

7800 East Orchard Road, Suite 200 Greenwood Village, CO 80111 P: 800-462-7845 • F: 303-741-2084

FROM: Colorado State University-Global Campus

OPEID: 042087

Pamela Toney, Vice President of Student Operations

7800 East Orchard Road, Suite 200 Greenwood Village, Colorado, 80111

Email Address: Pamela.Toney@csuglobal.edu

Phone: 720-279-1142 Fax: 720-249-0881

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TO: U.S. Department of Education Experimental Sites Team

Email: experimentalsites@ed.gov

We are resubmitting this letter along with the requested application materials as part of the second phase to participate in the Educational Quality through Innovative Partnerships (EQUIP) Experiment under the Department of Education's Experimental Sites Initiative. In partnership with Guild Education, we plan to offer a 24 credit hour certificate in Management & Leadership Fundamentals through a management training program that prepares working adults who have not yet completed a college degree with the training to move into supervisory and management roles, with continued opportunity to work towards their bachelor's degrees.

Sincerely,

Pamela Toney, MS, MBA

Vice President of Student Operations

Guild Education & CSU-Global Part II Application for EQUIP

I. Program Focus and Description (Sections I. A. 1-7)

The Business Management Fundamentals Certificate Program will be provided jointly by Colorado State University-Global Campus (CSU-Global), a regionally-accredited university serving nontraditional adult learners for Bachelor's and Master's degrees; and Guild Education, Inc., an education startup linking education with employment. This program leads to a Certificate in Management & Leadership Fundamentals and transfer opportunities towards Bachelor of Science degrees from Colorado State University-Global Campus. The intended outcomes of the proposed programs are threefold:

- 1. Engage low and middle wage employees with new pathways to traditional and alternative postsecondary education and lifelong learning.
- 2. Award 24 baccalaureate-level semester credits to students who complete the Certificate program for student-directed transfer towards the CSU-Global B.S. degrees.
- 3. Provide students with knowledge, skills, and abilities in business management, lifelong learning, and baccalaureate experience as they meet the needs of their employing company.

Students will earn a Certificate in Business Management Fundamentals (24 credits) over 48 weeks, which includes 12 credits from the Guild's leadership modules, and 12 credits through CSU-Global courses. Programs start dates will align with the CSU-Global campus start dates. The Program and sequence of coursework includes the following:

Module/Course	Provider	Guild Credits	CSUGC Credits
Guild Modules I. Knowing Yourself as a Manager II. Building Productive Relationships by Understanding Others	Guild	3	
2. ORG300 Applying Leadership Principles	CSUGC		3
3. MGT300 Principles of Management	CSUGC		3
4. Guild Modules III. Communicating Effectively IV. Mastering the Art of Difficult Conversations	Guild	3	
5. Guild Modules V. Managing People & Teams VI. Process Management	Guild	3	
6. Hum101 Critical Reasoning	CSUGC		3
7. MGT320 The Legal and Ethical Environment of Business	CSUGC		3

8. Guild Modules VII. A New Look at Traditional Practices	Guild	3	
	Total	12	12

Each of CSU-Global's 3-credit courses for the Program require 45 hours of instruction, 90 hours of class participation, and homework activities per week. The Guild's curriculum consists of 8 total units comprised of 8-10 hours of online instructor interaction per week that includes 90-minute weekly live sessions; and approximately 10-15 hours of independent and/or peer-based work study that involves projects and self-assessments.

The proposed Program has four key objectives:

- 1. Provide students with the theory, research and conceptual frameworks for understanding the best practices of modern management and leadership.
- 2. Support students in developing and practicing the applied skills of managing people and teams, assisted by tools and frameworks that they can execute in the workplace.
- 3. Create and facilitate opportunities for analysis of and reflection on students' personal models of leadership and management.
- 4. Provides students with an alternative initiation to CSU-Global's standard pathway to its baccalaureate degree programs

Each of the 4 CSU-Global 8-week, 8-module, 3-credit asynchronous courses include lectures, links to instructors and content-based videos, links to learning resources, interactive exercises, and mastery exercises; and its proposed English courses include adaptive learning technology. Students are required to participate in discussion board and critical thinking assignments each week, and they are also responsible for the completion of a final Portfolio Project to conclude each course.

The Guild's 16-week, 8-unit, 12 credit curriculum is structured around experiential learning opportunities, and as such, has capstone projects for each unit that capitalize on students' past and current work experiences. Roleplays, simulations, short presentations, and immediate feedback characterize the type of interactions students have with one another, their instructors and their success coach. Students can expect to receive detailed feedback on Capstone projects within 48 hours, highlighting their strengths and areas of improvement. The curriculum was designed with strong influence from the top undergraduate, graduate and workforce management programs in the U.S., along with primary research and interviews with dozens of employers, industry associations and institutions.

The proposed certificate strategically brings the two partner components together into a 40 week, integrated program.

CSU-Global Campus will apply its current Satisfactory Academic Standards (SAP) policy to this program, in which a student will be required to maintain a 2.0 cumulative GPA, 66.67% completion rate of all credit hours attempted, and maximum timeframe of 150% of the program. Repeated courses are counted as attempted credits in the completion rate calculation, however, the grade earned from the

most recent attempt counts toward the GPA calculation. SAP will be calculated at the end of each 16 week term.

The Program is designed to facilitate learning in introductory management and leadership fundamentals versus CSU-Global's Bachelor's degree Freshman program which features 24-credit hours in various subjects at the 100-200 level. The Program's focus is on meeting the needs that employers require of their employees in the area of business management and leadership, with its alignment to Bloom's Taxonomy higher order of thinking, to provide a unique introduction into higher education and to CSU-Global. Specifically, the program is designed to:

- meet market demand for this formal learning with relevant work-oriented content and resources at the introductory level of college learning;
- b) provide structured coaching and advising to students before, during and after program completion;
- blend competency-based mastery of leadership skills with academic learning for higher levels of workplace productivity;
- d) prepare students for a higher level of success in completion of a Bachelor's of Science degree.

In total, the program will cost students and/or their employers who have enrolled their employees, \$282.50/credit hour or \$6,780 per student for the entire 24-credit program. Operationally, CSU-Global will post the tuition amount for the Program (not to exceed \$6,780 / \$282.50 per credit hour) after the first week (Add/Drop Period) to the student's ledger, and then Pell Grant funds will be disbursed over three payments throughout the academic year. Any remaining credit balances will be released to the student in the form of a refund. The expected net price for a student can range from \$965 to \$6,780 depending upon their eligibility for Pell grant.

