

COMPETENCY BASED EDUCATION: HOUSE BILL 3289 2018 Report to the Oregon Legislature



OHSU/Kristyna Wentz-Graff

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EXECUTIVE SUMMARY

This report is provided pursuant to HB 3289 (2017), codified into law as ORS 350.125, which requires, beginning in 2018, that the HECC submit an annual report to the Oregon Legislature regarding competency based education (CBE). This first report will define CBE, provide a background on CBE both nationally and in Oregon, and will, as required by HB 3289¹:

- Describe the effectiveness of expanding competency based education in public post-secondary institutions of education in this state and of granting postsecondary degrees on the basis of competency based education.
- Identify issues and barriers, including postsecondary accreditation standards that present challenges to implementing or expanding competency based education programs in post-secondary institutions of education in this state.
- Analyze competency based education models and determine which models have been successful.
- Recommend specific policy changes and initiatives that public post-secondary institutions of education in this state may implement to expand competency based education.

Competency based education presents a unique opportunity to increase access to, and foster completion of, degrees for many students who may have historically been underrepresented in higher education. This is not to say that competency based education can, or should, replace traditional higher education approaches, but that it can supplement it.

Some regulatory barriers do exist that limit the expansion of CBE within Oregon. First, and foremost, there are potential issues around state funding for public institutions for student participation in CBE programs, as the current public university and community college funding models do not include CBE. Second, in the private career school sector, only cosmetology schools may currently be recognized as CBE programs, although work is being done to potentially expand this format to other types of private career schools. Third, federal financial aid rules that are based on student credit hours for determining if a student is making sufficient progress towards a degree are incompatible with CBE models. Although long-term plans to fix this are underway, currently access to financial aid for CBE is provided through waivers of certain federal aid rules to allow CBE programs to disburse federal student aid to students.

In Oregon, although there is growing interest, CBE is largely in its infancy, with one hybrid program at SOU and an MD program being established at OHSU as the only Oregon-based CBE programs at public institutions. In the private sector, seven cosmetology schools currently offer CBE programs to Oregon residents and several out of state institutions offer online CBE degree programs to Oregonians.

This report concludes with a few policy suggestions around CBE. Of particular note, the HECC sees a potential need to work with institutions to modify its community college and university funding models to accommodate CBE; suggests that an expansion of CBE to private careers schools beyond cosmetology might be warranted, and recommends that, if the Oregon Legislature wishes to encourage CBE, it could establish a grant program to support the creation and start-up costs of new CBE programs. The HECC is encouraged by the potential of CBE to help close achievement gaps and bring Oregon closer to 40-40-20. Progress will be catalogued in annual CBE reports.

The HECC thanks Southern Oregon University (SOU) President Linda Schott and OHSU's Senior Associate Dean for Education Dr. George Mejicano for their willingness to provide information on CBE and programs at their institutions to HECC staff.

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INTRODUCTION

The first step to understanding CBE is defining what it is and what it is not. The definition provided here synthesizes elements from several sources and represents a composite definition of CBE. Sources upon which parts of this definition is based are endnoted in the paragraph below:

Competency Based Education (CBE) is defined, for the purposes of this report, as a system, or systems, of instruction, assessment, grading and academic reporting where success is defined based on students demonstrating progress towards, or competence in, specific skills.² In CBE, “learning is the constant, time is the variable.”³ What is meant by this is that, rather than advancing at the speed of a traditional academic curriculum, students advance in CBE at the speed at which they demonstrate mastery of particular skills or competencies.⁴ Assessment tools vary and can take different forms based on the competencies being learned and the student’s skills and interests.⁵ For example, students might write a paper, but they also might produce a video or work on a relevant project to demonstrate mastery of the same competencies.⁶ In higher education CBE is often provided online but it does not have to be. For example, at the University of Maine-Presque Isle⁷ and at OHSU’s new competency based MD program⁸, face-to-face designs are used rather than online. As in higher education in general, there exist multiple models and approaches for implementing CBE, many of which are described in this report.

