

Testimony of

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## **Biography**

Deb Bushway, Ph.D. is a consultant focused on the development, launch and scaling of competency-based education programs. She has been deeply involved in the competency based education (CBE) movement since the 1990s, when she was a faculty member at Metropolitan State University in St. Paul, Minnesota. Metropolitan State was founded as a “university without walls” in the 1970s and was rooted in competency-based education. More recently, Deb led the development and launch of Capella University’s CBE direct assessment program, worked at the University of Wisconsin–Extension, and served as Senior Advisor to Under Secretary Ted Mitchell at the U.S. Department of Education regarding educational innovation. She also serves as a consultant to the Competency-Based Education Network (C-BEN). She has previously served in a variety of roles including Provost, Vice President of Academic Innovation, Associate Dean and Professor at public, private for-profit and private not-for profit institutions including Metropolitan State University in St. Paul, MN, Capella University, and University of Wisconsin – Extension. Dr. Bushway earned her Ph.D. in Psychology at Iowa State University in Ames, Iowa.

### **Summary of Testimony**

Today, I endeavor to represent a community of educators who, like me, believe that competency-based education (CBE) is an essential component of our nation's collective effort to increase the percentage of our population who possess post-secondary credentials of practical and personal value. If we are to maintain a vibrant middle class, we must provide educational opportunities that lead to more equitable outcomes for our increasingly diverse population of learners, in affordable and efficient ways. Now is the time for critical and careful decision-making about the way forward.

CBE is an approach to teaching and learning that focuses on the competencies (knowledge, skills and abilities) that students must master rather than the amount of time they have spent in class (as measured by credit hours). There is a misconception that CBE competencies are simply the demonstration of a disembodied skill, but high-quality CBE programs recognize that the ability to generalize learning and succeed in the global knowledge economy requires the mastery of underlying theory as well as the ability to perform the requisite skill. Both are needed, so CBE values both.

In CBE, the time it takes to demonstrate competencies and the sources from which students can learn may vary, but expectations about learning are held constant. All students earn their credentials by demonstrating mastery in multiple forms of assessment, often at a personalized pace. Some people wrongly assume that CBE programs are easier or shorter than traditional programs, but in reality, a high-quality CBE program is quite rigorous, as students must demonstrate acquisition of *all* the competency sets required to master a program of study. Still, CBE is quite often less expensive for both students and taxpayers than traditional programs because it disaggregates courses based on the competencies demonstrated, rather than relying on the traditional method of clustering chunks of learning into a "course." Such modularization allows for more efficiency and precision, as well as personalization.

More work is needed to standardize the definition of CBE across the post-secondary education field and regulatory bodies. I submit that Congress should define CBE within the HEA in a way that correctly emphasizes its focus on learning outcomes and that differentiates it from both distance education and correspondence courses. I further suggest that Congress authorize a CBE demonstration project to responsibly test innovative changes on a pilot scale before deploying them more broadly. These changes would include methods for moving away from the credit hour as the fundamental currency of U.S. higher education as well as new ways of delivering federal financial aid to students enrolled in CBE programs. Importantly, in any expansion of federal student aid dollars to more programs and providers, the federal government should mandate that CBE providers meet minimum benchmarks for student outcomes and withhold taxpayer dollars from low-quality programs.

Defining a workable path forward is admittedly a challenging prospect. But until we commit to embracing innovations like CBE, we will remain—and only grow increasingly—disconnected from the issues that matter most for our economy and our nation: beneficial labor market and civic engagement outcomes for graduates.

## **Introduction**

Mr. Chairman, Ranking Member Murray, and Members of the Committee, I want to thank you for holding this hearing and for inviting me to testify about competency-based education (CBE). I have been an advocate of CBE since the early 1990s, when I worked as a faculty member at a state university in Minnesota that had been founded as a “university without walls” in the late 1970s and was rooted in a competency model. I have been delighted to be able to apply that experience to the growth of a newer wave of CBE programs in my roles at various institutions, and through my participation in the Competency-Based Education Network. Today, I hope to represent the thoughts of a larger community of educators who, along with me, believe that competency-based education is an essential component in the effort to increase the percentage of our nation’s population who possess high-quality, post-secondary credentials of value. We believe that this increase in efficient, effective and high-quality post-secondary education is essential for individual and community prosperity, as well as critical to our nation’s ability to remain globally competitive.

