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Career Education REVIEW™

The Career College Information Source

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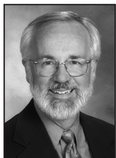

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Competency-based learning ensures student, faculty performance

By Dr. Larry Banks, Daymar College Group

The Daymar College Group has implemented a three-pronged approach to a competency-based learning model that drives improvements in student learning and school performance. The result should be students who are better prepared to take on jobs, teachers who are better instructors, and curriculum that is aligned to industry and employer needs.

Last spring, we exposed key leadership and program development committees to a competency-based learning model. The initial response was, "What is competency-based learning and why do we need it?" We are just now launching the work we started last April and May with our program committees. The steps we went through took time because we changed the academic culture.

First, we defined competency learning. Competencies are statements of doing — what kind of tasks a student can accomplish or what kind of skills he or she can apply in a particular context. Competencies can range from fairly broad statements at the program level, to extremely detailed statements for course-level outcomes. Competency-based learning, however, represents a radical departure from traditional

The result should be students who are better prepared to take on jobs, teachers who are better instructors, and curriculum that is aligned to industry and employer needs.

DR. LARRY BANKS is the provost and vice president of operations for the Daymar College Group, which includes 35 career tracks and 16 campuses in Tennessee, Ohio, and Kentucky, as well as online degree programs. He is also a consultant with Edushare, LLC, where he specializes in retention and placement training and strategy, online and blended course content and learning management systems.

Banks previously was associate provost at Western Governors University; provost at Rocky Mountain University of Health Professions; and vice president of academics at Eagle Gate College.

He earned his doctorate degree in Business and Learning with Technology from Touro University.

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higher education credentials based on “seat time” or credit hour and assessment. Instead, students are credentialed based upon the demonstration of the knowledge and capabilities required to meet an established skill set or competency.

Some people think competency learning is direct assessments; others think measuring outcomes is the same as measuring competencies. Our program committees developed what they thought the competencies were for particular programs and then determined how students would demonstrate skills that are necessary for employment within a particular field. The program committees made a list, and we went back and revised that list three or four times.

Next, we contracted with an assessment developer. If there is one thing that competency-based learning models have in common, it is third-party assessment. The secret sauce of a competency-based learning model is that of an assessment instrument and vetted competencies, or competencies that matter to the industry or to the employers. In other words, the key ingredients to the competency-based model are vetted learning outcomes and objectives that the professional associations, the employers and your own faculty members say are necessary. So we drafted what we thought were important competencies and outcomes and then worked with Wonderlic, which went to the employers for feedback.

Let me give you a specific example with medical assisting. Our people identified competencies and shared that with the association and with Wonderlic’s employer database. They came back and said we were missing about 20 percent of the competencies we needed and that we were spending too much time in a couple of other areas. For example, our faculty learned that we don’t need to spend as much time on EKG in the classroom, but that we need to spend more time in other areas. That caused us to revise and calibrate our program to the point where it is absolutely solid. We took out portions that don’t matter and we adjusted the program to be a solid diploma career-oriented medical

What is Competency-Based Learning?

In a nutshell, competency-based learning represents a radical departure from traditional higher education credentials based on "seat time" or credit hour and assessment. Instead, students are credentialed based upon the demonstration of the knowledge and capabilities required to meet an established skill set or competency.

"Unlike the credit hour, which is standardized around time, competency-based systems give "credit for learning no matter where it happens [or how long it takes]...students would be able to build on their own skills, abilities and knowledge, the time required to obtain a degree would be reduced, resulting in a less expensive and higher-quality education." ~ Louis Soares, *A Disruptive Look at Competency-Based Education*, 2012.

Core Elements of a Competency-Based Learning Model

- Job Task Analysis – Key to Designing Effective Assessments:
  A Job Task Analysis identifies the core knowledge areas, critical work functions, and/or skills that are common across a representative sampling of practitioners, often known as “subject matter experts. The results from the job analysis provide the basis of a valid, reliable, fair and a realistic assessment that reflects the skills, knowledge, and abilities required for competent job performance.

- The secret sauce -- *assessment instruments*:
  formative (measuring interim skill acquisition)
  summative (measuring final learning outcomes)
  Measurement of student performance (against expectations)

What are competencies?

- Competencies are statements of *doing*:
  - what kinds of tasks can a student actually accomplish
  - what kinds of skills can he or she apply in a particular context

- Competencies can range from fairly broad statements at the program level, to extremely detailed statements for course-level outcomes

- “.. the particular levels of knowledge, skills, and abilities that a student has attained at the end (or as a result) of his or her engagement in a particular set of collegiate experiences… Goals describe not only what is to be learned but also the specific levels of performance that students are expected to master (Ewell, 2001, p. 6)” assisting program that matched the competencies told to us by the association, the employers and our own people.

Next, we identified dynamic learning resources to support students who are not competent and to direct those students to learning resources that will help them master the competencies. Frankly, faculty members are learning resources, too. With a third party assessment, the school can measure faculty performance with regard to the learning process. In other words, competency or the outcomes are measured away from the faculty, but they also validate whether faculty members are doing a good job as facilitators of student learning. While some faculty members may resist the competency-based model because they fear they will not be competent, you need to stress to them that it is really about learning and student success: students can demonstrate skills and abilities in order to obtain employment. With this model, faculty members know whether or not the students are getting it or not because they get a report as to how well the students are doing. In addition, the students get a report as to whether or not they're mastering the outcomes.

Daymar is doing a selective rollout with the competency-based learning model with new students in four programs: medical assisting, business, billing and coding and criminal justice. However, we will implement this competency-based learning model in all programs over the next year. It is a big project. You basically go in and reengineer programs and courses in order to make sure that your learning objectives are good, clear and linked directly toward the competencies and outcomes that matter. There's no guessing about it; you really have to spend time making sure you triangulate with the industry, with employers, and with faculty.

Currently, national and regional accreditation standards are forming. That said, the Accrediting Council for Independent Colleges and Schools (ACICS) and other regulators

Direct assessment and competency-based programs

Technically, a direct assessment program is a program that uses direct assessment of student learning, no matter the type of learning or level at which learning is defined.

- Competencies are one type and level of student learning. They describe what a student must know or be able to do to be judged "competent" in a certain field.
- Learning can be defined in relation to other contexts, such as an academic discipline, rather that a trade, occupation, profession or area of technical knowledge.
- Learning can also be defined at levels other than competency. One example is "mastery," which can be defined as a level of learning that includes but exceeds "competency." Definitions of excellence in learning can even be open-ended.
- Despite these theoretical differences, both the U.S. Department of Education and other accreditors treat competency-based and direct-assessment programs as synonymous.
- Competency-based programs are particularly appropriate for career education.

History and Future

Demand for Competency-Based Credentials Is High:
"Americans want an education system that is focused on learning and demonstrated competencies, rather than "seat time."

According to a recent Gallup/Lumina Foundation poll:

- 87 percent of respondents said they believe students should be able to receive college credit for knowledge and skills acquired outside of the classroom
- 75 percent indicated they would be more likely to enroll in a higher education program if they could be evaluated and receive credit for what they already know
- 75 percent don't believe learning should be time based and agree that if a student demonstrates they have mastered class material in less than the traditional 16-week session, they should be able to get credit for the course without sitting through the entire academic term

are looking at ways to support the competency-based or direct educational learning models. Committees within ACICS are just now defining new standards for how they're going to measure more specific outcomes and competencies. It is a hot topic because the politicians in Washington, D.C. are talking about and wanting more competency-based models, and yet there's a lot of confusion about what that is.

