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MARYLHURST
UNIVERSITY

April 14, 2016

United States Department of Education

Re: EQUIP Experiment Waiver

To Whom It May Concern:

I am writing to submit our request to participate in the United States Department of Education's (the Department) Educational Quality through Innovative Partnerships (EQUIP) experiment. In this experiment, the Secretary will provide a limited waiver of the requirements that an ineligible institution or organization cannot provide 50 percent or more of a title IV-eligible educational program. Marylhurst University (Marylhurst) is honored to participate in Phase Two of the EQUIP waiver selection process.

Marylhurst is partnering with Epicodus, a local software coding school based in Portland, Oregon. Marylhurst and Epicodus are mutually dedicated to providing access to careers in computer software coding to low-income and historically underserved students.

Our proposed program leads to a Certificate in Web and Mobile Development and fully transferable college credits awarded by Marylhurst University that may count toward degree completion. The United States Bureau of Labor Statistics Occupational Outlook Handbook notes that employment for web and software developers is much much faster than average.

Epicodus developed a proven peer-based, cohort social learning model that begins every ten weeks. Students learning coding and user interface design in pairs. Students are also placed in required internships as pairs. Peer pairing is a unique attribute of the program and has produced a 90% completion rate. This program meets a critical employment need in the region and 93% of recent Epicodus graduates are employed in the field. Additionally, the program is expanding to Seattle and Philadelphia to meet employment demand in those markets.

The proposed Epicodus partnership fully aligns with our mission, vision, and values. Marylhurst is committed to expanding student access by removing financial, physical and social barriers to student success. An EQUIP waiver granted to this partnership would eliminate these barriers for students desiring market ready credentials that can lead to immediate employment and future degree completion, but lack the resources to do so.

If the Department EQUIP waiver program approves the Marylhurst-Epicodus partnership, then Marylhurst <u>will allow</u> eligible students in the program to receive Pell Grants, Direct Subsidized Loan, undergraduate Direct Unsubsidized Loans, and aid from the Campus-Based Programs. Additionally, Marylhurst intends to pursue VA approval of the certificate program after securing the EQUIP waver.

Assuming approval as an EQUIP waiver program and demonstrated success, Marylhurst intends to develop and seek further Department approval for a *stackable credentials pathway* towards an Advanced Certificate in Web and Mobile Development, a Bachelor of Applied Science (BAS) in Digital Product Development, and a Master of Business Administration (MBA) in Digital Marketing Strategy or Software Development Management.

Marylhurst University will leverage our prior learning assessment program to support this pathway so that more students may obtain degree completion and career advancement through higher education.

Marylhurst will use Climb as a Quality Assurance Entity. Climb is experienced in evaluating non-traditional approaches to education to ensure learning outcomes and programs goals are met. Climb will measure the outcomes and program goals in real time and for every graduate of the program and over the following years. The real determinant of quality in a career preparedness program is if students thrive in their careers.

The Marylhurst-Epicodus partnership is predicated on students earning accreditation body recognized and transferable college credit granted by Marylhurst University. Therefore, Marylhurst will maintain a controlling interest in the program at all times.

Marylhurst will grant full transfer of the credits to degree completion program within its student designed Interdisciplinary Studies degree program and will guarantee access to transcripts for the purposes of transferring credit to another degree granting institution if so desired by the student.

We are excited to pursue this partnership and feel that with Epicodus and CLIMB will deliver a high-quality and transparent experimental program for students in the Portland metropolitan region and beyond

Sincerely,

Tracy Reisinger
Director Financial Aid
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Ann Marie Fallon
Provost & Vice President for Academic Affairs
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April 15, 2016

To Whom it May Concern:

This letter is to express Epicodus's commitment to offer content and instruction once required approvals are secured for Marylhurt University's Certificate in Web and Mobile Development being developed in conjunction with Epicodus under the Department of Education EQUIP initiative. Please do not hesitate to contact me for any further information.

Michael Kaiser-Nyman
President, Epicodus, Inc.
michael@epicodus.com

April 11, 2016

Dr. Ann Marie Fallon
Provost
Marylhurst University
P.O. Box 261
Marylhurst, OR 97036

Dear Provost Fallon:

This is in reply to your electronic correspondence dated March 26, 2016, and received in our office on March 28, 2016, requesting information from the Northwest Commission on Colleges and Universities (NWCCU) regarding our agency's policy and procedure for reviewing your institution's program proposal to deliver selected education offerings by partnering with a non-accredited institution.

