

## U.S. Department of Education Application Requirements

### Purpose:

This template is designed to help you draft an application for approval to participate in the Title IV Federal Student Aid Programs (E-App) including the new program. The system will tell you, after submission, what documents are required to be mailed). You will also need to submit, via e-mail, a detailed description of the program that fully addresses each of the 10 required elements outlined in 34 CFR 668.10(b) and a detailed description of financial aid administration that addresses the financial aid requirements in §668.10(a).

### Detailed Program Description

(recommended length not to exceed 20 pages)

Information	Potential ACCJC Source (see below)	Who Should be involved?	Considerations from CBE Experts
1. The educational credential offered and field of study	ACCJC App	Discipline Faculty	This section can be fairly straightforward and also serves as an indicator to ED as to whether other program eligibility requirements are at play (e.g. non-degree/gainful employment program; teacher licensure, etc.)

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<p>2. How the direct assessment program is structured, including:</p> <ul style="list-style-type: none"> <li>a. How and when the institution determines on an individual basis what each student enrolled in the program needs to learn</li> <li>b. How the institution excludes from consideration of a student's eligibility for title IV, HEA program funds any credits or competencies earned on the basis of prior learning</li> </ul>		<p>Curriculum Admissions and Records Financial Aid Credit for Prior Learning? Assessment and Placement Office?</p>	<p>An underlying principle in this and some of the following sections is that FSA funds are intended to cover discrete periods of time, and the associated costs incurred by the institution/students, that in theory result in learning acquired based on the delivery of instruction/resources/academic experiences from the institution (i.e. learning that occurs 'within the walls of the school' where financial aid dollars are received). Since DA programs are not tied to the credit hour definition (and the assumed time-related costs that would otherwise be incurred/associated with the credit hour) the school must have mechanisms to ensure that credit awarded for learning that did not occur with that school is not included in aid eligibility calculations (i.e. that a school does not receive funds for learning for which they were not responsible).</p> <p><i>668.10(d) "Title IV, HEA program funds may be used to support instruction provided, or overseen, by the institution, except for the portion of the program that the student is awarded based on prior learning."</i></p>
<p>3. How learning is assessed and how the institution assists students in gaining the knowledge needed to pass the assessments</p>		<p>Discipline faculty general ed faculty</p>	<p>This is core to the direct assessment model and should contribute to the substantiation of the credit-hour equivalency methodology in lieu of the actual credit hour. I.e. How do we provide instruction and resources that promote learning, and how is this learning assessed such that it is equivalent to the credit that would be awarded in a traditional credit-hour context?</p> <p>Additionally, this will be part of the foundation for FA section #5 (regular and substantive interaction with instructors/faculty)</p>

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4. The number of credit or clock hours that are equivalent to the amount of student learning being directly assessed for the certificate or degree (as required by 34 CFR 668.10(b)(3)).	ACCJC App	Discipline faculty general ed faculty Is this the “crosswalk” as well as description of activity in modules	This is connected to #5. This could simply be a number, like “60 Credit Hour Equivalencies”, which is then substantiated by the next sections.
5. The methodology the institution uses to determine the number of credit or clock hours to which the program or programs are equivalent	ACCJC App	Discipline faculty general ed faculty-	See #3 above. Speaking to how learning is resourced and then assessed should reinforce how the credit awarded is equivalent to a credit-hour based model. E.g. If we offer a 60 credit program, how do we defend that the 60 credits awarded via direct assessment are equivalent to 60 credits that would be awarded through a traditional credit-hour based modality?
6. The methodology the institution uses to determine the number of credit or clock hours to which the portion of a program an individual student will need to complete is equivalent.	ACCJC App	Financial Aid SIS systems and reporters? Tie to IT workgroup “definition of full-time and part--time”	This is tied to any kind of readiness/prior learning diagnostics or assessments, if any. Additionally, this could address how credit earned elsewhere is consumed by the direct assessment program (e.g. transfer credit, credit awarded/waived for workforce or military training, etc.)

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<p>7. Documentation from the institution's accrediting agency or State approval agency indicating that the agency has evaluated the institution's offering of direct assessment program(s) and has included the program(s) in the institution's grant of accreditation.</p>	<p>ACCJC Approval</p>	<p>ALO</p>	<p>Will need to refer to substantive change responses approving the DA program(s) in question by name.</p>
<p>8. Approval documentation from the accrediting agency or State approval agency indicating agreement with the institutions methodology for determining the direct assessment program's equivalence in terms of credit or clock hours</p>	<p>ACCJC Approval</p>	<p>ALO</p>	<p>Will need to refer to substantive change responses affirming claims/descriptions in #4, #5, #6</p> <p>Potential recommendation - provide an appendix with the substantive change approval from the accreditor</p>

**Detailed Description of Financial Aid**  
**(recommended length not to exceed 5 pages)**

Information	Potential Source	Who Should be involved?	Considerations from CBE Experts
1. How you have established equivalencies for credit or clock hours [covered above]	ACCJC App (Describe the college's definition of credit or clock hour.)	discipline faculty	Should be covered in the preceding academic program description
2. How you determined the minimum weeks of instructional time		A&R Calendar Collective Bargaining Units Discipline Faculty	This may need to draw on some of the academic program information in the prior section and how the program is offered. Need to describe the variety of academic activities that occur and their periodicity. This also ties to FA section #4.
3. How you define the payment period		FIn Aid Office Calendar	Straightforward payment period and academic year definition. This may also be where we describe the approach as term-based, nonterm, subscription period disbursement...