Third party assessment validates that the student has mastered whatever outcomes you stated and adds quality assurance to the learning process.

In general, competencies should be more universal across the sector and in community colleges. I'll give you an example that just happened. We had an applicant come to our Paducah school. She took medical terminology six years ago at the local community college while enrolled in their medical assisting program. She wanted to enroll in our program and asked if she could get credit for the courses she's taken. Normally, you wouldn't even look at giving credit for core courses. But with this competency-based model, she can take the assessment, and if she passes, we will transcript the credit and have her move on without retaking the course. It's one reason why politicians are interested in competency-based models; the federal government doesn't have to pay for classes more than once from the Title IV point of view.

Sometimes, competency may be based on several classes, instead of just one. If I were a business major, I would take accounting, financial management and managerial accounting. Currently, I'll get a grade at the end of the semester for each course. But does that mean I can apply and demonstrate competency? To demonstrate that I have the knowledge, the assessment might be analyzing a financial statement and writing a report for the CEO on the financial condition of the company. That example of competency is based on subjective judgments. Schools need to create a rubric that says something like "you pass, you're highly competent." But it is up to the institution to determine what the cut score is.

There has been some media coverage saying that for-profits are going to dumb down the competencies. I don't think so. We're under scrutiny and, in general, our sector does a good job helping students get where they want to go. Still, we need to do a better job of measuring outcomes so

What's happening in your state?

About 39 states have enacted seat time waivers or competency education laws:

- Four states (Iowa, Maine, New Hampshire and Oregon) have implemented statewide policies to redesign their education systems to support competency-based learning.
- Fourteen states (Alabama, Arizona, Connecticut, Colorado, Florida, Idaho, Kentucky, North Carolina, New York, Ohio, Rhode Island, Tennessee, Utah and West Virginia) have implemented competency education pilots, credit-flexibility policies, or advanced next generation policies for equivalents to seat-time.
- Eight states (Michigan, New Jersey, South Carolina, Texas, Virginia, Vermont, Washington and Wisconsin) are beginning to explore competency education through district waivers or exploratory task forces.
- Ten states (CA, IA, KY, ME, NH, NY, OH, OR, WV, WI) have joined the Council of Chief State School Officers Innovation Lab Network to identify new designs that further student centered learning and the conditions to help these innovations thrive

Keys to effective competency-based learning models

- Valid third-party assessments
- Job task analysis (commitment to implement advisory board feedback)
- Secure assessments
- Faculty willing to take constructive feedback from assessment systems
- Faculty who believe "it is about learning, not teaching"
- Faculty engaged in mentoring and guiding the learning process
- Dynamic learning resources

we can show politicians and others that what we do is worth it. However, competency-based learning does have issues since it's not as simple as pass/fail or competent/not competent. How do you grade the competency-based learning models? Those things need to be worked out. The University of Northern Arizona is doing pass/fail, but then they're also grading on a transcript so people can understand what it is.

We're in our infancy. Just exactly what a competency-based model is going to look like will take years to iron out. But we're going to the next level of aligning what students need to know to get a job; third party assessment validates that the student has mastered whatever outcomes you stated and adds quality assurance to the learning process.

Demonstrating competencies isn't a new idea. The American Bar Association or the Certified Public Accountant exams measure competencies. Nurses take the National Council Licensure Examination to be licensed and to demonstrate achievement. Information technology has certification. You don't have to get 100 percent on the exams. There's a cut score and you're measured. But competency-based learning takes it to the next level; it may not be specific to every job, but there are basic things you need to be able to do like write a business memo, analyze a financial statement or do basic accounting.

It's too early to say how students will respond to this, especially those students who are just getting by in school and who will now have to prove they're competent. We are just starting the process at Daymar, and we will be able to answer that question better as we go along. But I can tell you that students in a medical assisting class at Clarksville are halfway through the term so they should be able to demonstrate competency at 50 percent or 60 percent. We just gave them the assessment and three of the 26 are over 70 percent. The bulk of the students were between 50 percent and 65 percent, while three students needed some help. So what does that do? First of all, it proves to the bulk of the students that they are really learning something and doing fine. In addition, the faculty and the program mentors know that some students need help in particular topic areas so they know where to go to help them be successful.

Questions for institutions to ask:

- How does the institution support faculty as they collaborate to explicitly define student-learning outcomes?
- How can faculty members be encouraged to use defined student learning outcomes to facilitate learning?
- How do institutions support faculty members in the agreement upon and development of assessments?
- How can institutions instill respect and security of assessment processes that can capture student abilities on stated learning outcomes in a credible fashion?
- What processes do institutions have in place to support documentation of student learning?
- What support and documentation does the institution have for learning obtained outside (for example, from on-the-job, military experiences, or extracurricular activities)?
- Are faculty evaluated and promoted based on how well they use appropriate pedagogy to support students in achieving competence?

Benefits for our Sector

- Students can use competency-based assessments as proof of their skills and knowledge
- Students can improve their ability to navigate careers and work transitions across industry sectors
- Educators can use assessments as evidence that they prepare students for employment
- Educators can ensure their curricula is well aligned with job skill requirements
- Politicians and Public policymakers are more likely to support our sector because we demonstrate learning and lower the cost of education
- Standards-based competencies, curricula, and assessments help prepare graduates to meet the demands of the labor market and ensure that businesses have the human capital they need to flourish

Still, the move to a competency-based program won't get overwhelming support from all. A poll of 50 or 60 in attendance at my ACICS convention presentation showed about 10 percent of the audience wanted to adopt it, another 30 to 40 percent wanted to know more about it, and the rest didn't want to go there. But there are always early adopters. In one form or another, it is where we are going.

What are the Problems with Competency Based learning models?

- Transcripts
- Transfer credits
- Centered on assessments not faculty
- Some say, academic freedom
- Scheduling
- Faculty beliefs
- Valid assessments
- Agreed upon competencies – academics and industry

There are valid reasons why career colleges should consider competency-based learning models. For one, there is evidence and understanding that students learn subjects at different rates. Secondly, employers want evidence of skills and knowledge, while politicians and the public question the value of education. We have to be better at demonstrating outcomes from what we offer and what we do at the career school level. Politicians want it because of the ulterior motive that they don't want to pay out as much money in Title IV student loans. They want to give them credit if they already know material. But I want it because I want to demonstrate to employers that our students are competent and have demonstrable skills, which should give them an edge in terms of employability.

I think all higher education will be forced to more effectively demonstrate outcomes — whether it is competency-based or direct assessment, or some good old-fashioned outcome demonstrations. We are leading the sector at getting there, but ours is not the only answer. However, it is a good answer and I think we're moving in the right direction. Will it change? Yes, we will learn from it as we go along. Our definition is different because I believe faculty really matter and they make or break the learning experience. Some of the competency-based models are not so faculty centered; they're assessment centered. But ours is a combination of faculty touch, technology and third-party assessment all aimed at student success.

Career Education REVIEW *Written by Barbara A. Schmitz.*

Employer driven competencies

By Raul Vaides Pages with Cheryl Hentz

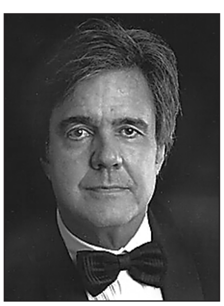
I've spent many years in the career education business, first with Devry and then in 1983 and beyond after I bought and subsequently operated Denver Technical College. It was there that I developed something that would be one of my greatest success stories in education, and something that all career colleges could also realize success from if they chose to implement it, especially with Gainful Employment on the horizon for the not-too-distant future: Career schools' future is in "employer driven competency programs."