COMPETENCY BASED EDUCATION

A SUMMARY OF COMPETENCY BASED EDUCATION AND ITS IMPLEMENTATION NATIONALLY

This section will summarize the current state of competency based education, on a national scale, and outline its key criticisms and proponents. CBE has grown substantially in the past decade, in no small part due to the increasing prevalence of online education and the ability for learners to complete degree requirements on their own schedule. Many schools that use CBE also claim that they produce graduates who have better employment outcomes than “traditional” higher education. For example, a recent survey commissioned by Western Governors University (WGU), an online university where all programs of study are CBE, purports to show that WGU alums are employed at a 20% higher rate than their non-CBE competitors.⁹ However, of course, outcomes may not be the same for all institutions or programs and this is only one measure at one institution.

CBE is not without criticism, and three main areas of criticism are worth mentioning. First, critics of CBE claim that because CBE’s focus on the outcomes of learning there is often an emphasis on testing which may not be the best way to ensure quality outcomes, that “There is no such thing as assessment for learning...assessment in any form always interrupts learning.”¹⁰ CBE supporters argue that this is not necessarily the case; they note that CBE’s focus on testing allows for more

individualized instruction to take place and for students and instructors to both understand where skill gaps lie.

Second, critics of CBE argue that the “modules” that comprise CBE programs do not necessarily allow students to demonstrate mastery, and that they are merely checkpoints on a list of knowledge (or competencies) students must learn to proceed.¹¹ CBE proponents counter that, in traditional programs, students may complete the courses required for a degree without necessarily demonstrating competency in key domains and that CBE requires that students prove that they understand certain competencies before advancing.¹²

Third, critics of CBE argue that, despite its focus on individualized education the mostly online format of many CBE programs can make student support services impersonal and harder to access.¹³ For example, since online courses may be taken at any time of day, students might need student support outside of typical business hours. Some providers may not be equipped to handle expanded access to student supports but many, such as WGU, are open to students for extended hours. Student support is also an issue at some in-person CBE programs, such as OHSU's, to the extent to which courses or practicum take place outside of normal business hours. It is worth noting that online credit hour based programs, or in-person credit hour based programs conducted outside of normal business hours, suffer from the same potential lack of direct student support.

In early 2014, with funding from the Lumina Foundation, seventeen institutions and two public higher education systems formed the Competency-Based Education Network (CBEN) in order to “provide an evidence-based approach to advancing high-quality competency-based education capable of serving many more students of all backgrounds.”¹⁴ SOU's President Linda Schott, then President of the University of Maine-Presque Isle, was part of the first cohort of institutions to join CBEN and was instrumental in its creation. President Schott is widely regarded as a national leader in CBE.¹⁵ Currently, CBEN is a self-supporting member driven network that consists of thirty institutions and four public higher education systems that broadly represent the higher education sector. The membership, much of which is in the Northeast, Midwest and West coast, includes public institutions such as Michigan and Purdue, private for profit institutions such as Walden University, private nonprofit institutions such as Westminster College and Community College systems such as those in Kentucky and Texas. No Oregon institutions currently participate in CBEN. During annual conferences network members create materials designed to encourage development and refinement of new, and current, CBE programs.

Prior to 2015, national standards for accrediting CBE programs did not exist and CBE programs could not be accredited unless they also contained elements of traditional clock-based programs (such as credit hours). However, in June 2015, the Council of Regional Accrediting Commissions (C-RAC) issued a framework outlining criteria for regional accreditors to use when defining and approving CBE programs.¹⁷ In January 2016, the Northwest Commission on Colleges and Universities (NWCCU), the regional accrediting body for higher education in Alaska, Idaho, Montana, Nevada, Utah, Washington and Oregon, issued its own guidance on accreditation of CBE programs. The adoption of this guidance removed a significant barrier for the creation of CBE programs at existing

institutions of higher education. The guidance¹⁸ requires that programs contain the following elements, among others, to be accredited:

- (a) Procedures to ensure that any CBE program has been evaluated and approved as a CBE program by the relevant field specific regulatory body, such as the Liaison Committee on Medical Education for Medical Schools or the Network of Schools of Public Policy, Affairs and Administration for Public Policy, Affairs and Administration Programs.
- (b) Procedures for disbursing student aid.
- (c) Procedures for determining what refunds must be made in the case of student withdrawal from a program.
- (d) Definition of the terms “student” and “academic year.”
- (e) A process that ensures regular and substantive interaction between students and instructors.
- (f) A clear policy on whether a student has made “Satisfactory Academic Progress” at various steps throughout the program.