In accordance with NWCCU Policy, *Substantive Change*, the Commission evaluates proposed changes whenever an accredited or candidate institution plans a substantive change in its mission and core themes, scope of its offerings, ownership or control, campus locations, delivery methodology, or other significant areas of impact. Insofar as a competency-based education delivery modality constitutes a substantive change for an institution, the Commission agrees to review and evaluate an institution's request to utilize a competency-based education delivery modality as part of NWCCU's customary procedure for reviewing proposals for substantive change.

Thank you for keeping the Northwest Commission on Colleges and Universities apprised of developments and initiatives at Marylhurst University. If you have questions, please do not hesitate to contact me.

Sincerely,

Pamela J. Goad
Vice President

c: Dr. Melody Rose, President
       Dr. Sandra E. Elman, President, NWCCU

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.

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?

      This program leads to a Certificate in Web and Mobile Development and fully transferable college credits awarded by Marylhurst University that may count toward degree completion.

      Marylhurst provides Prior Learning Assessment which can support non-traditional students and adult learners who want to earn an undergraduate degree in other fields in combination with the Certificate in Web and Mobile Development.

      Assuming approval as an EQUIP waiver program and demonstrated success, Marylhurst intends to develop and seek further Department approval for a stackable credentials pathway towards an Advanced Certificate in Web and Mobile Development, a Bachelor of Applied Science (BAS) in Digital Product Development, and a Master of Business Administration (MBA) in Digital Marketing Strategy or Software Development Management. P*lease see attached <u>draft</u>, stackable credentials pathway.*

      The stackable credentials pathway will depend on students prior learning, certificate, and/or college degree attainment.

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

      The program will include the following measurable student outcomes:

- Demonstrated programming fundamentals, problem-solving, and teamwork.
- Demonstrated technical proficiency in software coding languages.
- Demonstrated ability to complete an internship with a highly selective employer.
- Job placement rate tracking.
- Attainment of additional credentials after completion of the certificate.

Coding and basic software development skills will be evaluated by a third party employed by Marylhurst and independently vetted by an NWCCU accredited institution that offers comparable degrees.

Marylhurst will track job placement rates. Currently, Epicodus has a placement rate of approximately 93%.

Marylhurst will measure the number of students who continue to joint advanced certificate, undergraduate, and graduate degree programs, currently under development that would require Department approval. *Please see attached <u>draft</u>, stackable credentials pathway.*

3. What is the program's academic structure?

    ● 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?

       The program utilizes a peer-based, cohort social learning model that begins every ten weeks. Students learning coding and user interface design in pairs. Students are also placed in their required internships as pairs. Peer pairing is a unique attribute of the program and has produced a 90% completion rate.

       The certificate is organized as follows:

       1. Three levels of coursework to develop proficiency in coding and employability upon attaining the certificate
       2. Four courses over 20 weeks
       3. Internship preparation over 2 weeks
       4. 5-week internship in a company practicing coding

       Course Requirements are as follows:

	Course
Level 1 Required	Intro to Programming

Level 2 Choose 2	Ruby
	PHP
	JAVA
	JAVA Script
	C#
	CSS 1
	UI Design 1
Level 3 Choose 1	Rails
	Drupal
	Android
	.Net
	CSS 2
	UI Design 2
Required Internship	Internship
Total Certificate Requirements	2 Required & 3 Electives

- 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?

The program will be 27 weeks long in total and Marylhurst will track by clock hours which are currently being monitored by instructors at Epicodus.

Marylhurst University learning coordinators will monitor instructional clock hour reports weekly and spot verify.

Marylhurst University learning coordinators will monitor student progress clock hour reports weekly and spot verify.

- 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?

  The method of instruction is largely face to face with some online learning as part of a flipped classroom approach.

  A flipped classroom is a pedagogical model in which the typical lecture and homework elements of a course are reversed. Short video lectures are viewed by students at home before the class session, while in-class time is devoted to exercises, projects, or discussions.

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

  The program is coherently organized into three separate levels. Students must demonstrate competencies at each level before moving on. The students have a seamless experience, immersed daily in the interactive hands-on learning labs led by coding instructors.

  The curriculum is reviewed by experienced coders and the students' progress at each level is monitored weekly. At the completion of four courses and the internship, students will be awarded a Certificate in Web and Mobile Development.