We all know that, among the other issues we face, our sector is constantly under scrutiny and the target of criticism. But even back then we not only faced criticism, but banks refused to lend money to for-profit schools, for example. So a school really has to prove its worth. That's often hard to do.

If you think about education it's the second highest purchase most of us will ever make. But if you can't see it, you don't know how good it is, and you can't kick the tires, so to speak. If you don't have any good third party endorsements telling people which schools are good, or which schools are not, that can be a problem, because we go by reputation. So back then, I decided to demonstrate on a quantitative basis that my colleges were equal or better than our competition.

The advisory boards told us what skills, both hard and soft, our graduates had to have in order to graduate.

In order to do that, I assembled 300 companies eventually that made up 18 advisory boards, which equaled the



RAUL VALDES PAGES was the founder and president of Denver Technical College, which he grew organically from 50 to 2800 students and into an award winning career school offering degrees of Associate, Bachelors, and Masters level. Denver Technical College offered curriculum in both high tech and healthcare areas. Denver Tech was a trend setter in IT and Health Care Education using competencies and financial guarantees to employers based on student credentials. 85-15 at 52% , CDR's at 8%, 25% pre-tax at sale. The school has been nationally recognized by APSCU and was the winner of 16 Rodin "best practices" at annual conferences.

The school was purchased by DeVry in 1999 with Raul Becoming a Vice President at DeVry reporting to Ron Taylor,CEO on special projects.

Raul has served as Commissioner for Accrediting Commission of Schools and Colleges of Technology.He has been awarded the "Excellency in Education" award by the Career College Association.

If more information on how to develop employer based competencies email Raul at: raul@qicurriculum.com number of our programs. The advisory boards told us what skills, both hard and soft, our graduates had to have in order to graduate. So then we asked them to help us put together exit exams in order to help evaluate students before they graduate. Then we backed up those exams into the entire program. So we had assessments in every class. For example, if each class had five competencies…in a normal setting maybe you would get a B, but that B would come at the expense of your having a hole in your background, your foundation of your education and that would come back to haunt you later on. What we did in those cases is we gave students an incomplete. We sent them to the Learning Resource Center, where we had videotapes of every single class at the college. It's an old technology now but it worked well back then. The students would review those tapes and we'd work with them to help bring the deficient competency up to par. Then we would change the grade from incomplete to a passing grade. It improved retention, because we were not failing students because of lack of skills.

Our graduation exam was made up of both written and practical skills. If they passed that test, we would issue employers a guarantee that we would reimburse them for the first month's salary if a student was found to be deficient in the skills.

Our graduation exam was made up of both written and practical skills. If they passed that test, we would issue employers a guarantee that we would reimburse them for the first month's salary if a student was found to be deficient in the skills that we put in writing that they were strong in. In a nutshell, that was the Skills Guarantee program.

It helped us increase enrollment, not because students like competency exams, because they don't, but students liked the fact that we were going somewhere where employers were putting the third party seal of approval on the program. We gained a tremendous amount of tuition reimbursement. A lot of companies that previously had not approved us for tuition reimbursement suddenly started approving us. At the time that I sold to DeVry, it was not 90/10, it was 85/15. But the 85/15 calculation came in at 52 percent.

Competency tests based on skills was a little scary for students because they knew they couldn't just slide by with a 'C,' but it was also reassuring to them that they were investing in something that they knew had validation.

Many employers back then, and I suspect still today, were looking for the same kinds of soft skills, such as problem-solving, basic reading and writing, and communications skills. And most employers emphasized that more of the soft skills were what they were looking for. When it came to hard skills, they varied some, depending on the location of the campus. But our approach was always the same: To provide students with a very strong foundation so that then if they wanted to specialize in something, they could focus on that.

Being selective about our entrance exams was also key to the success of this program. When you have two or four years in which to teach a student, and faculty is going to teach down the middle, you can't create the extremes of the slow learners and the high speed learners to be too wide. So we really had to analyze our entrance exams. Our entrance exams were based on both cognitive skills and then Math and English. You can be extremely bright but maybe you have a 3rd or 4th grade Math and English education. That is not to say that we were elitist, but our tact was that I didn't want to position my colleges to be providing access, which is what everyone was talking about at the time. Instead, what we wanted to do was position our colleges to be the partner of companies and we wanted to be the first college that they would call to hire a graduate.

The biggest challenge in all this at first was our faculty. I was getting a lot of pushback from faculty. I eventually realized that was happening is that the faculty was afraid that what they knew would not match up with what industry wanted. That turned out not to be the case, of course, but their curriculum did have to be tweaked.

Since the metamorphosis of Denver Technical College from a trade school to a university, all of a sudden we acquired credibility. Our Skills Guarantee program was akin to the Underwriter Laboratories Seal of Approval on products. Students could come over to the college and know they were making a sound investment. Employers knew that when they were hiring a Denver Technical College graduate they were hiring somebody with the right skills. As a matter of fact, I followed all of this up by hiring a market research firm whose research showed that 95% of employers said our graduates were equal to or better than the graduates from other schools. The better was 61 percent.

Our slogan at the college at the time was College Listening to Employers. I fully believed then, and still do, that schools should be teaching what employers want, not what their faculty needs. So the paradigm shift started taking place at that time. I think nowadays we're hearing a lot about competencies, but whose competencies? I was asked by the Department of Labor to speak on behalf of Bill Clinton's National Skills Standards bill in 1998 in front of the House of Education Committee. The takeaway was every single member that testified at that time said that they thought that not only should you have skills standards, which really are competencies, but that they need to be employer based, or developed by employers, not the faculty. I think that it's a huge opportunity for our sector. Imagine if we came out saying we are the partners of employers. We are providing the graduates and the skills that employers are telling us that they want us to teach. Every time that we get attacked we get a bunch of employers coming out saying we can't do without the career college sector.

Being selective about our entrance exams was also key to the success of this program.

We struggle back and forth between being the sector that provides education to the disadvantaged and the sector that provides better education than community colleges. I think we need to solve that schizophrenic mindset. To me it was an easy decision because I realized that the only way I was going to get rid of criticism, lawyers and complaints from students was by showing them that what they were learning was relevant in the workplace and that when they got to a job they could do it seamlessly. It's the same for any school. Your college can either be a traditional college where students come in wearing shorts, flip flops and t-shirts and the instructor does the same thing; or you can mimic a workplace environment where you can communicate, dress and behave as you would in the workplace. We chose the latter because, again, for these students that became a model of what they would have to follow once they graduated from the college.

Since the metamorphosis of Denver Technical College from a trade school to a university, all of a sudden we acquired credibility.

I think we have a giant opportunity as a sector. The Department of Education has opened up competencies as a method of awarding financial aid. I think that we need to seize the opportunity and commit to teaching competencies to respond to employers and the solution of creating a first-rate workforce.

Career Education REVIEW *Written by Cheryl Hentz.*

Great teaching, course design help to improve student learning

By John Shaheen, Based on an interview with CER Editor Michael J. Cooney

Great teaching and course design go hand-in-hand, and when done well, can provide documented outcomes that prove student competency in specific subjects.

Unfortunately, the majority of teachers are not professionally trained faculty. They're content experts, but they're not trained teachers. It's a big leap for people who have not gone through a degree program in education to wrap their arms around the basic pedagogy. Some people take to it naturally, but others don't.

