

Updated November 30, 2015

Educational Quality through Innovative Partnerships (EQUIP) QUESTIONS & ANSWERS

Programs of Study

EQUIP-Q1. What should an institution do if it cannot develop programs and form partnerships by the priority deadline of December 14, 2015?

EQUIP-A1. The details of the partnerships between postsecondary institutions, non-traditional providers, and quality assurance entities (QAEs) do not have to be formed or finalized by December 14. By that date, postsecondary institutions interested in participating must submit a letter of interest, which must include the following:

- A brief description of the educational program or programs that the postsecondary institution is considering for inclusion in this experiment
- The name(s) of the non-traditional provider(s) with whom the postsecondary institution intends to partner
- An estimate of the number of title IV-eligible students who will be enrolled in the program
- The name of the QAE(s) to be engaged, if known
- Which of the following two title IV student aid program options the postsecondary institution will choose (in all cases providing title IV aid only to otherwise eligible students):
 - allowing students to be eligible for Pell Grants only; or
 - allowing students to be eligible for Pell Grants, undergraduate Direct Subsidized Loans and Direct Unsubsidized Loans, and the Campus-Based Programs. [Direct PLUS Loans for parents and graduate students and Direct Unsubsidized Loans for graduate students are not included in this experiment, and the Department will therefore not consider applications for graduate programs.]

The postsecondary institution may change the provider or QAE with whom they intend to work as part of Phase Two of the application process.

EQUIP-Q2. Can a postsecondary institution partner with more than one non-traditional provider?

EQUIP-A2. Yes. Under the EQUIP experiment, a postsecondary institution can offer a single educational program with multiple non-traditional providers—or multiple educational programs with a single or multiple non-traditional providers.

Under EQUIP, each postsecondary institution must create one or more coherent programs of study with educational content provided by one or more non-traditional providers of postsecondary education that are not currently participating in the Title IV, HEA programs. Each program must be reviewed by a Quality Assurance Entity (QAE) that is ultimately responsible for affirming the quality of a program and taking action based on its assessment. For more information, see the QAE section below.

Applicants should keep in mind that if an institution submits more than one program for approval under the EQUIP experiment, the Department may not select all of the institution's programs for participation. The

Department may approve only one or more than one of a postsecondary institution's proposed programs that meet the goals of the experiment, have a high likelihood of success, and otherwise meet Title IV, HEA program eligibility requirements.

EQUIP-Q3: In which programmatic areas is the Department most interested?

EQUIP-A3: The Department seeks to advance goals such as increased equity and access, more flexible and personalized learning, high-quality student outcomes, and reduced costs. We have no preference for specific subject areas, and welcome proposals for the EQUIP experiment that include a diverse range of subject areas. We are interested in any program area that helps students receive postsecondary education and training that will advance their educational or employment goals.

EQUIP-Q4: Is EQUIP only for short-term programs?

EQUIP-A4: No. The institution must award a certificate, degree, or other recognized credential to students who successfully complete the program, and the certificate, degree, or credential must have externally validated value in the workforce, for academic transfer, or both. The program must also otherwise meet applicable Title IV, HEA eligibility requirements, including, if applicable, gainful employment requirements. For more information about gainful employment requirements, please see the Gainful Employment Information Page at <http://ifap.ed.gov/GainfulEmploymentInfo/indexV2.html>.

EQUIP-Q5: What is the role of the Title IV-participating postsecondary institution applying for the experiment?

EQUIP-A5: The Title IV-eligible postsecondary institution applying for the EQUIP experiment must develop, and offer a program of study for students in partnership with a non-traditional provider of education and training and a QAE.

The program must also lead to a degree or other recognized credential from the postsecondary institution, and at least 50 percent, and up to 100 percent, of the program's content and instruction must be provided by one or more non-traditional providers through a contractual arrangement with the participating institution. The postsecondary institution is responsible for maintaining documentation of its contracts with the non-traditional provider and QAE.