  If the student would like to continue to advance to a certificate in Software Development, they can add on additional programming courses and traditional

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online courses in technical writing, personal ethics and project management offered by Marylhurst University online or on-campus with Marylhurst faculty.

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?).

This credential program is designed to transform a software coding novice into technically proficient, successfully employable coder in 27 weeks.
The program will offer a significantly lower cost entry point to this market at $10,000 compared to other local programs priced from $12,000 to $18,000.

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?

The United States Bureau of Labor Statistics Occupational Outlook Handbook notes that employment for web and software developers is much much faster than average:

Web Developers Job Outlook, 2014-24: 27% (Much faster than average)
http://www.bls.gov/ooh/computer-and-information-technology/web-developers.htm

Software Developers Job Outlook, 2014-24: 17% (Much faster than average)
http://www.bls.gov/ooh/computer-and-information-technology/software-developers.htm

93% of recent Epicodus graduates are employed. Epicodus is expanding to Seattle and Philadelphia to meet demand for trained coders in those markets.

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

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

$10,000

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

  Students without a Bachelor's degree would be eligible for a Pell grant. The expected net price would be approximately $7,500 depending on student need.

  Students with a Bachelor's degree would not be eligible for Pell or campus-based grants and the expected net price would be $10,000.

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

   Yes

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

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

     The existing program is offered by the non-traditional provider.

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

     Yes

   - 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?

     Yes

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

     $6,000. Students who pay tuition up front receive a discount which lowers the tuition to $4,875. However, students do not earn accreditation body recognized and transferable college credit.

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

  290. However, the program expects to significantly expand enrollment through the partnership with Marylhurst University. Epicodus is beginning to offer courses in Seattle and Philadelphia.

- 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

  20%

- 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?

  $68,268

B. Anticipated student population

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

   40. However, the program expects to significantly expand enrollment through the partnership with Marylhurst University. Epicodus is beginning to offer the program in Seattle and Philadelphia.

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.

   The program currently serves student who already received bachelor's degree, many of whom are 1st generation college students.

   The partnership with Marylhurst expects to serve more students without bachelor's degrees.

Additionally, Marylhurst intends to pursue VA benefits eligibility for the certificate program with Epicodus.

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?

    If enrolled at least half-time and not in default 100% would qualify for Federal Stafford and Federal Unsubsidized Stafford loans.

    If the Department EQUIP waiver program approves the Marylhurst-Epicodus partnership, then Marylhurst intends to pursue VA approval of the certificate program.

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?

    Marylhurst will allow eligible students in the program to receive Pell Grants, Direct Subsidized Loan, undergraduate Direct Unsubsidized Loans, and aid from the Campus-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.

    The expected benefits to completing the program are:

    - Certificate in Web and Mobile Development
    - Marylhurst University externally validated skills and knowledge
    - Recognized and transferable college credit
    - Access to industry employers through a required internship
    - Employment within the coding industry
    - Access to a stackable credentials pathway for professional development and career advancement

The program will lead to employment opportunities as it requires a highly structured internship program that includes placement with a potential employer, a host company as follows:

- A dedicated career coach will review program students resumes and cover letters,
- Students will practice for doing a mock interview, and
- Students will go through several interviews with host companies and are then matched with a host.

The internship design is up to the host, but all have two common elements: at least 30 hours per week of programming or programming-related work, and an experienced programmer available to mentor the student for at least 30 hours per week.

After completion of the internship and awarding the program credential, Marylhurst and Epicodus will provide career services and job search support.

93% of recent Epicodus program graduates gained employment.

As noted earlier, the United States Bureau of Labor Statistics Occupational Outlook Handbook notes that employment for web and software developers is much much faster than average.

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?

The non-traditional provider will develop content and provide the majority of the instruction. The two entities will co-market the program. Marylhurst University will provide support services, develop and administer assessments, and collect and validate student learning outcomes.

F. If the institution will provide payment to the non-traditional provider, on what basis will the amount of the payment be determined?

Marylhurst University and Epicodus will have a 60/40 revenue share for each student enrolled in the program. Marylhurst will provide payments to Epicodus quarterly based

on the number of students enrolled and making satisfactory progress toward the Certificate in Web and Mobile Development.

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.

Currently the non-traditional provider offers a part-time evening Level 1 Introduction to Programming course at reduced tuition for people making under 150 percent of the federal poverty line.

However, the purpose of the partnership with Marylhurst is to provide low-income students greater opportunity to attend the program full-time and earn transferrable college credits through expanded access to student services, including financial aid.