During the entire program, attendance will be required. Guild will submit attendance records to CSU-Global at a minimum of once a week. Student homework assignments will be submitted to validate learning, and it is required that students post attendance for a minimum of 60% of the program, and submit a minimum of 60% of all assignments and that the submissions will be stored for a minimum of 3 years post the completion of the program. Students who stop attending the program will be administratively withdrawn from the Program after 14 days of non-attendance. For students who fail to post attendance for a minimum of 60% of the program, and/or fail to submit a minimum of 60% of all assignments, an R2T4 calculation will be completed to determine the percent of Pell grant earned based on the student's last day of attendance. The Guild will be responsible to CSU-Global for payment of any balances due because of an R2T4 calculation.

The Program content has been designed and will be fully executed by CSU-Global and Guild Education, Inc. Guild will be responsible for marketing the program and providing student support. CSU-Global will be responsible for student financial aid and advising services, and for collection and auditing of student work as it relates to validating student learning and achievement.

Details on existing programs (Sections I. A. 8)

The Certificate program for consideration under EQUIP combines the existing Management Program offered by Guild Education with opportunities for students to pursue CSU-Global's existing B.S. degrees. Simultaneous to the offering of the EQUIP program, Guild Education will continue to offer the same and other customized management programs to employers and students who are cash-pay and/or Title-IV

ineligible, including non-U.S. citizens with work visas. Those existing similar programs are currently offered for between \$2,400 and \$3,400. Guild's most recent Management Program cohorts were sized at 10-12 students each, and Guild offers a variety of classes and customized employer programs that vary in size.

The majority of incoming students are expected to be Pell-eligible. Loans are not offered for students in the existing Guild programs, and the organization is not interested in providing that option at this time. Like most early venture-stage startups, Guild is not currently profitable as it reinvests its earnings back into the business.

Anticipated student population: (Sections I. B. 1-3)

The Management & Leadership Fundamentals program is focused on meeting the needs of employers for their employee development while providing the employees with a pathway to their bachelor's degree completion. It is estimated that the program will serve 80 non-traditional adult students in the first year.

In Guild's current work with low- and middle-wage working adults looking to move up in their career, the student population is typically aged 20-35, most of whom have some community college credit but not degree completion, and approximately 60% of students are estimated to be Pell-eligible. Depending on the target industry, anywhere from 5-30% of the students are Veterans, with the majority of that population eligible for Veteran's benefits.

Based on the data of the CSU-Global current student base of non-traditional working adult learners, of whom 80% are employed upon entry, it is estimated that the program will serve 80 non-traditional adult students in the first year with demographics of:

- 40% are first in their families to attend college
- 20% are from underserved populations
- 16% are military members or from military families
- Have at least two years of work experience
- 80% are Pell-eligible

It is also expected that the students will be eligible for federal Pell Grant funds. CSU-Global's student body of approximately 15,500 reflects 58.8% receiving federal financial aid, of which 29.7% are receiving Pell Grant funds. The university has a current default rate of 4.8%.

Sections I. C - J:

Expected benefits and supporting research:

The Management Program is designed for students focused on advancing within their given industry from a low-wage, technical, skills-based role into a middle-wage supervisory or management role. Employees who choose this path have backgrounds ranging from a hotel employee aiming for a promotion to assistant manager, a pastry chef looking to apply for a job at a nearby restaurant as a kitchen manager, or a welder in an advanced manufacturing factory looking to move up to shift supervisor. Benefits of the program include externally validated management, leadership and professional soft skills, increased salary, opportunities to apply for and earn promotion into more

advanced roles, and the opportunity to translate those learnings into college credits that transfer towards CSU-Global's B.S. degrees.

In surveys of existing and potential students in the Guild Management Program regarding their primary motivations for enrolling, it was found that:

- 82% were interested in improving their career prospects
- 76% were interested in enrolling to improve their skills on the job
- 70% were interested in moving up in their industry
- 41% were interested in a specific promotion or raise
- 64% were interested in completing a college degree.

The Management Program has been externally validated with employers across a range of industries and through student pilots offered in 2015-2016. Moreover, the industries targeted for Guild's programs, as well as the specific soft and managerial skills, are found to be in high demand by numerous research reports, including much of the recent research from the Georgetown Center for Education and the Workforce, particularly the "Good Jobs are Back" 2015 report.

The Programs are designed for students focused on advancing within their given industry from a low-wage technical skills-based role into a middle-wage supervisory or management roles. Employees who choose this path have backgrounds ranging from a hotel employee aiming for a promotion to assistant manager, a pastry chef looking to apply for a job at a nearby restaurant as a kitchen manager, or a welder in an advanced manufacturing factory looking to move up to shift supervisor. Benefits of the program include externally validated management, leadership and professional soft skills, increased salary, opportunities to apply for and earn promotion into more advanced roles, and the opportunity to translate those learnings into college credits that transfer towards completion of a CSU-Global's B.S. degree.

CSU-Global is a regionally-accredited university. Its degree programs incorporate external research reports, industry advisory leader feedback, and credentialed faculty of which 83% have industry experience in their areas of expertise. Guild's Management curriculum has been externally validated with employers across a range of industries and through student pilots offered in 2015-2016. Moreover, the industries targeted for Guild's programs as well as the specific soft and managerial skills are skills found to be in high demand by numerous research reports, including much of the recent research from the Georgetown Center for Education & the Workforce, particularly the "Good Jobs are Back" 2015 report.

For students looking to advance their education towards a college degree, the Management Program is offered as a stackable Certificate that can build towards one of the 13 B.S. degrees offered at CSU-Global, with transferable credit and a clear pathway towards degree completion. Students can choose to enroll in CSU-Global's programs after completing the Management Program, and we expect that many will choose to do so 6-18 months after completion, giving time to adjust to new managerial and/or supervisory work roles before re-enrolling.

CSU-Global will be responsible for all the billing, financial aid, and collections for the program; therefore, CSU-Global will remit payment to Guild Education the tuition minus an administration fee for the portion of the program that Guild will be providing.

Track record and data collection:

Guild's pedagogical model and student support services are designed specifically to support a low-income student population.