As the fiduciary for the Title IV, HEA programs, the postsecondary institution is ultimately responsible for complying with all Title IV requirements, including gainful employment requirements, where applicable. It is the responsibility of the participating postsecondary institution to ensure that its non-traditional provider partner(s) collect, and the institution maintains, the information necessary to comply with all statutory and regulatory requirements.

EQUIP-Q6: Can a postsecondary institution submit multiple letters of interest?

EQUIP-A6: No, a postsecondary institution may submit only one letter of interest, though it may include multiple programs of study in its participation in the experiment.

EQUIP-Q7: Is there a type of college or university that is ideally suited for this program?

EQUIP-A7: No, the Department is seeking a diverse set of postsecondary institutions to participate in EQUIP.

EQUIP-Q8: Will professional and job training programs qualify for EQUIP? What about apprenticeship programs?

EQUIP-A8: Yes, all types of degree- or certificate-granting postsecondary programs may be included in a postsecondary institution's participation in the EQUIP experiment. Apprenticeship programs that otherwise meet the Title IV, HEA requirements (as modified under the EQUIP experiment) are eligible for inclusion.

Non-Traditional Providers

EQUIP-Q9: Can a provider be a part of more than one letter of interest or participating partnership?

EQUIP-A9: Yes, providers may work with multiple postsecondary institutions submitting letters of interest and/or may partner with multiple postsecondary institutions on separate programs. However, please note that the Department will select only a small number of postsecondary institutions to participate, and will consider the quality of each application as well as institutional diversity, institutional type and control, geographic location, enrollment size, and title IV, HEA program participation levels, among other characteristics, in selecting applicants for participation in the experiment.

EQUIP-Q10. Under EQUIP, do eligible partnerships have to include external entities, rather than another, non-participating part of the same legal entity that owns or controls the institution – such as with the non-credit continuing studies part of an institution?

EQUIP-A10. The partnership must be between a Title IV-eligible postsecondary institution and external entities that are not traditionally eligible to participate in the title IV programs. Note that the EQUIP experiment does not waive the prohibition on contractual agreements in which the eligible institution and the ineligible institution or organization (non-traditional provider) are owned or controlled by the same individual, partnership, or corporation.

Quality Assurance Entities

EQUIP-Q11. Will the Department select and approve a single QAE for all participating programs?

EQUIP-A11. No, the Department will not select a single QAE for all postsecondary institutions, nor will the Department publish a list of approved QAEs with which postsecondary institutions may work. Institutions will identify a QAE to work with each program of study under the EQUIP experiment. A single QAE may work with multiple postsecondary institutions participating in the experiment.

Each educational program under the EQUIP experiment must be reviewed by a single QAE (selected by the postsecondary institution) that is ultimately responsible for affirming the quality of a program (in addition to quality assurance provided by the postsecondary institution's accreditor and the institution itself) and taking action based on its assessment.

However, given the range and depth of expertise and knowledge required for the quality assurance process, some applicants may wish to have two or more organizations working together to fulfill the requirements of the QAE role. In that case, one organization must be clearly designated as having the lead role and final responsibility for quality determination and consequences, and the respective roles and responsibilities of the organizations participating in the quality assurance process are clearly delineated and documented.

EQUIP-Q12. What is the role of the QAE?

EQUIP-A12. The QAE will review, monitor, and report on the proposed program and ensure the quality of the providers and their program components.

The Department is interested in outcomes-based approaches for reviewing, monitoring, and reporting on the quality of the programs included in the experiment. Thus, QAEs must establish a rigorous and timely process to assess the program before students are enrolled, monitor and report on an approved program's performance, and take action based on the program's performance.

You can find more information on the QAE role, including the "Quality Assurance Questions" that the QAE must answer when designing its review process, here: <https://www.federalregister.gov/articles/2015/10/15/2015-26239/notice-inviting-postsecondary-educational-institutions-to-participate-in-experiments-under-the#p-44>

EQUIP-Q13: What kinds of entities could serve as QAEs?

