding the students and their participating programs. And let's move onto Slide 3.

Now, implementing the experiments will require coordination amongst the various offices on your campus. Although schools are exempt from certain

parts of the regulations, you are required to adhere to all Title IV requirements.

Institutions should view participating into the ESI as a collaborative effort, one that will mean working with other offices at your institution, such as the financial aid office, the business office, faculty, registrar, admissions, communications and the president's office.

You may have other offices on your campus that you will work with. Other groups you may partner with will be your accrediting agency, very important; vendors; state agencies; and other policy stakeholders.

You can see the administrative capability regulation on the screen. And that is a regulation that requires institutions, not just the financial aid staff, to craft policies that are compliant with federal laws and regulations. These experiments are no exception.

It is vitally important that you develop and carefully document your policies and procedures related to this experiment. You want to ensure that you're in compliance with both federal and institutional policies.

Remember, administering federal student aid is an institutional responsibility. If you're not a financial aid staff on this call today, remember that talking with your financial aid administrator can assist you with the application and approval process for these experiments. They are well versed on financial aid regulations. And we really want to make sure you have that dialogue.

So let's move onto the next slide which is Slide 4. And I'm going to turn over the presentation to Dave Musser. Dave, it's all yours.

Dave Musser: All right. Thank you so much, Holly. So let's start with the discussion about the Department's objectives for the experiment. So through this experiment, we hope to examine innovative approaches to the ways that schools combine direct assessment and traditional coursework in an educational program. And we also have to look at how schools provide remedial coursework using direct assessment.

So in order to learn more about these types of programs and about the kinds of students who enroll in them, we've made these programs eligible for federal student aid under the experiment. We've also made it possible for schools to pay federal aid for remedial coursework using direct assessment.

And remember too that your participation in this experiment will mean following the exact waivers that are set out in your Program Participation Agreement amendment, not necessarily the ones that you might have described in a proposal to the Department. I'm going to the next slide, Slide 5.

So what is direct assessment? I want to talk a little bit about this before we get into anything further because this is a fundamentally important part of the experiment. Both the waiver for allowing hybrid direct assessment programs and the waiver for allowing remedial coursework requires that the institution be offering some amount of coursework using direct assessment.

So, in general, direct assessment programs are a subset of competency-based education programs. The distinction is about how a program measures a student's academic progress. Whereas some competency-based programs measure student progress in clock or credit hours, student progress in a direct assessment program is measured solely by assessing whether the student can demonstrate that he or she has command of a specific subject, content area or

skill, and can demonstrate a specific quality associated with the subject matter of the program.

And again, in this experiment, we're permitting direct assessment coursework to be on a more granular, course-fit level rather than having the entire program to be direct assessment. But the same basic definition applies to the coursework that's offered using direct assessment.

Direct assessment programs use units other than credit or clock hours to measure a student's progress, and often they are called competencies but they're not required to be. And those programs determine the credit or clock hour equivalent for those units to determine enrollment status and progression for the purposes of Title IV aid disbursement. Next slide, please? We're going to Slide 6.

So there are a number of specific requirements for an institution to participate in the limited direct assessment experiment. One of the requirements is that an institution must offer a part, not all, of an eligible program using direct assessment -- and, as I said before, we often call these hybrid programs -- or the institution must offer remedial coursework using direct assessment, or both. You have the option of doing both of these things or just one or the other.

We want to point out here that because the hybrid direct assessment programs are not currently eligible for Title IV aid, institutions wishing to offer these programs under the experiment will need to seek and receive approval from the Department before actively participating in the experiment. And that approval will have to take place on a program-by-program basis. We'll talk a bit more about program approvals at the end of this presentation. Next slide, please? Going to Slide 7.

So let's take a few seconds to look at the actual changes that this experiment will entail. Under the current rules, direct assessment programs are only eligible for federal student aid if 100% of the program is offered via direct assessment. Also, under the current rules, aid may not be paid for remedial coursework offered using direct assessment.