Epicodus, in partnership with Marylhurst, will promote low-income student success and measure low-income student learning outcomes as follows:

● Provide regularly scheduled drop-in hours for prospective students to ensure they are fully informed about the required investment of time and resources to be successful.

● Require each student to use a college success rubric self-assessment tool as part of admission to the program.

● Develop with students self-directed plans for success based on the self-assessment, for example learning time management skills.

● Utilize a cohort model to create peer-based social networks.

● Utilize peer pairs in teaching so low-income students are not socially isolated.

● At-risk students will be identified early during the Introduction to Programming course to direct proactive advising support resources to ensure success.

- Provide focused support during the internship readiness portion of the program to ensure students develop self-sufficiency in preparing resumes and conducting job searches.

- Provide career coaching after completion of the internship, including weekly email check-ins.

- Marylhurst University learning coordinators will monitor student progress clock hour reports weekly, spot verify attendance, and conduct weekly email check-ins.

- Coding and basic software development skills will be evaluated by a third party employed by Marylhurst and independently vetted by a NWCCU accredited institution which offers comparable degrees to ensure that low-income students are investing in legitimate training with direct relevance to industry employment and occupational outlook.

- Student will have access to the American Student Assistance SALT program which is designed to empower college students and alumni to confidently approach, manage, and pay back their student loans while gaining financial skills for life—offering a comprehensive continuum of services aligned to the student lifecycle: from college financing through successful loan repayment.

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.

Marylhurst has approximately 43% of UG students receiving the Pell Grant and approximately 27% with incomes under $22,000.

Marylhurst University is recognized for serving adult students and providing clear degree completion pathways to nontraditional students. The vast majority are working adults taking upper division courses part time in order to complete a degree started elsewhere.

Marylhurst reported had a 23%, six-year completion rate – namely because a very small subset of its students (just three percent) fall in the first-time, full-time cohort used to calculate completion rates. https://collegescorecard.ed.gov/school/?209108-Marylhurst-University

However, as with many schools that serve students who already have some college experience, this rate is not representative of the school's student body, which the US Department of

Education acknowledges for Marylhurst University. See
https://collegescorecard.ed.gov/assets/BetterInformationForBetterCollegeChoiceAndInstitutional
Performance.pdf

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?

Marylhurst University provides webinars and financial aid counseling as well as access to SALT, a financial literacy and skill building program for students. Marylhurst offers extensive advising services as well as Veterans advising. Marylhurst also provides proactive (intrusive) academic advising based on predictive indicators.

Proactive advising at Marylhurst is guided by the principles of academic and social integration as keys to student persistence. The low-income (as well as historically underserved) student success program outlined earlier utilizes proactive advising through academic and social integration.

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?

The University would continue to give priority in awarding Pell and campus-based funds to low-income, high need students.

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)?

Climb has evaluated over 60 alternative education platforms over the past year. It assess pedagogical effectiveness, student satisfaction, employer satisfaction, and dropout rates, employment rates and salaries for graduates. It conducts these assessments at time of enrollment, but more importantly over a multi year period following students' matriculation.

Its infrastructure leverages over a billion property and consumer records, social data, and various APIs and algorithms that map and match structured and unstructured data (social media, news, etc.…) to create a holistic view of a student's financial health over time. This includes employment, salary, continued education, debt burden to other creditors, and stability of initial and subsequent employment. This infrastructure is currently used by investors in student debt, student loan companies, and banks to evaluate affordability of loans over time.

The assessments can be broken out by pre-matriculation income tiers to isolate its effectiveness for low-income students. It has already been used to assess over 100,000 borrowers.

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?

    Climb has developed its assessments through review and consultation with over 60 alternative education platforms, employers in those fields (particularly software and web development) and through interviews with thousands of students it has worked with through its established quality assessment and lending platforms.

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.

    Climb has already evaluated Epicodus's offering. Climb will evaluate the new Marylhurst-Epicodus combined offering and the process to do so is already underway up approval under the EQUIP waiver program. Climb expects to complete the evaluation in Q2.

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?

Marylhurst University successfully completed its seven-year accreditation cycle in January 2016. Marylhurst will begin its review cycle in year 1 again in September 2016. The Institution would submit a substantive change proposal to the Northwest Council of Colleges and Universities (NWCCU), its regional accrediting body, to apply for approval of the proposed stackable certificates.

