

Summary of § 668.5 Written arrangements to provide educational programs.

Background

Educational innovations, especially those that require large investments in state-of-the-art tools and technologies, can be beyond the reach of some institutions due to high start-up costs or the inability to commit multi-year funds to seeing such a project through to full implementation. It can also be challenging to evaluate the effectiveness of a given innovation if tested on a single campus since limited sample sizes or certain selection bias may mask or confound results. Therefore, there may be economies of scale that enable an outside educational provider to develop and test technologies, and provide instruction using those technologies, for a number of institutions.

For example, simulation technologies and 3-D immersion experiences can change the way that students are taught and learn, and can enable students to practice certain techniques and procedures (landing a plane, performing a medical procedure, etc.) without the risks associated with live actions. However, high quality simulators are costly to build and maintain and it may be more efficient for a single vendor to develop them and to provide instruction using them to students at a large number of institutions through written arrangements with those institutions. For some career and technical programs, simulator-based instruction could constitute a significant portion of the program and require written arrangements that exceed the current 25 percent (or 50 percent with accreditor approval) limits.

In other situations, an institution may be unable to replicate the workplace setting or costly tools or equipment for use in preparing students for specific occupations. In such cases, it may be better for students to learn in the work environment under the instruction of expert operators, yet still earn credit toward their program. Written arrangements would promote such partnerships. Similarly, a student engaged in apprenticeship learning may not receive regular academic credit for the knowledge and skills gained on the job unless the institution has a written arrangement with the employer.

Written arrangements would also allow institutions to partner with organizations like building and trades unions to allow students to earn direct academic credit for the learning they do at non-accredited, state-of-the-art teaching facilities that are operated by such organizations. In such a case, a written arrangement will guarantee academic credit for learning that otherwise may or may not be recognized through prior learning assessment. Written arrangements with museums, theaters, and hospitals could also provide students with additional expanded learning opportunities. Although institutions may award credit for the learning activities described above through prior learning assessment, there is less certainty regarding how much credit will be awarded through PLA. Also, if a student transfers to another institution, PLA credits may not be accepted by the receiving institution. However, written arrangements allow students to earn direct college credit for learning that takes place through the non-accredited provider, which benefits students and may reduce the cost of postsecondary education to students and institutions.

Proposal

Allows a greater percentage of an accredited institution's program to be delivered through a written arrangement with an outside provider. Today, an institution can partner to deliver up to 25 percent of any program, or up to 50 percent of any program with accreditor permission. The Department proposes giving accreditors the authority to review and approve partnerships that go beyond 50 percent of a program. The Department seeks recommendations from negotiators regarding whether or not institutions should be authorized to enter into written arrangements for up to 50 percent of a program without accreditor approval, and whether or not institutions should be able to enter into written arrangements for greater than 50 percent with accreditor approval.

Questions for Negotiators and Subcommittee Members

- If institutions are permitted to go above the current limits, should the written arrangement be limited to some portion of the program that is less than 100 percent (perhaps at 75 percent since many accredits require students to complete at least 25 percent of a program at the institution that issues a credential)?
- What other protections can be enacted to ensure institutions, accreditors, and third parties are providing high-quality programs with strong student outcomes including, but not limited to employment?

As always, the Department is eager to hear from negotiators as to how the Department can ensure greater innovation and workforce responsiveness in higher education without putting students or taxpayers at risk.