

Experimental Site: Educational Quality through Innovative Partnerships (EQUIP) Information Collection Request

Overview

Through the Department of Education's (the Department) Educational Quality through Innovative Partnerships (EQUIP) experiment, the Secretary will provide a limited waiver of the requirements, under the Higher Education Act of 1965, as amended (HEA), that an ineligible institution or organization cannot provide 50 percent or more of a title IV-eligible educational program, and that an eligible program must be provided by a participating institution. For this experiment the Secretary will also waive, as needed, other requirements related to the minimum timeframes for eligible programs and the timeframe and method of calculating a student's academic progress. The experiment is described fully in a Federal Register notice which is available in the Federal Register Section of the Information for Financial Aid Professionals website, ifap.ed.gov.

The Department will select a limited number of postsecondary institutions (institutions) to participate in this experiment. As described in the Federal Register notice, interested institutions will be invited to submit a brief initial letter of interest. If all of the institutional qualifications for participation are met and the Department determines the initial letter to be of sufficient quality and in alignment with the goals of the experiment, the institution will be asked to submit a full application, based on the questions outlined here.

This information collection instrument is intended to gather information that will assist the Department in selecting a set of qualified and diverse institutions for participation in this experiment. Please provide thorough responses for each of the prompts below.

Note: Several of the items below ask for information at the educational program level. If any responses will differ by program, please indicate the differing information for each of those programs. If the response to an item is the same for all programs, one response is sufficient.

Full Application Information

Please include in the application the following information about the educational program(s) of study that the institution intends to include in its participation in the experiment.

Introduction

The last decade has seen the emergence of innovations in technology, pedagogy and business models both within and outside of the accredited higher education sector. Because financial aid is restricted to students attending accredited institutions, students needing financial aid are unable to access innovations that have emerged outside of traditional higher education. By creating a pathway to financial aid for students desiring to access programs offered by “non-traditional” providers, goals such as increased equity and access, more flexible and personalized learning and the reduction of costs can be achieved.

Dallas County Community College District (DCCCD) and StraighterLine (SL), monitored by the Council for Higher Education Accreditation’s (CHEA) Quality Platform, will jointly offer a version of two popular associate degrees enabling students to spend less, borrow less, start with less risk and finish more quickly than is currently possible. In addition, the consortium will offer a new program letting students who have achieved a certificate, but not an Associate’s degree, take StraighterLine courses to receive their Associates degree. Through the EQUIP Experimental Site program, students will be able to use Pell Grants and eligible federal loans to pay for the programs. With joint and independent marketing efforts from DCCCD and StraighterLine, it is expected that 600 students a year will enroll in the program by the end of the experimental period. As a veteran quality assurance entity, CHEA’s Quality Platform will evaluate the program for input quality and outcome performance. Ongoing evaluations will be able to compare the new program with the existing program and with StraighterLine’s non-participating students to determine learning outcomes and cost effectiveness.

Consortium and Participant Description

DCCCD, StraighterLine and CHEA have worked independently to successfully serve adult learners for years. With over 20,000 students taking online courses per year, DCCCD is one of the best-known, most experienced, and highly regarded providers of online programs in the 2-year sector. Indeed, DCCCD began offering courses at a distance to adult learners in conjunction with the Public Broadcasting System (PBS) in the 1980’s. StraighterLine has pioneered the low-cost alternative provider market for credit-bearing online courses, offering high-quality general education courses to students at prices dramatically lower than those charged by colleges themselves. StraighterLine will enroll nearly 20,000 students in the 2015-2016 academic year and has saved students and taxpayers over \$100 million in its six year history. CHEA has overseen accreditation efforts and has already implemented a review process for alternative learning providers called, Quality Platform. DCCCD, CHEA and StraighterLine have proven experience accepting, validating and providing alternative credit pathways that dramatically reduce the price of and time to a college degree.

Program Description

StraighterLine offers a full general education catalog (~60 courses) of high-quality, well-supported, self-paced online courses at prices well below those charged by most colleges. StraighterLine has direct articulation agreements with nearly 100 regionally accredited colleges (including DCCCD), which guarantee the transfer of credit. With its low price and self-pacing, students can complete general education requirements more quickly and more affordably than through other channels. However, because StraighterLine does not offer degrees, it has not been eligible to participate in the federal financial aid program. Accordingly, students have paid nearly exclusively out-of-pocket, which is a barrier to many to access StraighterLine's high quality and low-priced offering. By creating a Title-IV eligible StraighterLine pathway to a DCCCD degree, more students, particularly low-income students, will have access to this option.

For the most part, this proposed program takes what has already been proven and adds financial aid eligibility to improve access. For the EQUIP project, DCCCD will let students earn up to 75% of their degree through the completion of StraighterLine courses. Students will be able to enroll in StraighterLine's 3 or 4 credit courses for \$99 per credit during a 16 week term. This price includes all necessary textbooks, lab kits, proctoring services, support fees and other fees (excluding any costs for devices). It is expected that most students will choose to take at least 2 courses (six credits) thereby qualifying the student for at least half-time Pell eligibility. It is further expected that students will be able to add additional courses to their course load mid-semester should the student complete their initial courses before the end of the term. Upon completion of 75% of a program, the student will enroll in DCCCD's courses at standard DCCCD prices. The following Associates programs will be offered:

- Associate in Science (Business Concentration)
- Associate in Arts (Criminal Justice Concentration)

In addition, StraighterLine and the DCCCD colleges will pioneer the "Cert to Associates" initiative where existing holders of DCCCD college certificates will be offered the opportunity to complete five general education courses through StraighterLine to turn their certificate into an Associate's degree. Should a student desire to transfer these credits elsewhere, the StraighterLine courses can be transcribed by StraighterLine and/or a DCCCD college at the student's discretion.

StraighterLine has a track record of proven student outcomes showing that successful StraighterLine students have greater success at their destination college upon transfer. A longitudinal study with Western Governors University, a long-time partner college, shows the first year retention of StraighterLine students is 14 percentage points higher and on-time-progress is 30 percentage points higher than their overall student population.

	SL transfer to WGU	WGU w/o SL courses	Percent Improvement
7 month retention	95%	87%	9%
13 month retention	93%	79%	18%
On Time Progress	86%	56%	54%
n = 767			

In any circumstance in which the proposed program is suspended or terminated, students will be able to transfer into an equivalent course listing at a DCCCD college or finish their coursework with StraighterLine, in each case at no additional cost to the student. Combined with the program's low price and StraighterLine's proven track record delivering high-quality general education courses, this provides a high level of student and taxpayer protection during the experiment.

Program Goals and Measurement

Any quality assurance process must consider outcomes as well as inputs. An initial focus on inputs insures that the learning experience has the potential to achieve the desired outcome. Attention to outcomes confirms whether the initial expectations were correct. CHEA's Quality Platform reviews provider capacity to deliver quality programs and the outcomes listed in this proposal.

The goal of the DCCCD/StraighterLine program is to expand access to low-cost degree pathways, lower the price and risk of these pathways and to shorten the time to degree. Accordingly, StraighterLine and DCCCD colleges will provide CHEA with information sufficient to evaluate:

- Course completion rates in StraighterLine courses;
- Degree completion rates for those that take the StraighterLine path to a DCCCD degree;
- Transfer rates for those that start with the DCCCD/StraighterLine path, but transfer to a different college;
- Cost per credit achieved for students and taxpayers;
- Cost per credit started for students and taxpayers;
- Credit transfer frequency and destination;
- Net Promoter Scores at the course and program level for StraighterLine courses;
- Other information as required by the Department of Education.