If the QAE identifies issues of quality, it can raise concerns with the NWCCU to investigate. We would also include success indicators related to our core themes and to this project in our annual reviews. The QAE would submit accreditation reviews for our indicators in our year 1, 3 and 7 reviews as well as by request for ad hoc reports.

Follow up questions:

Will CLIMB be lending to EQUIP participants in this program?

No, CLIMB will not be lending to the EQUIP participants. CLIMB has no financial incentive for the program to succeed.

What will CLIMB do with the data it collects in terms of holding the program accountable? What's the frequency of review?

At the end of each quarterly session, CLIMB will collect employment information, student satisfaction surveys, persistence, retention and completion data. *CLIMB will collect actual salary data where possible from all graduates to determine actual outcomes from the program.* Biannually in the first year CLIMB will conduct interviews. Marylhurst faculty will review the weekly student progress reports submitted in the Epicodus learning management system for review by the Epicodus instructors. Additionally, Marylhurst faculty will conduct a quarterly on-site visit to review the instruction. Assessment and evaluation of the learning modules will be provided to Epicodus and their instructors, summative evaluations will be submitted to CLIMB at the end of each quarter.

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?

Assessment information will be shared through regular reporting. If any key assessment falls below standards, or below historical levels for the institution and the non-traditional provider this will be highlighted. Additionally best practices as identified across the more than 40 other non-traditional programs that Climb works with will be shared to assist improving against these assessments.

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.)?

The Marylhurst-Epicodus partnership is predicated on students earning accreditation body recognized and transferable college credit granted by Marylhurst University. Therefore, Marylhurst will maintain a controlling interest in the program at all times.

Marylhurst will grant full transfer of the credits to degree completion program within its student designed Interdisciplinary Studies degree program and will guarantee access to transcripts for the purposes of transferring credit to another degree granting institution if so desired by the student.

Should the program be limited in such a way as to impact an ongoing cohort, Marylhurst is committed to teach out the students through completion of their certificate program.

Students will have also access to American Student Assistance SALT program which is designed to empower college students and alumni to confidently approach, manage, and pay back their student loans while gaining financial skills for life—offering a

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comprehensive continuum of services aligned to the student lifecycle: from college financing through successful loan repayment.

Follow up question: What additional student and taxpayer protections will be put in place for borrowers in the program (i.e. loan repayments, refunds to students) and under what conditions these actions will be taken?

Marylhurst offers a petition process for students that need to leave the program because of illness or other emergencies. Upon approval, charges will be reversed and money will be returned to the student's lender for all loans disbursed. Students will be also be able to file an academic grievance to Marylhurst University and CLIMB if there is evidence that the program is not preparing students for the stated outcomes. Marylhurst and Epicodus will provide career counseling and assistance with resume writing and interview preparation. In the case that the certificate program is found by CLIMB to provide poor outcomes, Marylhurst will fully refund the cost of tuition. Marylhurst will not pay for cost-of-living expenses incurred during the duration of the program. Marylhurst and Epicodus will enter into an MOU agreement to stipulate that fees paid to Epicodus for content be returned.

Should the program be terminated or suspended, Marylhurst University and Epicodus will collaborate with an NWCCU accredited institution that offers comparable certificates or degrees to have students complete their certificate if they wish to complete. Otherwise, students will be provided with a full tuition refund for the certificate.

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.

Climb, the institution and the non-traditional provider are independent entities, with independent ownership, funding, and staffing. Additionally, Climb will continue to operate as an independent agency and complete the assessments for itself. Finally, during the experiment Climb does not intend to profit at all from this relationship, so will be able to maintain absolute independence and provide an unbiased assessment of outcomes for students.

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?

Marylhurst has reviewed industry reports specific to the QAE and non-traditional provider, reviewed applicable state of incorporation and business operation regulatory data as part of its due diligence process, and NMLS Consumer Access reporting (Climb NMLS# 1240013 http://www.nmlsconsumeraccess.org/EntityDetails.aspx/COMPANY/1240013).

Epicodus is regulated by the Oregon Higher Education Coordinating Commission and licensed in Washington State under Chapter 28C.10 RCW. with oversight from the state Workforce Board.

Marylhurst will require that the QAE and the non-traditional provider provide statements that their Boards, corporate officers, and employees are in good legal standing and have no past history of fraud, commission of a felony, disbarment or liability for negligence or misrepresentation prior to formal launch of the program and provide these statements to the Department for acceptance. Marylhurst will require annual renewal of these statements with the QAE and the non-traditional provider in order to continue the partnership under the EQUIP waiver program.