Adoption of these standards by NWCCU and the other regional accrediting bodies has allowed for a broader reach of CBE programs. Indeed, it removed one of the primary regulatory barriers to the implementation of CBE at institutions accredited by NWCCU and the other regional accrediting bodies. CBE programs exist in all facets of higher education nationally. The following section will provide quick case study examples of how CBE is implemented in each of five areas (Public 4-year, Public 2-year/Community College, Private for profit, Private non-profit and career schools). These case studies are not meant to be representative, although in their respective sectors they are highly regarded and seem to involve a fairly robust implementation of CBE with multiple programs.

For public four-year institutions, the University of Wisconsin’s Flexible Option program is one of the industry leaders.¹⁹ This program offers degrees in six different fields as well as certificates in three fields, all delivered primarily online, with some including hands on practical tests, and all utilizing a CBE approach. Incoming students are required to complete a “flex fit” self-evaluation to identify their individual needs and make sure that they fully understand the program prior to enrollment. Degree progress is based on completion of “competency sets.” “Competency sets” contain multiple related competencies, for example, a “competency set” on leadership might contain a series of competencies that are designed to demonstrate leadership skills.²⁰ Wisconsin students have two options for tuition in the university’s CBE programs.²¹ The first, and most common, is the “all you can learn” option, where tuition is based on how many “subscription periods (which are three months long)” it takes a student to complete a degree. Therefore, although self-paced, the incentive is clearly to complete quickly in order to save on tuition costs. Students can, however, also choose to pay by the “competency set”, which allows them to complete only one “competency set” within a particular three-month subscription period. If students wish to complete two or more competency

sets in a three month period, they must choose the “all you can learn” option. For most programs the “all you can learn” cost is \$2,250 per term and the ‘single competency set’ cost is \$900 per term.

For public two-year community colleges, Kentucky’s Enhancing Programs for IT Certification (EPIC) Program is a case in point example of CBE implementation. EPIC is an online-based CBE program designed to allow students to earn certificates in several IT subfields.²² This program, designed to link Kentucky workers with sponsoring employers, is self-paced and comes with extensive support for students. Tuition is based on the credit hour model, with a set tuition per credit hour (and thus per course) regardless of the time it takes to complete.

When it comes to private nonprofit institutions, there is no clearer market leader than Western Governor’s University (WGU). All of WGU’s programs are online and competency based.²³ WGU offers bachelor’s and master’s degrees in a number of fields, and the progress towards degrees for participants is entirely self-paced. However, as in Wisconsin, tuition is based on how many terms (which in WGU’s case are six months long) it takes a student to complete the degree. Therefore, students who are able to complete degrees more quickly pay less tuition.

As pertains to examples of private for profit institutions, one of the most recognized is Walden University. Walden runs several CBE programs, through their “Tempo Learning ® initiative.”²⁴ These programs are all offered entirely online in a number of fields, primarily revolving around business, early childhood education, healthcare, and nursing. As with both WGU and Wisconsin, tuition is based on the number of periods (in this case three month periods) it takes to complete a degree. The faster the completion, the less the degree costs.

Finally, perhaps the most prevalent area for CBE design in higher education today is in private career schools. Cosmetology schools, such as the Academies of Cosmetology in Florida, a three-location school that teaches cosmetology, massage and barbering, uses a CBE approach.²⁵ Their slogan, “Have a Career in Less than a Year”, is typical among career schools as the draw for these students is that CBE based programs mean less time to completion than their traditional clock-based alternatives. It is worth noting that Oregon is among the first states to allow CBE cosmetology programs, detailed later in this report.

Not only cosmetology career schools have embraced CBE. The CBE trend has begun to reach other areas such as culinary schools. For example, the August Escoffier School of Culinary Arts now offers a CBE-based online degree for its Certificate in Escoffier Online Culinary Arts Fundamentals program.²⁶ This program, which consists of interactive online courses, is based on a CBE-style learning modules approach; students complete the program as they are able to hit set benchmarks in each module. The program also requires a six-week externship, where placement is organized with the help of the school. Unlike other examples of CBE programs described above, tuition at August Escoffier School of Culinary Arts is a set amount regardless of the time it takes to complete the program. In this case, there is no incentive to complete quickly, although the program is designed to last 13 months.²⁷

Many CBE programs do require continuous enrollment (for example, WGU will automatically consider you withdrawn if you take a term off without notifying them first, although they do allow for short breaks of a few months with prior notification²⁸), in a manner very similar to that of traditional clock-based approaches. In addition, due to requirements in “Satisfactory Academic Progress” policies, which are required of institutions to disburse federal financial aid, some programs also generally limit the length of time a student can take to complete a program by requiring that a student complete a minimum amount of competencies each term.²⁹ Again, similarly to traditional clock-based programs, exceptions are granted with prior notice.

