

The Department of Education's  
*Experimental Sites Initiative*

**Educational Quality through Innovative  
Partnerships (EQUIP)**

November 2015

# Agenda

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- Overview of the Experiment

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- How to Apply

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- Evaluation and Reporting

# Responsibilities of Institutional Offices

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**Administrative Capability**  
**668.16(b)(1) and (4)**

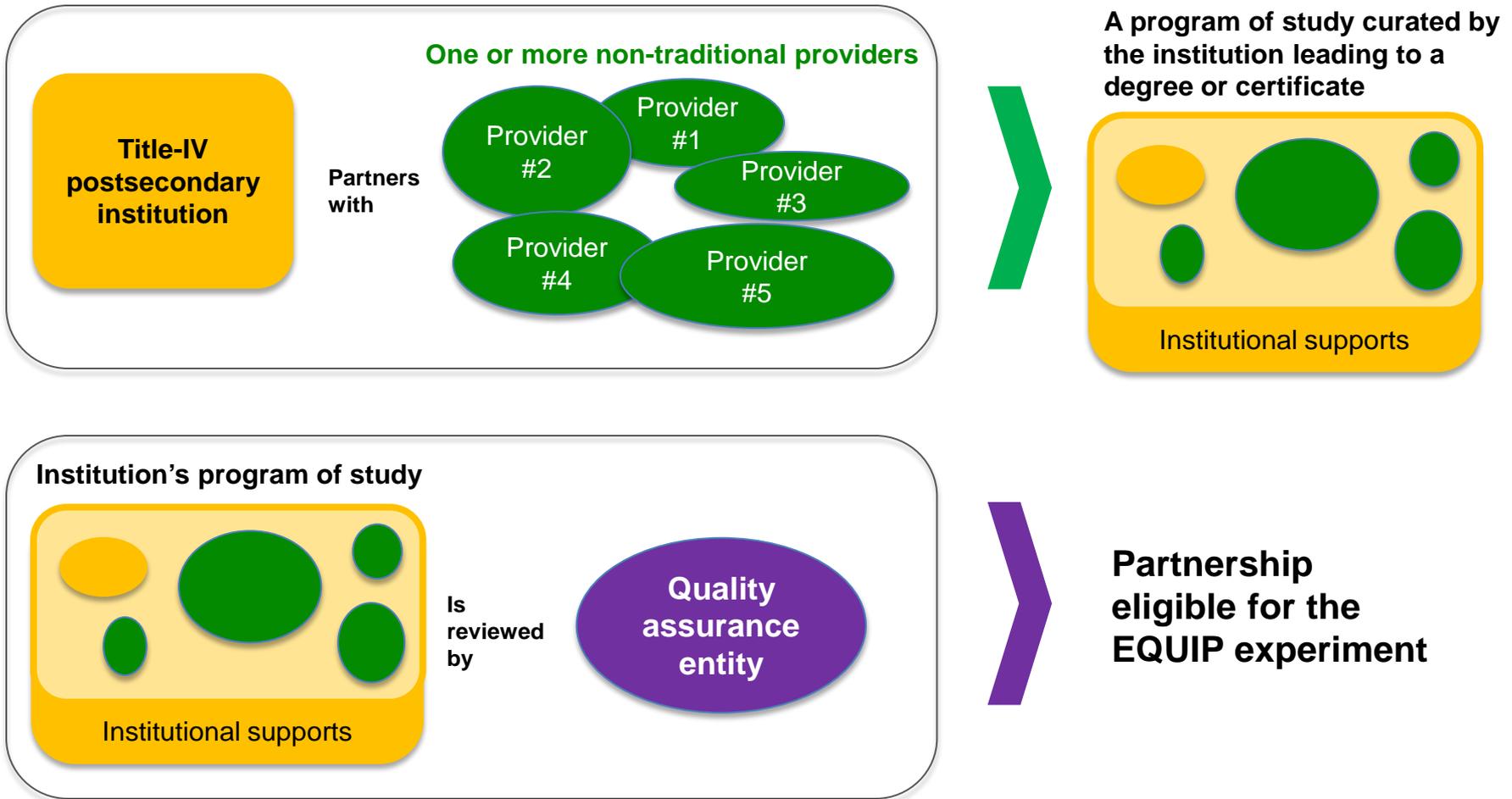
# Objectives

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**Encourage increased innovation in higher education through partnerships between the participating institutions and non-traditional providers in order to:**

- Learn whether those partnerships increase access to innovative and effective educational programs, particularly for students from low-income backgrounds
- Examine student outcomes to evaluate the effectiveness of these non-traditional providers
- Assess quality assurance processes appropriate for non-traditional providers and programs
- Identify ways to protect students and taxpayers from risk in this emerging area of postsecondary education