This experiment will provide the ability for an institution to provide a mix of direct assessment coursework and credit hour coursework in the same program. The experiment also provides the ability for an institution to provide aid to eligible students who are enrolled in a remedial coursework that's offered using direct assessment. Next slide? All right, I'm going to Slide 8.

And so these are the two specific waivers that we're offering under the experiment, and that they're pretty straightforward. The first is a waiver of the requirement for our direct assessment program to be offered using entirely direct assessment. The second is a waiver of the provision on paying federal student aid for enrollment in remedial coursework that uses direct assessment. We'll move onto Slide 9.

It's important to note that one of the waivers that we initially included in the July 31, 2014 federal register notice will not be included in this experiment. And you can see that here, that regulation is 34 CFR 668.10(a)(3)(iii). Your PPA amendment specifically states that this regulation is not being waived and that your schools will continue to be bound by this requirement.

That regulation relates to the definition of a week of instructional time in a direct assessment program. And the Department determined that it wasn't necessary in order for an institution to participate in the experiment. So it was not actually included in your Program Participation Agreement amendment.

It's just something to note as you begin implementing these programs on campus. Next slide? All right, on Slide 10.

We'll take just a few minutes to talk about the Program Participation Agreement amendment process. You've likely already received an amendment to your PPA. Once you receive this amendment, you should carefully review it and understand your commitment to participate in the experiment.

You'll also need to obtain the required signatures and then return the signed amendment to FSA via courier service. FSA then sends to you back a countersigned amendment to the PPA. You must keep that countersigned amendment on file.

So it's important to note that you cannot begin disbursing aid to eligible programs or for remedial coursework under the experiment until you've received the official invitation from Federal Student Aid which you have. You've accepted the invitation which you have. A school official signs and returns your required amendment to the PPA to FSA.

And finally, your actual Limited Direct Assessment programs are approved by FSA and your institution's accrediting agency and, if applicable, your state agencies. So, all of those things have to be in place before you can offer Title IV in one of these programs. We'll go onto Slide 11.

All right. So now let's talk about the actual application process for adding Limited Direct Assessment programs; so you've gotten your PPA amendment. The first thing we want to mention is, in March 2013, the Department published Dear Colleague Letter GEN 13-10 which outlined the steps the

institutions have to take in order to apply for Title IV eligibility for any direct assessment programs under the normal rules.

This Dear Colleague Letter is very important. And we're highlighting it here because the institutions will still follow the general rules in that Dear Colleague Letter when applying for Limited Direct Assessment programs under this experiment.

There are some different requirements, however, applicable to our approval process for Limited Direct Assessment programs. And the different requirements depend on the amount of direct assessment coursework that is included in your Limited Direct Assessment programs.

We made a decision that there are some programs with less Limited Direct Assessment that may not need the same level of review as programs that include more direct assessment. For instance, a program that only has two courses of direct assessment wouldn't require the same amount of review as a program that had 90% direct assessment. We're going to go through the differences between the two types of reviews on the next few slides. We'll go onto Slide 12.

So, for application purposes, we will differentiate between two types of Limited Direct Assessment programs -- programs consisting of less than 50% direct assessment coursework and programs consisting of 50% or more direct assessment coursework. In the next few slides, there are about programs with less than 50% direct assessment coursework.

So first, it's important to note that before any program may be considered Title IV eligible, you must report them to the Department through the E-App. So that's the Eligibility Web page that you probably - most of you are familiar

with. This must be done after the Department has countersigned your PPA amendment for the Limited Direct Assessment experiment.

So when you report a Limited Direct Assessment program that's eligible through this experiment, you'll need to include the dash LDA notation in the name of the program. So when you add the program in the E-App, at the end of the name of the program, you'll add dash LDA, so that we can identify that program as a Limited Direct Assessment program.

So if your program is comprised of less than 50% direct assessment coursework, you'll need to provide a documentation that your accrediting agency includes the program in your accreditation and specifically recognizes the program as a competency-based education program.

There's no need for a specific evaluation and approval of the program; however, the requirement for specifically recognizing each LDA program as a CBE program would be met if an institution's accrediting agency actually has a process for approving direct assessment programs, including these kinds of programs.