If our country is to have a vibrant middle class in the future, we must innovate to provide high-quality post-secondary opportunities that lead to credentials of value, and to advance more equitable outcomes for our increasingly diverse population of learners. As a nation, we must commit ourselves to developing all of our talent. This is the only sure path to becoming a country capable of solving its problems and leading on the global stage. We are urgently aware that our country must expand on the design and delivery of high-quality postsecondary opportunities that better meet the needs of today’s learners and employers, and that it must do so in affordable and efficient ways. We remain passionately hopeful that CBE is one essential part of the solution, and we believe that now is the time for critical – and careful - decisions.

## **Current Context & Future Possibilities**

While CBE is not new, there has been a sharp increase in the number of institutions developing and offering CBE programs during the past five years. In fact, a field scan conducted in 2015 by Public Agenda and the Competency-Based Education Network found that upwards of 600 institutions of higher education were in the process of developing, launching or scaling CBE programs. (<https://www.insidehighered.com/news/2015/09/10/amid-competency-based-education-boom-meeting-help-colleges-do-it-right>)

Why this rise in interest? A look at the learners, Jennifer and Samuel, help provide the range of answers to this question.

Jennifer is a nurse in her early 30s. After graduating from high school, Jennifer completed her LPN degree at a local community college. She loves her work in the local hospital and plays an important role in her community. Her hospital has joined a larger system, and this system is requiring all nurses to have a four-year degree. At this point, Jennifer began to look for options that would allow her to earn the BSN while working and caring for her son. She also hoped to broaden her education to prepare herself for possible leadership roles in the future. In the years of working as a nurse, she had attended many hours of continuing education, but none of these

courses were based in the fundamental currency of the US higher education system – credit hours. Thus, none of this work gave her any momentum toward the bachelor’s degree. She realized that there were areas in which she would benefit from traditional classes, but the idea of sitting through hours of lectures about nursing skills that she used on a daily basis was discouraging, at best.

Samuel is a young man who graduated from high school last year. He attended four different schools during his high school career, and his academic strengths are varied. He aspires to complete college, but is worried that he won’t qualify for college-level courses due to his uneven academic performance. Current assessment and placement systems for college entry are relatively blunt instruments that will likely place him in developmental or remedial courses which could discourage him as well as cost him time and money.

Our traditional models of higher education, due to the ways they are structured from entry to completion, present significant barriers to each of these individuals. Many of higher education’s structures and experiences were originally designed primarily for first-time, full-time 18-22 year old students who were not parents or supporting themselves. This student profile fits only a minority of students currently enrolled in our colleges and universities, and these structures and experiences designed for this minority do not address the diverse needs of our current student population. While this model may still work well for students who fit that profile, it presents the following challenges for others:

- Doesn’t address the knowledge, skills and abilities previously gained by many students, such as Jennifer above
- Too often fails to provide a coherent educational experience that connects life, learning and work
- Sometimes neglects to provide personalized support for students and specialized support for different types of learners, leaving many students on their own to navigate a confusing maze
- Contributes to wasting time and money for students, as well as taxpayer dollars, by providing a cookie-cutter experience for the diverse range of today’s students, such as Samuel above
- Remains disconnected from the issues that matter most for our economy and nation: labor market and civic engagement outcomes for graduates

### **CBE as a Solution**

A CBE program allows Jennifer to move quickly through the parts of her degree program that she’s already mastered AND slow down to focus on those critical areas where she needs to either get new knowledge or brush up on old learning. All of her educational experiences, from the curriculum to the design and support from faculty members and coaches, and through use of technology, are designed to efficiently and effectively allow Jennifer to achieve the learning and credential she needs for career advancement, deepened engagement in her community and socioeconomic mobility.

A CBE program could also support Samuel by modularizing the academic content necessary for his successful progression toward and completion of his post-secondary credential. Crisply defined competencies offer a more precise replacement for the blunt instrument of the “course” that is currently used to define readiness and allow access to higher education.

How might CBE programs provide these important solutions? Let’s start by creating a shared sense of what CBE programs look like.