EQUIP-A13: A goal of this experiment is to assess quality assurance processes appropriate for non-traditional providers and programs. Postsecondary institutions participating in the experiment must partner with a QAE to develop those quality assurance processes.

Some existing organizations, including traditional accreditors and other quality assurance bodies, may be well suited to perform these functions, while in other cases new organizations or consortia of multiple organizations may come together to perform the QAE functions.

The postsecondary institution must demonstrate that the QAE is an independent organization that is free from conflicts of interest with the postsecondary institution and the non-traditional providers.

General

EQUIP-Q14: Will the Department provide funding for institutions' implementation of this experiment?

EQUIP-A14: No additional funds are available from the Department to support a postsecondary institution's implementation of the EQUIP experiment.

EQUIP-Q15: How should potential partners find one another? Is there a list of approved organizations?

EQUIP-A15: No, there is no list of approved organizations. All organizations that meet the criteria in the Federal Register notice are encouraged to apply. When selecting partners, interested parties should consider the criteria in the Federal Register about successful organizations and consider whether potential partners would be able to

meet the requirements described as part of their role. They should also consider the needs of their students in finding a program that is appropriate for the postsecondary institution and the local labor market.

Some organizations have stated their interest in entering into partnerships on public websites, including at the following sites:

- [From Inputs to Outcomes: Decoding 'Quality Assurance' in Higher-Ed](#)
- [New America's EQUIP Interested Parties Spreadsheet](#)

If your organization or website is compiling and publishing lists of organizations that have publicly indicated an interest in participating in EQUIP and you would like your website to be included in the list above, please email innovation@ed.gov. Please note that the Department does not endorse any organization or institution listed at the links above. These links may contain resource materials that are provided for the user's convenience, but any information therein is not intended to reflect its importance, nor is it intended to endorse any views expressed, or products or services offered. These materials may contain the views and recommendations of various subject matter experts as well as hypertext links, contact addresses and websites to information created and maintained by other public and private organizations. The opinions expressed in any of these materials do not necessarily reflect the positions or policies of the U.S. Department of Education. The U.S. Department of Education does not control or guarantee the accuracy, relevance, timeliness, or completeness of any outside information included in these materials.

EQUIP-Q16: What is an accrediting agency's role in the EQUIP experiment?

EQUIP-A16: Accrediting agencies will have numerous roles in the EQUIP experiment. Postsecondary institutions interested in participating in the experiment should reach out to their accrediting agencies during the application process to ensure familiarity with requirements and timeline for accreditor review.

Contractual agreements under which a non-traditional provider provides 50 percent or more of the instruction in a program must be reviewed and approved by the participating institution's accrediting agency.

An educational program included in the EQUIP experiment must fall within the accreditor's scope of recognition, and by Phase Three of the EQUIP application and selection process, the postsecondary institution must obtain a determination from its accrediting agency that the institution's arrangement meets the standards and procedures the agency considers appropriate. The Department is not requiring the accrediting agency to provide specific program approval.

EQUIP-Q17: Do State laws and accrediting agency requirements apply to these experimental programs?

EQUIP-A17: Yes, postsecondary institutions are responsible for obtaining any necessary approvals from their state and/or local agencies and for working with their institutional accrediting agency to ensure the program is included in the institution's recognized accreditation.

EQUIP-Q18: Can students transfer in credit to EQUIP programs? If so, is the number of credits that a student transfers into an EQUIP program limited to 50 percent of the program?

EQUIP-A18: Yes, students are permitted to transfer in credit to programs included in the EQUIP experiment.

The Department does not have any requirements regarding the amount of credit that may be transferred into a program under the EQUIP experiment. At least 50 percent of the instruction in a program included in the EQUIP experiment must be provided by a non-traditional provider, but the Department does not require that an individual student receive at least 50 percent of the credit in his program as a result of instruction by a non-traditional provider.

States, accrediting agencies, and/or QAEs may have other requirements for the share of a program that an individual student must complete at the postsecondary institution or with the non-traditional provider. A participating postsecondary institution must ensure that such requirements are fulfilled during its participation in the EQUIP experiment.