Yet we often ask faculty members who are not trained teachers to assemble or modify courses, to teach courses that have not been designed for our sector, or to assemble a course from a textbook without telling them how to do that. When that happens, typically there is very little in the syllabus that demonstrates documented student outcomes.

By and large, people teach the way they were taught. Most of us went to college and were passive learners; we watched the teacher use PowerPoint presentations, we read our textbooks, and we took tests. Those methods have become less prevalent, however. There has been a great movement in the last couple of years for people to be aware of basic best practices concepts. However, it doesn't mean they're being applied.

In accreditation visits, I find a culture of dedication to students. Most classroom faculty members are dedicated and believe they are doing a great job. But when you watch them struggle with the basic concepts of good teaching you know that what they think is good teaching is not aligned with what research has found to be best practices.

Great teaching and course design go hand-in-hand, and when done well, can provide documented outcomes that prove student competency in specific subjects.

On the plus side, the major publishers have stepped up to the plate. The quality of materials you can get from Pearson, Cengage, McGraw Hill, Elsevier and others is almost overwhelming. If you buy a course from one of the major publishers you get teacher and online resources. I'm generalizing, but you don't often see faculty adopt these resources, except in programs that have a strong institutional culture of high-end faculty development, high-end faculty training, and a big emphasis on course design and effective pedagogy for their students.

In our industry, there is a huge debate about PhDs not trained to be teachers teaching to big classes. When we evaluate them, we often evaluate them only on the obvious components: Are they there on time? Do they know the material? Do they get reasonably good student evaluations?

The pressure on faculty in our sector, particularly adjunct instructors, to pass students along is not so subtle.

In addition, the pressure on faculty in our sector, particularly adjunct instructors, to pass students along is not so subtle. The big schools have backed away some from those pressures because of bad press, but it's still out there. If you go in and start flunking people, you won't have a job for long. So the temptation is always there to "dumb down" courses or do the minimum amount and to give away a lot of good grades.

We have many schools send faculty members to us for our online faculty orientation course. We find that many faculty members find it difficult to make the adjustment from teacher to learner, including difficulty keeping up with homework and difficulty accepting anything less than a perfect grade. The reality is that most of us, (and I'm at the top of the list), are just not quite as fantastic in the classroom as we think we are. And, from a supervisor standpoint, faculty members are rarely evaluated often enough, or in a methodical enough way, that will significantly impact the quality of our classroom teaching.

Competency-based models do change the game, however. Competency-based education is becoming self-paced. But the ones that succeed have a mentor or facilitator guide a group of students through the process and keep them on track. The mentor or facilitator is not the subject matter expert or teacher; the teacher becomes more of an evaluator and the student is learning on his or her own. The faculty pedagogy that a lot of us teach when you go watch a classroom is pretty much irrelevant in that situation. The onus on course design is huge, however.

The issue of academic rigor is certainly there, but it is somewhat removed when you look at competency-based programs because the A's, B's and C's typically go away. Ultimately, you

JOHN SHAHEEN - In 1996, John Shaheen founded the Distance Learning Consortium, which provides resources and tools for private career schools and training organizations to succeed in the competitive educational environment. Its services include faculty and staff training and coaching, professional development, course design, and full-featured classroom hosting with secure social networking for students and staff.

Shaheen has more than 33 years of experience in the private career school industry as a school director, owner, and consultant. Experience includes both large multi-campus institutions and fully online programs. He served as a volunteer on the ACCET Accrediting Commission for nine years, from 1999 – 2007, as a commissioner, member of the executive committee, and chairman of the commission. Shaheen has also participated in nearly 100 team visits, both as a team member and on intensive fact-finding mock visits.

He earned his bachelor's degree from Georgetown University and his master's degree from Central Michigan University.

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have to meet certain criteria and you keep working at it until you pass it. It's a very different viewpoint.

Many career colleges have 50 percent retention within their programs. Whether that is a good or bad percentage depends on your perspective. If you compare it to community colleges, 50 percent is considered wonderful. If you compare it to Harvard, it's not so good. In fact, some accrediting bodies like ACCET don't accept that; ACCET requires 67 percent completion.

The student retention and the college completion agenda are tremendously complicated because there are so many factors that enter into it. There's money, jobs, and if it's full-time or part-time. It's the remedial education side of it, the tutoring side, the services side, the teaching side — it's all of those things and more. The research has been very mixed.

Very few models have proven to move that needle a lot when you're dealing with the overall population. However, you can cherry pick and survive as an accredited institution. If high completion is your goal, you have to either be very careful in admissions, or you have to be very well resourced in student support services. But if you have an open enrollment environment, which many of our schools do, you're going to struggle. That's where I think our argument to the politicians and to the Department of Education is valid. We do better, particularly in short-term programs, than the public institutions and colleges.

Many career colleges have 50 percent retention within their programs. Whether that is a good or bad percentage depends on your perspective.

Much simpler are the essential elements of good course design. You go back to the basics of backward course design. You start off by what you expect students to be able to do by the end of the course. Look at the Lumina Foundation's attempts to define what it means to have a certificate, or associate, bachelor's, master's or Ph.D. degree? I'm using competencies in a different way, but there are good

Learner Centered Instruction

From: http://www.nclrc.org/essentials/goalsmethods/learncenterpop.html

Teacher vs. Learner-Centered Instruction

Teacher-Centered	Learner-Centered
Focus is on instructor	Focus is on both students and instructor
Focus is on language forms and structures (what the instructor knows about the language)	Focus is on language use in typical situations (how students will use the language)
Instructor talks, students listen	Instructor models, students interact with instructor and one another
Students work alone	Students work in pairs, in groups, or alone depending on the purpose of the activity
Instructor monitors and corrects every student utterance	Students talk without constant instructor monitoring, instructor provides feedback/correction when questions arise
Instructor answers students' questions about language	Students answer each other's questions, using instructor as an information resource
Instructor chooses topics	Students have some choice of topics
Instructor evaluates student learning	Student evaluate their own learning, instructor also evaluates
Classroom is quiet	Classroom is often noisy and busy

attempts to establish what students should be able to do by the time they graduate. This is the essence of good course design. What should students be able to do by the end of the course and how are they going to demonstrate that they can do it? If I decide this is what they have to be able to do or demonstrate, such as draw blood, write a coherent paragraph, or interview for a job, then what do I have to build into my course so the students can demonstrate that they can do those things?

The student retention and the college completion agenda are tremendously complicated because there are so many factors that enter into it.

Writing learning objectives and course outcomes is a starting point that's tremendously hard for an untrained instructor to do. You need an objective, some content, an activity and some way to assess them before you get a complete lesson. When you look at that effort, you can see how time consuming and expensive this is. But if you don't participate in the development and the struggle of a course, you don't quite own it.

This is where accrediting bodies have had some strength, but perhaps not as in-depth as they might. Typically, accreditation doesn't talk about course design, but they do often talk about curriculum review and revision. When we work with schools we often try to hone in on that process. So and so has a good idea and they're teaching English 101 down the hall; is that idea being shared with other English teachers who are teaching the other sections? Has it been demonstrated students achieve the learning outcome for that course? Have I shared that with the other instructors and have I formalized that in my syllabus? Again, it's an area where our schools have typically done well because we like uniformity. If we have something good, whether it's from a publisher or otherwise, we typically impose that on all instructors.