III. Information Related to Specific Title IV Provisions

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

   No as the program requires 27 weeks to complete and exceed the 15 weeks of instructional time and at least 600 clock hours

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

   Yes, but Marylhurst anticipates evaluation student SAP more frequently the standard under the waiver as Marylhurst University learning coordinators will monitor student progress clock hour reports weekly, spot verify attendance, and conduct weekly email check-ins.

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?

    This is not a distance education program.

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.

   Please see attached letter of commitment from Epicodus, Inc.

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.

   Please see attached letter of willingness to consider the program under a substantive change review process by the NWCCU.

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.

A. Claims for learning

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

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

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

  Marylhurst will directly measure the following learning outcomes:
  - Demonstrated programming fundamentals, problem-solving, and teamwork.
  - Demonstrated technical proficiency in software coding languages.
  - Demonstrated ability to complete an internship with a highly selective employer.
  - Job placement rate commensurate with occupational outlook compared to all other fields.
  - Attainment of additional credentials after completion of the certificate through a stackable pathway.

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?

   Marylhurst has tested the value and relevance of the technical proficiency in software coding languages claim with the located NWCCU accredited institutions with comparable degree offerings.

   Claims to completing with internship with a highly selective employer is a requirement of the program and therefore self-evident upon completion the certificate.

   As noted earlier, the US Bureau of Labor Statistics occupational outlook for web and software development is faster than average. The US Bureau of Labor Statistics is considered authoritative and is independent of the institution.

   A credential is considered stackable when it is part of a sequence of credentials that can be accumulated over time to build up an individual's qualifications and help them to move along a career pathway or up a career ladder to different and potentially higher-paying jobs. For example, one can stack a high school diploma, an associate's degree, and then typically obtain two more years of appropriate postsecondary education to obtain a bachelor's degree. An individual can also stack an interim career/work readiness

or pre-apprenticeship certificate, then complete an apprenticeship, and later earn a degree or advanced certification.

As the credential will be awarded by a regionally accredited institution of higher learning, it will be portable. A credential is considered portable when it is recognized and accepted as verifying the qualifications of an individual in other settings - either in other geographic areas, at other educational institutions, or by other industries or employing companies.

The US Department of Labor, the Center for Postsecondary and Economic Success, the Council of State Governments, and the Lumina Foundation all recognize the importance of stackable credentials. What is missing is a means for many potential candidates to afford to enroll in a program such as that proposed in this application and a structure to ensure quality in the offering.

https://doleta.gov/taaccct/pdf/presenters/Bosworth-Frugoli.pdf
http://www.clasp.org/resources-and-publications/files/2014-03-21-Stackable-Credentials-Paper-FINAL.pdf
http://knowledgecenter.csg.org/kc/content/stackable-credentials-help-students-and-employers-navigate-job-market
http://connectingcredentials.org

3. How will the claims be measured?

Coding and basic software development skills will be evaluated by a third party employed by Marylhurst and independently vetted by a NWCCU accredited technology institute.

Fundamentally claims related to professional training in the software engineering and web development space, the best assessment of these claims is a measure of students' employability. Climb has developed data driven tools to monitor employment, income and career trajectory of students over multiple years following graduation. In this way they can assess not only the immediate preparedness of graduates, but also the depth of their training as their careers develop. It can identify programs that prepare students well for an initial job interview, but who do not provide enough depth of knowledge to allow the students to receive promotions, or hold those jobs. It also collects information on previous education and employment of students to understand the net change in capabilities of students who have gone through a program.

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

In private lending settings Climb can cut off financing availability to schools that are underperforming. In the EQUIP setting the findings will be shared with the institution, the non-traditional institutions and the DOE as appropriate to inform the continuation of the program.

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

The program utilizes a peer-based, cohort social learning model that begins every ten weeks. Students learning coding and user interface design in pairs. Peer pairing is a unique attribute of the program as it encourages team-building and shared meaning when accomplishing learning outcomes and meeting program goals.

The program is designed to form a self-evident to students as a set of meaningful and coherent set of overall program outcomes and goals as follows:

1. Three levels of coursework to develop proficiency in coding and employability upon attaining the certificate
2. Four courses over 20 weeks
3. Internship preparation over 2 weeks
4. 5-week internship in a company practicing coding

The entire cohort shares Introducing to Programming and internship preparation together at a minimum. Students are also placed in their required internships as pairs to ensure continuity of the social model.