EQUIP-Q19: Will students in these experimental programs be counted in the postsecondary institution's standard reporting?

EQUIP-A19: Yes, all required outcomes for all students must be reported by the postsecondary institution, like any other program of study, including for gainful employment purposes, where applicable.

EQUIP-Q20: Will there be any protections in place for students if programs under EQUIP are terminated for low quality?

EQUIP-A20: In the event that a program is suspended or terminated, a teach-out plan, as generally defined under 34 CFR 600.2, must be developed to provide the remainder of the program by the postsecondary institution, or for the provision of the remainder of the program by another title IV-eligible institution, at no additional cost to students.

Additionally, for those programs in which students will have access to Federal student loans in addition to Pell Grants, postsecondary institutions must submit detailed plans describing how students and taxpayers will be protected in cases where programs are suspended, terminated, or otherwise limited in their participation in the experiment by the Department, the QAE, the accreditor, or the postsecondary institution, for any reason, including poor student outcomes and low quality.

Application Process and Timelines

EQUIP-Q21: Who must submit the application? Can any organization apply to be a part of this experiment?

EQUIP-A21: The letter of intent must come from a Title IV-eligible postsecondary institution. We encourage robust dialogue among the postsecondary institution, the provider(s), and the QAE(s) and accreditor they intend to work with, in addition to the institution's accrediting agency, prior to the institution's submission.

EQUIP-Q22: What are the Department's expectations for the timeframe for implementing the experiment?

EQUIP-A22: Letters of interest are due on December 14, 2015. If all of the institutional qualifications for participation are met and the Department determines this initial letter to be of sufficient quality and alignment

with the goals of the experiment, the postsecondary institution will receive an invitation to submit a full application. Postsecondary institutions will have 60 days from the date of issue to return completed applications. The preliminary application questions are currently published for public comment here: <http://www.regulations.gov/#!documentDetail;D=ED-2015-ICCD-0123-0003>.

This is a multi-step and complex process involving many stakeholders, including the potential establishment of new programs and quality assurance processes, obtaining approvals from accrediting agencies, and in some cases, States. Timeframes for final approval of an institution's program(s) under EQUIP will vary depending on a variety of factors, including the time necessary to secure State authorization and/or for an institution's accrediting agency to complete its review of the program(s). Under best case circumstances, including the efficient establishment and processing of the afore-mentioned steps, Title IV could be disbursed by Fall 2016.

EQUIP-Q23: Can instruction be completely provided by the non-institutional provider?

EQUIP-A23: Yes. Institutional faculty retain oversight of the curriculum under EQUIP; however, up to 100 percent of the instruction in a program can be outsourced to a non-traditional provider.

EQUIP-Q24: Are distance education programs under EQUIP subject to the requirements for regular and substantive interaction between students and faculty?

EQUIP-A24: Regular and substantive interaction regulations and requirements are unchanged in EQUIP. 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 program offered under EQUIP, including one offered entirely by a non-traditional provider, that does not include regular and substantive interaction between students and instructors would be considered to be a correspondence program with the significant limitations and restrictions on Title IV eligibility that apply to such programs.

EQUIP-Q25: Does a student in an EQUIP program have to be a registered student at the postsecondary institution? Will the student receiving aid need to be admitted to the university?

EQUIP-A25: Yes, students enrolled in EQUIP programs must be regular students enrolled in a program leading to a degree, certificate, or other recognized credential issued by the postsecondary institution.

EQUIP-Q26: EQUIP has a goal of increasing access for underserved students. Is that a requirement?

EQUIP-A26: A key goal of this experiment is to assess the extent to which new programs provide access for students from low-income backgrounds to high-quality postsecondary education and training programs. Programs will be selected, in part, based on the extent to which programs will provide equitable access to innovative postsecondary education programs, particularly for students from low-income backgrounds.

EQUIP-Q27: How long will the EQUIP experiment last?

EQUIP-A27: Typically, experimental sites last for at least three years. We hope that the next Administration continues this experiment.