Although not the subject of this report, we would be remiss if we failed to note the extent to which CBE has been implemented at the K-12 level, where may also be referred to as “proficiency based learning,”³⁰ and is an especially prevalent within Career and Technical Education courses. Like in higher education, student progress is based on meeting standards within a given content area, not seat time. The meeting of standards is verified by assessments of various types, geared to test the relevant knowledge and skills. Grades are based on whether a student has achieved the required knowledge and skills, not on more traditional project-based standards. Unlike CBE at the post-secondary level, learning and testing is largely done in the classroom setting and not online. Essentially every state has implemented proficiency based learning to some extent, with Oregon considered among the nation’s leaders.³¹

Although not fully representative of the extent to which CBE has been implemented in higher education, the above cases show how broadly CBE has been implemented. CBE is indeed a growing trend and one that touches all facets of education, public, private, for profit, nonprofit, community college and career schools, and secondary grades.

REGULATORY BARRIERS

Goal 2 of ORS 350.125 is to identify any regulatory or other barriers to increasing use of CBE. With the adoption of the accreditation standards by NWCCU and other regional accrediting bodies in 2015, one of the primary regulatory barriers was removed. CBE programs that are accredited through the NWCCU process are eligible to receive federal financial aid in the same manner as traditional clock-hour based programs. Indeed, accredited CBE programs are now on an equal footing with accredited non-CBE programs in every important respect.

The most significant barrier to the development of CBE in Oregon concerns how Oregon determines state funding for community colleges and universities. Both the Community College and Public University Support Funds base a significant portion of their funding on the completion of “Student Credit Hours.” Currently, completion of competencies in CBE programs would not earn state funding dollars in the absence of student credit hours. Therefore, work needs to be done by institutions to define how each competency matches up to a particular number of traditional student credit hours in order to create a crosswalk between the two and thus ensure that institutions are properly funded for student completions in CBE programs. This work has been done in the past; for example, the University of Maine Presque-Isle mapped out specific competencies that needed to be

completed for students to get credit for a particular course.³² However, in the absence of student credit hours, in a direct assessment model, work will need to be done to create these equivalences between competencies and student credit hours.

For most out of state CBE programs that issue degrees to Oregon students, such as those at WGU and Southern New Hampshire University, there are no regulatory barriers to student participation as Oregon is a signatory to the State Authorization Reciprocity Agreements (SARA).³³ SARA ensures that any regionally accredited program may be offered in any of the other member states and that any resulting degrees are fully valid. In practice, this means that out of state CBE programs accredited as such by their regional accrediting bodies are valid in Oregon without any additional regulatory action. The exception is programs in California and Massachusetts, which are not automatically included because those states are the only two states not signatories to SARA. For example, WGU is a SARA institution and in the 2017-18 academic year, 1,842 Oregon residents were enrolled at WGU.³⁴

For private career schools, there are limited regulatory barriers for cosmetology programs as, under Oregon law, cosmetology schools may currently be certified as CBE programs by the state pursuant to OAR 715-0045-0200.³⁵ This rule is currently being revised, and the updated rule is expected to be promulgated later this year, in order to increase clarity on CBE requirements, differentiating them from those of clock-based programs.

However, all other types of private career schools in Oregon may not currently offer CBE programs. While there are plans to consider expanding CBE to other types of private career schools, no concrete steps have yet been taken. It is worth noting that, unlike the rest of higher education, private career schools in Oregon are licensed annually, not accredited. Accreditation, although encouraged, is not required for private career schools to be licensed in Oregon.