Working with community college students across the U.S., Guild's executive team has designed, launched and implemented programs with 80-90% completion and graduation rates. Those rates are 4x greater than the expected average 15-20% graduation and transfer rates for this same student demographic across traditional community colleges and other vocational programs. In expanding to serve a broader population of working adults, Guild has been working directly with employers and education and labor researchers to validate the Management Program curriculum, in addition to holding constant and/or improving completion rates. Guild's model relies heavily on a student advising and coaching method designed to support busy working adults, providing students with the support and resources to manage the sometimes complex factors of managing hour-wage work in the U.S. while aiming to advance in higher education.

In surveys of Guild graduates, the Management Program received an average Net Promoter Score (NPS) of 79. As context, Harvard Business School's NPS was recently cited at 41, while institutions regularly celebrate scores from 30-60. Graduates of the Management Programs consistently identified strengths of the program as role play, learning by doing, the collaborative process and relevance to work.

Across all of its programs, Guild tracks regular student feedback, NPS and completion rates in addition to employer satisfaction and promotion rates. Guild also tracks longitudinal data on college enrollment and career success. In this pilot program with CSU-Global, Guild and the CSU-Global team will be particularly focused on tracking the college enrollment and college persistence rates for members of the student cohort who choose to pursue their B.S. with CSU-Global after completing the program.

CSU-Global has graduated over 4600 students with Bachelor's degrees since it opened its doors to students in 2008. Based on its annual alumni data on graduates one year post graduation: 91% are employed, 25% have receive a promotion, 21% have changed careers, 95% are Highly Satisfied or Generally Satisfied with their CSU-Global education, and 93% would recommend the university to a friend or family member. To facilitate its student success, CSU-Global tracks over 100 different data related to its each month. The data include student demographics, 1st to 3rd term retention, trimester to trimester retention, degree program retention, student satisfactory-academic-progress, student satisfaction with courses and faculty, and incoming and graduating ETS scores. Twice a year, CSU-Global reviews learning outcomes achievement data; and annually, the university secures and records data on student satisfaction as measured through a third-party assessor, employer satisfaction and Equifax salary data on CSU-Global graduates, and student retention. Student-specific CSU-Global data can be found on its website.

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)?

Tyton Partners is establishing a non-profit organization that will serve as the QAE in partnership with Colorado State University-Global Campus (CSU-Global) and Guild Education (Guild) for the EQUIP program. We are establishing this QAE in partnership with three industry-leading organizations – Burning Glass Technologies, Professional Examination Service, and RSM – as we believe that the expectations and aspirations for the QAE role exceed the qualifications of any one organization today.

The QAE will aggregate and align the four organizations' collective set of best-in-class capabilities across a range of key areas that include, but are not limited to: strategy and operational advisory services in the education sector; cognitive and non-cognitive assessment models; precise, real-time labor market analytics and tracking; and higher education regulatory, compliance, and risk management services. For more detail on each of the partner organizations, please see *Exhibit 1: QAE Partners*.

The Department of Education has asked that a QAE partner be identified that can perform the following responsibilities: Tyton will ensure CSU-Global a) fulfills measurable learning outcomes; b) ensures validity of assessments; c) shows student outcomes and outcomes specifically for low-income students; and d) manages, monitors, and reviews the overall CSU-Global EQUIP program.

Tyton Partners is a dynamic advisory firm that serves clients across the education, information, and media markets within the global knowledge sector. CSU-Global believes the assembled Tyton team brings the skills and capabilities necessary to fulfill all QAE responsibilities. Tyton is committed to this practice as is its intent to establish a not-for-profit entity with directors appointed by Tyton Partners, Burning Glass Technologies, Professional Examination Service, and RSM for educational accreditation purposes.

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?

Led by Tyton Partners, the QAE partner organizations have reviewed existing requirements and practices of CSU-Global's regional accreditor, the Higher Learning Commission. This review will guide QAE partner's efforts to design an assurance and quality improvement process for EQUIP that reflects and respects existing standards and practices, while simultaneously identifies opportunities for innovative approaches to support the explicit and implicit goals of EQUIP.

Tyton Partners has worked collaboratively with its QAE partners to design an approach that aims to enrich the quality assurance and improvement process for institutions and their non-traditional partners (NTP) to ensure they are well-positioned to meet and support student needs and expectations. This approach will also, by extension, enhance oversight and insight for the Department of Education and other stakeholders.

Tyton Partners has sought to design an approach that will work well within the context of the program pursued by the EQUIP partners but will also have the structure and flexibility to scale to meet the needs of various other innovative program models that may be pursued by institutions and NTPs. At that heart of this approach – articulated in more detail in the sections below – is initial feedback on the program design and potential outcome pathways for students married

with a feedback and reporting frequency that accounts for the operating history of the partnering institution and the non-traditional provider.

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.

The QAE has not yet reviewed the partner's program based on the "Quality Assurance Questions." Tyton will coordinate with CSU-Global and Guild to complete this review, which will occur on an ongoing basis for continuous improvement on new and existing courses.

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 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?

Given the nature of EQUIP and the expectation that NTPs will (likely) assume a prominent role in program design and delivery, creating a consistent feedback and improvement loop between the institution and the NTP will be a hallmark of Tyton's QAE approach. The Tyton Partners QAE will guide partners engaged in program refinements and enhancements on a regular cadence to ensure the needs of students and other key stakeholders are met.

As such, the QAE's monitoring and reporting process will depend on the maturity of the partnership between the institution and the NTP. Currently, the QAE will determine partnership "maturity" based on two primary variables: the amount of <u>time</u> that the two organizations have worked together and the <u>number of programs / initiatives</u> the institution and NTP have collaborated. The table below highlights the intersection between partnership maturity and the anticipated frequency with which the QAE, institution, and NTP will interact to ensure program health and mitigate issues that may arise.

Partnership Maturity	Established	Developing	Limited / None
Definition	Institution and NTP have collaborated for more than 2 years on several programs and / or initiatives	Institution and NTP have collaborated for more than 6 months and less than 2 years on one or more programs	Institution and NTP have collaborated for less than 6 – or not at all – on a single program or initiatives
Process	Institution sends annual report to QAE on program and student performance outcomes Institution and NTP meet at least semi-annually to review and evaluate program efforts	 Institutions send semi- annual report to QAE on program student performance outcomes Institution and NTP meet at least quarterly 	 Institution sends quarterly report to QAE on program student performance outcomes Institution and NTP meet at last monthly to

to review and evaluate program efforts review and evaluate	
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Based on this process, the QAE would expect to be in contact with institutions and partners in a manner that reflects the maturity of their relationship, in particular emphasizing more frequent interaction for newer relationships.