For benchmarking, all of these metrics will be compared to StraighterLine's and DCCCD's non-participating populations.

I. Program Focus and Description

A. Description of the program(s) of study

1. What certificate, degree, or recognized credential will the program award to graduates? If a certificate or other non-degree credential, will it count as credit toward a degree at the institution?

RESPONSE: I.A.1.

This EQUIP proposal will allow up to 75% of the following programs to be fulfilled using StraighterLine's courses (degree maps in Appendix A):

- Associate in Science (Business Concentration)
- Associate in Arts (Criminal Justice Concentration)

In addition, StraighterLine and the DCCCD colleges will pioneer the "Cert to Associates" initiative where existing holders of DCCCD college certificates will be offered the opportunity complete the necessary general education courses through StraighterLine to turn their certificate into an Associate's degree.

2. What types of measurable student outcomes will the program strive to achieve (e.g., specific learning outcomes, academic transfer credit, job placement)?

RESPONSE: I.A.2.

The goal of the DCCCD/StraighterLine program is to expand access to low-cost degree pathways, reduce the cost and risk of starting down these pathways and to shorten the time to degree. StraighterLine's courses will count toward academic credit valid at DCCCD and anywhere else where DCCCD transcripts are honored. Accordingly, StraighterLine and DCCCD will evaluate whether the program generated a lower cost per credit started and cost per credit achieved for students and for taxpayers relative to non-participating DCCCD and StraighterLine rates. It will also track the frequency and destination of students transferring credits. To measure these outcomes, the following will be tracked and reported:

- Course completion rates in StraighterLine courses;
- Degree completion rates for those that take the StraighterLine path to a DCCCD degree;
- Transfer rates for those that start with the DCCCD/StraighterLine path, but transfer to a different college;

- Cost per credit achieved;
- Cost per credit started
- Net Promoter Scores at the course and program level
- Credit transfer frequency and destination
- Other information as required by the Department of Education

3. What is the program's academic structure?

RESPONSE: I.A.3.

StraighterLine's courses, whether taken through DCCCD or from StraighterLine directly, will fulfill up to 75% of DCCCD's existing Associates degrees in Business and Criminal Justice. Students can enroll with StraighterLine directly to take advantage of free trials and \$99 per month subscription pricing. Or, a student can enroll in the DCCCD/SL EQUIP program to take the same classes, but with financial aid access. For degree pathways for both programs, see Appendix A.

- How will the curriculum be structured? For example: Will the program be offered in courses or in modules? Will the program start at the beginning of the term, monthly, or individualized by student?

A student may enroll in any number of StraighterLine's 3 or 4 credit course options at \$99 per credit. This includes all ancillary fees such as required textbooks, lab kits and proctoring fees.

At the point of student inquiry, DCCCD will determine whether the student needs to take the Texas Success Initiative (TSI) Assessment and whether the student is transferring additional academic credits. To place out of the TSI Assessment, a student must have a sufficiently high SAT or ACT score, transfer qualifying credits in college level English and Math from another academic institution or transfer qualifying credits from StraighterLine. If the student is transferring credits from elsewhere, a custom degree plan will be created clearly identifying the StraighterLine and DCCCD courses that need to be completed to achieve the degree. A predetermined course sequence will be recommended, though not required. This plan will be prominently displayed on the student's StraighterLine portal (called MyLine).

- What will be the program's duration (e.g., semester(s), quarter(s), academic year(s), weeks)? Will the program track credit hours or clock hours, and how will it calculate those hours? How will the federal satisfactory academic progress requirement be calculated and tracked?

Up to 45 of the 60 credits necessary for graduation can be completed using StraighterLine's courses either before or after enrollment in the DCCCD EQUIP program. If taken in EQUIP, a

student will be given access to two courses (six or seven credits) in an eight week term. Satisfactory Academic Progress will be checked at the end of each semester.

- What will be the instructional method and approach (e.g., face-to-face, online, or hybrid; competency based; self-paced)? Will it include experiential requirements such as internships or other components?

StraighterLine's courses are self-paced, online courses with embedded on-demand tutoring, non-academic support services and success coaches. In addition, for this program, StraighterLine will embed regular outreach to students from an appropriately credentialed subject matter expert (Masters or PhD in the appropriate discipline) in each course offered. See question III (3) below for details on regular and substantive interaction compliance.

- How will the components be integrated into a coherent and meaningful credential?

Associates degrees, whether delivered online, face-to-face, or a combination of the two, have market value, regulatory standing and are a pathway to a four year degree. The StraighterLine/DCCCD EQUIP program creates a lower-priced, more convenient, financial aid eligible pathway to the same credential.

4. How will the program be designed to offer better value or outcomes than other programs that currently exist (e.g., lower cost, more flexibility/personalization, increased labor market value and/or transfer value)? Please provide quantifiable goals where applicable (e.g., how much of a lower cost or higher value?).

RESPONSE: I.A.4.

The DCCCD/StraighterLine partnership will increase convenience, lower costs and lower risk to both students and taxpayers. Further, students nervous about their academic ability or learning online, can start with StraighterLine's free trial.

Students that choose to go beyond the free trial and that cannot afford to enroll directly with StraighterLine will be eligible to enroll in the DCCCD/SL EQUIP program. At \$99 per credit hour – all materials including lab kits (where applicable) – the price is generally equal to DCCCD's in-county pricing, but uses no taxpayer resources. By allowing students to enroll in additional courses mid-semester, the student's risk of enrolling, but not completing courses, is diminished.

5. What is the market demand for this program (e.g., students or employers willing to pay full tuition and fees)? How was this market demand determined?

RESPONSE: I.A.5.

Though difficult to estimate demand for a variant of a new program, there are some indicators. First, StraighterLine will enroll nearly 20,000 students in the 2015-2016 academic year. When asked, the most common reason for cancelling or not enrolling with StraighterLine is inability to pay the \$99 subscription fee. Current and prospective students will now be given the ability to enroll in the DCCCD/SL EQUIP program using Title IV aid. Second, DCCCD currently enrolls over 72,000 credit students with the great majority declaring an Associate of Arts or Associate of Science degree. Third, there are 400,000 individuals in Dallas County alone with some college but no credential. Dallas County has specific needs for Criminal Justices and Business and a shortage of Police. Lastly, there are tens of thousands DCCCD certificate holders that could “upgrade” into an Associate’s degree with this program. DCCCD will create an outreach plan to target these populations through e-mail, social networking and advising.

6. Please provide information about the costs of the program:

RESPONSE: I.A.6.

- What is the total tuition and fee amount that the student will be charged for the entire program?

Students will be charged \$99 per credit attempted. This includes all materials and fees except devices. The maximum amount a successful student could spend on the StraighterLine portion of the program would be \$4,455 (materials included). 15 additional credits at DCCCD will vary depending on where the student resides.

- What is the expected net price for the student after grants and other gift aid are subtracted?

For Pell eligible students, the program is no cost. Ineligible Pell students will either pay out-of-pocket through StraighterLine directly or access federal direct student loans.

7. Is the non-traditional provider in this partnership a for-profit entity?

RESPONSE: I.A.7.

Yes, StraighterLine is for-profit. However, unlike other unaccredited for-profit and non-profit general education course providers, StraighterLine:

- Is not a “lead generator.” In other words, it does not sell student data to other colleges for their marketing and lead acquisition purposes.
- Is not owned in any part by a college. Therefore, there are no conflicts of interest about where students should be directed.
- Is not reliant on the college for providing programmatic content. Therefore, StraighterLine can maintain independence when sourcing new content and services to best serve its students.