So what we were asking for that is we specifically recognize this bullet. It could be a variety of things. It could be a simple letter from an accrediting agency. It could be something more formal. But we just need to see that your accrediting agency recognizes that your program is competency-based and that it's an important component of the direct assessment coursework in the program. All right, we'll go onto the next slide. All right, on Slide 13.

So again, for Limited Direct Assessment programs with less than 50% direct assessment, an institution needs to supply documentation that its accrediting agency has approved its general approach for determining the credit or clock

hour equivalency for a direct assessment coursework. This approval might comprise multiple programs or it might be program by program. Either one is fine if the programs have less than 50% direct assessment.

We understand that some schools have a desire to offer the same coursework using direct assessment to multiple programs. And if that's the case, what we're primarily interested in is that your accrediting agency has evaluated your equivalency process for those courses, and that could apply in the multiple programs.

Now, if your programs all have individual coursework that don't apply to other programs, then it's likely we'll need to see the accrediting agency approval for all of that coursework in each of the programs.

The other thing that we'll need for a program with less than 50% direct assessment is a short narrative explanation of how your financial aid procedures would change as a result of the institution's implementation of the Limited Direct Assessment program.

That narrative still needs to answer all the questions into Dear Colleague Letter 13-10, but there may be instances where there's no change to your normal policies and, in those cases, you may simply note that in your documentation that you submit.

And, in general, you should always include information on your satisfactory academic progress and your return of Title IV policies, both of which tend to be impacted by your inclusion of direct assessment coursework since that coursework takes place at a timeframe that's a little different from the traditional course. Then we'll move onto Slide 14.

So now we're going to talk a little bit about programs that are comprised of 50% or more direct assessment coursework. And there are some different requirements associated with these programs.

The first requirement is exactly the same as programs with less than 50% direct assessment, and that is that you have to report these programs to the Department with the dash LDA notation in the name of the program, and don't forget to add the dash. Next slide? All right, on Slide 15.

So for programs with 50% or more direct assessment, the institution must also provide documentation of accrediting agency approval. So you'll note that there are three bullets here rather than two for the prior slide about the less than 50% direct assessment programs, and that's because for programs with more than 50%, we will expect that your accrediting agency has specifically evaluated and approved your Limited Direct Assessment program. It's not just something that can be added into your general accreditation.

As I mentioned before, the requirement for specifically recognizing each one of the direct assessment program as a competency-based education program would be met if the institution's accrediting agency - the process for approving direct assessment programs and generally defines direct assessment programs as competency-based education programs.

And what I'm getting at there is that if your accrediting agency already has a specific process set out for you to apply to add a direct assessment program to your accreditation, and the agency already understands the direct assessment programs are competency-based programs, then we just don't - you just don't need to take any other steps, that that's already - all of these things would be met if your accrediting agency evaluates your program under that policy. We'll move onto Slide 16.

So, similarly, for programs with 50% or more direct assessment, the institution will need to provide documentation that its accrediting agency specifically evaluated and approved the institution's approach to its clock or credit hour equivalency for each program, not just the approach in general.

And this is because with programs that are more than 50% direct assessment, there's a lot more coursework that's going to be offered using direct assessment for which specific equivalencies will need to be determined. And we think a program-by-program evaluation by an accrediting agency is appropriate in this case.

So we're also requiring that an institution that has a program with 50% or more direct assessment coursework would need to provide a comprehensive description of its financial aid procedures. And that's very similar to what would be done for a program that's offered 100% using direct assessment that's not under the experiment.

You would follow the procedures in Dear Colleague Letter GEN 13-10 which includes information on all the areas to be addressed. And you need to explain to us in detail how each of your procedures work, not just those that would be different, because this program now incorporates Limited Direct Assessment coursework. So, for example, you'd need to give us your full R2T4 policy, your full satisfactory academic progress policy, and everything that we would need to see in order to know exactly how your financial aid will work in these programs.