# Partnership Structure



# EQUIP

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	Current Rules	Experiment
Non-traditional Provider	Limited to providing less than 50 percent of the content and instruction of a Title IV eligible educational program	50 percent or more of the content and instruction is offered by one or more Title IV ineligible organizations (non-traditional providers)

# EQUIP

	Current Rules	Experiment
Instructional Time	Generally, a Title IV-eligible program must be at least 15 weeks in duration	A program under EQUIP must be at least 8 weeks in duration
Hours	At least: <ul style="list-style-type: none"><li>• 600 clock hours</li><li>• 16 semester hours</li><li>• 24 quarter hours</li></ul>	At least: <ul style="list-style-type: none"><li>• 450 clock hours</li><li>• 12 semester hours</li><li>• 18 quarter hours</li></ul>

# EQUIP

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	Current Rules	Experiment
Satisfactory Academic Progress	Must check once annually, but can check more often	Must check at least once each Title IV academic year, but can check more often
Quantitative Evaluation	Is student on pace to complete the program within 150% of normal time, calculated using credits completed divided by credits attempted	Is student on pace to complete the program within 150% of normal time, given credits completed over a calendar period

# EQUIP Waivers

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Law/Regulation	Description
34 CFR 668.8(a)	Requires that an eligible program be provided by the participating institution
34 CFR 668.5(c)(3)	Restricts the amount of an eligible program that may be provided by an ineligible institution or organization

# EQUIP Waivers

Law/Regulation	Description
Section 481(b)(1)(A) of the HEA and 34 CFR 668.8(d)(1)(i) and (ii)	Sets the minimum timeframes for Title IV eligible programs and establishes the timeframes for eligible programs
HEA Section 484 (c) and 34 CFR 668.34 (a)(3)(ii),(a)(5)(ii), and (b)	Requirements for satisfactory academic progress evaluations

# Required vs. Optional Waivers

Law/Regulation	Requirement
34 CFR 668.8(a) and 34 CFR 668.5(c)(3) <i>Ineligible institution or organization (non-traditional provider) restrictions</i>	These waivers are <u>required</u>
Section 481(b)(1)(A) of the HEA and 34 CFR 668.8(d)(1)(i) and (ii) <i>Minimum program length</i>	This waiver is optional
HEA Section 484 (c) and 34 CFR 668.34 (a)(3)(ii),(a)(5)(ii), and (b) <i>Satisfactory academic progress</i>	This waiver is optional

# Requirements for Participation

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## Program Length



Program must be a minimum of 8 weeks of instruction and 12 semester or trimester hours, 18 quarter hours, or 450 clock hours



Normal proration requirements for Pell Grants and Direct Loans apply



Definition of “credit hour” in 34 CFR 600.2 applies to credit hour programs offered under the Experiment

# Requirements for Participation

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## Program Design



Create one or more coherent programs



Contractual agreement with one or more non-traditional providers



50 to 100 percent of content and instruction must be provided by non-traditional provider

# Requirements for Participation

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## Program Design



The institution must award a certificate, degree or other recognized credential



The certificate, degree, or credential must have externally validated value in the workforce, for academic transfer, or both



Gainful Employment provisions apply

# Requirements for Participation

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## Program Design



Contractual agreements must ensure non-traditional provider agrees to provide information to institution to comply with Title IV regulations



Contractual agreements under the experiment require accreditor review and approval

# Requirements for Participation

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## Quality Assurance



Identify a Quality Assurance Entity (QAE) with capacity to review, monitor, and report on the proposed program as outlined in the FR Notice



QAE must be an independent organization that is free from conflicts of interest with institution and non-traditional providers

# Requirements for Participation

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## Accreditor Review



Program must fall within accreditor's scope of recognition



Determination from accreditor that arrangement meets appropriate standards and procedures



No specific program approval by accrediting agency required

# Requirements for Participation

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## Disclosure



Experimental nature of programs



Possibility of termination of the programs



Teach-out procedures if program or relationship with non-traditional provider is terminated

# Requirements for Participation

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## Consequences of Low Quality



Must take immediate action to improve, suspend, or terminate programs or non-traditional providers not meeting quality standards established by the QAE



Teach-out plan must be developed that results in no additional cost to students

# Title IV Program Options

Institutions must choose one of two options regarding the types of Title IV aid for which students in EQUIP programs will be eligible:

- **Federal Pell Grants only**
- **Federal Pell Grants and certain other Title IV aid**
  - Direct Subsidized Loans
  - Direct Unsubsidized Loans
  - Campus-Based Programs

# Protections For Students and Taxpayers

If an institution chooses the option to provide Pell Grants and certain other Title IV aid to students, the institution must submit detailed plans to the Department describing:

- How students and taxpayers will be protected in cases where programs are suspended, terminated, or otherwise limited in participation in the experiment
- Specific actions that will be taken, such as loan repayments and refunds to students (in addition to normal Title IV requirements)

# Quality Assurance Questions and QAE Role

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The Department is interested in understanding how a QAE will determine the quality of a program of study through:

- A set of largely outcome based questions
- Rigorous and timely monitoring
- Accountability processes

Draft questions are included in the Federal Register notice to provide an overview. The final set of questions that potential participants must answer will be provided in Phase Two of the application process.

