

Session #35

**Program Integrity: Institutional and
Program Eligibility: Credit Hour and
Clock-to-Credit Hour Conversion**

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Note: Print slide 38 as a full page

Negotiated Rulemaking



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Negotiated Rulemaking

- Hearings and negotiations
 - June 2009 through January 2010
 - No consensus
- Notice of proposed rulemaking: June 18, 2010
 - <http://edocket.access.gpo.gov/2010/pdf/2010-14107.pdf>
 - Credit hour provisions
 - Preamble: **pp. 34810-34812**
 - Proposed regulations: **p. 34872, 34874**
 - Nearly 1,200 comments on NPRM

Negotiated Rulemaking

- Final regulations: October 29, 2010
 - <http://edocket.access.gpo.gov/2010/pdf/2010-26531.pdf>
 - Credit hour provisions:
 - Preamble: **pp. 66844-66857**
 - Regulations: **pp. 66946, 66949-66950**
 - Effective date: July 1, 2011
- Technical corrections: April 13, 2011
 - <http://ifap.ed.gov/fregisters/attachments/FR041311ProgramIntegrityIssues.pdf>

Definition



Regulations

- For purposes of federal programs, the regulations:
 - Provide a definition of a credit hour or its equivalent; and
 - Establish consistent measure of eligibility for, and payments of, federal funds
- The regulations do not preclude an institution using a different definition for academic or other purposes

Credit Hour Definition

- An institutionally established equivalency of an amount of student work represented in intended learning outcomes and evidence of student achievement that reasonably approximates minimum measures

Credit Hour Definition (cont.)

- Must approximate not less than—
 - For a semester or trimester hour, one hour of classroom and two hours out of class student work each week in approximately a 15-week semester or trimester
 - For a quarter hour, one hour classroom and two hours out of class student work each week in a 10- to 12-week term quarter
- Not required to use these ratios



Credit Hour Definition (cont.)

- Must approximate equivalent work for other academic activities as established by the institution, e.g., lab work, internships, practica, studio work, and other academic work

Accrediting Agencies and State Agencies



Accrediting Agencies

- Applies to agencies if accreditation is to enable institutions to establish Title IV, HEA program eligibility
- Must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours as part of an agency's review of an institution for initial accreditation or pre-accreditation or renewal of accreditation

Accrediting Agencies

- Must review the institution's—
 - Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs, and
 - The application of the institution's policies and procedures to its programs and coursework

Accrediting Agencies

- Must make a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education
- May use sampling or other methods in the evaluation



Accrediting Agencies

- Must take such actions that it deems appropriate to address any deficiencies that it identifies at an institution as part of its reviews and evaluations as it does in relation to other deficiencies it may identify
- If an agency finds systemic noncompliance with the agency's policies or significant noncompliance regarding one or more programs at the institution, must promptly notify the Secretary



Accrediting Agencies

- Is no requirement that an accrediting agency or State agency make determinations about credit hours assigned to individual coursework though some agencies are providing such reviews
- Is the institution's responsibility to ensure its compliance with Title IV requirements

Credit Hour: State Agencies

- Agencies for the approval of public postsecondary vocational institutions
- Similar requirements as apply to accrediting agencies
- Currently agencies in four States
 - New York
 - Pennsylvania
 - Oklahoma
 - Puerto Rico

Clock-to-Credit Hour Conversion



General

- §668.8(k) and (l) in eligible program definition
- An exception to the credit-hour definition in §600.2 that applies for purposes of the Title IV, HEA programs
- Modification of prior regulations
 - The requirements for when an institution must use clock hours
 - The standards for clock-to-credit hour conversions

General

- Section 668.8(k) and (l) continues to apply to undergraduate gainful employment (GE) programs
- For public and private nonprofit institutions, GE programs generally are—
 - Non-degree programs
- For postsecondary vocational institutions proprietary institutions, GE programs generally are—
 - Degree programs, and
 - Non-degree programs

General

- Detailed information on whether programs are considered GE programs
 - <http://ifap.ed.gov/dpcletters/GEN1110.html>
 - <http://ifap.ed.gov/eannouncements/05202011GETeacherCertProgram.html>
 - <http://ifap.ed.gov/eannouncements/062411WhatisGainfulEmploymentGEAnnounceNumber11.html>
 - <http://ifap.ed.gov/eannouncements/070811DeterminWhetherAnEduProgIsGE.html>
 - <http://ifap.ed.gov/eannouncements/083111GEAnnounce19PrepCoursesNotGEProg.html>



Clock Hour Only - §668.8(k)(2)

- The program is required to be measured in clock hours for federal or state approval except if required for only a limited component of the program
- Completing clock hours is a requirement for licensure to practice an occupation except if required for a limited component of the program
- Note: If a state uses another measure but that measure represents clock hours, we consider the state to require clock hours

Clock Hour Only (cont.)