Through this anticipated review and monitoring cycle, if the Tyton QAE identifies any program quality concerns or determines that the program is at risk of adverse action, it will immediately notify in writing the program leaders at both the institution and the NTP. Upon receipt of notification of the concern(s), the QAE will then request a call and/or meeting with appropriate representatives from the institution and the NTP within a short window of time to discuss the concern(s), review potential interventions, and set a timeline for the institution and NTP to implement and address the concern(s) raised; this timeline will also include expectations for communication with the QAE.

- 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?
 - 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.)?

If the program is terminated for any reason, Guild will do a teach-out for all students of the 16-week program, and Guild will continue to work with CSU-Global to place the students in degree pathways. Because of the commitment by Guild to do a full teach out of the bootcamp, CSU-Global will only need to focus on enrolling the students in its traditional programs as desired. Guild will also continue to provide the career and job coaching that it provides to all graduates regardless of the Title IV termination.

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.

The QAE is to be a newly-established not-for-profit entity with directors appointed by Tyton Partners, Burning Glass Technologies, Professional Examination Service, and RSM. As the QAE is a not-for-profit entity, it will have no stockholders and must utilize all profits, if any, for its educational accreditation purposes. The QAE will obtain in-kind contributions and funding from the above companies and anticipates seeking additional funding from other not-for-profit foundations.

All contracts for employment, goods, or services will require approval by the board of directors of the QAE and by the designated project manager for the institution. In addition, employees of the institution and the NTP will be excluded from employment by the QAE or as independent contractors to the QAE.

D. What due diligence has the institution done, or will 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?

The institution will require a contract provision with the QAE and NTPs that 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 and comply with all federal, state, and local statutes, rules and regulations including, without limitation, the U.S. Department of Education, Federal Student Aid Program as modified by the ESI 2015-Educational Quality through Innovative Partnership program.

III. Information Related to Specific Title IV Provisions):

In articulation reviews with CSU-Global and other partner universities, Guild's hybrid model has been found to exceed the requirements of regular and substantive interaction between the student and instructor, supported by live weekly sessions, individual and peer-cohort coaching in addition to other synchronous and asynchronous teaching activities. The program will run 48 weeks and 24 credit hours, and therefore, we will not need a program length waiver. Additionally, we will not need to request a waiver for satisfactory academic progress.

Quality Assurance

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 post-secondary- or post-baccalaureate-level work?
 - Do the institution's statements about student outcomes capture requisite knowledge and skills? How?

Institutions describe offerings such as certificates, degrees, or recognized credentials (*Programs*) to be awarded to graduates. By way of attracting students, these institutions may describe better value or outcomes in comparison to other competing programs that currently exist (e.g., lower cost, more flexibility/personalization, increased labor market value and/or transfer value). At the same time, institutions also identify the expected benefits to the students for completing the program (e.g., transfer credit, certifications earned, successful potential completion of licensure exams, externally validated skills and knowledge, employment, salary increase). In both accredited- and non-accredited programs, institutions identify learning outcomes or

learning objectives that form the basic criteria against which student progress is to be measured. Using a multi-step process, these learning outcomes can be used to objectively evaluate the claims the institution is making.

First, analysis of the veracity of the claims about a *Program* and its associated learning outcomes begins with an understanding of the *mission* of the specific *Program*. Institutions will be required to identify the *Program* mission and to document (via cross-walk) the relationship between the claims of the mission statement and the actual learning objectives attached to the elements of the *Program*. Using standards for programmatic evaluation, Tyton QAE will develop and provide a template for use by institutions in documenting these relationships.

Second, the documented learning outcomes will be evaluated in terms of traditional *SMART* goals. Tyton QAE will review the steps that have been implemented to verify that the learning outcomes are *specific*, *measurable*, *attainable*, *realistic*, *and time-bound*; the QAE may customize these traditional criteria with regard to specific mission of the *Program*. Tyton QAE will review the rigor of the *SMART* goals proposed by the institution and indicate where they can / should be strengthened.

2. How is 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?

Tyton QAE will develop specific content validation criteria related to the learning objectives and the claims of *Programs*. Content validation requires consultation with key stakeholders who are external to the institution (e.g. practitioners, supervisors of new entrants into the practice area, regulators, employers) in order to establish that the learning objectives meaningfully contribute to the attainment of relevant knowledge and skill sets. Tyton QAE will develop templates for the *Program's* documentation of validation efforts, including the inclusion of key stakeholders with multiple perspectives in *Program* development and implementation efforts.

3. How will the claims be measured?

Tyton QAE will provide criteria for the documentation of both (a) the immediate impact of the *Program* on the students, and (b) the short- and long-term progress students make to achievement of *Program* claims. In regard to immediate impact, we will develop and provide a template for the documentation of quantitative data about student progress to *Program* completion (e.g., descriptive statistics regarding time to completion, number of attempts prior to completion, percentage of completers versus dropouts). We will also develop and provide a template for the documentation of qualitative information about student progress (e.g., reports from completers and non-completers; their need for additional academic, financial, and emotional support; obstacles to completion).

Although some claims will likely be about immediate benefits to students, documentation should focus on both short-term and long-term outcomes. This will require institutions to put into place effective mechanisms to follow-up with individual graduates of the programs regarding the claims made by the *Program* and the associated specific learning objectives.

Tyton QAE will provide the standardized template for the collection of these metrics and information that each program will complete and forward for input into our data analytics

platform for analysis. Each institution will need to provide anonymized data using a unique identifier for each student so that outcomes can be tracked over time. This is data that will be used to track actual results against established claims and hypothetical results.

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

Depending on the extent of the discrepancy between the program's claims and the measured results, as well as the discrepancy between the program's learning objectives and the actual knowledge and skill requirements of the practice area, the QAE develop an action plan for the institution to implement. This action plan could range from *no change* to *minor recommendations* to *major change/recommendations*.

The timeframe for implementation will be determined by the QAE in consultation with the institution, and will be commensurate with the results of the evaluation – for example, programs that are functioning in a manner that is harmful to students will need immediate feedback and will be held accountable for the prescribed change(s) in short order, while programs that are functioning in a generally satisfactory manner may be provided a greater amount of time and flexibility to make adjustments.

In the event that the institution does not comply with the action plan, Tyton QAE will develop a series of consequences based on the QAE's perception of the severity of the non-compliance. These consequences could range from a request for a follow-up call or meeting to notification of the institution's Regional Accrediting Organization and/or the Department of Education.