And again, all of the information that we need is included in their Colleague Letter GEN 13-10, both an important reference for you as you begin the

process of applying for these programs. All right, next slide? All right, on Slide 17.

Now there's a couple of important follow-up questions that you may want to ask as you begin implementing these programs. The first one is do you have a leave-of-absence policy? A leave of absence policy is not required for any of these programs but it might be useful if you're offering your Limited Direct Assessment program as a non-term program.

We've heard from schools that many students in direct assessment or just competency-based programs generally like the option of taking a bit of time-off from working on their competency, especially since many of those programs are self-paced.

It's important if you've never used a leave of absence policy to review whether the policy would meet the requirements and the regulations. And, of course, if you have questions about that, you can reach out to our Experimental Sites team and they can refer you to folks in the Department who can give you some more information about that.

Our second concern might be does the faculty member help the student create an individual learning plan or is it a coach who does this? And what we found is that many direct assessment programs have a very clearly laid out learning plan or something similar, so that students who are taking coursework, especially if it's a great deal of direct assessment coursework, can clearly lay out exactly what they're going to take and when. And they're set and they are assigned specific deadlines for that work.

But that's also important for the purposes of determining whether a student is half-time for direct loan purposes. If you're offering a program that's using

direct assessment and you're not using the traditional term system, it may be more difficult to ascertain exactly how many courses the student is enrolled in if it's not clearly laid out at the beginning of an academic year or a program. An individual learning plan can help with this.

And finally, how does your program ensure regular and substantive interaction between the faculty and the students? You should have a very clear grasp on how your program ensures regular and substantive interaction, especially if you're taking a traditional program and only adding a few direct assessment courses.

It's important for the entire program to include a requirement that students regularly and substantively interact. And direct assessment is a little different from a traditional course format where courses are taught, you know, usually with one instructor. And students have specified times that they'll come in and actually interact with the instructor.

In direct assessment, students are often working at their own pace and have access to the materials at their own time. So you need to find ways of ensuring that those students still interact with the appropriate faculty members. And those faculty members are the same faculty members that meet your accrediting agency's requirements for instruction in the subject matter that students are taking.

And of course, as how I mentioned before, all of these need to be carefully laid out in your policies and procedures so that it's clear that your policies will necessarily result in regular and substantive interaction between students. And we'll move onto Slide 18.

So after you've updated the E-App to add the Limited Direct - your -- oh, sorry about that -- yes, after you've updated the E-App to add your Limited Direct Assessment program, the last part of the approval process is developing and submitting the detailed program description and the detailed description of financial aid administration for your program.

And that's what I was describing before. All of that is included into Dear Colleague Letter GEN 13-10, Pages 7 to 9. And it includes very specific instructions beginning on Page 7 that will guide you to the process for completing those two things.

And again, those two things are a detailed program description, so a description of your direct assessment program that would probably need to include, in most cases, exactly what component of your program is offered using direct assessment, and which courses are offered using direct assessment; and also a detailed description of financial aid administration.

And remember that if you have a program that's offered using less than 50% direct assessment, the detailed description of financial aid administration can be a little bit more streamlined and can include only the things that will change from your normal policies and procedures.

Once you complete these two things and these pieces of documentation, you must e-mail the detailed program description and the detailed description of financial aid administration of your direct assessment program to [CaseTeams@ed.gov](mailto:CaseTeams@ed.gov). And you see that here on the slide.

So this process can occur around the same time that you send - that you actually fill out the electronic application through the E-App. But it's very important that this information reaches the [CaseTeams@ed.gov](mailto:CaseTeams@ed.gov) e-mail

because that will be the point at which the Direct Assessment Workgroup can begin reviewing your program. And we want to make sure that we get these programs reviewed for you as quickly as we can, so that we can get you started in the experiment. All right, we'll go onto the next slide, on Slide 19.

So we've talked a lot about the application process. And now we want to talk a little bit about the actual evaluation and reporting requirements for the experiments. I know that we've gotten a lot of questions about this from institutions.