# Application and Selection

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From the institutions that submit letters of interest and full applications, the Secretary will select a limited number to participate in the experiment. Applications will be evaluated on five criteria:

1. Positive student learning and employment outcomes
2. Equitable access for students from low-income backgrounds
3. Quality assurance processes that address the types of quality assurance questions outlined in the FR Notice
4. Program affordability
5. Strength of proposed student and taxpayer protections

# How to Apply

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## Letter of Interest

- On institutional letterhead
- Signed by the institution's financial aid administrator and an academic official
- Must include the institution's official name and OPEID, mailing address, email address, FAX number and telephone number of a contact person,
- Must include a request to be considered for participation in this Educational Quality through Innovative Partnerships (EQUIP) experiment
- Submit as a PDF attachment via email to: [experimentalsites@ed.gov](mailto:experimentalsites@ed.gov) no later than December 14, 2015

# How to Apply

<b>Letter of Interest Checklist</b>	
	PDF attachment to email
	Name and address of institution on institutional letterhead, signed by two officials (FAA and academic official)
	OPE ID
	Name, mailing address, email address, FAX number and telephone number of a contact person at the institution
	Brief description of the educational program(s)
	Name(s) of the non-traditional provider(s)
	Estimate of the number of Title IV eligible students to be enrolled in the program(s)
	Name of the QAE to be engaged, if known
	Which title IV student aid program option <ul style="list-style-type: none"> <li>• Pell Grants only</li> <li>• Pell Grants, undergraduate Direct Subsidized Loans and Direct Unsubsidized Loans, and the Campus-Based Programs</li> </ul>

# Application Review

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## Phase One

- Institution submits letter of interest
- Department reviews the institution's history of the administration of Federal Title IV Aid (for example, audits and program reviews)
- If the Department determines that the institution is eligible to proceed to the next application phase, the institution will receive an invitation to submit a full application for Phase Two

# Application Review

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## Phase Two

- All invited institutions submit an application that must include information outlined in the Federal Register, including:
  - Program design
  - Student population and intended outcomes
  - Provider and QAE selection and roles
  - Process for defining, implementing, monitoring, and taking appropriate actions based on rigorous quality assurance standards
  - Student supports and protections

# Application Review

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## Phase Two (continued)

- Institution must demonstrate:
  - The commitment of the non-traditional provider(s) to offer content and instruction
  - The accrediting agency's agreement to consider including the proposed program in the institution's accreditation

Proposed Phase Two questions available at:

<http://www.regulations.gov/#!documentDetail;D=ED-2015-ICCD-0123-0003>

# Application Review

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## Phase Two (continued)

- If institution is approved at the end of Phase Two, it will receive an amendment to its Program Participation Agreement (PPA)
- Institution signs and returns amended PPA
- FSA sends the institution a countersigned amendment to the PPA and a welcome letter
- School retains copies of both of those documents for their records

# Application Review

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## Phase Three

- Institution submits its programs to FSA for review and final approval
- This must include documentation of that the program:
  - Has been reviewed and approved by the QAE
  - Is included in the institution's accreditation and State authorization, if applicable
  - Meets all other Title IV, HEA eligibility requirements

# Evaluation and Reporting

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The Department's evaluation of the experiment will include information from:

- Integrated Postsecondary Education Data System (IPEDS)
- Common Origination and Disbursement (COD)
- National Student Loan Data System (NSLDS)
- Institutional Student Information Records (ISIRs)
- Institutional Experimental Site Survey and Narrative Descriptions

# Evaluation and Reporting

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- Annually, institutions will:
  - Complete a survey to provide background information on your EQUIP programs
  - Report identifiers and other data for students enrolled in your EQUIP programs
- The Department will provide the specific information that an institution must report

# Experimental Sites Initiative Website

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<https://experimentalsites.ed.gov>

Home

How to Apply

Implement an Experiment

Experiment

ESI Reporting

The diagram illustrates navigation paths from the website menu. A blue line starts from the 'Implement an Experiment' menu item, goes down, then right, then down again to point at the 'Action Plans' box. Another blue line starts from the 'Experiment' menu item, goes down, then right, then down again to point at the 'List of Participants' box.

Action Plans

List of Participants

# Contact Information

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# Questions and Answers