

January 31, 2014

Thank you for the opportunity to propose ideas for experiments to test new approaches to administering student financial assistance programs to support better student outcomes. We share the Department's goals of increasing the quality and affordability of higher education and appreciate your efforts to support innovation that will improve student persistence and reduce student borrowing.

We applaud the Department for its willingness to test competency-based approaches and urge it to conduct these experiments in both occupational and academic programs of study and to include representation from certificate and associate degree granting institutions and baccalaureate degree granting institutions. We believe a comprehensive approach that includes the full range of postsecondary institutions will contribute to the momentum toward the creation of stackable credentials that have value in both education and the labor market.

Attached, please find two detailed proposals for experiments developed by Jobs for the Future that we believe will significantly enhance student persistence, improve their career and educational outcomes, and make college more accessible and affordable. Both proposals are in close alignment with the Department's stated goals for the upcoming experiments. The first proposes to test the effectiveness of dual enrollment programs that allow high school students to earn college credits. The second proposes to test career pathway programs that integrate adult basic education with credit-bearing postsecondary programs. Both proposals are based on extensive experience designing and implementing dual enrollment and career pathway programs.

Below, please find additional suggestions for experiments, or elements of an experiment, that could help meet the Department's goals of strengthening academic and career outcomes for students, especially students from low-income backgrounds and those who struggle to succeed academically:

- **Remove Restrictions on Direct Assessment Programs for Remedial Education and Teacher Preparation:** Section 8020 of the Higher Education Reconciliation Act of 2005 (HERA) (Pub. L. 109-171) established the eligibility criteria for direct assessment programs wishing to be considered for participation in Title IV, HEA programs. The law expressly prohibits several types of programs and coursework from consideration for direct assessment authority including, 1) preparatory and remedial (i.e. developmental) coursework and 2) courses designed to prepare primary and secondary school teachers for a teaching credential. Given the Department's goals of increasing college access and completion and improving teacher quality, we believe these prohibitions may be unnecessarily stymieing innovations that could contribute significantly to realizing those goals. Specifically:
 - **Developmental and Remedial Education:** Reforms to developmental education that generate better student outcomes are essential for increasing college completion rates. While the majority of community college students are required to take some form of developmental math or reading, less than one quarter of those students earn a postsecondary degree or certificate after eight years of enrollment. Enabling innovation in the design and delivery of developmental education through the use of direct

assessment approaches may surface important new insights into how to support learners at this critical chokepoint in postsecondary education. For example, a direct assessment approach may improve outcomes for some nontraditional students who master the necessary skills but, due to job and family responsibilities, have difficulty completing a semester-based program. Other students might benefit from programs that more actively involve partnership outside the college – community-based organizations or employers – in mastering the necessary content. We encourage the Department to remove any restrictions on experiments that include direct assessment approaches to developmental and/or remedial education.

- **Teacher Education Programs:** The prohibition on “courses necessary for an elementary or secondary school teaching credential or certificate” also presents an obstacle to innovation in an area of critical importance to the Department and the larger education community. Direct assessment programs may be particularly well suited to individuals who already possess a Bachelor’s degree and/or considerable work experience in a non-teaching profession who wish to become teachers. Providing alternative pathways to teaching credentials is particularly important in Career Technical Education fields, where industry expertise and experience are essential for teachers to be effective. In a similar vein, direct assessment programs for teacher preparation could help the Department meet its goal of preparing 10,000 new STEM teachers over the decade. We encourage the Department to waive existing restrictions on direct assessment for teacher education programs and to encourage applicants to consider testing direct assessment approaches to teacher education programs.
- **Test Dual Enrollment for Both High School Students and Out-of-School Youth:** As the attached brief from Jobs for the Future illustrates, we strongly support the Department’s interest in designing experiments to test the effect of allowing high school students to receive federal student aid for enrollment in postsecondary coursework. We also urge the Department to consider expanding the scope of the experiment to include out-of-school youth, ages 16-25, who demonstrate 8th grade proficiency or higher in reading and math but failed to graduate or obtain a high school equivalency. In contrast to in-school youth, these students would participate in a college-based dual enrollment program that would enable them to complete necessary high school credits or exams, while taking postsecondary courses. For an example of this type of dual enrollment program, see [South Texas College’s Recovery Program](#). By including out-of-school youth in efforts to measure the effectiveness of dual enrollment programs, the experiment would lend valuable insight into how to facilitate successful transitions to college for young people most at risk of failing to earn a postsecondary credential.
- **Test Variety of Prior Learning Assessment Approaches:** We are pleased that the Department is interested in exploring how federal financial aid can be used to support the assessment of prior learning. We encourage the Department to test a variety of scalable assessment method, such as individual portfolio assessment, credit by exam, credit recommendations of college-level learning that occurred outside of a classroom, and crosswalks such as the one developed by Ivy Tech Community College of Indiana that can be used by institutions to determine equivalencies.
- **Focus on Quality and Learning Outcomes in Competency-Based Education Experiments:** We are also pleased that the Department is interested in using experimental sites to create safe spaces for innovation around competency-based education (CBE). There is much promise in CBE,

in terms of reduced time to degree and reduced cost, and there are significant statutory and regulatory barriers to CBE—and we hope that the Department will structure its experiments to test these critical questions. But they must be tested along with CBE’s most fundamental promise—to provide transparent and high-quality learning. This will be much more difficult than (the admittedly important) determining whether waiving statutory definitions of an academic year or regulatory definitions of instruction result in greater completions, reduced costs, etc. Rather than shy away from the complexity, the Department should insist that institutions involved in a CBE experimental site grapple fully with the question of learning in order to fulfill the statutory purpose of experimental sites—to inform reauthorization of the Higher Education Act. We don’t expect participating institutions will approach the issues of defining, validating, and assessing their competencies the same way. Indeed, this is a learning opportunity for institutions, accreditors, and federal policy makers. But participating institutions should be explicit about how they will define, validate, and assess their competencies and build in mechanisms for safeguarding against fraud and abuse. This will increase the likelihood that, at the end of the experiment should Congress be interested in making broader changes to HEA, these changes would result in increased high-quality learning opportunities for students.

- **Encourage Inclusion of Industry Certification Exams and Other Third Party Assessments in Experiments:** In addition to waivers for prior learning assessments, we suggest the Department consider using its experimental authority to test how embedding other third-party assessments into postsecondary programs of study affect student outcomes. A growing body of evidence, including a recent report by the U.S. Census Bureau, points to positive earnings returns to non-degree credentials for students across the educational spectrum, including students who failed to earn a degree. As industry certifications and licenses become more prevalent in the labor market, it is important for educational institutions to establish relationships with certifying and licensing bodies to ensure their programs are well-aligned with industry and professional standards. Currently, there is relatively little direct collaboration between the two sectors and educational institutions often do not have access certification exam data, limiting their ability to know if students are leaving their programs well prepared. Experiments that test the effectiveness of programs that combine industry and academic assessments and credentials can incentivize stronger collaboration between educational institutions and certifying bodies in ways that work to the benefit of both and, more importantly, to students seeking credentials with labor market value.

We understand that the Department will only be able to run a handful of experiments but we would encourage you to make public all of the suggestions for experimental sites. These suggestions provide a learning opportunity for Congress and members of the public at large to see what types of regulatory and statutory problems and solutions are being experienced and proposed by the broader higher education community.

Thank you for your consideration of the suggestions and the attached proposals.

Sincerely,

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Jobs for the Future
New America Foundation