There is potential federal action on expanding the ability to use federal financial aid for CBE programs. The US Department of Education has filed a notice³⁶ that they may soon commence negotiated rulemaking procedures to allow federal-backed student aid to be provided more readily to CBE programs. Currently, such access is limited due to the lack of integration of CBE programs into the federal financial aid system, which is still based on traditional clock-hours.³⁷ The basic problem is that the current rules do not allow for “satisfactory academic progress” to be as readily measured with CBE programs as with traditional clock-based programs. Currently aid is being disbursed by waiving certain elements of the federal financial aid rules. Work is continuing to define how “satisfactory academic progress” will be measured so as to more readily provide student aid to CBE programs.³⁸ It is worth noting that student aid is being routinely provided to CBE programs at accredited institutions of higher education (those already eligible to receive student aid) but that adoption of permanent rule changes at the federal level would likely increase access to CBE programs for students by allowing for easier distribution of student aid to such programs.

In addition, there are efforts underway at the federal level to amend the Higher Education Act (this effort is known as the “Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act”) to reduce regulatory barriers to CBE programs and to limit the ability of states to regulate such programs.³⁹ Although it is impossible to know the likelihood that such legislation would succeed with these provisions, should it pass as introduced, the new laws would likely increase the ability of institutions of all types to offer CBE programs. At the time this report was written, although the legislation moved out of Committee in February 2018, there has been no action in the intervening time and recent reporting suggests that the PROSPER Act likely lacks the votes to pass in the current session.⁴⁰ It is not entirely clear, should this or similar legislation pass in the future, what Oregon-specific regulatory barriers it might be eliminating, but it is worth keeping an eye on.

MODELS IN OREGON TODAY

The following section provides a brief synopsis of CBE as it exists in Oregon today by sector. The sectors are defined to include public universities, community colleges, private nonprofit, private for profit and private career schools. Table 1 summarizes examples of the programs available to Oregon residents below:

Table 1:

In terms of Oregon-based public institutions, both Southern Oregon University and Oregon Health

Examples of Competency Based Education Providers Available to Oregon Students	
Sector	Institution/ Program Name
Public Universities	SOU Innovation and Leadership Program
Public Medical School	OHSU MD Program
Community College	COCC Culinary Arts (Partial CBE)
Not for Profit	None identified at this time
For Profit Degree Offering	None identified at this time
Online out of State	Coursera and Similar Platforms
	WGU/Other providers via SARA
Private Career School (Cosmetology)	Aesthetics Institute
	Beau Monde
	Bella Institute
	IBS School of Cosmetology and Massage
	Portland Beauty School
	Spectrum Advanced Esthetics
	Tangled Ends

and Sciences University are incorporating CBE. SOU’s Innovation and Leadership Degree is an online hybrid program designed for adult learners.⁴¹ This program was created specifically to deliver competencies desired by employers; it draws upon parts of many disciplines to do so, rather than being discipline-based. Students must have at least five years full-time experience beyond entry level in order to enter the program; and teachers draw upon this work experience to facilitate a highly

accelerated pace of learning. However, this is not fully a CBE program because these competencies are still delivered through the format of specific time-based courses.

In addition, SOU's president, Dr. Linda Schott has begun discussions at SOU about the creation of additional CBE programs there.⁴² SOU's Outdoor Adventure Leadership program is incorporating CBE principles into its curriculum, and SOU has initiated a CBE component to its first-year seminar curriculum. A pilot course offered in Spring, 2018 used CBE to allow students to demonstrate competencies in the foundational goals of communication, critical thinking, and information literacy skills, with a view to adding a CBE component to complement the conventional three-course seminar sequence required for all incoming students. President Schott has considerable experience with CBE, having been one of CBEN's early leaders and also overseeing the development and implementation of CBE programs while serving as the President of the University of Maine at Presque Isle.⁴³

There is a more fully formed CBE program at an Oregon public institution, the MD Program at OHSU.⁴⁴ Beginning with the 2014 cohort, OHSU redesigned its MD program to focus on achieving forty-three competencies in six domains of competence, which match the six domains now taught in medical education, following a recent, substantial curriculum revision in 2013.⁴⁵ Performance in these forty-three competencies is evaluated by "qualified assessors" (of which there are 20 out of a total faculty base of around 2,000.) Assessors evaluate whether a student has met the requirements for a competency and once a certain number of assessors approve (varying from three on some competencies to eight on others), the student is certified as proficient in that competency.

