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WGU example shows chilly policy climate for competency-based education

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It's an understatement of near-epic proportions to say that policy makers and politicians are smitten with Western Governors University's brand of competency-based learning. After years of slow growth in the wake of its founding (by governors of 18 Western states) in 1997, the nonprofit institution has been embraced ([if not hyped](#) ^[1]) as one possible answer to the challenge of educating more students (especially adults) at a lower cost.

At the core of the fascination with WGU (in addition to its focus on adult students, its comparatively reasonable prices, etc.) is the university's emphasis on gauging its students' academic progress based not on how many credit hours they accumulate and how much time they spend in class, but how much learning they show they have mastered through a series of assessments. Breaking the link between seat time and learning is one way that American colleges and universities can educate more people more efficiently, posit prominent reformers like Education Secretary Arne Duncan.

Competency-based programs like Western Governors are the exception now, but "I want them to be the norm," Duncan told *The New York Times* [last fall](#) ^[2].

But here's the catch: For all of the enthusiasm that Duncan and others express for spreading WGU's approach further in higher education, many experts on nontraditional education say that the federal regulatory bureaucracy that Duncan now oversees serves to discourage -- if it doesn't outright deter -- other institutions from following in the unconventional university's footsteps.

While a 2005 law specifically designed for Western Governors created a way for it and other institutions to participate in federal financial aid programs by directly assessing how much students were learning, independent of how many course hours they took or how much time they spent in the classroom, few people in higher education seem to realize that WGU chose not to seek that authority (nor, seven years later, has any other college or university).

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And while WGU instead earned federal approval for students to receive financial aid for a competency-based education by using the existing credit-hour rule -- theoretically blazing a trail that other colleges might follow -- none yet have.

To higher education officials like Peter Smith, vice president for strategic initiatives at Kaplan Higher Education, those facts show that for all of policy makers' stated enthusiasm about competency-based education and other forms of curricular innovation in higher education, roadblocks remain to any institution that wishes to try to break the link between the awarding of academic credit and the time a student spends in class (in person or online).

Western Governors has shown the rest of higher education that competency-based education can work and can win the approval of accreditors, Smith says. But while the conventional wisdom holds that WGU earned federal approval for a system that gave students credit based directly on how much they showed they have learned, the institution "has become a poster child for something that actually hasn't happened," says Smith. "There really is no pathway, no connection that can be used by someone else."

Others see the situation differently. While they concede that the pathway forward is unlikely to be smooth, they argue that an institution seeking to win federal approval to offer a competency-based education actually has two options: the legal avenue that was created for Western Governors in 2005 and the credit-hour-based approach WGU ultimately used. And while advocates for competency-based and other nontraditional forms of education believe the government should allow for much more experimentation, they believe the link between financial aid and seat time has been broken, and hope other colleges will take advantage of that fact.

"The link may not have been broken in the way people think, and it is still largely constrained," says Amy Laitinen, a senior policy analyst at Education Sector, "but it has been broken."

The Example of WGU

Through most of its first decade, Western Governors was able to enroll students on the federal dole through a "demonstration program"^[3] that essentially exempted the entirely online university from a requirement that institutions educate at least half their students in on-ground classes.

But when the demonstration project was preparing to expire in 2006 (in part because of concerns that it had enabled explosive growth in online education among for-profit colleges), Congressional supporters of Western Governors (of which there were many, given the many powerful state politicians who helped give the institution its name) crafted a legislative provision that, for the first time, allowed an academic program to qualify for federal student aid through Title IV of the Higher Education Act by establishing "an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others."

The creation of such a mechanism represented a major departure for federal policy making – at least, potentially. But while it was tailor-made for Western Governors, the university opted not to try to use the new mechanism in its quest for continued Title IV eligibility.

Instead, the university chose to stick with the more-traditional credit-hour-based approach that it had previously used.

Under that system, the university divides the learning competencies it expects students to achieve into units that it equates to credit hours. Students pay a flat rate per term, and while they must complete a minimum number of what WGU calls "competency units" to make sufficient academic progress and qualify for federal student aid, there is no limit on the number of competency units they can earn in any time period. As WGU officials see it, that effectively kills the link between learning and seat time because a student getting credits based on learning she proves she has mastered can earn more credit in a term than would be possible in any classroom-based approach.