8. If an existing program will be adapted for the proposed program, provide answers to the following questions about the existing program:

RESPONSE: I.A.8.

- Is the existing program provided by the institution or by the non-traditional provider?

DCCCD currently offers AA's in both Criminal Justice and Business in online and face-to-face formats. Similarly, StraighterLine already offers the same courses that will be bundled into this program directly to students.

- Will that version of the program continue to be offered while an alternative version participating in the experiment is also offered?

Both DCCCD's programs and StraighterLine's courses will be offered concurrent with the DCCCD/SL EQUIP program. Such alternatives should allow for useful programmatic comparisons at the end of the EQUIP program.

- Will the institution or the non-traditional provider also be offering a version of the program that is not Title-IV eligible while participating in the experiment?

DCCCD will be offering a version of the program that is Title IV eligible. StraighterLine will be offering versions of the courses that are not Title IV eligible.

- What is the total tuition and fee amount that is charged a student for the existing program?

For DCCCD, 2015-2016 tuition for in-county, in-state and out of state students is \$59, \$111 or \$174 per credit not including textbooks. Out of state distance learning students incur an

additional fee of \$55 per credit. For StraighterLine students outside the EQUIP program, tuition is \$99 per month plus a per-course fee that ranges between \$49 and \$69.

- How many students were enrolled in the existing program in the most recent year?

At DCCCD, 72,000 were enrolled in fall, 2015, with the majority declaring an Associate in Arts or Associate in Science degree as their program of study. For the 2015-2016 school year, StraighterLine will enroll 18,000 – 19,000 students.

- To the extent that information is available, provide the percentage of students who relied on private loans to cover all or some of the tuition and fees charged for the existing program.

At DCCCD, the percentage of students who rely on private loans to cover all or some of the tuition and fees charged for an existing program is .0002%. Typically, DCCCD students meet their cost of attendance through federal, state and institutional funding. As a result, students have little need for private loans. At StraighterLine, students pay “out-of-pocket.”

- To the extent that this is applicable and there are publicly available documents that provide this information, what were the total profits generated by this program or service in the most recent year?

Not applicable.

B. Anticipated student population

1. What is the estimated number of students in the program in its first year?

RESPONSE: I.B.1.

In Year 1, we anticipate the program to enroll 600 students.

2. Describe the target student demographics (e.g., race/ethnicity, age range, prior academic credit or credentials, work experience, family income). Please specify the expected number and percent of Pell-eligible students.

RESPONSE: I.B.2.

Student demographics are expected to closely match the National Center for Education Statistics' definition of non-traditional student. These are students that meet one of the following characteristics:

- delayed enrollment into postsecondary education;
- attends college part-time;
- works full time;
- is financially independent for financial aid purposes;
- has dependents other than a spouse;
- is a single parent; or
- does not have a high school diploma.

These characteristics largely define StraighterLine's existing student population. Almost 75% of StraighterLine's students are financially independent and are over the age of 27. About 60% are ethnic minorities. 54% have household incomes less than \$40,000 and 72% have household incomes less than \$60,000. Given that StraighterLine has not been eligible for financial aid, StraighterLine's student income categories are likely skewed higher than they would be in a market where Pell eligible students were able to use Pell grants to finance their StraighterLine studies.

3. What are the estimated proportion of students in the program who would receive title IV aid, estimated proportion of students in the program who would receive Veteran's educational benefits, and the estimated total proportion of students in the program receiving one or the other or both?

RESPONSE: I.B.3.

Given that StraighterLine courses are available without financial aid in a subscription pricing model, students not needing financial aid are likely to enroll with StraighterLine directly. Though it is unclear how many students would use Veteran's educational benefits, StraighterLine already serves a significant number of active military and veterans without access to subsidies. Many of StraighterLine's partner colleges serve substantial military populations.

C. Will the program allow otherwise eligible students in the ex-site to receive 1) only Federal Pell Grant funds, or 2) Pell Grants as well as undergraduate Direct Subsidized Loan, undergraduate Direct Unsubsidized Loans, and aid from the Campus-Based Programs?

RESPONSE: I.B.4

The program will allow otherwise eligible students in the ex-site to receive Pell Grants as well as undergraduate Federal Direct Loans, and aid from -based programs.

D. What are the expected benefits to the students for completing the program (e.g., transfer credit, certifications earned, completion of licensure exams, externally validated skills and knowledge, employment, salary increase)? Please cite specific data or studies, where they exist, to demonstrate that the program leads to the expected benefits.

RESPONSE: I.B.5

Median earnings for individuals between the ages of 25-34 with an Associate's degree are 19% greater than for individuals with only a high school degree. This rises to 28% greater as the individual ages. Should the individual go on to earn a bachelor's degree, the earnings premium is 70% greater than having a high school diploma alone (Baum, 2014). Unfortunately, the 3 year graduation rate for students starting an Associates program is 20% (NCEA, 2015). Anything that can speed the pace, increase convenience or lower cost will improve both the success rate and decrease the financial penalty for lack of completion.

E. What will be the roles and responsibilities of the institution and the non-traditional provider(s)? For example, who will develop content; market the program; advise students; provide instruction; provide support services; develop and administer assessments for students; and collect and validate information on student outcomes?

RESPONSE: I.B.6

To best describe the cooperation needed, the following describes the various partner roles as a student moves from awareness to enrollment to completion. For a visual representation, see Appendix B:

- a. Awareness: Students will be made aware of the program through a variety of sources. Interested past, current and future StraighterLine students will be informed of the availability of financial aid for StraighterLine's courses. StraighterLine will specifically extend this opportunity to students that are referred to StraighterLine with the intention of enrolling at WGU (including WGU-Texas). DCCCD will also communicate the availability of the programs to its past, current and prospective student base as well, particularly the students that will be eligible for the "Cert to Associates" degree. The partners will also engage in selected press awareness in Texas and through social media channels.
- b. Inquiry: Students that inquire about the program through phone, e-mail or web will be directed to a specific DCCCD/StraighterLine landing page that will have necessary information about the program and a "lead" form that will kick off the application process. StraighterLine enrollment counselors and DCCCD student advisors and enrollment personnel will be jointly trained on the program and how to answer student questions.

- c. Application: A student will need to apply to DCCCD and submit their FAFSA to be eligible. Once the application is submitted a DCCCD advisor will determine whether the student must take the TSI exam and what, if any, credits can be transferred into the program. Upon collection of credits, a degree plan will be constructed.
 - d. Enrollment: The degree plan will be shared with StraighterLine and listed on the student's MyLine portal. StraighterLine will provide necessary content, textbooks, assessments, technology (except student owned devices), assessments, tutoring services, student advisory services (in cooperation with DCCCD) and anything else necessary to attempt the course. StraighterLine will also confirm student attendance and participation in the program for DCCCD.
 - e. Degree Completion or Transfer: Upon reaching 75% of program completion, the student will enroll in DCCCD's courses. Information about the enrollment, user interface and pricing change will be provided on the initial program description and as the student approaches 75% completion. Should the student elect to transfer their credit, this can be accomplished through StraighterLine's or DCCCD's transcribing services (all of which are free).
 - f. Data Collection and Reporting – DCCCD will collect data on enrollments, demographics, financial aid eligibility and academic information for the remaining 25% of the program. StraighterLine will provide information on grades, completion rates, dropout rates and time to completion. This information will be accumulated between the two parties at least monthly and provided to the Quality Platform.
- F. If the institution will provide payment to the non-traditional provider, on what basis will the amount of the payment be determined?