The question remains what the instructor will do with that material. Are they just presenting it from a PowerPoint? Are they assessing students? Is the assessment built in? This is where programs tend to be weaker. It's not that the content isn't wonderful or that the learning outcomes haven't been established, but rather are the activities that the students are doing to demonstrate or practice those skills effective? Are they interesting? Are they engaging? This is where we often lose the students.

Internships, apprenticeships and those types of things have always worked well to keep students engaged. If you ask schools how often students drop out from their clinicals, they will typically tell you that no one drops out. Why not? Because they are interesting and relevant. Students signed up to go to school to receive training for hands-on professions, so when they're doing that hands-on work, they're interested and engaged. But as soon as you put them in a theory-based didactic course, their interest wanes.

It's not that the content isn't wonderful or that the learning outcomes haven't been established, but rather are the activities that the students are doing to demonstrate or practice those skills effective? Are they interesting? Are they engaging? This is where we often lose the students.

Some students are also unprepared for theoretical learning. That's an issue of admissions standards in our schools. If we are not able to provide that remediation in some effective way, we are setting students up for failure and they will drop out. It works better to include remediation in the skills learning process, rather than making it a separate remedial course, which has not proven effective. But it's hard to do that because remediation that is integrated requires a great deal of tutoring and is heavily individualized. That means a lot of handholding, which is expensive.

Some schools use competency-based education, self-learning and e-learning so students can learn some of this on their own. The students come together in a lab and work at their own pace with an instructor who is walking around. But if your school doesn't have the resources to do this, those students will drop out. If you don't take care of it on the admissions side and you don't have the resources for remediation in class, you're going to be in trouble.

To summarize, in order for classroom instructors to be successful, they must work in a culture that supports high-engagement learning in all aspects of their instructional program. We try to teach that philosophy, that learner-centered instruction is going to be more effective with almost everybody, but particularly for students in our sector. Many of the students who come to us have dropped out or failed from community colleges or other schools. We can't throw them back into that same environment and expect something wonderful to happen. As a generalization, students won't succeed if you don't have trained, talented people who can be counselors and advisers to work with them.

The most effective classroom teachers simply care. They read up on what works or go to workshops and then try it. They work very, very hard. Even if they don't have the pedagogy down, they're the ones responding to students' emails late at night and on the weekends. They've covered their lack of formal training with a whole lot of love.

If a teacher cares enough, good things will happen. But if you give somebody like that some tools and some practice you're going to really enjoy the outcome. However, it does take a huge investment in time. Project-based instruction takes this whole concept to a new level. But the amount of resources that go into those programs is immense. You can't expect an instructor to magically become this learner-centered focus in a meaningful way by him or herself. It must be done in teams. You've got to build it over time, one little thing at a time. You need to embrace the publisher-provided materials and as a team, go through those materials and take advantage of all that they've laid at your footsteps. But you must get used to it, try it, modify it, and put it into your syllabus so it doesn't happen by chance. It's an issue of time, resources and training.

As a generalization, students won't succeed if you don't have trained, talented people who can be counselors and advisers to work with them.

Career Education REVIEW *Written by Barbara A. Schmitz.*

Quarterly regulatory update with FAME, Inc.

By D. Sherwin Hibbets, with Cheryl Hentz

The following is a continuation of our quarterly updates with D. Sherwin Hibbets, director of regulatory affairs for FAME, Inc. The series features what new regulations have been put in place with regard to Title IV funding; what new regulations are on the horizon; what are the best ways for schools to make sure they're in compliance; what are schools doing right when it comes to compliance and what could they be doing better, etc. As always, the information provided herein is FAME's opinion based on their interpretation of the issues and events provided and their interpretation of the Title IV regulations as they may apply. FAME shall not be held liable for any errors contained within this article or for any damages that may arise out of or related to the use of this information.

This Quarter: Focus on Financial Aid

So quickly things happen! In the recently closed three-month period we have seen so much occur! In our update three months ago we were progressing into the fall with our standard anticipation of what to expect. But, oh so quickly things change. We embarked on a trek through a federal government shut-down the first of October. Naturally, it was an unknown as to how long it would last. But, the two week shut-down now almost seems a challenge to remember. But, the good news is that it apparently generated enough concern to not see it happen again that a federal budget agreement was recently reached!

Also of importance on October 1, 2013, at the start of a new federal fiscal year, was another announcement of the impact of sequestration resulting from the ongoing effects of the *Budget Control Act (BCA) of 2011*. For the Iraq and Afghanistan Service Grant (IASG) awards where the first disbursement occurred on or after October 1, 2013, the awards had to be reduced by 7.2 percent from the original amounts provided in law. Likewise, for TEACH Grant awards first disbursed on or after October 1, 2013, the award was required to be reduced by 7.2 percent from the original statutorily authorized amount. Further, the most recent announcement

As soon as the government re-opened for business, the U.S. Department of Education (ED) put out clarification on what is considered "acceptable documentation" for Federal Student Aid verification purposes for the remainder of the 2013-2014 award year.

impacted loans that were to be disbursed on or after December 1, 2013 (rather than October 1, due to the operational impact and system adjustments that had to be made). The most recent sequestration effect resulted in the new loan origination fees of 1.072 percent for subsidized and unsubsidized direct loans and 4.288 percent for parent and graduate/professional student PLUS loans.

As soon as the government re-opened for business, the U.S. Department of Education (ED) put out clarification on what is considered “acceptable documentation” for Federal Student Aid verification purposes for the remainder of the 2013-2014 award year. This announcement expanded situations in which paper tax returns may be used in lieu of the otherwise mandated use of the Internal Revenue Service (IRS) Data Retrieval Tool (DRT) process or an IRS Tax Return Transcript. Prior to this announcement there were very specific circumstances in which a signed copy of a paper tax return could be accepted. The most common of the limited situations included scenarios of when a tax filer had experienced identity theft, filed an amended tax return, or filed a foreign tax return. The expanded guidance now also allows acceptance of a signed copy of a paper tax return in situations in which a tax filer requested an IRS Tax Return Transcript using the IRS paper or online methods for requesting the tax transcript but was unsuccessful in obtaining it. However, the signed copy of the paper tax return alone is not sufficient. The signed copy of the paper tax return will also have to be accompanied by a copy of

D. SHERWIN HIBBETS is Director of Regulatory Affairs with FAME. His prior experience includes more than three decades of financial aid practice in the campus environment and student lending. Prior to joining FAME, he was an account executive with Access Group, Inc., a non-profit lender. His most recent campus responsibility was as Director of Financial Aid at Regent University in Virginia Beach, VA. His financial aid background also includes working in management roles at Louisiana State University in Baton Rouge and Appalachian State University in North Carolina. He has been extensively involved in the various levels of professional financial aid associations. Hibbets was President of the Virginia Association of Student Financial Aid Administrators (VASFAA) in 2003-2004 and the North Dakota Association of Student Financial Aid Administrators (NDASFAA) in 1984-85. Additionally he is a past Treasurer on the Board of Directors of the Rocky Mountain Association of Student Financial Aid Administrators (RMASFAA). He has served as a Commission Director on the Board of the National Association of Student Financial Aid Administrators (NASFAA), chaired and been a member of numerous NASFAA committees, as well as served on the NASFAA Task Force on Professional Excellence, and as a charter Peer Reviewer with the NASFAA Standards of Excellence Review Program. On the regional level Sherwin has contributed as the Curriculum Coordinator and as an instructor for the Southern Association of Student Financial Aid Administrators' (SASFAA) Summer Workshops for New Aid Administrators, and he was a member of the SASFAA Board of Directors in 2003-2004. At the state level he has chaired numerous committees, and received recognition for the Committee of the Year while chair of the VASFAA Strategic Planning and Assessment Committee. Other professional experience includes serving as a member of the NPSAS 2000 Technical Review Panel with NCES, a Steering Committee member of the National Postsecondary Education Cooperative (NPEC), and has been listed in the NASFAA Speakers' Directory. He has been a presenter of more than 80 sessions at state, regional, and national conferences and workshops.