The Competency-Based Education Network, or C-BEN, is an organization with 86 members, (including 66 higher education institutions with over 100 campuses, 4 corporations, 8 individuals, 8 K-12 Institutions, Associations or Other Non-Profit Organizations, Government Entities, and Non-U.S. Institutions of Higher Learning) who are active with CBE program development. C-BEN defines CBE as follows:

*Competency-based education combines an intentional and transparent approach to curricular design with an academic model in which the time it takes to demonstrate competencies varies and the expectations about learning are held constant. Students acquire and demonstrate their knowledge and skills by engaging in learning exercises, activities and experiences that align with clearly defined programmatic outcomes. Students receive proactive guidance and support from faculty and staff. Learners earn credentials by demonstrating mastery through multiple forms of assessment, often at a personalized pace.*

Understanding of what constitutes a competency is pivotal to understanding CBE. A well-defined competency articulates required knowledge, skills and abilities, and balances theory and application in a demonstration of mastery. It is essential to emphasize that both knowledge and the ability to apply it are required for a full demonstration of competency. Many times, competency is misunderstood as simply the demonstration of a disembodied skill. High-quality CBE programs recognize that the ability to generalize learning and succeed in our knowledge economy requires the mastery of underlying theory as well as the ability to perform the requisite skill – not simply the stand-alone skill.

CBE has several distinguishing features designed to meet the needs of our nation’s 21<sup>st</sup>-century students:

- *Intentional backward design.* In CBE programs, the educational journey is designed with the end in mind and the student at the center. Faculty begin by answering the question: “What ought a graduate of this program know and be able to do?” From this starting point, teams of faculty members, employers and instructional designers develop a set of clearly specified competencies that illustrate what the learner must know and be able to do in order to progress in and complete a credential. These competencies are integrated and scaffolded so that the integrity (or gestalt) of the academic credential is maintained.
- *Outcomes emphasis.* Competency-based education is an approach to teaching and learning that focuses on the competencies (knowledge, skills and abilities) that students must master rather than the amount of time they have spent in class (as measured by credit hours). This allows students with some existing knowledge or skill to spend their time on new content rather than reviewing already mastered material.

- *Agnostic regarding learning source.* Because well-defined competencies mandate the integration of knowledge (theory) and practice (application), CBE programs can be agnostic as to the source of students' learning. A student may have learned the practice or application component of a competency in a work setting and the theoretical component in a traditional classroom, but what matters is the student's ability to knit this together and demonstrate the competency as required by the credential being earned. The institution enrolling the student and offering the credential must provide the student with proactive, relevant, and substantive educational support that leads to this demonstrated learning. This is very important to our student Jennifer.
- *Rigorous requirements.* Many people wrongly assume that CBE programs are easier or shorter, but in reality a high-quality CBE program offers a very rigorous instructional model in which students must demonstrate acquisition of all the competency sets required to master a program of study. In fact, for some students, CBE programs will take *longer* to complete than traditionally structured programs--but a high-quality CBE program will guarantee the learning outcomes – competencies - of the students, unlike most traditional programs.
- *Students at the center.* In CBE programs, the student educational journey becomes a primary organizing principle. Rather than enrolling in a series of courses taught by individual faculty members, the CBE student is engaged in a carefully designed set of learning experiences and assessments built to allow the student to demonstrate the required competencies when she or he is ready to do so.
- *Modularization.* Rather than relying on the traditional method of clustering chunks of learning into a “course,” CBE disaggregates courses based on competencies demonstrated as a result of learning. Each competency is clearly articulated, and demonstration of each competency is assessed and transcribed. Modularization not only allows for more transparency, it also supports stacking of competencies into diverse credentials.
- *Personalization.* Such modularization allows for more precision and personalization in developing the student learning journey. For each student—from Jennifer to Samuel in our introductory examples—the path to a credential can be customized by acknowledging where competencies already exist and “prescribing” additional learning where competency is absent or incomplete.
- *Transparency.* Student learning outcomes (competencies) are clearly articulated and transparently transcribed so that students, employers, and the public can all know what any given credential means. This is much more meaningful than the traditional “grade” offered for a course.

In high quality CBE programs, these features are interwoven to produce value for the students in unique ways, including increased transparency of learning outcomes, potential lower costs of both tuition and time for some students, and the ability to personalize each student's learning pathway with increased precision and intentionality.

## **Current Barriers to CBE**

Without question, competency-based education presents new challenges with which policymakers must contend. First and foremost among these is the question of what students are paying for in an educational offering.