RESPONSE: I.B.7

DCCCD is committed to keeping the price of this program as low as possible. It will not "mark-up" StraighterLine's wholesale price. DCCCD will pay StraighterLine the full amount of tuition and fees per eligible term enrollment (\$99 per credit hour).

- G. What is the track record (e.g., measurable student outcomes such as academic or employment outcomes) of the non-traditional provider(s) with respect to serving low-income students? If the provider has not served low-income students in the past, please provide: 1) measurable student outcomes for all students served by the provider, and 2) a detailed description of how the program would be tailored to help low-income students succeed.

RESPONSE: I.B.8

Because StraighterLine does not collect student income information at the time of enrollment nor can it use Pell-eligibility as an income proxy, it is difficult to isolate its impact on low-income students. However, StraighterLine's non-traditional student demographics and the composition of its network of partner colleges suggest significant use by low-income students. Though anecdotal, here is link to over 20 profiles of StraighterLine students: <http://www.straighterline.com/category/success-stories/>

- H. What is the track record of the institution with respect to serving low-income students? In the response, please include the Pell completion rate that the institution is required to disclose to enrolled and prospective students per 34 C.F.R. § 668.45.

RESPONSE: I.B.9

Dallas County Community College District is an open-enrollment, public community college. As such, the district serves many low-income and first-generation college students. At DCCCD, 60% of 16,000 Pell Grant recipients have maximum Pell Grant eligibility. Dallas County is fourth in the nation for poverty, with a 23.9% (center city) rate or 1 in 4 living in poverty. Most of DCCCD students attend part-time, work less than full-time, or do not work at all, and manage family obligations.

The Pell completion rate disclosed to enrolled and prospective students is 25.49% for both Associate Degree and Certificate programs.

- I. What support services does the institution already have in place for low-income students? Do these supports and services need to be adapted for this program?

RESPONSE: I.B.10

Comprehensive student support services are available to all enrolled DCCCD students. Online and in-person services are listed at <https://www.dcccd.edu/SS/Pages/SS.aspx>

- J. For institutions choosing to allow access to Pell Grants and other title IV aid (as listed above), how will the institution award Campus-Based aid in a way that will remain consistent with the experiment's focus on access for low-income students?

RESPONSE: I.B.11

It is the policy of the Colleges of Dallas County Community College District's Financial Aid Department to award FSEOG and FWS as follows:

Federal Supplemental Educational Opportunity Grant (FSEOG) program is for undergraduates with exceptional financial need. These are students with the lowest Expected Family Contributions (EFC). Federal regulations give priority to students who are receiving federal Pell Grants. Eligibility requirements include enrollment for at least 3 credit hours.

The Federal Work-Study (FWS) Program provides part-time employment to students attending institutions of higher education who need the earnings to help meet their costs of postsecondary education and encourages students receiving FWS assistance to participate in community service activities.

Federal Work-Study award is determined by a student's financial need (must have a minimum of \$2000 unmet need), based on his or her financial aid budget, and FAFSA information. Financial Need is defined as the difference between the total cost of education and the amount of money the student and family can contribute toward these costs, known as the expected family contribution (EFC) and other current financial aid awards.

II. Quality Assurance Process

A. Description of the quality assurance entity (QAE)

1. What entity will be the QAE and what experience, expertise, and skills will it bring to this role? What information gives the institution confidence that the QAE will meet all the requirements of this experiment, including the capacity to address the "Quality Assurance Questions" (listed below)?

RESPONSE: II.A.1.

The QAE entity will be the Council for Higher Education Accreditation and its "Quality Platform" – a form of external quality review developed for non-institutional, innovative providers. CHEA is the national coordinating organization for nongovernmental regional, national and programmatic accreditation and is the only private sector body that reviews accrediting organizations based on its quality standards as contained in its *Recognition Policy and Procedures*. The Quality Platform itself has been tested recently in China with a review of innovative offerings from the DeTao Group based in Shanghai and Beijing. CHEA's work in accreditation and quality assurance is extensive, both nationally and internationally.

2. By what process has the QAE developed (or will develop) clear, specific, and measurable standards by which to review, approve, and monitor programs based on the "Quality Assurance Questions," establish consequences, and enforce the standards?

RESPONSE: II.A.2.

The CHEA Quality Platform review is first and foremost, outcomes-based, requiring providers to provide evidence that the outcomes are developed and appropriate for postsecondary education. As part of the Quality Platform process, providers must provide adequate evidence of what students learn and can do. CHEA has developed four major standards by which to review, approve and monitor programs. These are, in summary:

- Learning outcomes are articulated and achieved.
- Learning outcomes meet postsecondary expectations.
- Curricula provide opportunities for successful transfer of credit.
- Transparency is maintained and comparability is established.

3. How will the QAE review programs based on the “Quality Assurance Questions”? Has it already reviewed the program based on those questions? If so, attach specific answers. If not, when will it do so? (Please note: these questions will need to be answered by the QAE before the Program Participation Agreement for the participating institution is amended.

RESPONSE: II.A.3.

The Quality Platform process involves (1) a self-review by the provider that includes background information and evidence that the Platform standards are met and (2) an expert team that examines the self-review and the provider to affirm that the provider meets the Quality Platform standards. Both reviews will address the Quality Assurance questions, requiring evidence that the expectations embedded in the questions are fully addressed. The team will provide a report and recommendation to CHEA.

Normally, the Quality Platform would review the program prior to the EQUIP application. However, given the short turnaround for this application, the extensive existing review of StraighterLine’s courses by ACE Credit, DEAC and over 100 colleges, and history of enrolling nearly 50,000 students, the Quality Platform will defer course review until late Spring or Summer but prior to amending the Program Participation Agreement.

4. How will the institution, QAE, and/or accreditor monitor and report on the performance of the program, providers, and students? How will the QAE be linked with the institution’s and accreditor’s existing complaint processes? If the QAE identifies program quality concerns or determines that the program is at risk of or subject to any adverse action by any party, how will the QAE notify the institution and affiliated non-traditional providers?

RESPONSE: II.A.4.

The goal of the DCCCD/StraighterLine program is to expand access to low-cost degree pathways, reduce the price and risk of these pathways and shorten the time to degree. Accordingly, StraighterLine and DCCCD colleges will provide Quality Platform with information sufficient to evaluate:

- Course completion rates in StraighterLine courses;
- Degree completion rates for those that take the StraighterLine path to a DCCCD degree;
- Transfer rates for those that start with the DCCCD/StraighterLine path, but transfer to a different college;
- Cost per credit achieved;
- Net Promoter Scores at the course and program level;
- Other information as required by the Department of Education.

For benchmarking, all of these metrics will be compared to StraighterLine's and DCCCD's non-participating populations.

At StraighterLine, students can call, chat or e-mail with Student Advisors or submit concerns via its ticketing and CRM system. Please see the attached DCCCD Student Complaint policy. The three participants, StraighterLine, DCCCD and Quality Platform, will jointly share student complaints within 48 hours of the complaint as well as any relevant resolution. Further, at the time of enrollment students will be provided contact information for CHEA's Quality Platform should they feel like they are not getting a sufficient response.

5. What actions will the institution and/or QAE take, and under what circumstances, to hold the institution and the non-traditional providers accountable, and help them improve as necessary?