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the response from the IRS that informs the tax filer that IRS could not provide the requested transcript. The copy of the IRS response submitted to the school must be signed by the tax filer.

For those tax filers that made a transcript request using the IRS online transcript method, they must present a copy of the screen print of the official IRS Web page that displayed the message indicating that the transcript request was unsuccessful. The screen print copy being submitted to the school must be signed and dated by the tax filer.

Finally, in addition to a signed copy of the tax filer's paper tax return and the applicable documentation of inability to obtain an IRS Tax Return Transcript, the tax filer must also complete and submit to the school an IRS Form 4506T-EZ or Form 4506-T on which the tax filer has listed the school's name, address, and telephone number on line 5 of the form. Unless the school has reason to doubt the accuracy of the documentation provided, the school merely retains this document in its files and proceeds with completing verification of the student's application data.

ED set a record this year. In November the Department released its "suggested text" to be used by schools as they request documentation from students to verify information reported on their Free Application for Federal Student Aid (FAFSA). This is the earliest ED has provided this information. Therefore, schools may begin earlier developing the materials in which they may use the provided text suggestions, depending upon the verification tracking group in which the application is categorized. Highlighted in this announcement is the fact that the Verification Tracking Group 2 related to Supplemental Nutrition Assistance Program (SNAP)-Food Stamps that was in use in 2013-2014 is not being continued in 2014-2015. But, there is the addition of a new tracking group, Verification Tracking Group 6, which addresses household resources. This group was added to address concerns about applicants that reported very low income relative to the size of the household.

Schools are to ensure they have updated their Gainful Employment disclosure information for the 2012-2013 award year not later than January 31, 2014 by using the new GEDT.

Speaking of the timeliness of things, while ED was early this year in the release of suggested text for verification purposes for 2014-2015, the same timeliness was not evident in the release of the Gainful Employment Disclosure Template (GEDT). The recent release of the GEDT was long-awaited since the implementation of the Program Integrity regulations. But, at long last it is now available. Schools are to ensure they have updated their Gainful Employment disclosure information for the 2012-2013 award year *not later than January 31, 2014* by using the new GEDT. This template will have a similar look and feel to it as ED's Net Price Calculator (NPC) template. However, unlike the NPC template where schools may opt to use a privately developed template, for the GEDT schools must use ED's template. No privately developed templates are authorized for Gainful Employment disclosure purposes.

Speaking of Gainful Employment, another item of interest related to Gainful Employment is the ongoing Negotiated Rulemaking (Neg Reg) process. The Neg Reg team held its second round of meetings from November 18-20, 2013. A previously unplanned third one-day round of meetings was held on December 13,

2013. Since there was no consensus in the final round of negotiations, ED will develop and publish a Notice of Proposed Rulemaking (NPRM) early in 2014. Some of the issues on which consensus did not occur include considerations of exceptions for low-cost schools with low loan participation, as well as granting an automatic pass of the GE metrics for "exceptionally performing" programs (based upon the program-level Cohort Default Rate). Schools are encouraged to review the analysis of the Neg Reg meetings in various professional and news publications, as well as the NPRM itself when it is published. Comments from schools many times impact the final outcome of proposed regulations as they reach the "Final Regulations" status. ED has posted the "draft" proposed regulatory language (prior to the second round of Neg Reg meetings) on ED's Gainful Employment Negotiated Rulemaking web site (http://www2.ed.gov/policy/highered/reg/hearulemaking/2012/gainfulemployment.html).

The correct response to the marital status questions is dependent upon whether the student or parent was legally married at the time of the FAFSA completion, regardless of where the couple resides or the student will attend school.

ED has also provided updated guidance related to the Supreme Court's decision on the *Defense of Marriage Act (DOMA)*—commonly called the *Windsor* decision—as it relates to Federal Student Aid. Of note is that if a student or parents were in a legal same-sex marriage at the time of the initial submission of the 2013-2014 FAFSA and they submit a change to their marital status on their 2013-2014 FAFSA based upon the results of the *Windsor* decision, the officially calculated Expected Family Contribution (EFC) that results from that change in marital status must be used by the school for all 2013-2014 FAFSA and EFC purposes. The correct response to the marital status questions is dependent upon whether the student or parent was legally married at the time of the FAFSA completion, regardless of where the couple resides or the student will attend school. For 2014-2015, the terms "Mother" and "Father" will be replaced on the FAFSA and the resulting Student Aid Report, etc., with such terminology as "Parent 1", "Parent 2", "Stepparent 1", or Stepparent 2", as applicable.

Another item that ED has updated is the Financial Aid Shopping Sheet. In the recent release of the updated Shopping Sheet format, ED also provided the Institutional Metric Data file for schools to be able to populate the Sheet. The main change for the 2014-2015 edition is in the language used on the Shopping Sheet. Other than wording changes, there is the addition of a glossary to enable users to understand the terminology employed, and the expansion of the customizable box so that institutions can include additional individualized explanatory information. There were no major content changes. Schools are reminded that this Shopping Sheet is still voluntary from ED's perspective, although encouraged. However, schools may want to consider use of the Shopping Sheet as a means of complying with Presidential Executive Order 13607. The current understanding is that, to be in compliance with the Executive Order, use of the Financial Aid Shopping Sheet (or a very similar personalized and individualized type form) is "currently" only required for students receiving Veterans' or military education benefits. It is not required of all students, although a school may choose to use it for all students. ED reports that over 1,950 institutions have voluntarily committed to using the Shopping Sheet to date.

As we are beginning the application cycle for the 2014-2015 award year, there are a couple of things to keep in mind. First, the FAFSA on the Web (FOTW) will be available for students to complete beginning January 1, 2014. Financial Aid Administrators will also be able to begin accessing FAA Access to CPS Online for those who assist students in submitting their FAFSA information. And, the Department's Central Processing System (CPS) will begin processing submitted FAFSAs on January 3, 2014. As schools begin anticipating students and parents using the IRS DRT in the FOTW process, they should be aware that the DRT process is currently not scheduled to be available until Sunday, February 2, 2014.

In conclusion, the world of financial aid stays ever exciting. We look forward to the upcoming opportunities that will be presented to respond to the NPRM, and the discussions that will be generated as the Reauthorization of the Higher Education Act comes in to full swing in the coming year. Schools can make a difference in the world of financial aid by participating in these opportunities that lie ahead. Stay tuned for more developments!

Career Education REVIEW

State Affairs Update

By Brian Newman

In 2013, over 143,000 bills were introduced by state legislatures. While only a small fraction were of interest to private sector postsecondary institutions, the process begins anew in 2014 as 46 state legislatures will convene at some point during the year.

According to Suzanne Hultin, Education Policy Specialist at the National Conference of State Legislatures (NCSL), state legislators will be focusing on accountability for both public and private institutions in 2014. For private sector institutions, she identified student loan debt as one of the main issues shaping the accountability debate.