- A program that might otherwise qualify to do conversion to credit hours must be in clock hours for Title IV if the institution—
 - Does not continue to provide the clock hours that are the basis for the conversion to credit hours, and
 - Does not require attendance in those hours (apart from excused absences under §668.4(e))
 - Checking attendance for the day does not satisfy this requirement



Clock Hour Only: Not Eligible for Conversion – (cont.)

- The credit hours awarded are not in compliance with the definition of a credit hour in §600.2

No Conversion Required - §668.8(k)(1)

- Unless §668.8(k)(2) applies, an undergraduate GE program may use credit hours as defined in §600.2 without applying the conversion formula if one of two conditions is met
- Condition #1 is that the GE program is at least two academic years in length and provides an associate degree, a bachelor's degree, an undergraduate professional degree, or an equivalent undergraduate degree as determined by the Secretary

No Conversion Required (cont.)

- Condition #2 is that the GE program is an undergraduate non-degree program with—
 - Each course in the program being fully acceptable toward a degree program at the institution, and
 - The institution being able to demonstrate that students enroll in, and graduate from, that degree program

No Conversion Required (cont.)

- A GE program not meeting condition #1 or #2 must use either—
 - The conversion formula, or
 - Clock hours
- A program may always use clock hours
- If using the conversion formula—
 - The program must be eligible to use it, and
 - The conversion must be properly implemented

New Conversion Ratios - §668.8(I)(1)

- Ratios
 - One semester or trimester credit hour is equal to at least 37.5 clock hours
 - One quarter credit hour is equal to at least 25 clock hours

New Conversion Ratios – (cont.)

- Default option
 - Using these ratios based only on clock hours in class is always acceptable
 - Generally must apply by individual class or program activity

New Conversion Ratios Exception

- §668.8(I)(2)

- Full formula option
 - Option is an exception to new ratios
 - Option takes into account out-of-class work
 - Credit hours must meet new definition
 - Accreditor, or state approving agency, has identified no deficiencies
- Out-of-class student work determination: Is based on individual coursework components, e.g., classroom study versus practica with little outside study (NPRM, Preamble, p. 34810)

New Conversion Ratios Exception

(cont.)

- Regardless, must meet these minimums:
 - One semester or trimester credit hour must include at least 30 clock hours
 - One quarter credit hour must include at least 20 clock hours
- May need to use greater than 30 or 20 clock hours per semester or quarter hour if insufficient out-of-class student work in a course to support at least 37.5 or 25 hours of student work per semester or quarter hour

Conversion Case Study

(to semester hours)



Case Study

- A program with 720 clock hours consists of—
 - Five classroom courses with 120 clock hours each, and
 - A 120 clock hour externship with no out-of-class student work
- The institution determines that for—
 - The first three classroom courses, a student generally is required to perform 40 hours of out-of-class work for each course, and
 - The last two classroom courses have eight hours of out-of-class work for each course



Case Study

- A program with 720 clock hours consists of—
 - Five classroom courses with 120 clock hours each, and
 - A 120 clock-hour externship with no out-of-class student work
- The institution determines that for—
 - The first three classroom courses, a student generally is required to perform 40 hours of out-of-class work for each course, and
 - The last two classroom courses have eight hours of out-of-class work for each course



Case Study: Two Options

- Default option: convert only based on clock hours and ignore any out-of-class work
- Full formula option: convert based on both clock hours and out-of-class work to determine the maximum allowable credit hours

Case Study: Two Options (cont.)

- Several possible outcomes depending on institutional policy for option and rounding
 - If rounding, always round down course-by-course
- Default option: 19.2 or 18 semester hours
- Full formula option: 22.026, 22, or 21 semester hours

Case Study: Default Option

- Use the default 37.5 clock hours per semester hour, ignoring the out-of-class work

$$120/37.5 = 3.2 \text{ semester hours per course} \\ (\text{or } 3, \text{ if rounding})$$

- Always calculate on a course-by-course basis
- Always round down any fraction course-by-course

Case Study: Default Option (cont.)

- Converted program with six 120-clock courses
- Without rounding

3.2 hours per course * 6 = 19.2 sem. hrs.

- With rounding

3 hours per course * 6 = 18 sem. hrs.