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:

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

- 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)?

As web and mobile coding is an iterative process that requires continuous error, functionality, and operability testing across multiple platforms, students learning is assessed in real time during each course and in group projects to demonstrate programming fundamentals, problem-solving, teamwork, and technical proficiency in software coding languages. These rolling assessments are therefore fully aligned with with the specific tasks, expectations, and contexts for which the program claims to be preparing students for entry level employment in web and mobile development.

Coding and basic software development skills will be evaluated by a third party employed by Marylhurst and independently vetted by an NWCCU accredited institution that offers comparable degrees.

Marylhurst University learning coordinators will monitor instructional clock hour reports weekly and spot verify to ensure content delivery and instruction is fully aligned with the intended overall program outcomes and goals.

Marylhurst University learning coordinators will also monitor student progress clock hour reports weekly and spot verify to ensure student learning is fully aligned with the intended overall program outcomes and goals.

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

The program averages a 90% completion rate with an average entry level employment rate of 93% which indicates reliability of rolling assessments.

Marylhurst conducts it own institutional assessments in order to maintain its accreditation by NWCCU.

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

- Face validity: Does the assessment appear to measure what it says it measures?

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Yes as the students are learning to code with programing languages with highly specific parameters it is self-evident if a student has achieved a course outcome.

- Content validity: Does the assessment accurately measure the knowledge and skills covered by the program?

  Yes as the students must demonstrate technical proficiency through individual and group projects that directly reflect the content covered.

- Predictive validity: Does the assessment accurately predict the student's ability to demonstrate a given competency in the future?
  The program is structured by levels of competency from novice to proficient. Progress from one level to the next is predictive of the student's ability to be competent when entering the job market.

- Concurrent validity: Does the assessment correlate with other measures of the desired performance meant to be assessed?

  The program uses a required internship as a form of concurrent validity of the cohort. Proficiency must be demonstrated at an internship where they practice coding for an industry host. Epicodus places interns in pairs for which reports are made and desired performance can be assessed and concurrently validated.

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

   Climb assesses these each time they are updated. It compares them to the assessments used at other successful programs in its network. Where they differ from what has proven successful it consults with employment partners in its network specifically in the local geography of the institution. If the employers suggest that they would hire someone through this innovative assessment, Climb is more likely to view it favorably. Additionally, Climb measures the outcomes of these in real time for every graduate of the program and over the following years. The real determinant of quality in a career preparedness program is if students thrive in their careers. If the assessments being used by the educational institution do not predict the actual employment outcomes they must be reassessed.

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?

   All assessments will be provided to QAE on a periodic basis. The QAE will ensure that the standards of assessment have not changed and the student's performance will be tracked against all previous classes. Based on the QAEs assessment of employer demand for various skill levels it will flag early any shifts in performance that could affect employment outcomes based on its tracking of previous graduates through their employment and career.

2. How are students progressing through the program?

   All CRM / student management software data will be shared via FTP or API with the QAE. Through this data integration, the QAE can monitor in real time every student's performance against the following metrics. This allows for far earlier flagging of issues in specific programs or with specific high risk populations. For example, if those who lack a previous post-secondary degree are dropping out earlier and with greater frequency than those with a degree this can be identified immediately, rather than waiting for an annual review. It will allow programs to adapt their curriculum more quickly to address this sort of issue.

   • Retention rate?

     90%

   • Withdrawal rate?

     10%

- Average time to completion?

  The program is designed to be completed in 27 weeks.

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

  90% of student complete the program that requires a 27-week commitment from the onset as it is based on cohort model.

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

   As described above, CLIMB leverages over a billion property and consumer records, social data, and various APIs and algorithms that map and match structured and unstructured data (social media, news, etc.…) to create a holistic view of a student's financial health over time. This includes employment, salary, continued education, debt burden to other creditors, and stability of initial and subsequent employment. This infrastructure is currently used by investors in student debt, student loan companies, and banks to evaluate affordability of loans over time.

   The assessments can be broken out by pre-matriculation income tiers to isolate its effectiveness for low-income students. It has already been used to assess over 100,000 borrowers.

   On each of the following measures it can assess in real time for years after graduation the student's specific outcomes. What's more, rather than simply evaluating the "starting salary", the immediate job attainment, or the immediate certification / education achieved following graduation, it can follow outcomes over years. In order to assess the quality of an institution and the effectiveness of the EQUIP program outcomes must be understood on a longer time frame than simply the 3 months following graduation.