Regardless of the trends shaping the public policy landscape in 2014, the new year will bring challenges, both expected and unexpected, and hopefully a few opportunities that will benefit institutions and students alike. The following is my attempt to gaze in to the proverbial crystal ball and examine a few of the state legislative and regulatory issues that are expected to impact private sector postsecondary institutions. While I reached out to many practitioners, friends, and experts for guidance, all errors and omissions are mine alone.

BRIAN NEWMAN is currently a government relations and education policy consultant. From 1997 to 2013, Brian was a government relations professional at the Association of Private Sector Colleges and Universities (APSCU). He can be reached at brian.carl.newman@gmail.com.

Oh SARA

The implementation of the State Authorization Reciprocity Agreement (SARA) may prove to be one of the year's most significant public policy developments. The initiative provides a voluntary framework that aims to centralize the authorization process for accredited degree-grant institutions offering online programs to the institution's "home state." Accordingly, participating colleges or universities in a SARA state will be afforded "reciprocity" to offer online programs to residents of any other SARA member state without obtaining approval or licensure. An appropriate "home state" agency will be required to have procedures to address consumer complaints.

The implementation of the State Authorization Reciprocity Agreement (SARA) may prove to be one of the year's most significant public policy developments.

The effort to move SARA from a theoretical concept to reality was significantly enhanced in August 2013 when the Lumina Foundation provided $2.3 million in funding for regional and national implementation. Shortly thereafter, The National Council for State Authorization Reciprocity Agreements (NC-SARA) was established and Marshall Hill, formerly the executive director of Nebraska's Coordinating Commission for Postsecondary Education, was appointed as the organization's executive director.

Dr. Hill reported in a recent interview, the effort to enroll states in SARA will begin in earnest next year. He expects 20 to 25 participating states at the end of 2014, mostly from the Midwest and West. Early participants are expected to include Hawaii, Indiana, Nebraska and North Dakota.

Because different methods of calculation are employed and because some accreditors/ states do not require the calculation of a job placement rate, the disclosure is not as useful and meaningful at it needs to be."

It is expected that legislatures in a number of states will be addressing bills to authorize state agencies to participate in SARA. In some cases, amendments will be necessary to make sure the state's "SARA portal agency," or a combination of agencies, has the authority to investigate and resolve complaints against all public, non-profit and for-profit degree-granting institutions operating within the confines of its borders.

Potential hurdles to SARA adoption, identified by Dr. Hill, include SARA's equal treatment of accredited degree granting for-profit institutions. Additionally, he noted that some states, including Massachusetts, Tennessee and Wisconsin, derive "a good bit of revenue" from licensing or approving out-of-state institutions. Finally, there is also some disappointment that SARA does not address credentialing and licensure issues in fields such as nursing and teacher education.

The NC-SARA website (http://nc-sara.org) includes additional information of interest to postsecondary institutions and states. The FAQs on the website will be continuously updated during the rollout.

Attorney General Activity

During the U.S. Department of Education's Fall 2013 Gainful Employment Negotiated Rulemaking, the negotiators representing state attorneys general, Della Justice, Special Assistant Attorney General, Kentucky Attorney General and Libby DeBlasio, Assistant Attorney General, Colorado Department of Justice, proposed a "uniform" standard for calculating job placement rates.

They stated in a September 6th email that was circulated to other negotiated rulemaking participants, "consumers rely on job placement rates when deciding whether the program will lead to a better paying job. Yet, at this time the Department only requires schools to disclose job placement rates if they are required to calculate a rate by the accreditor/state authority. Because different methods of calculation are employed and because some accreditors/states do not require the calculation of a job placement rate, the disclosure is not as useful and meaningful at it needs to be."[1]

Their proposal follows below:

> Job Placement means within 180 days of completion/graduation the student has been employed for at least 13 weeks with the employer in a full-time paid position in the field or related field of study. In the field/related field of study means employment is –

[1] See http://1.usa.gov/1fpmWis

(1) Included in the list of job title for the program published by the institution and included in the list of Classification of Instructional Program (CIP) job titles on O*NET crosswalk for which the programs were approved by the Department; or
(2) In a position where the routine work predominately requires using the core skills and knowledge expected to have been taught in the program and the position requires education beyond high school level; or
(3) In instances where completers/graduates are continuing in prior enrollment, the prior enrollment must be reasonably related to the program training and the completer/graduate attests in his/her own handwriting at the time of enrolling in the program and upon completion of the program, with reference to a specific written policy of the employer, to the benefit of the training as a catalyst for maintaining or advancing in a position.

For part-time employment to be considered as placement, there must be a handwritten statement from the graduate/completer at time of completion that part-time employment is his/her objective for employment including a general explanation for such objective.[2]

While a job placement definition was not in the most recent Department of Education draft circulated at negotiated rulemaking, state attorney generals and legislators may pick up the fight in several state capitals. In Colorado, State Senator Morgan Carroll (D) circulated a draft disclosure bill in 2013 that includes a definition of "employed" for the purposes of calculating the employment rate of a credential program. The sector will be closely monitoring developments in Colorado as Senator Carroll currently serves as the President of the Senate. Kentucky will also be of interest due to Attorney General Jack Conway's (D) scrutiny of the sector and his office's participation in the recently concluded negotiated rulemaking.

In Massachusetts, Attorney General Martha Coakley (D) released proposed regulations in November requiring for-profit colleges and career schools "to provide accurate information to the public, prohibit misleading advertising practices, and address unfair lending practices."

According to a press release, "schools would be required to disclose, in their advertisements and recruitment literature, accurate and readily comparable information about tuition and fees, placement statistics, graduation rates, and program completion time." Furthermore, "schools would be prohibited from using high pressure sales tactics, including repeated solicitations through phone calls and text messages, and misrepresenting the role of recruitment personnel by referring them to 'counselors' or 'advisors.'"[3]

The Attorney General's Office has announced that public hearings on the regulation will be held in Boston on January 7 and in Springfield on January 9.

Financial Aid

A New Jersey bill, originally introduced in 2012, that requires degree

[2] See http://1.usa.gov/1bSvmye
[3] See http://1.usa.gov/1i47RHk

granting proprietary schools to meet "a specified graduation rate to be determined by the Commission on Higher Education" to be eligible to receive any form of student assistance from the State will remain of interest until the legislature officially adjourns its current session on January 13, 2014.

A 2012 California budget bill requiring colleges to have a minimum graduation rate of 30% and a maximum three-year cohort default rate of 15.5% to maintain Cal-Grant eligibility established the precedent for thresholds designed to limit private sector college participation in state need grant programs.

State Authorization

Pennsylvania Governor Tom Corbett (R) signed into law state authorization legislation, H.B. 1425, on December 18, 2013 to recognize barber schools, cosmetology schools, and nursing schools as "institutions of post-secondary education." In addition to Pennsylvania, a representative from the cosmetology sector indicated that Arkansas, Hawaii, Oklahoma, Texas, Utah and Washington were among the states that made regulatory or statutory changes for cosmetology schools to comply with the U.S. Department of Education's enforcement of state authorization regulations on July 1st. The cosmetology sector is continuing to address state authorization issues with state agencies to ensure compliance.

2013 ACICS Conference and Annual Meeting

Focusing on quality in workforce development

By Albert C. Gray, Ph.D., President and Chief Executive Officer

The first year into ACICS's second century of operating as a quality assurance authority for post-secondary education and workforce development included substantial challenges, important milestones and occasions for appropriate celebration. All of these became the focus of the annual conference and meeting in Jacksonville in early November.

