



C-BEN
Quality Assurance
Review Process

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PART I: Introduction

Quality Assurance

The Competency-Based Education Network (C-BEN) quality assurance review process provides a framework essential in assuring quality competency-based education programs for all learners. The process is guided by transparent standards that are developed collaboratively by member programs and professional peers.

The quality assurance review process focuses on ensuring programs deliver, and learners complete, programs that support the achievement of their personal and professional academic goals. The C-BEN Quality Framework provides programs a guideline to demonstrate and communicate their commitment to learners through the documentation of positive learner outcomes and achievement of the guiding mission.

Commitment

C-BEN recognizes that today, competency-based education is still a nascent field with a small number of people and institutions understanding enough to describe it or implement it effectively. To ensure its impact on the future of learning and student success, C-BEN is committed to spreading its knowledge and expertise through programming, review, and support services that can help others move through the learning curve—accelerating development, adoption, and continued innovation across higher education. C-BEN's efforts focus on three main priorities: growing demand, building capacity, and removing barriers.

- **Grow Demand:** to reach and build sustainable movement, C-BEN helps students, employers, and other key stakeholders better understand CBE and its evidence of outcomes for competition, cost, and workforce needs alignment.
- **Build Capacity:** to help institutions and organizations offer high-quality CBE programs, C-BEN equips leaders from a wide range of disciplines and perspectives with the resources needed to be successful in their various roles.
- **Remove Barriers:** to make the design and delivery of CBE programs less challenging, C-BEN seeks to remove barriers currently in place through legislative regulatory or accreditation bodies.

History of C-BEN

In early 2014, the Competency-Based Education Network (C-BEN) selected an initial cohort of participating colleges and universities. This first cohort included 17 institutions and two public systems serving 42 campuses. These institutions participated in a research-and-development phase, funded by the Lumina Foundation, to create an evidence-based approach to advancing high-quality competency-based education capable of serving learners across all backgrounds. The Board of Directors, led by Laurie Dodge of Brandman University, was formed in spring 2013 and the network issued a formal call for membership applications in the fall. A second cohort of 13 colleges and universities and two public higher education systems joined C-BEN in early 2015. In May 2017, C-BEN became its own non-profit organization and opened membership to a larger group of constituencies. Today, the network is comprised of over 140 colleges, universities, state systems, corporations, service providers and individuals dedicated to realizing the full potential of competency-based learning.

Participating institutions either offer degree programs with well-defined learning outcomes and rigorous assessment or are on their way to creating them. The C-BEN Board of Directors, comprised mostly of higher education innovators from member institutions, guide the work and annually issue a call for applications to join the Board.

As higher education continues to seek effective academic models to meet the needs of a growing population of learners, C-BEN developed accreditation-like standards and a peer-review process to evaluate the quality and communicate the effectiveness of competency-based programs.

Competency-Based Education Defined

Competency-based education combines an intentional and transparent approach to curricular design with an academic model in which the time it takes to demonstrate competencies varies and the expectations about learning are held constant. Learners acquire and demonstrate their knowledge and skills by engaging in learning exercises, activities, and experiences that align with clearly defined programmatic outcomes. Learners receive proactive guidance and support from faculty and staff. Learners earn credentials by demonstrating mastery through multiple forms of assessment, often at a personalized pace.

Competency-based education is rapidly changing, and new models are constantly emerging. In most competency-based programs, learning can occur in a wide variety of forms and settings, and learners can receive regular support and encouragement along the way. Learners are assessed using objective, performance-based tools that reinforce the rigor of programs. Many of these programs are designed as flexible, affordable options for learners who are not served well by existing postsecondary programs. Learners receive more intensive guidance and support from faculty and mentors and, also have the option of accelerating their studies to save additional time and money.

Part II: Quality Assurance Review Process

Introduction

The Competency-Based Education Network (C-BEN) offers programs the opportunity to submit their curriculum for a quality assurance review using the Quality Framework. The burden of demonstrating program quality, academic rigor, and compliance with C-BEN's published Quality Framework rests with programs.