In quality CBE programs, students are paying for an intentionally conceptualized, designed and delivered educational experience with learning outcomes at the forefront. These programs may be agnostic as to the source of learning (for example, it could come from an instructor, an interactive technology or open educational resources), yet they are dedicated to clear, rigorous and demonstrated learning outcomes for students and provide full support along the way. Rather than simply being propelled through a program, CBE students in a high-quality program have demonstrated mastery of the skills required to comprise a degree. Graduates are able to prove their knowledge and to succeed in the workforce; employers have faith in the graduates' skills; and policymakers are confident that their investment has supported high-quality programs at which clear, rigorous, and demonstrated learning outcomes take precedence above all else.

In such programs, innovative learning models are emerging, with new approaches creating opportunities for personalized, relevant, responsive and substantive support for learning that involves faculty, peers, employers and others.

We must acknowledge that not all programs that claim to be CBE live up to this potential, and there is reason to proceed with caution when developing policy to support CBE in order to avoid the creation of new, lower quality higher education programs that could be harmful rather than helpful to students. The emergence of poor-quality competency-based education programs would threaten the reputation and promise of CBE, while putting both students and the integrity of taxpayer dollars at risk. For that reason, it is critical that the higher education field--and CBE providers in particular--move from primarily relying on inputs and proxies for learning to instead supporting the provision of high-quality educational opportunities for students that lead to demonstrated competencies. Importantly, in any expansion of federal student aid dollars to more programs and providers, the federal government should mandate that CBE providers meet minimum benchmarks for student outcomes and withhold taxpayer dollars from low-quality programs.

One specific form of CBE program is called "Direct Assessment". This term comes directly from the HEA (<https://ifap.ed.gov/dpceletters/GEN1310.html>; 34 CFR 668.10). In Direct Assessment programs, the student is awarded financial aid based on demonstration of competency rather than accumulation of credits. Since the approval process is appropriately rigorous, there are only a handful of institutions with approved direct assessment programs. These programs continue to create crosswalks between the competencies being earned and credit hours. These crosswalks support students' needs for transfer options, employer reimbursement and application to graduate schools.

Existing high-quality providers of competency-based education providers recognize the importance of preserving the integrity of the academic credentials being earned. To that end, they have sought to provide assurances of the quality of their programs and ensure continuous improvement. However, some barriers to the expansion of high-quality CBE programs make further reform challenging. In recent discussions with many of the institutions that offer CBE



programs, the following were some of the most significant barriers to fulfilling the promise of competency-based education:

- 1) There is no shared definition of competency-based education programs.** Currently, no definition of competency-based education exists in federal law or regulation. This absence generates confusion over what competency-based education is, and what it is not. Substantial differences exist even within competency-based education programs (for instance, direct assessment programs function differently from course-based programs), and this confusion only furthers misconceptions of competency-based education programs. Some wrongly assume that CBE programs simply certify prior knowledge, which in actuality represents its own sub-field of prior learning assessment. This confusion contributes to challenges with financing students' tuition, transferring student credit, and ensuring accreditors are able to review and approve satisfactory programs in a timely manner.
- 2) Confusion exists over the best ways to integrate CBE programs into federal financial aid.** Competency-based education programs do not necessarily cleanly operate within the framework created for traditionally structured programs. They may face challenges in appropriately assessing student progress against a standardized benchmark of a term, given the self-paced nature of the programs. Whereas faculty and administrators at most colleges understand what a credit hour is, CBE providers lack a similar shared definition of a competency that can be used to accurately calculate a student's federal student aid. The assumption of credit hour as currency in higher education challenges programs to calculate satisfactory academic progress and award aid in CBE programs. As a more specific example, students want to enroll in both direct assessment and credit bearing CBE programs concurrently, and this is prohibited under current regulations. There are additional important questions regarding the definition of the academic calendar and weeks of instructional time as well as issues with modular programs. The issues surrounding a requirement of regular and substantive interaction with faculty are knotty but critical to address. Each of these challenges requires careful and thoughtful consideration of how best to treat them within the context of federal student aid, and demands testing of the most promising solutions that will work both within the multitude of CBE frameworks that exist and in the broader scope of other higher education offerings.

### **The Path Forward for Responsible Innovation**

Defining a workable path forward is admittedly a challenging prospect. As we seek to support innovation in the higher education space that includes adequate guardrails to protect students and taxpayers, we must approach our work with a blend of caution and openness.