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

Tyton QAE recognizes that the measurement of programmatic efficacy is an important but complex goal, given the many intervening variables. For that reason, standards for the overall evaluation of a program should look beyond the details of the number of enrolled and completing students. As described earlier, the QAE will develop and provide templates for the documentation of long-term outcomes (which may be measured in weeks, months, semesters, or years, depending on the nature of the claims and the type of program). These may include qualitative and quantitative findings about student outcomes, faculty behavior, and the direct and indirect impact of the program on the institution itself.

Separately, regarding the development of all standards, we propose to implement criteria that lend themselves to effective feedback to *Programs*. It is seldom the case that *Programs* are *Completely Acceptable* or *Completely Unacceptable*. As with most performance rubrics, a *Program* may be *Below Standard* and recommendations for improvements can be provided. Similarly, a *Program* may be *Acceptable* but recommendations leading to an *Exemplary/Model* status can be provided.

The period of time in which a program has to make changes should also be commensurate with the results of the evaluation. *Programs* that are functioning in a manner that is harmful to students need immediate feedback and to be held accountable for change in short order. *Programs* that are functioning in a *Generally Acceptable* manner should receive feedback and may be provided time to make enhancements.

Finally, assuming that *Programs* change curriculum and requirements, methodology, and pedagogy, the duration of a *Program's* status needs to be determined. We propose to develop and implement a cycle of documentation and review that is responsive to the continuing status of a program and takes into account the rate of change associated with the underlying content of the program.

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?

Program learning outcomes for the Certificate are aligned with assessments in both the Guild online coursework and the CSU-Global-provided coursework. The Association of American Colleges & Universities Value rubrics were utilized to develop a framework of student expectations and evidence of learning. The content and resulting capstone projects for each unit vary in specificity based on identified skills necessary for management positions, including memos, case studies, research reports, strategic plans and group presentations. Assessment data are collected electronically and reports reviewed by CSU-Global faculty. Alignment will be reviewed by the QAE.

 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 students' work made available to outside parties (with appropriate privacy and other protections)?

To determine whether students enrolled in the program can meet the claims associated with the *Program*, the institution must collect evidence through multiple measures of student performance. These measures should include a variety of evidence, including standardized assessments, interim and formative assessments, assignments, work products, simulations, practicums and projects. Where appropriate and in conjunction with the process outlined in *A.2*, the QAE and the institution may use examples of student work when conducting content validation activities with key external stakeholders.

To determine alignment of assessments with the contexts for which the *Program* claims to be preparing students, as appropriate, Tyton QAE may also apply labor market data to evaluate the alignment of learning outcomes to job market skill needs, including whether or not learning outcomes map to many of the skills required by employers or only a few; whether they map to the skills that are hardest for employers to find and/or those for which employers pay a premium to obtain; and other selected criteria.

Student work is reviewed both summatively and formatively in the course, both during each unit and at the completion of each unit capstone project. Capstone projects for each unit incorporate activities and applications relevant to each competency within each unit. Student

work is reviewed both summatively and formatively in this regard. In addition, given the critical importance of self-reflection in management positions as catalogued from industry expert interviews and analysis, all students complete self-reflection exercises demonstrating their own assessment if each competency. Rubrics specify explicit levels of understanding including mastery, developing, and emerging criteria. Students create an e-portfolio of their work, given the relevance to managerial roles (including capstone projects such as a "60 day plan as a new manager"). This work belongs to the student, and they are able to utilize the work whenever relevant for current and future employment. During each student CSU-Global courses are reviewed by an industry analyst though student work is not released for review; CSU-Global faculty review student work. Guild will share its assessment data, including examples of student work, with CSU-Global faculty. All examples of student work will be reviewed by the QAE.

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

See B.3 below.

- 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?
 - Content validity: Does the assessment accurately measure the knowledge and skills covered by the program?
 - Predictive validity: Does the assessment accurately predict the student's ability to demonstrate a given competency in the future?
 - Concurrent validity: Does the assessment correlate with other measures of the desired performance meant to be assessed?

To determine whether students enrolled in the *Program* can meet the claims associated with it, the institution should collect evidence through multiple measures of student performance. These measures may include a variety of evidence (e.g., standardized assessments, interim and formative assessments, assignments, work products, simulations, practicums and projects) that will range in levels of rigor and quality.

The institution must provide evidence to Tyton QAE that the assessments are trustworthy measures providing actionable and reliable information. Minimally, the QAE will require the institution to demonstrate that the assessments are demonstrably aligned to the specific learning and *Program* outcomes (content validity).

As the number of measurement opportunities increase, confidence in what students know and are able to do also increases, therefore, combining several types of assessment is an appropriate way to improve reliability and content validity. Similarly work products, simulations and supervised practicums, should be evaluated against a standardized rubric by a trained rater and combined with other sources of information to minimize any bias related to the scorer/rater evaluating those sources of information.

Each institution will be required to identify individuals for training as raters. Raters will be asked to complete an on-line, self-paced study module and then participate in a calibration study administered via a remote proctored internet-based assessment. The results of the study will

determine the accuracy of the rater. Raters will be asked to participate in a recalibration study at random times to ensure consistency and alignment with the intended rubric. Data for these types of assessment will be collected in the standardized template and will be added to the anonymized student record

Ultimately, all of the measures used to evaluate students are ultimately predictive of success after completion of the program (predictive validity).

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

The evaluation of assessment tools and methodology will be completed upon the launch of the *Program* and at least every 3 years thereafter, or whenever a major change has been made to the *Program* or methods of assessment. The monitoring of the *Program* and longitudinal tracking of student success will be done yearly. The institution will be asked to provide information about any changes that they have made to the *Program* and self assess as to what impact they believe the change will have on the student outcomes. These anecdotal records will be used to help interpret the results of all data analyses collected. Over time, this information can be used to help inform the organization as to what types of changes have positive, negative or no impact on student outcomes.