RESPONSE: II.A.5.

The goal of this program is to create a pathway to an Associate's degree that has greater value. "Value" should be defined by the student's total price (tuition, fees, materials, government subsidies) per credit started, per credit achieved and per degree attained. Other indicators are the percentage of successful credit transfer, degree completion and student satisfaction indicators. Data necessary to monitor these key performance indicators (KPIs) will be shared with the QAE at least quarterly. The QAE can suggest adjustments to the program based on the program's performance against these KPIs.

- B. If the program is suspended, terminated, or otherwise limited in its participation in the experiment by the Department, the QAE, the accreditor, the institution, or the non-traditional provider(s), what academic options will be provided to students by the institution (e.g., full transfer of credits into another program at the institution, a title IV teach out plan, and/or other options)? For institutions allowing access to federal student loans as part of the experiment, what actions will the institution take, and under what conditions, to protect students from debt or other financial liabilities resulting from their enrollment in a program that is suspended, terminated, or otherwise limited (e.g., repayment of student loans, transfer of credit to another institution, free access to credit-bearing courses, etc.)?

RESPONSE: II.B.

Should the program be suspended or terminated, students will be able to transfer successfully completed credits to DCCCD, StraighterLine's 100+ articulating partner colleges or possibly to any of the 2,000 colleges that will consider ACE Credit recommendations. Students who have borrowed federal direct loans, will have the opportunity to continue their studies at DCCCD, in order to maintain at least half-time attendance, thus allowing their loans to have in-school deferment status.

- C. What policies and procedures will be in place to assure the independence and absence of conflicts of interest among the non-traditional providers, QAE, and the institution? Please address independence in terms of ownership, funding, and staffing.

RESPONSE: II.C.

Each of the participants is 100% independent in terms of ownership, funding and staffing. The participants would agree to obtaining the DoE's prior approval before entering into any transaction with any other member of the group outside the EQUIP program.

In addition, the Quality Platform calls for adherence to CHEA's Conflict of Interest Policy for the CHEA board, key employees and CHEA representatives (attached).

- D. What due diligence has the institution done, or will it do, to determine if the QAE, non-traditional providers, and their employees are in good legal standing and have no past history of fraud, commission of a felony, disbarment or liability for negligence or misrepresentation?

RESPONSE: II.D.

DCCCD legal counsel conducted a litigation review, checked the federal debarment database at the U.S. Department of Labor and the State of Texas debarment list, and has confirmed that StraighterLine is in good legal standing and has no history of fraud, felony, disbarment or liability for negligence or misrepresentation. In addition, DCCCD legal counsel reviewed Better Business Bureau (BBB) records related to StraighterLine, Inc. and did not find that StraighterLine, Inc. had an unfavorable rating with the BBB or that it had an inordinate number of complaints.

CHEA has a good legal standing, with no history of fraud, felony, disbarment, liability of negligence or misrepresentation as indicated by its annual external audits that are public as well as its annual IRS Form 990s.

III. Information Related to Specific Title IV Provisions

1. Will the program use the minimum program length waiver?

RESPONSE: III.1.

No

2. Will the program use the satisfactory academic progress waiver?

RESPONSE: III.2.

No

3. If the program is a distance-education program, how will it address the "regular and substantive interaction" requirements, or qualify as a degree-granting correspondence program?

RESPONSE: III.3.

For the StraighterLine courses, mandatory short answer assessments will be triggered at regular intervals as a student progresses through the course. Institutional staff who meet accrediting agency standards for providing instruction in the subject matter being discussed (SMEs) will provide substantive feedback.

IV. Provider and Accreditor Commitments

Please include letters from the non-traditional provider(s) and from the institution's institutional accreditor confirming the following:

1. Non-Traditional Provider(s): Commitment to offer content and instruction once required approvals are secured.

RESPONSE: IV.1.

Please refer to attachment (A), a letter from the non-traditional provider, StraighterLine, confirming their commitment to offer content and instruction once required approvals are secured.

2. Accreditation Agency: Agreement to consider including the proposed program in the institution's accreditation. NOTE: A proposed program does not need to have been reviewed and included in accreditation at the time of this application; statement simply needs to express agency's willingness to undertake that review.

RESPONSE: IV.2.

Please refer to attachment (B), a letter from the Dallas County Community College District's (DCCCD) accreditor, the Southern Association of Colleges and Schools Commission on Colleges, confirming their agreement to consider the inclusion of the proposed program in the DCCCD accreditation.

Quality Assurance Questions

As part of this experiment, the Department is interested in understanding how a QAE will determine the quality of a program of study through a set of largely outcome-based questions, rigorous and timely monitoring, and accountability processes. Participating institutions must ensure that the QAE has established a thorough quality assurance process that defines and monitors outcome-based standards for each of the numbered questions below.

The current Quality Platform standards will provide for full evaluation of the claims for learning and outputs. The expert team will be configured to additionally address the questions related to assessment instruments and practice as well as management.

A. Claims for learning

1. What measurable claims is the institution making about the learning outcomes of students enrolled in the program?

RESPONSE: IV.A.1.

Students that successfully complete StraighterLine's courses will earn academic credit that can be applied toward the award of an Associates in Arts, Associate in Arts with a Field of Study in Criminal Justice, Associate in Sciences, or an Associate in Science with a Field of Study in Business at DCCCD or transferred to a college willing to accept it for academic credit. In all respects, this credit is equal to the credit earned in a traditional program but will be less expensive per credit started, per-credit received, or to the student, taxpayer or both.

- What is the evidence that the learning claims are commensurate with postsecondary- or post-baccalaureate-level work?

See item 2 below

- Do the institution's statements about student outcomes capture requisite knowledge and skills? How?

DCCCD has clearly defined learning outcomes that must be achieved to earn an Associates in Arts, Associate in Arts with a Field of Study in Criminal Justice, Associate in Sciences, or an Associate in Science with a Field of Study in Business. StraighterLine's courses match those outcomes for up to 75% of the degree program.

2. How are the value and relevance of those claims established? For example, what external stakeholders have been consulted to verify the value and relevance of the claims?

RESPONSE: IV.A.2.

StraighterLine's courses have been reviewed extensively by third-party evaluators. Over 100 regionally accredited colleges and universities have entered into formal, direct articulation agreements with StraighterLine pursuant to which those institutions have determined where a StraighterLine course is a direct equivalent for a course at that institution and for which a student may substitute the StraighterLine course for the institution's course within the student's formal degree program. This number does not include any additional schools included in the Alternative Credit Project™ described below.

- Additionally, all of StraighterLine's courses have been reviewed and recommended by the American Council on Education's Credit Recommendation Service (ACE Credit). ACE Credit is a widely recognized college credit recommendation service that reviews specific courses to determine whether they are commensurate with college level course work. However, the ACE Credit recommendation is not binding on any college or university and is considered among other factors

when a college makes a specific credit recognition decision. StraighterLine has completed at least six ACE Credit reviews.