Today's students of higher education are a very diverse set of people, inclusive of all classes, races, developmental stages of life, ages and abilities, and we have to challenge ourselves to create a range of higher education solutions that can support all of these types of students toward their goals. We must ask ourselves what our overall goals are for our higher education systems. In our current global environment, do we believe that learning only occurs in a formal setting? What should we do about learning that occurs outside of our institutions? Our current financial aid system is rooted in the assumption that students pay tuition to be given opportunities to

acquire new knowledge. What if we also supported systems that validated learning that has occurred in other settings, such as the military or the workplace?

Competency-based education offers a way to respect learning wherever it occurs while still insisting on demonstration of integration and synthesis of essential knowledge, thus maintaining the integrity of the earned credential. CBE does not give “credit” for experience. It is always focused on progress toward demonstration of robust competencies – each consisting of knowledge, skills and abilities. CBE also does not give “credit” for independent bits of learning, but rather CBE programs create an integrated learning experience which has its own form or Gestalt, and in which existing learning can be leveraged as appropriate.

CBE can be delivered in a variety of ways: online, face-to-face or in a hybrid model. CBE is sometimes conflated with distance education, but there are important distinctions, including the program design, the intentional use of student support and the transparency of the learning outcomes. In fact, conflating distance education and CBE can lead to risky and damaging policy changes.

### What Congress Can Do

- **Create a definition for CBE.** CBE must be defined within the HEA, and new expectations must be set for the CBE category to differentiate it from correspondence courses and distance education, and to address the concern that students might be “left to learn on their own.” These expectations should be focused on outcomes. They can be rooted in C-BEN’s new Quality Framework and inclusive of new capabilities to personalize the learning pathway for students. This definition should not be conflated or confused with delivery modalities, including distance education.
- **Authorize a CBE demonstration project to responsibly test out broader changes.** While no one wishes we were ready to move away from a time-based measure of learning more than I, I also recognize that we’re not ready to just throw out the credit hour. While the credit hour is an undeniably flawed measure, we don’t yet have a replacement. Removing the tie back to credit hour without careful work can harm students, leaving them stuck without ability to transfer or apply for advanced degrees. There are a number of regulatory and statutory provisions that are tied to time that are worth exploring in a demonstration project. A carefully designed--and evaluated--pilot could be created under the structure of a demonstration project and could allow us to learn how students and institutions behave in an actual program, thus identifying which guardrails are needed to protect students and taxpayers. Even good ideas can easily turn harmful when federal financial aid dollars are available without a clear sense of how new regulatory flexibilities could be abused--and how they can and should be guarded against.

In this approach, C-BEN’s newly released Quality Framework should be used to both inform the definition of CBE and to provide guidelines regarding which programs meet this new definition and thus can be included in the demonstration project. Through this effort, new expectations can be defined and tested to provide support for learning and differentiate CBE from correspondence

education. This project, with well-defined guardrails to both protect students as consumers and guard against fraudulent use of federal tax dollars, could also support the creation of shared competencies and explore ways to safely wean our systems away from complete reliance on the credit hour as the sole currency for higher education in our nation.

Once a program meets the criteria of a CBE program according to the new definition, the Department of Education could launch a full-throated pilot project to find the best ways forward and make specific recommendations to Congress. This would allow for responsible innovation and reconsideration of current requirements such as regular and substantive interaction between students and faculty, weekly academic engagement, academic year definitions and existing satisfactory academic progress definitions. Since these CBE programs would be held to a higher bar for approval—and that higher bar would include personalized, relevant and substantive support for learning—the requirement for “regular and substantive interaction with the instructor” could be tested. CBE programs would be free to leverage educational technologies, instructional design and learning sciences applications to provide support for learning outcomes without being restricted to narrow, outdated, and input-driven definitions.

## **Conclusion**

In summary, CBE can serve as a vital part of the solution to the challenges facing our nation’s higher education system. CBE programs will not meet the needs of every student, but they do offer a useful pathway to a post-secondary credential for some students. A growing number of institutions offer CBE programs, and the field has taken steps to define quality in this space. A well designed demonstration project could allow the next phase of innovation to occur with the protection of important guardrails. Within the context of this space for responsible innovation, new solutions could be developed and tested, supporting future, more permanent policy changes.