The assessments will be evaluated based on principles for quality assessments, including information about the reliability and validity of the measures collected to evaluate students, including:

- Numbers and types of measurement opportunities
- Test blueprints, item and test development specifications
- Descriptions of scoring methods and associated rubrics
- · Estimates of form reliability
- Correlation of results across reported scores
- Correlation with external measures of expected performance

Data collected by the institution will be imported via a standardized layout to Tyton QAE's data analysis and reporting tool (i.e., ProExam DASH) to evaluate not only the results of each cohort of students to help evaluate the assessment data, but also to track performance of items, forms and students over time. As described earlier, each institution will be required to provide a unique identifier for each student and anonymize the data prior to sending the template to Tyton QAE. The analysis will be dependent on the amount and type of data provided by the institution, but at best the information can be interpreted within the context of all of the environmental and personal factors that influence candidate and *Program* performance, including:

- Demographics candidate (e.g. gender, age, socio-economic status, ethnicity, location) and program descriptors;
- Perceptions candidate values, expectations and satisfaction with their learning experience;
- · Achievement candidate outcomes and data about items, forms and results; and

 Processes – information about an organization's operations, i.e., its geographic composition and target audience, its finances and program structures

As Tyton QAE collects *Program(s)* and organizational data from more institutions over time, it anticipates being in a position to establish more evidence-based, high-level indicators (i.e., red, yellow, green) of *Program* design and assessment models that may enhance *Program* initial evaluation and improvement processes for institutions, NTPs, and their students.

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

1. How are students performing on program assessments?

Sections A and B (i.e., "Claims for Learning" and "Assessments and Student Work", respectively) offer details regarding Tyton QAE's process for various strands of course- and program-level assessment. The QAE and CSU-Global are committed to several principles in this area:

- CSU-Global aims to report and the QAE will collect student performance metrics visà-vis course- and program-level assessments and progress disaggregated to show outcomes specifically for low-income, minority, and first generation ("LIMFG") students
- Data collected by CSU-Global and the QAE will serve as a catalyst for regular discussion regarding student outcomes and progress the program proceeds through year one. This initial period will help sharpen and refine assumptions and aspirations for performance and outcomes targets.
- Within a reasonable time from the launch of the program, the QAE will evaluate the
 data collected from these interim program reports, and utilizing the QAE's collective
 expertise, will articulate a set of more formalized metrics to determine performance
 levels; these metrics will then be circulated to CSU-Global and Guild, and student
 performance results will henceforth be evaluated against those standards on a regular
 interval, as appropriate for the nature of the program.
- CSU-Global and the QAE are committed to ensuring that all students enrolled are supported throughout the program and provided with every opportunity to succeed.
- 2. What are the actual program outcomes for students (e.g., entry into subsequent phase of study, career, etc.)? For example:
 - Employment outcomes, for all programs that have a stated mission focused on employment (include method for how these outcomes are measured):
 - Job placement rates in field of study?
 - Average length of time between completion of program and employment in field of study?
 - o Job retention rates?
 - o Median starting salaries?
 - Transfer rates to other academic or vocational programs, where applicable
 - Certifications and licensure exam passage rates, where applicable

The primary outcomes measured for students completing the certificate will include:

- Enrollment / transfer rate into CSU-Global (or another accredited institution)
- Persistence rate within one year of enrollment into CSU-Global (or another accredited institution)

The QAE will also leverage its access to real-time labor market data to evaluate the potential job and career pathway options for students completing the Management Training Program. Evaluations may include:

- Breadth of occupations for which the program prepares a "completer" (i.e., graduate) –
 i.e. Does the program prepare a graduate for a single occupational pathway or a
 multitude of ones?
- Number of job openings available to the graduate i.e. Does the program prepare a
 graduate for a small, niche job market or a larger set of job market opportunities?
- Number of next-step occupations and jobs available to the graduate i.e. Does the
 program prepare the graduate for a career with limited next-step occupations, or does it
 prepare the graduate for a career made up of a series of progressing jobs?
- Average advertised salary associated with occupations in the pathway i.e. does the
 program prepare the graduate for a job that earns a living wage, middle-income wage,
 or typical bachelor's degree holder wage?

The QAE will create a program scorecard and share it with CSU-Global and Guild assessing the magnitude and quality of career pathways and job market options available to program completers.

- 3. 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
 - Published tuition and fees versus earnings published tuition and fees are not to exceed \$3,250; average national earnings for management roles are approximately \$53,000 with a range of \$36,000 to \$78,000 depending on industry.
 - Average net price versus earnings net price for students is expected to range between \$0 and \$3,000 depending on Pell eligibility, with average national earnings of \$53,000 for manager roles.
 - Median student debt versus earnings Guild will not be offering loans for the management programs at this time.
- 4. 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?

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

The QAE will require that CSU-Global and Guild submit its process for capturing, reviewing and applying student satisfaction data to program and course improvements. It is expected that this process should address frequency and timing of satisfaction measurement, the inclusion of closed and open-ended responses (e.g. multiple choice questions and free responses), and guidelines for the use of customer satisfaction responses in program improvement efforts.

Additionally, the QAE will request that CSU-Global include a question in each course-level student satisfaction survey that enables calculation of a net promoter score (NPS).

As of the time of this submission, Guild has supported two cohorts of students through their Management Programs, designed for individual contributors looking for promotions and for recently promoted supervisors and managers. Guild has also supported two cohorts of Career Bootcamp graduates, looking to move into management roles within a new industry or company. In surveys of graduates, the Management Program received an average NPS of 79. As context, Harvard Business School's NPS was recently cited at 41, while institutions regularly celebrate scores from 30-60.

D. Management

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

Tyton QAE will provide a partner evaluation template (PET) to the institution on behalf of its non-traditional provider (NTP) requesting various data that may be used to establish a risk audit of the NTP. In addition to background information and selected qualifications of the NTP, the institution will be asked to provide specific reasons as to why the NTP is an optimal partner for the provision of the *Program* services. Data requested on the PET may include, but is not limited to:

- Background descriptive information of the NTP, including financial resources and/or viability
- Roles and responsibilities in development and delivery of the Program
- Current leadership team, board of directors and individuals who will specifically be involved in the partnership
- Known conflicts of interest with the Institution and/or the QAE
- Disclosure of any ongoing or past regulatory investigations
- NTP's prior experiences with similar projects, including past outcomes
- References from other institutions with whom the NTP has previously partnered

Tyton QAE will perform the risk audit of the NTP, and the implications for the partnership, based on material provided by the institution and NTP. As necessary, the QAE may request additional information from the institution and/or NTP, as well as time with *Program* leadership to review and discuss findings. The efforts building towards this specific program offering with Guild's Management Program and CSU-Global are fairly recent (nine months of research and nine months of operation), but Guild's existing management programs are built on five years of work, research and partnerships led by Guild's founding team across over 65 universities and community colleges, and organizations including America Achieves,

Bloomberg Philanthropies, American Honors and Student Blueprint. Guild's leadership team have spent their professional careers working directly with low-income post-secondary and higher education learners.