While currently the OHSU program is a hybrid of traditional credit hour-based learning and CBE, it is moving towards full CBE implementation. The next step will be implementation of thirteen "badges," each covering a core skill area, which will begin in 2019. Unlike the 43 competencies, evaluation for these badges will occur on an ad hoc basis and can be done by any faculty member. Once fully implemented, estimated for the incoming class of 2021, students will have to complete both the 43 competencies and earn the thirteen badges to graduate. It is also expected that, once CBE is fully implemented, OHSU will move away from credit hour-based learning in favor of a full CBE approach. This CBE framework allows OHSU MD students to focus on developing the skills and abilities they will need to succeed as Doctors, although it still utilizes essentially the same timeline and framework as a more traditional MD program. The results so far have been promising, with 100% of the first cohort (which began in 2014) matched with a residency, above the national average of 93%.⁴⁶ According to OHSU, among this first cohort in the new CBE-based MD program, 32 of the 139 students were able to graduate a term early, saving over \$17,000 in tuition and fees alone.⁴⁷

In the community college sector, CBE is limited. Although some programs, such as PCC's Automotive Services Program⁴⁸, have elements of CBE, these are not fully developed yet. Programs at Central Oregon Community College's (COCC) Culinary school are leaning toward CBE, and they enjoy strong connection with the local hospitality industry.⁴⁹ However, COCC Culinary programs are still largely based on clock hour design.

There are no fully formed CBE programs at private not for profit institutions in Oregon today. Although there are practicum based programs, such as Linfield's Wine Studies major⁵⁰, they are still fundamentally based on clock hour practices and do not necessarily include CBE elements in a significant way.

In terms of online education from out of state providers, there are both competency based courses, and fully formed programs from multiple providers. For example, Coursera hosts several individual courses and programs such as the State University of New York's Strategic Career Self-Management program⁵¹ and the Wharton School's Business Foundations Specialization⁵² where progress is made by demonstrating mastery of competencies within each course. Courses are typically self-paced (within certain time limits). Notably, these programs, while providing valuable skills, do not result in accredited and recognized degrees in the same way CBE programs from institutions such as Western Governors University or OHSU's MD program do. Nor do they typically qualify for federal financial aid so the students most pay the cost of any tuition and fees out of pocket.

Accredited CBE institutions include Western Governor's University or out of state public institutions such as Purdue, offered in Oregon through the SARA agreement. As noted above, under SARA any program from an accredited institution that participates in SARA and is from a SARA-participating state can be offered to students in any other SARA-participating state.

The biggest usage of CBE in Oregon today is in private career schools, specifically cosmetology schools. Currently seven cosmetology schools offer CBE programs in Oregon⁵³ and more schools are projected to offer such programs in the coming months and years. The HECC's current efforts to expand the ability of cosmetology schools to offer CBE programs may impact the extent to which such growth happens, as would a potential, although not yet undertaken, expansion of CBE to other types of private career schools.

Though not specifically covered in this report, it is worth noting that in the K-12 arena, proficiency based learning is fairly common in Oregon and schools are required to offer students credit based demonstration of meeting proficiencies. In many cases, they are a required part of the K12 curriculum.⁵⁴ In addition, training programs that embrace CBE principles, such as the ProStart® program⁵⁵ in the restaurant industry, involve high school students in practical work-based education.

Finally, it is worth noting that sometimes CBE gets confused with Credit for Prior Learning (CPL) initiatives, which award academic credit to students for their prior learning, through licensure or other relevant learning experiences.⁵⁶ Although some CBE programs may offer credit for a student's prior learning through CPL programs, they are not the same thing. For example, a student in OHSU's MD program who enters with some experience may complete certain competencies more quickly if they demonstrate competency by completing the required assessments more quickly than those without experience, but they still must complete all other competencies to earn their degree.⁵⁷ Of note, Oregon's CPL standards specify that only 25% of possible credits for a program may be earned through experiential learning.⁵⁸ Indeed, CBE programs are fundamentally different in that,

instead of offering clock-based credit for learning assessments, they are fully formed academic programs that do not use clock hours to measure completeness.

Overall, CBE in Oregon is in its infancy. Although programs do exist across most of the postsecondary education spectrum, there are relatively few opportunities for students to access Oregon-based CBE programs.