- ACE Credit has recently launched the Alternative Credit Project™ to encourage greater acceptance of students' alternative credit and create a more flexible pathway towards post-secondary education attainment for the more than 32 million non-traditional students who may have some college credit but no degree. Pursuant to that project, ACE Credit has engaged 40 colleges and universities and three systems to, among other things, establish quality course and provider criteria. All of StraighterLine's courses thus far reviewed (44) under the Alternative Credit Project™ have been recommended and received the ACPE designation. StraighterLine had the most submitted and recommended courses in the project.
- The Distance Education and Accrediting Commission has established the Approved Quality Curriculum (DEAC AQC) program. The DEAC AQC is a quality assessment process designed explicitly for providers of online courses delivered directly to learners. AQC status is granted for individual courses submitted for review. Based upon recommendations by external peer reviewers and an Academic Review Committee, the DEAC Board of Directors makes the final decision to grant AQC status for up to three years. AQC utilizes peer reviewers who are distance education experts grounded in experience with core academic functions at accredited institutions. Peer reviewers assess whether AQC expectations are met. All of StraighterLine's courses thus far reviewed (17) under the DEAC AQC program have received AQC status.

3. How will the claims be measured?

RESPONSE: IV.A.3.

StraighterLine and DCCCD colleges will provide CHEA's Quality Platform with information sufficient to evaluate:

- Course completion rates in StraighterLine courses;
- Degree completion rates for those that take the StraighterLine path to a DCCCD degree;
- Transfer rates for those that start with the DCCCD/StraighterLine path, but transfer to a different college;
- Cost per credit achieved for students and taxpayers;
- Cost per credit started for students and taxpayers;
- Credit transfer frequency and destination;
- Net Promoter Scores at the course and program level for StraighterLine courses;
- Other information as required by the Department of Education.

4. How will institutions be held accountable for meeting those claims?

RESPONSE: IV.A.4.

Disclosure of student performance described above vs. the institution's and non-traditional provider's appropriate comparison population(s).

5. How do all the claims for learning come together into a meaningful and coherent set of overall program outcomes and goals?

RESPONSE: IV.A.5.

The goal of this EQUIP proposal is not to create a new credential or program, but to bring more value to current programs. Accordingly, StraighterLine and DCCCD's learning claims match those of existing Associate of Arts degrees.

B. Assessments and Student Work

1. How does the institution assess whether students enrolled in the program can meet the claims outlined in Section A? For example:

RESPONSE: IV.B.1.

In addition to customary general education course assessments like mid-terms, essays and periodic quizzes, StraighterLine has built psychometrically valid/reliable final exams for its highest volume courses (19 in total, using the Council for Aid to Education (CAE) as its assessment developer). This rigorous assessment approach ensures that these assessments accurately measure what they purport to measure.

- How are assessments aligned with the specific tasks, expectations, and contexts for which programs claim to be preparing students?

Assessments are carefully aligned with the course material and homework assignments presented to the student throughout the course.

- Beyond one-time assessments, is student work reviewed as part of the assessment of student learning and program outcomes? Do external stakeholders review students' work? How are examples of student work made available to outside parties (with appropriate privacy and other protections)?

Student work, like essays and short answer responses, are part of student learning and program outcomes. However, like with most AA programs, student work is not typically made available to outside parties. However, for QAE review purposes, student assignments can easily be provided.

2. How has the reliability of these assessments been established?

RESPONSE: IV.B.2.

StraighterLine contracted with the Council for Aid to Education (CAE, the makers of the Collegiate Learning Assessment) to build 19 psychometrically valid and reliable assessments. This process required developing a sufficient number of test items for two 50 question exams, a statistically valid test taking population to ensure inter-population test reliability and then review and confirmation by ACE Credit's testing division.

3. How has the validity of these assessments been established, for example in terms of the following?

RESPONSE: IV.B.3.

- Face validity: Does it look like it measures what it says it measures?

StraighterLine's assessment structure follows the commonly used assessment structure of most college courses. For non-writing courses, there is a mid-term, a final and smaller periodic grading opportunities. For writing courses, there are 6-8 writing assignments that are graded by in-house, appropriately credentialed graders.

- Content Validity: Does it actually cover the domain?

Test items are first generated by experts in the subject area. The pool of items is then tested in existing exams to determine validity and reliability.

- Predictive validity: Does it actually predict the ability to perform outside the assessment?

The student outcome data described in the beginning of this application demonstrates that students completing StraighterLine courses are achieving improved student outcomes in their formal degree programs.

- Concurrent validity: Can students currently do the actual performance being assessed?

Yes, these assessments have been psychometrically developed and validated.

4. How and how often does the QAE review these assessments?

RESPONSE: IV.B.4.

The Quality Platform will review the provider at least every three years. Similarly, StraighterLine courses are reviewed by ACE Credit every 3 years

C. Outputs, which, where applicable, must be disaggregated to show outcomes specifically for low-income students.

Note: At the time of application for this experiment, the application should include a description of how the QAE will track these outcomes (specific measures and process) and what level would meet the quality standard for each outcome. If the non-traditional provider(s) have gathered this data for an existing version of the program to be implemented, the application should also include those data. For all measures that reflect existing data, appropriate privacy protections should be applied.

1. How are students performing on program assessments?

DCCCD Program Success Rates

CJ	3.47%
BUS	2.86%

RESPONSE: IV.C.1.

Since StraighterLine does not award degrees, it does not have information on program success rates. However, StraighterLine can share average and individual course success rates. Approximately 60% of StraighterLine students successfully complete at least 1 course.

2. How are students progressing through the program? For example:

RESPONSE: IV.C.2.

StraighterLine Course Completion rate will be provided to DCCCD and CHEA every month and will be provided on a cohort basis. For each term's group of starting students, DCCCD and CHEA will be able to see course progress and course completion rates.

- Retention rate?

1 Year

CJ	34.16%
BUS	22.26%

- Withdrawal rate?

CJ	65.84%
BUS	62.99%

- Average time to completion?

776 DAYS (2 Years)

- Completion rate (within 100 percent and 150 percent of expected time)?

Program	100	150
CJ	0.98%	0.98%
BUS	0.65%	0.81%

3. What are the actual program outcomes for students (e.g., entry into subsequent phase of study, career, etc.)? For example:

RESPONSE: IV.C.3.

- Employment outcomes, for all programs that have a stated mission focused on employment (include method for how these outcomes are measured):
 - a. Job placement rates in field of study?

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Institution	Major	Area	Award	Total Graduates	4th Qtr Employment Rate
Brookhaven College	430104	Criminal Justice/Safety Studies	Associate	9	89%
Brookhaven College	520201	Business Administration and Management, General	Associate	18	83%
Cedar Valley College	430104	Criminal Justice/Safety Studies	Associate	11	73%
Cedar Valley College	520201	Business Administration and Management, General	Associate	17	59%
Eastfield College	430104	Criminal Justice/Safety Studies	Associate	45	78%
Eastfield College	520201	Business Administration and Management, General	Associate	17	88%
El Centro College	520201	Business Administration and Management, General	Associate	15	87%
Mountain View College	430104	Criminal Justice/Safety Studies	Associate	17	82%
Mountain View College	520201	Business Administration and Management, General	Associate	18	67%
North Lake College	520201	Business Administration and Management, General	Associate	10	80%
Richland College	520201	Business Administration and Management, General	Associate	47	77%

- b. Average length of time between completion of program and employment in field of study? N/A
- c. Job retention rates? N/A
- d. Median starting salaries?
CJ: \$21,288
BUS: \$36,960

- Transfer rates to other academic or vocational programs, where applicable

Though an Associate's degree may be a terminal degree, it may also be the first step to a Bachelor's degree or a way to transfer credit elsewhere. Transcript requests of StraighterLine and DCCCD will be monitored and reported.

- Certifications and licensure exam passage rates, where applicable
N/A

4. What are the following ratios for the program, where relevant?

RESPONSE: IV.C.4.

