



SUBSTANTIVE CHANGE: COMPETENCY-BASED EDUCATION DOCUMENTATION REQUIREMENTS FOR INSTITUTIONS

An institution will to provide documentation of the Northwest Commission on Colleges and Universities (NWCCU) actions of approval to deliver instruction using a Competency-Based Education (CBE) modality. The documentation required depends, in part, on the type of CBE program that the institution offers.

To include a course/credit or a direct assessment program, an institution must provide documentation that NWCCU has evaluated and approved its general approach to CBE as part of an initial accreditation, renewal of accreditation, or substantive change evaluation.

To include a course/credit CBE program, an institution must provide documentation that its program(s) are recognized as CBE programs by NWCCU (to include the specific elements related to the institution’s approach to CBE as stated in the “Overview” above) and are approved and/or included in the institution’s grant of accreditation.

To include a direct assessment program, the institution must provide documentation that:

- ▶ For a program where 50% or more of the program can be completed using direct assessment, the program and the institution’s claim of equivalence in terms of credit or clock hours has been approved by NWCCU; or
- ▶ For a program where less than 50% of the program can be completed using direct assessment, the program is included in the institution’s grant of accreditation, and the program is recognized as a CBE program by NWCCU.

Chart of Review and NWCCU Approval Requirements

Type of Program	Required Narrative for CBE Substantive Change Proposal
Course/Credit CBE Program	Institution’s general approach to CBE
Direct Assessment Program – 50% or more	Institution’s general approach to CBE
Direct Assessment Program – less than 50%	Institution’s general approach to CBE

Policy Topic	Required Procedure	Date Procedure Created/Updated
Institutional Eligibility	<p>The institution must include <i>procedures</i> to ensure and document that any CBE program offered has been evaluated and is recognized or approved as a competency-based education program by its accrediting agency. The institution must also include <i>procedures</i> to ensure and document that the institution’s approach to CBE has been evaluated and approved by its accrediting agency, including, as applicable, any “substantive change” requirements in accordance with the regulations at 34 CFR 602.22, and</p> <ul style="list-style-type: none"> • If the CBE program measures students’ progress in credit or clock hours, the institution’s accrediting agency has determined that the institution’s assignment of credit or clock hours in the program conforms with general practice in higher education; or • If approved by the Department to provide a direct assessment program, the clock or credit hour equivalencies for the competencies in that program have been approved by the institution's accrediting agency and the Department under the regulations at 34 CFR 668.10. <p>Finally, the institution must include <i>procedures</i> to ensure and document that the program has been evaluated and approved for Title IV eligibility by the Department before the institution begins disbursing Title IV aid.</p>	<p>Provide a copy of the procedure as part of the substantive change proposal</p>
Disbursement for Direct and Indirect Costs	<p>The institution’s <i>procedures</i> must separate the components of the student’s Title IV COA into two categories, one for “direct costs” (i.e., tuition and fees and books and supplies) and the other for “indirect costs” (such as room and board, transportation, miscellaneous expenses).</p>	<p>Provide a copy of the procedure with the substantive change proposal</p>
Withdrawals and the Return of Title IV (R2T4)	<p>The institution is not required to perform a calculation when a student withdraws during a payment period. However, the institution must include <i>procedures</i> to cancel or return all aid for a student who does not begin attendance in a payment period, and to withdraw a student who ceases to be academically engaged for 45 days, or fails to enroll in any competencies for 45 days. These <i>procedures</i> must ensure that no further Title IV aid is disbursed to such students. Further, the institution must include <i>procedures</i> to comply with regulations for late disbursements under 34 CFR 668.164(g), except insofar as post-withdrawal disbursements will not be calculated in accordance with 34 CFR 668.22(e). The institution must include procedures to ensure that within 45 days of determining that a student has withdrawn, it notifies the student of any loan funds for which the student might be eligible and maintains a process for issuing those funds to the student or the student’s account upon request. Likewise, the institution must include procedures to pay to a student any grant funds that the student was eligible to receive at the time of the withdrawal, and comply with the requirements in 34 CFR 668.21 to return funds for a payment period in which a student did not begin attendance.</p>	<p>Provide a copy of the procedure as part of the substantive change proposal</p>