Department officials say that WGU officials chose not to directly assess student learning because some students, state funding agencies, and employers interesting in providing tuition assistance for their workers were more comfortable with the credit-hour-based approach. WGU "adapted to the needs of students and employers by using what people were familiar with and accustomed to seeing," said a senior Education Department official, who spoke only on background.

Others familiar with the deliberations between the department and Western Governors at that time said they believed that federal officials -- who had no clear procedures in place and were nervous about how an attempt to measure student learning directly would play out -- had strongly encouraged WGU to stick with its existing approach rather than take advantage of the new "direct assessment" provision.

Robert Mendenhall, WGU's president, demurs when asked whether the university stuck with its existing system willingly or at the government's urging. But he concedes that the "nonstandard term" model that it wound up sticking with did "allow students to transfer more easily to other institutions, and dealt with the corporate tuition reimbursement issues."

Mendenhall says that Western Governors's chosen approach absolutely breaks the link between how much students learn and how much time they instructional time they spend.

"We don't award three credit hours when people spend a certain amount of time learning something; we award three competency units when they master learning, independent of time," says Mendenhall. "If a student can pass 40 competency units in that term, which would be equivalent to 40 credit hours, that's how much they can earn."

Can Others Follow?

Michael J. Offerman, former president of Capella University and a longtime administrator in public higher education, was among those who was surprised to find out last year that Western Governors had opted not to pursue the Congressionally approved process that, theoretically at least, cleared the way for a postsecondary program to qualify for federal student aid by showing that it was directly assessing the learning of its students.

But by earning Title IV approval from the Education Department for a mechanism that awards academic credit independent of seat time, he says, WGU has cleared a pathway for other institutions that wish to provide a competency-based education to follow.

“What they’ve done isn’t quite what a lot of us interested in competency-based education thought they had pioneered,” says Offerman. “What they have pioneered is a way to think about and use the existing credit hour rule to allow for this experimentation with competency-based delivery. The department has worked out a way to make the credit hour work for a competency-based program, and that should mean that the door should be open for other institutions to work with the department and accreditors to do the same thing. That is a big deal.”

But suspicion remains in many quarters about whether the department would be as amenable to such an arrangement for other higher education providers – especially those that might not be backed by the political clout of nearly 20 governors and their supporters in Congress.

It doesn’t help that most of the institutions likeliest to experiment with competency-based education are online institutions and for-profit colleges, the latter of which, particularly, have been a focus of intense concern from the Obama administration about potential fraud and abuse. One new entrant into competency-based higher education, [New Charter University](#),^[4] opted to forgo seeking federal financial aid rather than try to win the approval of the Education Department, says its CEO, Gene Wade.

“It would be naïve not to acknowledge that WGU has a lot of political support, and the department is going to have to protect against bad actors, but that doesn’t mean that [the approval process] wouldn’t be available to others as well,” says Laitinen of Education Sector.

Department officials, for their part, say they remain open to other institutions’ making the case for providing competency-based education, either through the process WGU used or by making a case that they directly assess student learning, which the law requires institutions to do on a program-by-program basis. (The agency has also created a task force that is looking into the credit hour and other such issues.)

“I could envision another institution adopting [the WGU] approach,... and every week we’re having some conversations with entities that are looking at the [direct assessment] authority,” says a senior official at the department.

But “it’s fair to say that while we have this provision, and we’re developing procedures for it, we are cautiously seeing what the implications are of it as institutions come in and explore it,” says another department official. “As in any circumstance, there is risk of fraud and abuse [that comes with] anything that’s new and untested.”

So there are two possible pathways for institutions that wish to offer competency-based education to qualify to do so – that’s a point of optimism for those who advocate for more experimental forms of higher education.

Less so is the reality that, in the six years since Western Governors cleared one path and steered clear of the other, no other postsecondary institution has pursued either one.

[Assessment and Accountability](#)^[5]

[Accreditation and Student Learning](#)^[6]

[Learning Outcomes Measures](#)^[7]

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Links:

[1]

https://www.insidehighered.com/news/2011/05/09/western_governors_university_and_online_competency_based_learning_model_gain_traction

[2] http://www.nytimes.com/2011/11/30/education/duncan-calls-for-urgency-in-lowering-college-costs.html?_r=0

[3] <http://www2.ed.gov/programs/disted/index.html>

[4] <https://www.insidehighered.com/blogs/confessions-community-college-dean/all-you-can-learn>

[5] https://www.insidehighered.com/news/focus/assessment_and_accountability

[6] <https://www.insidehighered.com/news/news-sections/accreditation-and-student-learning>

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