In particular, the Guild team has established expertise in supporting low- and low-middle-income adult students in traditional and alternative higher education pathways. Working with community college students across the U.S., Guild's executive team has designed, launched and implemented student services programs with 80-90% completion and graduation rates. Those rates are 4x greater than the expected average 15-20% graduation and transfer rates for this same student demographic across traditional community colleges and other vocational programs.

Incubated from work at the Stanford Venture Studio, Guild is funded from a \$2M investment, with a group of advisors, investors and faculty mentors, including Miriam Rivera (Ulu Ventures), Matt Glickman (NovoEd and Stanford faculty), Dai Ellis (Spire & Kepler), Fern Mandelbaum (Stanford faculty), Brigette Lau (Social + Capital), Aileen Lee (Cowboy Ventures) team and Michael Dearing (Harrison Metal & Stanford faculty). Guild additionally has a variety of advisory boards focused by industry and issue area, represented by industry leaders, union representatives, policy makers and specific employers.

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

Tyton QAE will provide a template to the institution requesting information on various processes and relevant data that address privacy, security, and student authentication issues; the collection and review of this information prior to the *Program's* launch will serve as a risk audit to identify any issues requiring mitigation and their level of severity. In this fashion, Tyton QAE anticipates assisting the institution and its NTP in strengthening these core processes.

The QAE will annually audit the program's privacy, security and authentication processes and procedures to validate that they are being implemented as prescribed. These audits will test the authentication process and require evidence that these processes are secure and effective. Part of this review will include a review of any allegations of unauthorized access to determine if the inquiry process was complete.

As necessary, the QAE may request additional information from the institution and/or NTP, as well as time with *Program* leadership to review and discuss findings.

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

Tyton QAE will request that the institution and NTP share materials detailing recruitment and promotional processes and materials for the *Program*. In addition, the QAE may conduct sporadic evaluation of relevant recruitment and promotional channels and materials at its own discretion. These will be evaluated to ensure that the institution – and the NTP – make transparent to prospective and current students:

- The experimental status of the Program relative to Title IV eligibility
- The nature of the partnership between the institution and the NTP
- How to contact the institution directly with questions regarding the Program

In the event that the institution is deemed to have failed to articulate any of this information, Tyton QAE will require immediate action from the institution to actively inform all potential and current students of this information.

Tyton QAE will request that the institution include any material updates to its student recruitment processes and activities as part of the regular update process established in II.A.4.

4. How is pricing made transparent?

The institution will make pricing transparent by including a Net Price Calculator (NPC) on its website specific to the program. The NPC will include all minimum required elements as defined in the HEOA regulations. The calculation will be updated on an annual basis.

5. Are all materials accessible to learners with disabilities?

Tyton QAE will complete an accessibility audit prior to *Program* launch, and subsequently the institution's accessibility policy will be reviewed annually to ensure alignment with any changes in laws and regulations. In addition, a confidential student survey will be issued during the annual review to assess student satisfaction and areas for improvement.

Tyton QAE will ensure that the institution and its NTP have developed an accessibility policy that is compliant with all applicable laws including but not limited to Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA), and its main objective is enabling all learners with disabilities will be provided with the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as students without disabilities with substantially equivalent ease of use. Additionally, the institution, and as appropriate the NTP, shall conduct accessibility training for its employees.

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

Guild's leadership team is trained in and practices agile development, a practice employed across the organization to specifically drive continuous improvement and openness and willingness to adapt and improve on a regular basis. As a result, Guild aims to regularly implement processes and procedures to drive improvement based on feedback and findings from students, employers, advisors, other stakeholders, market data and relevant research.

Guild collects student feedback at the completion of every learning module, as well as comprehensive feedback at the end of the program on course content, student supports, the learning experience, faculty and peer interactions. Additionally, Guild works directly with employers to review course content, student supports and overall alignment between the program and the roles sought by Guild students.



TO: DEPARTMENT OF EDUCATION

RE: CSUG & GUILD EDUCATION EQUIP APPLICATION

DATE: 7/29/2016

As documented in the most recent report from the Georgetown Center for Education and Workforce "America's Divided Economy" Management is the fastest growing occupation today in the U.S., adding 1.6 million jobs to the American economy since the recession. The B.A. degree has traditionally been the signaling power for promotions into management roles in fields like hospitality, food service, construction, retail, nonclinical healthcare, and other skilled trades. As a result, the B.A. has been the limiting factor in allowing low income skilled trade employees from moving from entry level roles in their field into managerial roles with middle class wages.

At Guild, we're focused creating career pathways into middleclass management roles by providing managerial skills to entry level employees. Our curriculum is informed from field research with over 150 employers drawing on the key fundamentals of management taught in MBA programs designed to training managers. Our partnership with Colorado State University Global has enabled us expand those managerial training pathways to include B.A. completion opportunities, building stackable credentials that help low income Americans move into management roles with family-sustaining wages while also advancing towards B.A. degrees. Given that 11.6M of the jobs that have been created since the recession have traditionally gone to college graduates, the power of the stackable credential is more powerful than ever before.

Guild's core program is the Management Training Program a course based on field research with 150+ employers and informed by work across Stanford's Graduate School of Business, School of Education and Design School. Guild's Management Program is designed for students focused on advancing from a lowwage, technical, skillsbased role into a middlewage supervisory or management role in growing industries including hospitality, food service, construction, retail, nonclinical healthcare, and other skilled trades. Examples of such employees choosing this path include a hotel employee aiming for a promotion to assistant manager, a pastry chef looking to apply for a job at a nearby restaurant as a kitchen manager, and a welder in an advanced manufacturing factory looking to move up to shift supervisor. Benefits of the program include externally validated management, leadership and professional soft skills, increased salary, opportunities to apply for and earn promotion into more advanced roles, and the opportunity to translate those learnings into college credits that transfer towards CSUGlobal's B.S. degrees.

The program proposed for the EQUIP experiment is a joint effort between Guild and CSUG that includes all units of Guild's Management Bootcamp as well as 4 business and management classes from CSUGlobal, with a pathway for interested students that leads towards a bachelor's degree from CSUGlobal.