First, the challenges. They are derived from the on-going scrutiny of college education in general, and career education in particular. The areas of greatest scrutiny continue to be the placement performance of the institutions and the ability of their graduates and completers to earn an income.

Also, the challenges are derived from the continuing weakness of the economy, which suppresses enrollment demand, particularly among those who are fearful that an investment in post-secondary education will leave them with debt but without the means to service the debt.

While some of these challenges are directly related to the effectiveness of ACICS's program of quality assurance, many of them have little to do with quality and integrity, and have everything to do with environmental factors outside of the control of the colleges, their administrations, or the accrediting entity. Therefore ACICS is working to re-cast the public debate in terms that reasonably reflect those factors that the sector can control. The task is substantial but not impossible.

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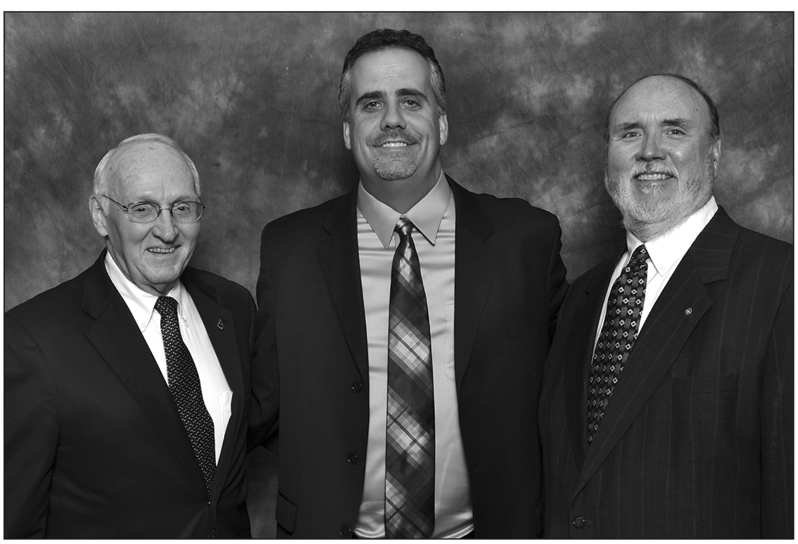
The Honorable Virginia Foxx (R-NC 5th District).


Commissioners Linda Blair and Dr. Mary Anne Ramirez.

The challenges have manifestation in ACICS's operating metrics. First, the aggregate placement rate for all institutions declined again for the third straight year, reflecting the difficult placement environment facing our institutions. The Council has strengthened the benchmarks and will soon implement more rigorous verification procedures, but the underlying trend will only get better when placement opportunities are grown to match the enrollment levels of the colleges and schools. On the positive side, retention rates remain strong and steady.

Five of the top ten programs based on enrollment are in healthcare related fields, reflecting the market-driven demands of aging baby boomers.

Second, the aggregate enrollment at ACICS institutions declined for the first time in a decade. Clearly, the scrutiny and the economy have contributed to lagging demand for enrollment, and our colleges and schools are feeling the effect quite directly. Likewise, ACICS supervised the closing of 13 campuses in the previous year and is closely monitoring plans for the closings of 48 additional campuses.


Commissioners Dr. Thomas B. Duff, John Euliano, Dr. Edward G. Thomas.

The Council will take those trends into consideration as it reviews institutional performance and revisits its numerical standards.

Third, there is some residual strength in the demand for applied, post-secondary education in certain, focused geographies: the Sunbelt states of California, Texas, Florida and Puerto Rico are robust in the number of ACICS colleges and schools, followed closely by five of the six states in the Ohio River Valley. The rest of the country combined represents less than 50 percent of all the ACICS membership. In spite of those trends, ACICS added 24 new campuses to its membership through initial grants.

The demographically-driven nature of career education appears consistently in the data reviewed by ACICS. Once again, five of the top ten programs based on enrollment are in healthcare related fields, reflecting the market-driven demands of aging baby boomers. The other are dominated by business and technology related fields, followed by criminal justice and culinary. It is also worthy to note that nearly half of the enrollment in all ACICS institutions remains at the associate's degree or non-degree levels.

ACICS encounters these trends in a number of ways, but most directly through the increased demand for revisions to programs and a residually strong demand for new program reviews and approvals. To the degree timely and effective review of these institutional changes enhances the ability of colleges

ACICS Chair Brian Stewart presents Elizabeth M. Guinan with the Evaluator Chair of the Year award.

and schools to adjust to a dynamic external environment, ACICS staff and the Council have redoubled their efforts. It is a testament to the functionality of the ACICS quality assurance program that resources can be scaled appropriately as demand ebbs and flows.

In terms of significant milestones, a two-year review by the U.S. Department of Education of ACICS culminated with re-recognition in mid-summer. The advisory committee to the Secretary acknowledged publically that ACICS's proposed independent placement verification program was worthy of note and perhaps replication by other accreditors. Adopting a proactive approach to addressing quality assurance issues does not come without some pain, but it also has the potential to pay some significant dividends.

In terms of celebrations, ACICS continues to place great emphasis on the value of the peer evaluation model, the core of the agency's quality assurance enterprise.

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The effectiveness of peer review relies heavily on the quality of the evaluators and site team chairs, who volunteer their time and expertise to interview, observe and inspect files during multi-day excursions to campuses across the country and overseas.

Three premiere evaluators are celebrated during the ACICS's annual conference each year, representing the best of a large cadre of more than 1,000 volunteers and professionals. Those feted this year were Dr. Robert Palmatier, Student Relations Evaluator of the Year; Libby Guinan, Chair of the Year; and Thomas Phillips, Evaluator of the Year.

ACICS appreciates their vital contribution to the cause of quality and integrity.

Dr. Robert Palmatier, Student Relations Evaluator of the Year; Ms. Elizabeth Guinan, Chair of the Year; and Mr. Thomas Phillips, Evaluator of the Year.

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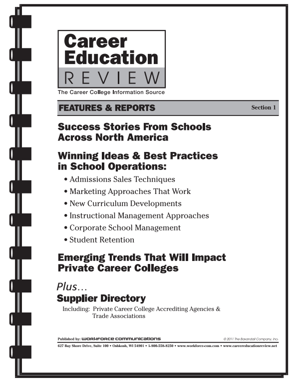
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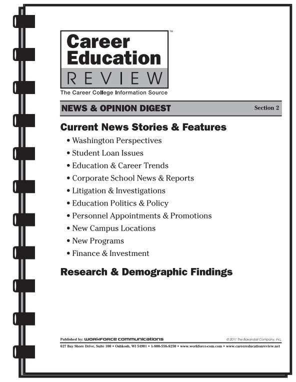
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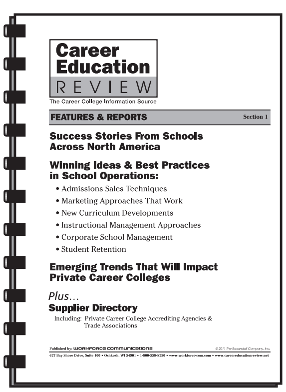
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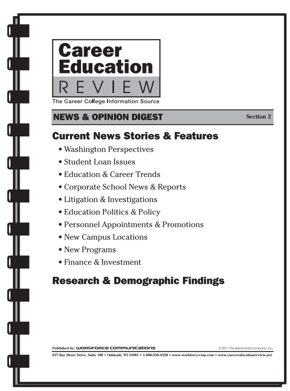
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