- Published tuition and fees versus earnings

	In District - At Home With Parents	In District - Off Campus	Out of District - At Home With Parents	Out of District - Off Campus	Out of State and International - At Home With Parents	Out of State and International - Off Campus
Tuition and Fees	1,665	1,665	3,015	3,015	4,695	4,695
CJ	21,288	21,288	21,288	21,288	21,288	21,288
BUS	36,960	36,960	36,960	36,960	36,960	36,960

- Average net price versus earnings

	In District - At Home With Parents	In District - Off Campus	Out of District - At Home With Parents	Out of District - Off Campus	Out of State and International - At Home With Parents	Out of State and International - Off Campus
CJ	\$12.79	\$12.79	\$7.06	\$7.06	\$4.53	\$4.53
BUS	\$22.20	\$22.20	\$12.26	\$12.26	\$7.87	\$7.87

- Median student debt versus earnings

	Median Student Loan Debt	Earnings AAS/Criminal Justice	Earnings AAS-Science
Brookhaven	\$ 7,871.00	\$ 10,838.00	\$ 22,462.00
Cedar Valley	\$ 4,570.00	\$ 19,763.00	\$ 20,431.00
El Centro	\$ 2,567.00	\$ 16,230.00	\$ 20,807.00
Eastfield	\$ 5,881.00	\$ 18,404.00	\$ 22,874.00
Mountain View	\$ 4,252.00	\$ 14,882.00	\$ 15,141.00
North Lake	\$ 3,270.00	\$ 12,480.00	\$ 24,024.00
Richland	\$ 6,407.00	\$ 20,663.00	\$ 23,392.00

5. How does the program rate on measures of student satisfaction? For example, how does the program rate in the following:

RESPONSE: IV.C.5.

- Comments from students about what made them successful or unsuccessful in the program?

Currently, StraighterLine gathers Net Promoter Score data at the course and provider level. To be clear, this is not the same as the proposed program. However, we find that the link between successfully completed courses and high Net Promoter Scores is extremely high. By implementing “test and learn” product improvement strategies that increase completion rates, StraighterLine has been able to improve its Net Promoter Score by 44%.

- A rigorous and transparent methodology for gathering and synthesizing customer satisfaction measures?

StraighterLine administers a Net Promoter Score survey for every student upon subscription cancellation. Students that complete at least one course successfully report an NPS of 42.

D. Management

1. How has the stability of the non-traditional provider(s) been evaluated (e.g., longevity and past outcomes, leadership/board, etc.)?

RESPONSE: IV.D.1.

StraighterLine was launched in 2008 as a division of the online tutoring company SMARTHINKING (now owned by Pearson). StraighterLine was spun out as a standalone company in 2010. It will serve between 18,000 and 19,000 students in 2015-2016. Its Board is composed of Burck Smith (founder), David Parento (CFO), Amish Jani from FirstMark Capital and Wright Steenrod from Chrysalis Ventures. FirstMark Capital and Chrysalis Ventures are both experienced venture capitalists with investments in leading education technology companies such as Knewton, Lumosity, Schoology and Regent Education.

2. How are privacy, security, and student authentication managed?

RESPONSE: IV.D.2.

StraighterLine is fully PCI compliant. StraighterLine’s privacy policy is listed on its website and can be found here: <http://www.straighterline.com/privacy-policy/>. StraighterLine does not sell student

information to any third parties. For course security and authentication, StraighterLine integrates with ProctorU for all final exams (mandatory proctoring).

3. Are activities related to student recruitment appropriate and transparent?

RESPONSE: IV.D.3.

Yes. StraighterLine neither buys nor sells student information. Students typically learn about StraighterLine through organic search, word-of-mouth, or referral by partnering and non-partnering colleges.

4. How is pricing made transparent?

RESPONSE: IV.D.4.

StraighterLine's direct-to-consumer pricing is provided in a clear and transparent manner on its website. Students complete their purchase on StraighterLine's online shopping cart. Currently, all student purchases are direct pay (i.e., no financial aid). The distinction between this pricing and StraighterLine's direct pricing will be clearly communicated at the point of application to DCCCD.

5. Are all materials accessible to learners with disabilities?

RESPONSE: IV.D.5.

Yes. StraighterLine is in the process of a review to ensure it is fully compliant with the Americans with Disabilities Act.

6. What is the process for continuous improvement of all aspects of the learning experience (content, platform, student support, faculty engagement, etc.)?

RESPONSE: IV.D.6.

StraighterLine has subject matter experts (credentialed faculty) that provide regular course maintenance. StraighterLine also conducts controlled testing (i.e., A/B tests) of content providers to select those that help its students achieve higher completion rates and that provide greater student satisfaction (as measured by NPS scores). As a side note, StraighterLine's validated assessments (described above) provide its ability to conduct such controlled testing.

OMB Number: 1845-0140
Expiration Date: 02/28/2019

PRA Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1845-0140. Public reporting burden for this collection of information is estimated to average 80 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain a benefit (Section 487A (b) of the Higher Education Act of 1965, as amended). If you have comments or concerns regarding the status of your individual submission of this information, please contact Experimental Sites at experimentalsites@ed.gov directly.



April 11, 2016

Chancellor Joe May
Dallas County Community College District
1601 S. Lamar Street
Dallas, TX 75215

Dear Chancellor May,

It is my pleasure to pledge StraighterLine's participation in the Dallas County Community College District's (DCCCD) EQUIP proposal to the Department of Education. Like DCCCD, StraighterLine has an extensive and proven history of successfully and affordably educating students online.

Our two organizations, in conjunction with the Council for Higher Education Accreditation's (CHEA) Quality Platform, offer a sound combination of experience, innovation and rigor. I'm excited about how we can make a college degree more affordable, accessible and valuable.

Sincerely,

A black rectangular redaction box covering the signature of Burck Smith. There are some handwritten marks above the box, including a checkmark and the number "7".

Burck Smith
CEO and Founder, StraighterLine

bsmith@straighterline.com
(443) 842 5801



April 4, 2016

Dr. Jean L. Conway
President
Eastfield College
3737 Motley Drive
Mesquite, TX 75150-2099

Dear Dr. Conway:

Thank you for your letter of March 21, 2016, to the Commission regarding the institution's participation in the U.S. Department of Education (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment.

The EQUIP experiment provides flexibility in regulations for awarding federal title IV student financial aid to allow institutions to partner with non-traditional providers of academic programs and instruction.

The institution intends to offer four degree programs: the Associate of Arts (A.A.), the A.A. with a criminal justice concentration, the Associate of Science (A.S.), and the A.S. with a business concentration.

The institution is reminded, independent of its participation in the EQUIP experiment, of its obligations to comply at all times and with respect to all programs with the *Principles of Accreditation* and with all Commission policies. The institution should be particularly mindful of its obligations of the following:

- *Substantive Change for SACSCOC Accredited Institutions – Policy Statement*,
- Core Requirement (CR) 2.7.4 (course work for degrees),
- Comprehensive Standard (CS) 3.4.1 (academic program approval),
- CS 3.4.4 (acceptance of academic credit),
- CS 3.4.6 (practices for awarding credit),
- CS 3.4.7 (consortial relationships / contractual agreements),
- CS 3.4.10 (responsibility for curriculum),
- CS 3.4.11 (academic program coordination), and
- CS 3.5.2 (institutional credits for a degree).

