




Commenter	Comment	Response
ED-2017-ICCD-0113-0004	I would like to see metrics that capture time to degree completion and estimated cost savings at the program level for students who earn various percentages of their required credit hours through PLA and CBE.	No change. The Department of Education will be able to measure the progress toward degree (through PLA and CBE) that occurred at a participating school at the student level (student items #12-#15 page 12).
ED-2017-ICCD-0113-0004	Also, in regard to students in CBE courses, I would like to capture data on: a) how many students accelerate through CBE courses by 'testing out' of all or some portion of course content; b) how many students move through CBE courses more deliberately than average/recommended course length; and c) instructional strategies incorporated into CBE courses specifically for student support (e.g., grading rubrics, pacing charts).	No change. The Department of Education does ask for a similar overall assessment of the change in the number of students (school item #24 page 5), asking participating schools whether the number of students "increased, decreased, or stayed the same after implementing the experiment?" While information on specific student supportive instructional strategies may be interesting, it would require expanding data collection efforts to instructors and thus greatly expanding the burden on schools.
ED-2017-ICCD-0113-0004	Finally, under 17 on the institutional tool, I would like to see the following item added: For each program that is a blended education or face-to-face program, what are the institutional procedures to ensure regular and substantive interaction between students and faculty?	No change. With school item #17, page 4, the Department of Education is seeking this information for all distance education programs. We believe the burden of requesting similar assurance of "regular and substantive interaction" for other types of programs would impose too great of a burden upon respondents.
ED-2017-ICCD-0113-0005	It may be helpful to request demographic information including age, marital status, employment status and number of dependents, since this may assist in better understanding the population that is being served by the learning modality/experiment.	No change. The Department of Education will have the demographic information (age, marital status, dependency status, house hold size, number of family members attending college, etc.) applicants provide when completing their FAFSA.
ED-2017-ICCD-0113-0005	Additionally, the following items may need further clarification: Page 11, Item # 8 A student's cumulative postsecondary grade point average may not be applicable for many Competency Based Education programs as they do not record grades other than Pass/Fail.	No change. While GPA may not be applicable for all courses of study. It does provide a qualitative assessment of student performance, when it is available. Student Items #14 and #15 page 12 provide quantitative counts of credits attempted and earned when qualitative measures such as GPA are not available.

ED-2017-ICCD-0113-0005	Page 12, Items #12 and #13 Assuming that this tool is for postsecondary institutions, it is unclear what is meant by "grade level" (at the beginning or end of the completed award year). Further clarification may be required.	No change. "Grade level" will be clarified to the institution at the time we collect information from participants.
ED-2017-ICCD-0113-0005	Page 14, Item #29 This question appears to request a Yes/No type of answer. However, it may also be applicable to indicate "in progress" because a student may still be engaged in his or her education at the time of reporting.	No change. The "program completion" item is meant to be a yes/no measure and is meant to measure program completion during a specific award year.
ED-2017-ICCD-0113-0006	On PLA, some additional questions to consider are: - Did the number of credits awarded through PLA increase/decrease?	No change. School item #11 on page 2 already asks: "Did the number of students at the institution who received academic credit based on prior learning assessments increase, decrease, or stay the same after implementing the experiment? If so, by how many students?" In addition, the experiment limits the maximum number of credit hours a school may add to the student's enrollment status to three credit hours per payment period.
ED-2017-ICCD-0113-0006	- Is PLA available for all degree/certification programs, or for a limited number? Which ones do not allow for PLA as an option and why?	No change. The extent of an individual school's offerings allow for PLA and why is beyond the scope of the evaluation
ED-2017-ICCD-0113-0006	- To what extent did students use the course load waiver?	No change. Student item #32 on page 15 already addresses: "Did the institution increase the student's cost of attendance based on a prior learning assessment provided by the institution, and if so, by how much?"
ED-2017-ICCD-0113-0006	- How does the institution promote PLA generally?	No change. School item #12 on page 3 does address how schools promote availability of Title IV aid for PLA: "How did the institution promote the availability of federal aid for PLA?"

ED-2017-ICCD-0113-0006	On CBE, consider also asking about the process that the institution used to develop the competency framework (how they defined the competencies and determined which ones would be required for the credential) used in the program	No change. School item #14 on page 3 asks for a general description of program formation: "Describe the review and approval process for your programs under the experiment."
ED-2017-ICCD-0113-0007	 ED-2017-ICCD-0113-0007.pdf	No change. Many of the specific suggestions will be addressed by the proposed data collection, however, FSA determined the size, scope and evaluation design to fit the available resources.
ED-2017-ICCD-0113-0008	 ED-2017-ICCD-0113-0008-.pdf	No change. The calls for the addition of wage data and to make the data available to other researchers would require additional resources.
ED-2017-ICCD-0113-0009	 ED-2017-ICCD-0113-0009.pdf	No change. The proposed 11 additional institutional questions are beyond the scope of "assessing the effect of a change in Title IV regulations." The current proposed evaluation will address each of the 7 "additional" student questions. Whether or not postsecondary credits earned during the experiment will be transferrable will depend on the decisions of future degree granting institutions and consequently will not be known during the reporting and evaluation period associated with the award year of the experiment.