So, first off, the Department's evaluation is going to include a number of different factors that will look at the institution, program and student level. We're going to collect as much information as we possibly can from our own systems.

So, in order to minimize the burden of reporting, we're trying to integrate all of that information. And we're trying to ask you to report as little as absolutely necessary. So, in order for this to work, schools will need to supply student-identifying information -- so social security numbers, last name and the first character of the first name -- in order to allow FSA to access data reported elsewhere. So the experiment reporting will focus on very specific information, for information specific to the experiment.

So, for example, information on the programs that are actually eligible for Title IV assistance, the types and amounts of grant and loan assistance received by students, and this is particularly important if you have students who are enrolled in more than one program, and one of the programs is not in the Limited Direct Assessment experiment. We need to know exactly how much to operate is going to the students within the experiment; and then also academic outcomes for students affected by the experiment.

In addition, participating institutions will be required to submit a narrative description and evaluation of their implementation of the experiment. At a minimum, that narrative should include any unforeseen challenges and unexpected benefits. All right, we'll go onto the next slide, on Slide 20.

So annually, institutions participating in the Limited Direct Assessment experiment will be required to submit data, and the data will be comprised of really two things.

First, participating schools will have to complete a survey that will gather information about how your school implemented the applicable waivers and also about your Limited Direct Assessment program or programs that are involved.

Now the second piece is participating schools will be required to identify the individual students affected by the experiment and report outcome information for those students, including which Limited Direct Assessment program that the student participated in and the outcomes of that participation; for example, did they withdraw, did they complete, et cetera?

As I mentioned before, we plan to minimize the burden of this second type of reporting by leveraging our existing ISIR Analysis Tool that's located currently in the FAA Access Web site. The federally-operated Web site has a number of important tools for you to use.

And by using that tool, you can input information that will allow FSA and participating schools to take advantage of all the student demographic and financial data that the student has already reported on the FAFSA and that you have already reported to us in COD and NSLDS and elsewhere. All right.

And, with that, I will turn it over to Holly Langer-Evans to start on Slide 21.  
Holly?

Holly Langer-Evans: Thank you. We're going to take a few moments and talk about the ESI Web site; then we're going to go out live and demo it for you. The Experimental Sites' Web site is a very useful resource for you that you all should become very familiar with and access it to assist you with implementing your experiments. The Web address is located on the top of the slide for you, and we hope you save it as a favorite to your desktop. Mike, while I talk about it, would you be so kind as to bring it up live for us?

Michael Cagle: Sure.

Holly Langer-Evans: Mike, if you could do that for us. Thank you, Mike. One of the documents that you should become familiar with, as you get started with the implementation of the experiment, is the Action Plan. And it's located on the homepage of the Web site under the Implementation Experiment tab. And this is the first link, titled Action Plan. So let's take a look at that.

And if we scroll down, that Mike would be so kind, we are going to just go under Implement an Experiment and click on Action Plan. And when we do that, you're going to see Limited Direct Assessment. And let's click on that, just real quick.

And I'd like for you to all view that sometime today and print that out. And that's a document that's going to get you started. And it really gives you an idea of what the experiment is about. It really does mirror that of your federal register. And it gives you an idea of what it is that you need to do. It does list out what you need to do for policies and procedures as well.

And if you look at that, in addition to the document that we have uploaded on the training session today, we'll also help you get your policies and procedures in order because that's very important when you do these experiments, because when you have an auditor come in or a program reviewer come in and they're like, "What is this experiment? What are you involved in? What waivers are you involved in?"

You'll see that you have the waivers right there; it's listed for you. What you need to do for your policies and procedures is listed right there for you. It tells you what you need to do for your consumer information. It's a nice little list for you. It helps keep and package what it is that you need to do.

And auditors are going to look at that. Your reviewers are going to look at that. And it just helps keep you all in line. So I really think you're going to find that very helpful for you.

So Mike, let's go back out to the homepage, and let me show you something else that I think you need to take a look at. Look at How to Apply. What another document that I think you're going to need is to go into dear colleague letters. And what is it that we've been talking about, which is the fourth one, is GEN 13-10. That is the document that you're going to have to use to do these experiments.