Case Study: Full Formula Option

	In-class clock hours		Allowable out-of-class prep hours	Total clock and prep hours	Semester hours	Semester hours (rounded)	Notes
Course #1 (40 hours of actual out-of-class student work)	120	+	$7.5 * 4 = 30$	150	4	4	(A), (C)
Course #2 (40 hours of actual out-of-class student work)	120	+	$7.5 * 4 = 30$	150	4	4	(A), (C)
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Course #5 (8 hours of actual out-of-class student work)	120	+	8	128	3.413	3	(B), (D)
Externship (no out-of-class student work)	120	+	0	120	3.2	3	(E)
Total clock hours and out-of-class student work (amount not relevant)				826			
Total semester hours if no rounding					22.026		
Total semester hours if rounding (must round down any fractions to ensure no overawards)						21	

NOTES:

Limitation: the rules do not allow more than 7.5 hours of out-of-class prep for every 30 hours in class

(A) 120 in-class hours divided by 30 hours = 4 There are 10 hours of out-of-class prep per 30 clock hours ($40/4 = 10$), but cannot have more than 7.5 ($4 * 7.5 = 30$)

(B) 120 in-class hours divided by 30 hours = 4 There are 7.5 or fewer hours of out-of-class prep per 30 clock hours ($8/4 = 2$), so use actual hours of out-of-class prep (8)

Semester hours per course

(C) 150 total clock and prep hours divided by 37.5 = 4

(D) 128 total clock and prep hours divided by 37.5 = 3.413

(E) 120 total clock hours divided by 37.5 = 3.2

Case Study: Full Formula Option

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Case Study: Full Formula Option

Course #1 (40 hours of actual out-of-class student work)
Course #2 (40 hours of actual out-of-class student work)
Course #3 (40 hours of actual out-of-class student work)
Course #4 (8 hours of actual out-of-class student work)
Course #5 (8 hours of actual out-of-class student work)
Externship (no out-of-class student work)

- Must evaluate course by course

Case Study: Full Formula Option

	In-class clock hours		Allowable out-of-class prep hours	Total clock and prep hours	Semester hours	Semester hours (rounded)	Notes
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Case Study: Full Formula Option

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Notes
(A), (C)
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Limitation: the rules do not allow more than 7.5 hours of out-of-class prep for every 30 hours in class

(A) 120 in-class hours divided by 30 hours = 4

There are 10 hours of out-of-class prep per 30 clock hours ($40/4 = 10$), but cannot have more than 7.5 ($4 * 7.5 = 30$)

- Must meet thirty clock-hour minimum
- Is no carry over of out-of-class work between courses

Case Study: Full Formula Option

	In-class clock hours		Allowable out-of-class prep hours	Total clock and prep hours	Semester hours	Semester hours (rounded)	Notes
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(B) 120 in-class hours divided by 30 hours = 4 There are 7.5 or fewer hours of out-of-class prep per 30 clock hours ($8/4 = 2$), so use actual hours of out-of-class prep (8)

- Use all out-of-class work for courses #4 and #5
- Have more than 30 clock hours per semester hour

Case Study: Full Formula Option

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Case Study: Full Formula Option

In-class clock hours		Allowable out-of-class prep hours	Total clock and prep hours
120	+	0	120

- No out-of-class work for externship

Case Study: Full Formula Option

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Case Study: Full Formula Option

Total clock hours and out-of-class student work (amount not relevant)	826

- Total clock hours and allowable prep hours is not relevant; must look at each course

Case Study: Full Formula Option

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Case Study: Full Formula Option

Total clock and prep hours	Semester hours	Notes
150	4	(A), (C)
150	4	(A), (C)
150	4	(A), (C)
128	3.413	(B), (D)
128	3.413	(B), (D)
120	3.2	(E)

Semester hours per course

- (C) 150 total clock and prep hours divided by 37.5 = 4
- (D) 128 total clock and prep hours divided by 37.5 = 3.413
- (E) 120 total clock hours divided by 37.5 = 3.2

- Calculate semester hours based on total clock hours and allowable prep hours per course

Case Study: Full Formula Option

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Case Study: Full Formula Option

	Semester hours
Total semester hours if no rounding	22.026

- Program length in semester hours without rounding

Case Study: Full Formula Option

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Course #2 (40 hours of actual out-of-class student work)	120	+	$7.5 * 4 = 30$	150	4	4	(A), (C)
Course #3 (40 hours of actual out-of-class student work)	120	+	$7.5 * 4 = 30$	150	4	4	(A), (C)
Course #4 (8 hours of actual out-of-class student work)	120	+	8	128	3.413	3	(B), (D)
Course #5 (8 hours of actual out-of-class student work)	120	+	8	128	3.413	3	(B), (D)
Externship (no out-of-class student work)	120	+	0	120	3.2	3	(E)
Total clock hours and out-of-class student work (amount not relevant)				826			
Total semester hours if no rounding					22.026		
Total semester hours if rounding (must round down any fractions to ensure no overawards)						21	