The Management Training Program is focused around three objectives:

- 1 Learning the theory, research and conceptual frameworks for understanding the best practices of modern management.
- 2 Gaining opportunities and tools for analysis and reflection on personal models of management and leadership.
- 3 Developing and practicing the practical skills of managing people and teams.

https://cew.georgetown.edu/cewreports/americasdividedrecovery/



Key skills for mastery in the bootcamp include: process management, workplace skills, effective personnel management, motivating and empowering others at work, diffusing conflict and tension in the workplace

Bootcamp Data from Guild's California and Colorado graduated cohorts:

- Overall, median salaries for students who completed Guild's management bootcamp grew from \$66,890 to \$71,120.
- On average, Guild students who received promotions saw a 9.03% increase in salary year over year. 33.3% of all students who received a promotion internally within 3 months of the program
- Our most recent data suggests that 66.7% of our students who completed a bootcamp and switched companies are still employed at the new organization nine months later.
- For unemployed students who completed management bootcamp, 75% were hired within 2 months of completion into management positions, with a median salary of \$61,500. They moved occupations from individual contributor to management roles.
- Program completion rate of 87% (includes 16-week and 8-week programs)
- Student Net Promoter Scores (NPS) ranged from 71-87.

NOTE as we expand nationally, we're cognizant that starting salaries in CA and CO are at the upper ends of the national spectrum, skewing our starting and graduating salaries upwards. Therefore, we will benchmark success metrics against self sustaining family wage indicators by region.

Guild Employer Partnerships:

Guild's Management Program has been externally validated with employers across a range of industries and through student pilots offered in 2015-2016. Moreover, the industries targeted for Guild's programs, as well as the specific soft and managerial skills, are found to be in high demand by numerous research reports, including much of the recent research from the Georgetown Center for Education and the Workforce, particularly the "Good Jobs are Back" 2015 report.

Since formally launching their employer partnerships in Q1 2016, Guild has offered Management Programs and B.A. completion programs to current and future employees with 8 corporate employers and labor unions representing over 80,000 eligible students. Guild's current partners range from Chipotle Mexican Grill to the Public Service Credit Unions. Guild plans to expand corporate and labor partnerships with 23 national employers and/or unions per month in sectors including retail, construction, hospitality, food services, nonclinical healthcare, advanced manufacturing and skilled trades.

We measure key indicators of success for Guild's national employers including:

- Hiring ratios
- Retention rates
- Employee promotion rates
- Managerial ratings
- Employee satisfaction



Additionally, the Guild team did fieldwork and surveys of existing and potential students in the Guild Management Program regarding their primary motivations for enrolling, it was found that:

- 82% were interested in improving their career prospects or changing jobs
- 76% were interested in enrolling to improve their skills on the job
- 70% were interested in moving up in their industry
- 41% were interested in a specific promotion or raise at their current company
- 64% were interested in completing a college degree.

UPDATE IN RESPONSE TO DEPT OF ED QUESTIONS:

Please share more about your work with low income students:

- The main reason we wanted to apply to EQUIP is that we've accessed a large # of low income students through employers in our April, May and June bootcamps BUT accessing this lower income student demographic has only worked when the employers are willing to pay.
 - NOTE those April, May, June students are not in the data set since they haven't completed yet, but we've
 included the initial data is below)
- EQUIP will give us the opportunity to allow entrylevel employees in that \$22-\$40k starting salary range to take our bootcamp and increase promotion and wage opportunities while advancing towards a B.S. degree with CSUG.

Bootcamps today with lowincome students:

- Today, we're running multiple programs with students from our active employer partnerships. On average, that employee base makes \$29,500 today.
- The profile of those students are below, with average promotions.
 - Teller I
 - Prebootcamp wages \$30-\$33k salary
 - Average promotion \$44k to Manager
 - o Restaurant Crew
 - Prebootcamp wages \$11 per hour; \$22k salary
 - Average promotion \$33K to Kitchen Manager; \$36K to Service Manager
- With this population so far, we've had 91% retention rate in the bootcamp.

Clarifying details on our directtostudent bootcamps (data in the memo):

- The final data set in our pilots are from the programs were for students who paid themselves out of pocket for the program, hence the natural selection bias towards a middle income population.
- The \$66k median income excludes the unemployed folks or those working temp jobs who took our bootcamp in order to find a job. If we add them to the data set, starting median salary drops to \$45,000.



May 25, 2016

Dr. Jon Bellum Provost and Executive Vice President Colorado State University-Global Campus 7800 East Orchard Road, Suite 200 Greenwood Village, CO 80111

Re: Participation in EQUIP Experimental Sites Initiative (ESI)

Dear Dr. Bellum:

Thank you for your letter requesting confirmation that the Higher Learning Commission will consider a program proposed by your institution for the U.S. Department of Education's EQUIP project. The Commission is willing to consider such proposals following current Commission policy and procedures. Keep in mind that if the proposed program requires a substantive change review and approval by the Commission, the Commission's regular protocol and timetable for substantive change applies. Please contact your liaison to discuss your proposed program as soon as possible.

We look forward to additional information from the U.S. Department of Education about its expectations for the Commission's role in the EQUIP ESI process.

Sincerely,

Higher Learning Commission Legal and Governmental Affairs

cc: Karen Peterson Solinski, Executive Vice President for Legal & Governmental Affairs, HLC Stephanie Brzuzy, Vice President for Accreditation Relations, HLC Yuanxia Ding, U.S. Department of Education



September 27, 2016

U.S. Department of Education Experimental Sites Team Email: experimentalsites@ed.gov

To whom it may concern:

I am pleased to confirm Guild Education Inc.'s (Guild) commitment to participating in the US Department of Education's (Department) Educational Quality through Innovation Partnerships (EQUIP) experimental site initiative. In our partnership with Colorado State University's Global Campus (CSU Global), and under the supervision of our Quality Assurance Entity (QAE) Tyton Partners, we will offer a cohort of up to 80 students access to Guild's Management Bootcamp as well as 4 business and management classes from CSU-Global. Through this joint effort, interested students will be given a pathway that leads towards a bachelor's degree from CSU-Global

The Management Training Program will be focused around three objectives:

- Learning the theory, research and conceptual frameworks for understanding the best practices of modern management.
- Gaining opportunities and tools for analysis and reflection on personal models of management and leadership.
- 3. Developing and practicing the practical skills of managing people and teams.

Working with CSU-Global and our QAE, Guild will ensure students receive high-quality placement, instruction and student support in the Guild & CSU-Global program and in subsequent B.S. completion programs, as relevant. In addition, we will provide the Department and our partners with any data necessary for the evaluation of our programs in the experiment.

We look forward to working with the Department to provide students with new, innovative pathways to a postsecondary degree.

If you have any questions or require additional information please do not hesitate to contact me at rachel.carlson@guildeducation.com

Sincerely.

Rachel Carlson, CEO Guild Education



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