GEN 13-10, Pages 7 through 9, you're going to need to use that. I want you to go right there. You don't need to hunt for it. It's right there out on the Web site for us. You need to print this. You need to follow that, the letter of the law there.

You don't want to delay the processing of these programs. These are going to be returned to you when these teams are looking at it. If you don't have everything it is that you need, you really need to pay attention to what's in 13-10. Please make sure you're reviewing that, and you're following and getting all the information that you need for that. It's right there for you right off of the Web page.

So let's go back out to the homepage. Another piece of information that you might find very helpful here is it's like, "Who else? You know, I'm in these experiments. I want to talk to a colleague who's also involved in these experiments. Who else is involved?"

Before you come out to the FSA conference, you know, you can, you know, start to bond with other colleagues as we try to have sessions, so that you can all get to meet each other.

But before then, if you want to talk to another colleague, you can go out to Experiments. And if you go down to Experiments and scroll down, and you can hit - select List of Participants, and you click on List of Participants, you select Limited Direct Assessment, and you can see some of your colleagues.

Now maybe some of your colleagues have yet - have countersigned. You don't know who have countersigned yet or not. But you can see some of your colleagues who are interested in the experiments. You might want to give them a call and say, "Hey, what are you doing? How is your process going?" And start a dialogue with them, so you can start your own networking.

So that's another way that you can use the Web site. I think it's a great way for you to have that opportunity. So I think the Web site is really very helpful and we're designing that for you to assist you.

You'll also see Questions and Answers. Mike, can we select Questions and Answers? Now, of course, you'll click on there and you'll take a look and you'll look down, that's the Limited Direct Assessment. It's not blue yet. I don't have any questions and answers out there for you.

But as we talk today and we start getting your questions and answers and start collecting those, I will start doing that. And then I will post them out there in several weeks. And then you'll be able to go out there and see what those questions and answers are.

So you'll see that we have Federal Work-Study out there; and we've compiled them; and they're now available. So that's how we are monitoring this for you. So we're trying to make this as useful to you as possible.

So, with that, we are going to go back out to our training session. And Mike is going to close this out for us. And we'll go back to our training materials. And we're going to open this up to our question-and-answer.

Oh, the contact information slide; there we go. And there I am. I am your ESI regional rep. So, if you have questions, you can contact me, and I am happy to get back to you; or you can put your questions into our ExperimentalSites@ed.gov mailbox, either or, but I'm always happy to help you.

And what I'm going to do now is open this up to questions and answers. (Jay), I'm going to ask you to come back on and give everyone instructions, so they know how to ask their questions. Are you there?

Coordinator: Thank you. Yes, I'm here, ma'am.

Holly Langer-Evans: You're wonderful, (Jay). Thank you.

Coordinator: You're welcome and thank you. We'll now begin the question-and-answer session. If you'd like to ask a question, please press star 1 and record your first and your last name clearly when prompted.

Please check your mute button first; you might be on mute; because your name is required to introduce your question. However, to withdraw your question, please press star 2. One moment, please, for the first question. At this time, ma'am, there are no questions in queue. I do have one; one moment.

Holly Langer-Evans: Oh good.

Coordinator: Our first question comes from (Kristina Delbridge). Your line is now open.

(Kristina Delbridge): Hi. My name is (Kristina Delbridge). Our institution is only offering a few courses at our first go-around. And my question is - so building it into the existing term structure, we're actually taking in existing courses and breaking them into a competency or into competencies, so that the credit hours will map, so they'd be the same as what they were before.

If the students - so the students traditionally will have the same start date, they would have up to 15 weeks to finish the course, just like any other student would in the traditional course. If the student finishes early and is enrolled in other 15-week courses during that term, should we view it as a module for R2T4 purposes or should we just still consider it as being enrolled with that full 15 weeks?