   Additionally, Climb can determine at a more granular level the root cause of employment and financial success. For example, if an EQUIP backed graduate is not paying their loans, it can determine if the student is able to afford and if they are paying other debts. If a student had entered the program largely indebted and post graduation are struggling with bankruptcy that may not be a negative mark against the program, but instead the unfortunate financial reality for that student. Alternatively if a program is drawing from a population with lower job and education attainment prior to the program it can measure

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the positive impact a program has had on improving the capabilities of that otherwise marginalized population. In order to do this you need to understand the full financial and education picture of a student prior to enrolling, and after.

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

    Marylhurst and Epicodus will conduct email surveys to determine job placement rates in the field of study tabulate the data in an annual report.

  o Average length of time between completion of program and employment in field of study?
    Marylhurst and Epicodus will track average length of time between completion of program and employment in field of study via email survey and tabulate the data in an annual report.

  o Job retention rates?

    Marylhurst and Epicodus will track job retention rates via email survey and tabulate the data in an annual report.

  o Median starting salaries?

    Marylhurst and Epicodus will track median starting salaries via email to students and employers and tabulate the data in an annual report.

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

    Marylhurst and Epicodus will track transfer rates via email to students and employers and tabulate the data in an annual report.

- Certifications and licensure exam passage rates, where applicable

    Marylhurst and Epicodus will track certificate completion rates and tabulate the data in an annual report.

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

    ● Published tuition and fees versus earnings

    ● Average net price versus earnings

    ● Median student debt versus earnings

    These will be determined once the Marylhurst-Epicodus program begins the assessment. However, Epicodus does have historical average earnings that can inform each of the above. Marylhurst uses published tuition and fees versus earnings.

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

    • Comments from students about what made them successful or unsuccessful in the program?
       Every week, the program emails students a survey with the following questions:

       When my teacher helped me, he/she/they were: Always helpful and supportive, Mostly helpful and supportive, Sometimes helpful or supportive, sometimes not, Usually not helpful or supportive, Never helpful or supportive
       The amount of attention and help I got from the teacher was: Just right, A bit too little, Far too little
       The lessons this week were: Very good, Good, So-so, Bad, Very bad
       he in-class exercises this week were:
       Here's some other stuff I want to tell you:

       The surveys are tabulated and proactively reviewed for trends as well as indications where support is needed on the instructional side and/or the learning side.

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

Surveys of students and graduates will be conducted to determine these measures. Climb already conducts these surveys at dozens of alternative education providers.

D. Management

Climb conducts a thorough financial review of all parties to ensure they are stable. It also completes full background checks, fraud checks and litigation checks on all senior management of all parties involved in the programs it works with.

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

   Stability has been evaluated based on past outcomes of student success in completing the program and gaining entry-level employment.

   The program intends to create an Advisory Board for the Marylhurst-Epicodus partnership.

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

   Epicodus keeps student records in a secure database and only authorized, vetted staff are granted access.

   The Marylhurst-Epicodus program will comply with all applicable federal and state requirements for privacy, security, and student authentication.

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

   All student recruitment occurs through publically available websites and is culturally competent. This practice will be maintained by both Marylhurst and Epicodus.

4. How is pricing made transparent?

All pricing is stated on the program website and enrollment agreements. This practice will be maintained in the Marylhurst-Epicodus.

5. Are all materials accessible to learners with disabilities?

The Marylhurst Director of Student Services will work with Epicodus to ensure access to the program materials for learners with disabilities.

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

Marylhurst maintains a continuous improvement program as a requirement of accreditation. The improvement program includes institutional self-assessments, student and faculty engagement, and review of student support effectiveness. Marylhurst provides professional development to support institutional improvement and capacity building. The Marylhurst-Epicodus program will model, at smaller scale, this institutional improvement practice.

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Ma y u s U ve s y-Ep codus

Certificate in Web and Mobile Development

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JAVA Sc p	●
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Ma y u s U ve s y-Ep codus

BAS Digital Product Development*

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Advanced Certificate in Web and Mobile Development

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M.B.A. Digital Marketing Strategy*

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Ma y u s U ve s y-Ep codus

M.B.A. Software Development Management*

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To a MBA Requ eme s 9 Requ ed Co e MBA & 3 E ec ves

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