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<p>4. How you will document that an academic activity takes place on a weekly basis</p>		<p>Faculty Fin Aid</p>	<p>Will need to address the question as to whether a program is considered ‘attendance taking’ or not for FSA purposes.</p> <p>This question should not be inferred to dictate attendance taking. However, we need to articulate how the program’s <i>design</i> is such that students are expected/have the opportunity to engage in academic activity every week that counts as a ‘week of instruction’ for payment period and AY definition purposes.</p> <p><i>FSA HB Vol2Ch2: A school must ensure that the instructional materials and faculty support necessary for academic engagement are available to students every week that the school counts toward its defined payment period or academic year. Instructional activity in a CBE program includes but is not limited to</i></p> <ul style="list-style-type: none"> <li>• <i>attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students);</i></li> <li>• <i>submitting an academic assignment;</i></li> <li>• <i>taking an assessment or an exam;</i></li> <li>• <i>participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;</i></li> <li>• <i>attending a study group, group project, or an online discussion that is assigned by the institution;</i></li> <li>• <i>interacting with an instructor about academic matters; consultations with a faculty mentor regarding the content of a course or competency;</i></li> <li>• <i>and other instructional activities approved by the institution’s or program’s accrediting agency.</i></li> </ul> <p><i>For direct assessment programs only, educational activity also includes development, in consultation with a qualified faculty member, of an academic action plan that addresses competencies identified by the school.</i></p>

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<p>5. How the student will interact with a faculty member on a regular and substantive basis</p>	<p>Discussed in ACCJC App</p>	<p>Faculty</p>	<p>FSA HB Vol2Ch2</p> <p><i>In distance education, an instructor is defined as an individual responsible for delivering course content and <b>who meets the qualifications for instruction established by a school’s accrediting agency.</b></i></p> <p><i>In addition, <b>substantive</b> interaction is defined as engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Providing direct instruction</i></li> <li>• <i>Assessing or providing feedback on a student’s coursework</i></li> <li>• <i>Providing information or responding to questions about the content of a course or competency</i></li> <li>• <i>Facilitating a group discussion regarding the content of a course or competency;</i></li> <li>• <i>or Other instructional activities approved by the institution’s or program’s accrediting agency</i></li> </ul> <p><i>A school ensures <b>regular</b> interaction between a student and an instructor or instructors by, prior to the student’s completion of a course or competency:</i></p> <ul style="list-style-type: none"> <li>• <i>Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and</i></li> <li>• <i>Monitoring the student’s academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student</i></li> </ul>

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			<p><i>Instructors must engage in at least two forms of substantive interaction meeting the regulatory requirements during each course or competency. The regulations do not prescribe a specific frequency or combination of each type of interaction except that they must be “predictable and scheduled.”</i></p> <p><i>Monitoring a student’s “academic engagement and success” may include:</i></p> <ul style="list-style-type: none"> <li>• <i>Evaluating a student’s level of participation in synchronous sessions</i></li> <li>• <i>Monitoring the student’s activity on course websites or materials</i></li> <li>• <i>Considering the quality of the student’s coursework or understanding;</i></li> <li>• <i>or Other forms of monitoring the student’s engagement and success</i></li> </ul>
6. How you define a full-time student		Faculty Fin Aid	This should tie to the credit hour equivalency methodology and academic year/payment period definition.
7. How you will measure whether a student is making satisfactory academic progress in the program		Faculty Fin Aid	<p>This is essentially where we would document the Title IV SAP policy for this program</p> <p>See FSA HB Vol1 on SAP</p>
8. How you will determine when a student has withdrawn or changed his or her enrollment status		Success Coaches Faculty Fin Aid A&R	<p>This can tie to academic delivery/support model, any kind of monitoring by instructors, coaches or other staff; whether the program is considered attendance taking; and whether the program is term-based, nonterm, or subscription-based disbursement.</p> <p>Would recommend including some of what will be posted on consumer information pages for R2T4 (e.g. <a href="https://www.cccd.edu/departments/education-services/financial-aid/return-to-title-iv.html">https://www.cccd.edu/departments/education-services/financial-aid/return-to-title-iv.html</a>)</p>

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<p>9. Evidence that your institution has considered whether your financial aid systems are configured to handle the management of a direct assessment program and whether you anticipate any challenges related to these systems</p>		<p>Fin Aid IT</p>	<p>This ties to administrative capability and will require more than an affirmative statement, rather a narrative about staffing, resources, technology, etc. deployed to support the program.</p>