Dave Musser: Hi. You would consider a course - a work on a competency to be exactly the same as a module. So, for example, if your student was taking two traditional courses and also taking one competency within the same term, then the time the student spends working on the competency is essentially considered a module between the start and the completion date. And if the student finishes that competency and is still enrolled in other course work, then the student would simply continue to be enrolled for the remainder of the term.

(Kristina Delbridge): Okay. Thank you.

Dave Musser: No problem.

Coordinator: Thank you.

Dave Musser: Before we...

Coordinator: Once again - go ahead sir.

Dave Musser: Before we go on, I do want to mention that that question and a number of other questions about coursework that's more self-paced can be found in another dear colleague letter, Dear Colleague Letter GEN 14-23 which was published in December. And that may be another important reference as you begin looking at the financial aid implications for implementing these programs. So it's just one more thing to take a look at. Thanks.

Coordinator: Thank you. And once again, to ask a question, please press star 1. And don't forget to record your first and your last name. Thank you. At this time, ma'am - oh, we have another question from Ms. (Kristina Delbridge). Your line is now open.

(Kristina Delbridge): Hi. It's (Kristina Delbridge) again. I always have questions. I appreciate you taking them. My second question is - because this is so limited, as far as the number of courses that we are offering, it does cross many different programs. And so we understand the whole process of middle states and going forward with listing of the Limited Direct Assessment for our EF, for updating (unintelligible).

But my question is, within our own system, if we keep it listed as the traditional program, is that problematic at all? It's because we'd still be able to flag the course in the background to know that it's a competency. So I'm just saying guidance that you can give on that. Thank you.

Dave Musser: Sure. I think, in that case, the important thing is that you can identify, as you said, exactly which courses include direct assessment coursework because that's going to be important for your reporting purposes to know how many of those were actually taken by students in a given award year.

So it's not a problem if you have the course listed in your general system the same way, as long as you have a clear way of identifying it and documenting that. So that's, number one, you're able to report what we need you to report as part of the experiment; and, number two, you can clearly show your auditor exactly which courses were actually direct assessment because those will work differently in terms of your Title IV processing.

(Kristina Delbridge): Perfect. Thank you.

Dave Musser: Sure.

Coordinator: Thank you, and one moment for the next question. At this time, speakers, we don't have questions in queue.

Holly Langer-Evans: Are you sure there are no questions?

Michael Cagle: Maybe everybody has been enlightened.

Coordinator: Speakers, I show no further questions in queue. Oh, we do have one; one moment. Our next question comes from Ms. (Trisha Springston). Your line is now open.

(Trisha Springston): Hi. This is (Trisha Springston). I am working with the UW Flexible Degree Option and we have full direct assessment programs. Some of our students are looking to take some coursework that's traditional coursework and not in competency-based educations.

Are we doing a Limited Direct Assessment program if only some of our students are going to be taking some of the traditional (unintelligible) in combination with our regular competency-based coursework?

Dave Musser: That's a great question. And the answer is yes. Essentially, if your program allows students to take traditional courses, so clock or credit hour courses, as well as direct assessment courses, even if not all students decide to take those courses, that program would be considered a hybrid direct assessment program, and would only be eligible under this experiment. So, as you said, if you want to offer students that option, then you wouldn't need to come in under this experiment.

(Trisha Springston): So when I put all of our information there, there would be each program that were going to allow it, and basically explain how we're going to administer that and allow them to take the courses, and all the policies and procedures surrounding that, correct?

Dave Musser: Exactly. Right. So if you've already had the programs approved, is that correct, the ones that you're planning on including in the experiment?

(Trisha Springston): Yes.

Dave Musser: If you've already had those approved, essentially, it's going to be a matter of submitting a - you'll have to change the name of the program on the E-App to say dash LDA instead of dash direct assessment, whichever it's going to be, it's slightly different. And then you'll have to submit an explanation for exactly how this version of the program would differ from the direct assessment program that we've already approved.

And that would explain to us, you know, which courses are going to be - the students would be allowed to take from the traditional format, as well as anything that might change with your financial aid process that's different from what you've submitted in your original direct assessment application. And that should give us enough to review it.