1.0 Eligibility

Before C-BEN accepts an Application for Review, the program demonstrates it meets the following eligibility criteria:

- 1.1 **Mission:** Communicates the program's purpose and commitment to providing quality postsecondary competency-based education to learners.
- 1.2 **Program Director:** Employs a program director (or similar oversight position) who possesses the qualifications and experience in operations, financial management, and leadership to administratively oversee all aspects of the competency-based education program in support of its mission, goals, and outcomes.
- 1.3 **Curriculum:** Reflects an intentional and transparent approach to curricular design using an academic model in which the time it takes to demonstrate mastery of competencies varies and the expectations about learning are held constant.
- 1.4 **Admissions Criteria:** Publishes equitable admissions policies and verify learners meet the minimum requirements to be successful in completing the education offered.
- 1.5 **Instructional Team:** Implements an instructional team that possesses the academic background, professional experience, and ongoing professional development to ensure the delivery of quality competency-based education.
- 1.6 **Sponsoring Institutional Support (if applicable):** Submits a narrative description of the alignment between the competency-based education program's mission and the sponsoring institution's mission.

2.0 Quality Assurance Review

Programs are encouraged to become familiar with the C-BEN Quality Framework prior to completing the Program Assessment Report and Exhibits. Programs should begin preparing the Program Assessment Report and corresponding Exhibits a minimum of 6-9 months prior to submitting the Application for Review. C-BEN expects programs to demonstrate their commitment to establishing and delivering quality competency-based education opportunities by investing financial resources, appointing qualified instructional team members and administrative leadership, and creating a comprehensive curriculum reflective of competency-based education best practices focused on continuous improvement and consistent outcomes assessment. Programs are encouraged to consult with C-BEN staff for planning purposes prior to submitting the Application for Review.

- 2.1 **Application for Review:** A program submits to C-BEN staff the following documentation: 1) Application for Review and 2) non-refundable application fee.

- 2.2 Application for Review Acceptance:** A program’s Application for Review undergoes evaluation by C-BEN staff. The program receives notification from C-BEN staff that the Application for Review has been accepted within 30 days following submission. The C-BEN staff provides the program with a timeline for submission of the Program Assessment Report and Exhibits for review.
- 2.2.1 Application for Review Denial:** A program’s Application for Review may be denied if any eligibility criterion is not met. If a program’s Application for Review is denied, the program may reapply once all eligibility criteria are met. The program will need to re-submit a new Application for Review and non-refundable application fee.
- 2.3 Submitting Program Assessment Report and Exhibits:** A program submits a completed Program Assessment Report and Exhibits to C-BEN according to the timeline provided by C-BEN staff following the Application for Review acceptance.
- 2.4 Program Assessment Report Review Process:** C-BEN staff assigns a Program Assessment Review Team member to complete a comprehensive review of the program’s Program Assessment Report and Exhibits using the C-BEN Assessment Report Rubric. The Program Assessment Review Team member is a subject matter expert both in the discipline and in competency-based education design and determines whether the program complies with the C-BEN Quality Framework. The Program Assessment Review Team member completes the C-BEN Assessment Report Rubric, makes recommendations for continued improvement, and submits the completed report to C-BEN staff within 90 days.
- 2.4.1 Consent to Serve:** All Program Assessment Review Team members annually sign a consent to serve that includes conflict of interest and confidentiality policies.
- 2.5 Quality Assurance Review Approval Process:** C-BEN Board of Directors review the Assessment Report Rubric, Program Assessment Report, and Exhibits submitted by the developing program prior to granting approval. Quality approval is granted if the program demonstrates policies, procedures, and a curriculum that demonstrates compliance with the C-BEN Quality Framework. Quality approval is denied if the program requires more time to demonstrate adequate policies, procedures, and curriculum that comply with the C-BEN Quality Framework. C-BEN Board of Directors meets quarterly to make quality approval decisions.
- 2.5.1 Quality Approval Granted:** A program that achieves quality approval status receives a letter and copy of the C-BEN Assessment Report Rubric from C-BEN staff 30 days following the Board of Directors’ decision to grant approval. Quality approval is effective on the last day of the month in which C-BEN grants status. A program’s status expires 5 years from the date approval is granted.
- 2.5.1.1 Quality Approval Status Disclosures:** A program publishes the following disclosures on its website and/or marketing materials and documents learners received notice of these disclosures. Granting quality approval status enables a program to publicly disclose a recognized relationship with C-BEN. If a program granted quality approval status fails to publish required disclosures, C-BEN remove approval of the program.
- C-BEN has granted (Name of Program) quality approval status. Quality approval status signifies compliance with the Quality Framework. Achieving quality approval status is not an indication of accreditation but a demonstration that the program has completed a peer-review process and deemed to meet best practices in competency-based education.