NOTES:

Limitation: the rules do not allow more than 7.5 hours of out-of-class prep for every 30 hours in class

(A) 120 in-class hours divided by 30 hours = 4 There are 10 hours of out-of-class prep per 30 clock hours ($40/4 = 10$), but cannot have more than 7.5 ($4 * 7.5 = 30$)

(B) 120 in-class hours divided by 30 hours = 4 There are 7.5 or fewer hours of out-of-class prep per 30 clock hours ($8/4 = 2$), so use actual hours of out-of-class prep (8)

Semester hours per course

(C) 150 total clock and prep hours divided by 37.5 = 4

(D) 128 total clock and prep hours divided by 37.5 = 3.413

(E) 120 total clock hours divided by 37.5 = 3.2

Case Study: Full Formula Option

Semester hours (rounded)
4
4
4
3
3
3
21

Total semester hours if rounding (must round down any fractions to ensure no overawards)

- Program length in semester hours with rounding down
- Always round down any fraction, even if greater than .5

Case Study: Full Formula Option

	In-class clock hours		Allowable out-of-class prep hours	Total clock and prep hours	Semester hours	Sem. Hrs. (Alternative rounding)	Notes
Course #1 (40 hours of actual out-of-class student work)	120	+	$7.5 * 4 = 30$	150	4	4	(A), (C)
Course #2 (40 hours of actual out-of-class student work)	120	+	$7.5 * 4 = 30$	150	4	4	(A), (C)
Course #3 (40 hours of actual out-of-class student work)	120	+	$7.5 * 4 = 30$	150	4	4	(A), (C)
Course #4 (8 hours of actual out-of-class student work)	120	+	8	128	3.413	3.4	(B), (D)
Course #5 (8 hours of actual out-of-class student work)	120	+	8	128	3.413	3.4	(B), (D)
Externship (no out-of-class student work)	120	+	0	120	3.2	3.2	(E)
Total clock hours and out-of-class student work (amount not relevant)				826			
Total semester hours if no rounding					22.026		
Total semester hours if rounding (must round down any fractions to ensure no overawards)						22	

NOTES:

Limitation: the rules do not allow more than 7.5 hours of out-of-class prep for every 30 hours in class

(A) 120 in-class hours divided by 30 hours = 4 There are 10 hours of out-of-class prep per 30 clock hours ($40/4 = 10$), but cannot have more than 7.5 ($4 * 7.5 = 30$)

(B) 120 in-class hours divided by 30 hours = 4 There are 7.5 or fewer hours of out-of-class prep per 30 clock hours ($8/4 = 2$), so use actual hours of out-of-class prep (8)

Semester hours per course

- (C) 150 total clock and prep hours divided by 37.5 = 4
- (D) 128 total clock and prep hours divided by 37.5 = 3.413
- (E) 120 total clock hours divided by 37.5 = 3.2

Case Study: Full Formula Option

Sem. Hrs. (Alternative rounding)
4
4
4
3.4
3.4
3.2
Total semester hours if rounding (must round down any fractions to ensure no overawards)
22

- Program length in semester hours with an alternative rounding down

Additional Resources and Information



START HERE
GO FURTHER
FEDERAL STUDENT AID®

OPE Website and DCLs

- Access at either—
 - <http://www2.ed.gov/policy/highered/reg/heaulemaking/2009/integrity-qa.html>, or
 - Under IFAP Hot Topics: Program Integrity Information – Questions and Answers
- Dear Colleague Letters
 - GEN-11-06

E-App

- Use your E-App if—
 - The information for a program on your ECAR has changed, or
 - You need to add programs that you were not previously required to report
- You must update program information if—
 - The program previously used credit hours but must now uses clock hours, or
 - The number of credit hours has changed
- For any questions about E-App reporting, contact your School Participation Team
 - <http://www.eligcert.ed.gov/>



E-App: Transition Options

- Amended clock-to-credit hour regulations effective date: July 1, 2011
- Transition options for students attending a program prior to July 1—
 - Apply pre-July 1 regulations and policies until these students complete the program and amended regulations to students starting on or after July 1, or
 - Apply amended regulations to all students in the program in payment periods assigned to the 2011-12 and subsequent award years



E-App: Transition Options

- If you are teaching out students under the pre-July 1 regulations—
 - Add a program with new information, and
 - Retain the pre-July 1 program until all the students have finished it
- When all students finish the pre-July 1 program, report an “end date” for that program
- The two programs together would be one on-going GE program—no new GE program

Contact Information

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