(Trisha Springston): Okay. Wonderful. Thank you.

Dave Musser: No problem.

Coordinator: One moment, please, for the next question. At this time, speakers, there are no questions in queue.

Holly Langer-Evans: I know there has to be a question (unintelligible) in someone's mind.

Coordinator: We do have one; one moment, please. Our next question comes from (Will Peña). Your line is now open.

(Will Peña): Thank you. I have a quick question about the turnaround time for the direct assessment coursework to review applications or program change notices for existing approved programs. Just, you know, what's the kind of a ballpark that you're looking at for those of us who've gone through the regular approval process and the time that (unintelligible) for that?

Dave Musser: Well I think it would depend on exactly how extensive the changes are. If you're only planning to allow students to take a few traditional courses at the same time, and that wouldn't substantially impact your financial aid procedures, it's likely that our approval process will be quite short, actually, because we will have already gone through in great detail your financial aid procedures for the direct assessment program, and we'll just need to figure out how you're going to incorporate the traditional coursework.

Now, if a traditional coursework comprises a much larger proportion of the program, then it might take us a little bit longer because we're going to have to consider the impacts, both to the direct assessment's component of your program and to the financial aid procedures.

So it's all about exactly how extensive the changes are. But I think, in general, those kinds of applications will be a lot faster and probably would be more around a few weeks rather than months because we've already done most of the work of approving it initially.

(Will Peña): Okay. Thank you.

Dave Musser: Sure.

Coordinator: Thank you. One moment for the next question. At this time, speakers, there are no questions in queue.

Holly Langer-Evans: Okay. Well, you all know how to reach me if you have any questions. I'm going to keep it open for another minute just in case anyone thought of something, because I want to make sure, because this is your time, and I want to give you that time, should you have questions. So let's leave it open for another minute.

Coordinator: Definitely, ma'am, and we do have one question in queue. One moment, please?

Holly Langer-Evans: Good.

Coordinator: Our next question comes from (Kim Kaska). Your line is now open.

(Kim Kaska): Good afternoon. This is (Kim Kaska) from the University of Wisconsin Colleges and UW Flexible Option. I have a question about the student pathway and how they might access limited direct assessment.

One of the - or at least maybe it's a misconception on my part, but as I listen to the conversation about students taking traditional courses, blended in a hybrid fashion, with completely competency-based programs, or within a completely competency-based program, I'm thinking that you might have in mind that there's going to be a fixed program there that students would take these number of courses traditionally, and these number of courses, your competency-based education?

But what we're hoping for is that students could be flexible about how and which courses they wanted to take traditionally versus a student who might

really struggle with math and want to take that face-to-face, compared to another student who might struggle with English and want to take that face-to-face.

So we wouldn't necessarily know ahead of time which courses the students would choose and which format? Does this program accommodate that freedom of choice?

Dave Musser: Yes. And it is one of the options that we had in mind when we developed the experiment. And so what you've described exactly would be absolutely fine. And you would - in order to figure out how to apply for the program, you know, what proportion of your program is offered using direct assessment, you would simply determine how much of the program could be taken in direct - using direct assessment.

So, if a student can complete 60% of your program using direct assessment coursework, it doesn't matter whether individuals actually choose to do that. It matters whether it's possible. And so that's how you would decide which type of application to submit based on what we've described today.

(Kim Kaska): Great. Thank you.

Dave Musser: Sure.

Coordinator: Thank you. One moment, please, for the next question. At this time, speakers, there are no questions in queue.

Holly Langer-Evans: Okay. Thank you so much, (Jay). Then what I'm going to do is thank you all for attending. We really appreciate it. If you have any questions that you

think of after today's session, please do not hesitate to send them to me. I will be happy to have them researched and get those answers back to you.

We look forward to working with you. We're very excited about the experiments. And we look forward again to help you and assist you as much as we can. So thank you again for joining us today. And all have a very good day. Thank you.

Coordinator: This concludes today's conference. Thank you for your participation. All participants may disconnect at this time. Speakers, please stand by.

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