POLICY SUGGESTIONS

The final required element in this report under ORS 350.125 was to “Recommend specific policy changes and initiatives that public postsecondary institutions of education in this state may implement to expand competency based education.” As noted in the regulatory barriers section, an area of policy that could be addressed is examining the community college and public university support fund allocation formulas to award funding based on competencies, in addition to student credit hours, should institutions adopt CBE programs that do not rely on student credit hours. Should such an initiative be led by the universities and community colleges, it would be within the HECC’s existing legislative authority and does not require additional legislative action. Should changes be required, for community colleges, which award virtually all funding on the basis of student credit hours, this would impact almost the entire community college funding formula. For public universities, where only a portion of state funding (about 33%) is based on student credit hours, with the rest based on mission-driven programs and degree completions, this would impact a smaller proportion of the total formula. The good news is that since CBE programs produce degrees that are identical, in value and form, to those produced by traditional student credit hour driven (also referred to as clock based) programs, the university funding model would only require adjustment for the part driven by student credit hours.

In addition, the state could encourage public institutions with CBE programs, to the extent possible, to use the SARA multistate agreement to spread access to their programs as broadly as possible outside of Oregon. The state could also create a grant program for institutions that seek to develop CBE programs in order to defray some of the associated startup costs.

For private institutions, especially private career schools, the state might grant the HECC rulemaking authority to license institutions as CBE rather than clock based in areas other than cosmetology. Licenses are the extent of the state’s regulatory authority in the private sector.

Finally, the state could act indirectly by supporting CBE-like programs at the K-12 level through partnerships. The new Future Ready Oregon initiative, which is designed in part to “Prepare our future workforce by making investments in education that uses hands-on learning⁵⁹” will focus efforts at the K-12 level on career and technical education classes in every Oregon school district. While not exactly the same as CBE, these efforts could prepare students who are ready to participate in CBE programs at the post-secondary level, and/or bring a CBE-style problem solving mindset to their career or post-secondary studies.

CONCLUSION

It is clear that CBE is increasing in usage and acceptance nationally. As regulatory systems continue to adjust to allow CBE programs to grow, and, as more is understood about how CBE can better reach certain types of students, it is very likely that CBE programs will increase in number in Oregon. Future editions of this report will monitor this trend and focus directly on Oregon's implementation of CBE. The HECC looks forward to annual reporting and a coordinating role in supporting the growth of CBE, or other models that help close achievement gaps and bring the state closer to 40-40-20.

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APPENDIX

- ¹ **ORS 350** <https://www.oregonlegislature.gov/bills_laws/ors/ors350.html>
- ² **Competency Based Education Network-Competency Based Education** <<http://www.cbenetwork.org/competency-based-education/>>
- ³ **David Jarvis interview of SOU President Linda Schott, 2/22/2018.**
- ⁴ **Western Governors University-Competency Based Education** <https://www.wgu.edu/about_WGU/competency-based-education#>
- ⁵ **Brandman University, What is Competency Based Education?** <<https://www.brandman.edu/news-and-events/news/2017/08/17/13/12/what-is-competencybased-education>>
- ⁶ **Schott interview.**
- ⁷ **University of Maine-Presque Isle, Personalized Learning** <<http://www.umpi.edu/personalized/>>
- ⁸ **OHSU-Your MD Brochure** <<https://www.ohsu.edu/xd/education/schools/school-of-medicine/about/curriculum-transformation/upload/your-MD-brochure.pdf>>
- ⁹ **WGU Alumni Outcomes Report 2018** <<https://www.wgu.edu/wgu/gallup-report-2018.pdf>>
- ¹⁰ **Answers for Lessons from Critics of Competency Based Education** <http://blogs.edweek.org/edweek/on_innovation/2012/11/answers_for_lessons_from_critics_of_competency-based_learning.html>
- ¹¹ **A brief critique of master/competency learning** <http://blogs.edweek.org/edweek/on_innovation/2012/11/answers_for_lessons_from_critics_of_competency-based_learning.html>
- ¹² **David Jarvis interview of SOU President Linda Schott, February 22, 2018, Portland, Oregon.**
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- ⁵³ **A complete list is located in the chart earlier this section.**
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