As requested by the institution and required in the institution's application to USDE to participate in the EQUIP experiment, SACSCOC agrees to consider including in the institution's scope of accreditation the proposed A.A., A.A. with a criminal justice concentration, A.S., and A.S. with a business administration concentration degree programs in partnership with a non-traditional provider.

Best regards,


Belle S. Wheelan, Ph.D.
President

BSW/KWS:efk

cc: Dr. Kimberly K. Chandler, Dean, Planning, Research, and Institutional Effectiveness
Dr. Fernando Figueroa, Dallas County Community College District
Dr. Patricia L. Donat



April 4, 2016

Dr. José Adames
President
El Centro College
801 Main Street
Dallas, TX 75202-3604

Dear Dr. Adames:

Thank you for your letter of March 21, 2016, to the Commission regarding the institution's participation in the U.S. Department of Education (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment.

The EQUIP experiment provides flexibility in regulations for awarding federal title IV student financial aid to allow institutions to partner with non-traditional providers of academic programs and instruction.


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Best regards, 


Belle S. Wheelan, Ph.D.
President

BSW/KWS:efk

cc: Dean Karen Mongo, Accreditation Liaison
Dr. Fernando Figueroa, Dallas County Community College District
Dr. Larry L. Earvin



April 4, 2016

Dr. Thom D. Chesney
President
Brookhaven College
3939 Valley View Lane
Farmers Branch, TX 75244-4997

Dear Dr. Chesney:

Thank you for your letter of March 21, 2016, to the Commission regarding the institution's participation in the U.S. Department of Education (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment.

The EQUIP experiment provides flexibility in regulations for awarding federal title IV student financial aid to allow institutions to partner with non-traditional providers of academic programs and instruction.

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Best regards,


Belle S. Wheelan, Ph.D.
President

BSW/KWS:efk

cc: Mr. Thomas I. Anderson, Assistant to the Vice President of Academic Affairs
Dr. Fernando Figueroa, Dallas County Community College District
Dr. Nuria M. Cuevas



April 4, 2016

Dr. Robert Garza
President
Mountain View College
4849 West Illinois Avenue
Dallas, TX 75211

Dear Dr. Garza:

Thank you for your letter of March 21, 2016, to the Commission regarding the institution's participation in the U.S. Department of Education (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment.

The EQUIP experiment provides flexibility in regulations for awarding federal title IV student financial aid to allow institutions to partner with non-traditional providers of academic programs and instruction.

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- CS 3.4.11 (academic program coordination), and
- CS 3.5.2 (institutional credits for a degree).

As requested by the institution and required in the institution's application to USDE to participate in the EQUIP experiment, SACSCOC agrees to consider including in the institution's scope of accreditation the proposed A.A., A.A. with a criminal justice concentration, A.S., and A.S. with a business administration concentration degree programs in partnership with a non-traditional provider.

Best regards,


Belle S. Wheelan, Ph.D.
President

BSW/KWS:efk

cc: Ms. Iva Bergeron, Dean of Planning, Research and Institutional Effectiveness
Dr. Fernando Figueroa, Dallas County Community College District
Dr. John S. Hardt



April 4, 2016

Ms. Christa Slejko
President
North Lake College
5001 North MacArthur Boulevard
Irving, TX 75038-3899

Dear Ms. Slejko:

Thank you for your letter of March 21, 2016, to the Commission regarding the institution's participation in the U.S. Department of Education (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment.

The EQUIP experiment provides flexibility in regulations for awarding federal title IV student financial aid to allow institutions to partner with non-traditional providers of academic programs and instruction.


The institution intends to offer four degree programs: the Associate of Arts (A.A.), the A.A. with a criminal justice concentration, the Associate of Science (A.S.), and the A.S. with a business concentration.

The institution is reminded, independent of its participation in the EQUIP experiment, of its obligations to comply at all times and with respect to all programs with the *Principles of Accreditation* and with all Commission policies. The institution should be particularly mindful of its obligations of the following:

- *Substantive Change for SACSCOC Accredited Institutions – Policy Statement*,
- Core Requirement (CR) 2.7.4 (course work for degrees),
- Comprehensive Standard (CS) 3.4.1 (academic program approval),
- CS 3.4.4 (acceptance of academic credit),
- CS 3.4.6 (practices for awarding credit),
- CS 3.4.7 (consortial relationships / contractual agreements),
- CS 3.4.10 (responsibility for curriculum),
- CS 3.4.11 (academic program coordination), and
- CS 3.5.2 (institutional credits for a degree).

As requested by the institution and required in the institution's application to USDE to participate in the EQUIP experiment, SACSCOC agrees to consider including in the institution's scope of accreditation the proposed A.A., A.A. with a criminal justice concentration, A.S., and A.S. with a business administration concentration degree programs in partnership with a non-traditional provider.

Best regards,


Belle S. Wheelan, Ph.D.
President

BSW/KWS:efk

cc: Ms. Candace Castillo, Vice President for Planning and Development
Dr. Fernando Figueroa, Dallas County Community College District
Dr. Larry L. Earvin



April 4, 2016

Dr. Kathryn K. Eggleston
President
Richland College
12800 Abrams Road, A230
Dallas, TX 75243-2199

Dear Dr. Eggleston:

Thank you for your letter of March 21, 2016, to the Commission regarding the institution's participation in the U.S. Department of Education (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment.

The EQUIP experiment provides flexibility in regulations for awarding federal title IV student financial aid to allow institutions to partner with non-traditional providers of academic programs and instruction.

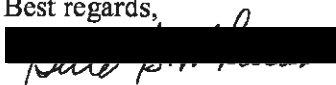
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- CS 3.5.2 (institutional credits for a degree).

As requested by the institution and required in the institution's application to USDE to participate in the EQUIP experiment, SACSCOC agrees to consider including in the institution's scope of accreditation the proposed A.A., A.A. with a criminal justice concentration, A.S., and A.S. with a business administration concentration degree programs in partnership with a non-traditional provider.

Best regards,


Belle S. Wheelan, Ph.D.
President

BSW/KWS:efk

cc: Ms. Janet C. James, Dean and Executive Assistant to the President
Dr. Fernando Figueroa, Dallas County Community College District
Dr. Charles A. Taylor



April 4, 2016

Dr. Jennifer Wimbish
President
Cedar Valley College
3030 North Dallas Avenue
Lancaster, TX 75134

Dear Jennifer:

Thank you for your letter of March 21, 2016, to the Commission regarding the institution's participation in the U.S. Department of Education (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment.

The EQUIP experiment provides flexibility in regulations for awarding federal title IV student financial aid to allow institutions to partner with non-traditional providers of academic programs and instruction.

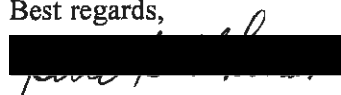
The institution intends to offer four degree programs: the Associate of Arts (A.A.), the A.A. with a criminal justice concentration, the Associate of Science (A.S.), and the A.S. with a business concentration.

The institution is reminded, independent of its participation in the EQUIP experiment, of its obligations to comply at all times and with respect to all programs with the *Principles of Accreditation* and with all Commission policies. The institution should be particularly mindful of its obligations of the following:

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- Comprehensive Standard (CS) 3.4.1 (academic program approval),
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Best regards,


Belle S. Wheelan, Ph.D.
President

BSW/KWS:efk

cc: Dr. Karen Laljiani, Associate Vice President for Planning, Research, and Institutional Effectiveness
Dr. Fernando Figueroa, Dallas County Community College District
Dr. Nuria M. Cuevas