Policy Topic	Required Procedure	Date Procedure Created/Updated
Payment Periods	<p>The institution's <i>procedures</i> must ensure that Title IV aid be disbursed to students under the "non-term" provisions of the regulations, except that institutions must shorten the length of the CBE program's payment period from 50 percent of the program's defined "academic year" to no more than 25 percent of the academic year. Since aid for direct and indirect costs will be decoupled, there must be two separate Title IV payment periods. The institution's procedures must ensure that a direct cost payment period is based on the student's completion of no more than 25 percent of the competencies in the program's Title IV academic year. Further, the school's <i>procedures</i> must ensure that an indirect cost payment period is based on the student's completion of no more than 25 percent of the number of weeks of instructional time in the program's Title IV academic year.</p>	<p>Provide a copy of the procedure as part of the substantive change proposal</p>

Policy Topic	Required Policy	Date Policy or Procedure Created/Updated
Academic Year	<p>The institution must ensure that the defined academic year for a semester- based or trimester-based CBE program includes a minimum of 24 semester hours and a quarter-based program’s academic year must include a minimum of 36 quarter hours. The institution must ensure that the academic year in a direct assessment program using credit hour equivalencies includes competencies equivalent to an amount of learning associated with a minimum of 24 semester hours or 36 quarter hours and at least 30 weeks of instructional time. The institution must ensure that the academic year in a direct assessment program using clock hour equivalencies includes competencies equivalent to an amount of learning associated with a minimum of 900 clock hours and at least 26 weeks of instructional time. The institution’s <i>policy</i> must establish clock or credit hour equivalencies for each of the CBE program’s required competencies.</p>	<p>Provide a copy of the policy and/or procedure as part of the substantive change proposal</p>
Weeks of Instruction, Educational Activities and Substantive Interaction	<p>The institution’s <i>policy</i> must ensure that a week of instruction time is any seven-day period in which the institution makes available to the students enrolled in the CBE program the instructional materials and faculty support to enable the student to engage in an educational activity. The <i>policy</i> must also ensure that an educational activity includes, but is not limited to, participating in regularly scheduled learning sessions (where there is an opportunity for direct interaction between the student and the faculty member), participation in faculty-guided independent study (as defined in 34 CFR 668.10(a) (3) (iii), consultations with a faculty mentor to discuss academic course content, or, in combination with any of the foregoing, assessments. For direct assessment programs only, educational activity also includes development of an academic action plan developed in consultation with a qualified faculty member that addresses competencies identified by the institution.</p> <p>The institution must include a <i>process</i> that ensures regular and substantive interaction between students and instructors.</p> <p>Further, the institution must include a <i>process</i> that may not allow Title IV aid to be paid for academic credits resulting from successful assessments of prior learning where the learning was not based on instruction provided during the payment period.</p>	<p>Provide a copy of the policy and/or procedure as part of the substantive change proposal</p>

Policy Topic	Required Policy	Date Policy or Procedure Created/Updated
<p>Satisfactory Academic Progress (SAP)</p>	<p>The institution's SAP <i>policy</i> for CBE programs must evaluate a student's SAP upon the student's completion of each of the program's academic years, as measured in weeks of instructional time (i.e., at least 30 weeks for a program with credit hour equivalencies and at least 26 weeks for a program with clock hour equivalencies). The institution must include <i>procedures</i> to determine whether a student has completed sufficient competencies to complete the program within the maximum time frame, for an undergraduate program, that is no more than 150% of the program's published length, as provided in the definition of "maximum timeframe" in the regulations at 34 CFR 668.34 (b). If the institution accepts any transfer credit to meet requirements of a student's program, the institution's <i>procedures</i> should include whether it will prorate a student's maximum timeframe based on the number of transfer credits a student has received.</p>	<p>Provide a copy of the policy and/or procedure as part of the substantive change proposal</p>