- 2.5.2 Quality Approval Status Denied:** A program denied quality approval status receives a letter and a copy of the C-BEN Assessment Report Rubric from C-BEN staff 30 days following the Board of Directors' decision to deny approval.

If a program denied candidacy, decides to continue pursuing C-BEN-quality approval status, the program is required to revise the Program Assessment Report and Exhibits incorporating feedback from the C-BEN Assessment Report Rubric and submit a new Application for Review following C-BEN's published procedures.

- 2.6 Requests for Additional Information:** If a program fails to submit additional information requested within 14 days, C-BEN will suspend the review process. Lack of communication with C-BEN following a request for additional information could result in quality approval being denied and the review process terminated. The program receives a letter from C-BEN staff that the review was terminated within 30 days.
- 2.7 Withdrawal from the Quality Review Process:** A program may withdraw its Application for Review or Program Assessment Report and Exhibits by submitting a letter of withdrawal from the program director or institution leadership to C-BEN staff prior to the Board of Directors making a quality approval decision.

3.0 Quality Assurance Review Decisions

- 3.1 Initial Approval Decision Timeframes:** The C-BEN Board of Directors meets quarterly to make initial approval decisions. During these meetings, the Board reviews all documentation submitted by the program including the Program Assessment Report, Exhibits, Assessment Report Rubric, and Response to the Assessment Report Rubric.
- 3.2 Renewal of Approval Decision Timeframes:** The C-BEN Board of Directors meets quarterly to make renewal of approval decisions. During these meetings, the Board reviews all documentation submitted by the program including the Program Assessment Report, Exhibits, Assessment Report Rubric, and Response to the Assessment Report Rubric.
- 3.3 Review Decisions:** The Board may take one of three courses of action:
- 3.3.1 Award Approval:** A program seeking initial review may be granted approval up to three years. A program seeking renewal of review may be granted approval up to five years. Program enhancement reports may be required throughout a period of approval.
- 3.3.2 Defer Approval:** A program seeking initial or renewal of approval may be required to submit a progress report, additional information, or undergo a follow-up evaluation. The maximum deferral period is 12 months unless the decision is extended for "good cause". A decision to defer is not an adverse action. At its discretion, C-BEN may restrict substantive changes in conjunction with deferring a program's approval.
- 3.3.2.1 Renewal of Approval:** The program's approval is retained throughout the deferral period.
- 3.3.2.2 Good Cause:** The maximum time period for demonstrating compliance with the C-BEN Quality Framework is 12 months. The Board may extend this 12-month period for good cause shown. "Good cause" in this context is defined as a sufficient reason for the Board to allow additional time for the program to demonstrate that it has made substantial progress; for example, more time is needed to comprehensively document full compliance, additional resources will become available, or there are

exigent circumstances, such as illness or accident, that justify an extension of time. The Board may elect to monitor the program that received a good cause extension by requesting periodic documentation be submitted demonstrating ongoing progress toward compliance with the C-BEN Quality Framework. Upon reviewing these considerations, the Board will grant or deny a program's "good cause" extension.

3.3.3 Probation: A program seeking renewal of approval may be asked to demonstrate why its approval should not be withdrawn. When the Board has reason to believe that a program is not in compliance with the C-BEN Quality Framework and other requirements, the Board will place the program on probation. These decisions are made when a program was unable to demonstrate compliance or substantial progress towards compliance during a deferral period. A program that receives a probation directive is required to demonstrate corrective action and compliance with all Quality Framework principles, standards, and procedures. The issuance of a probation directive is not an adverse decision. The burden of proof rests with the program to demonstrate its full compliance with the C-BEN Quality Framework.

The program receives a written notice within 30 days of the Board decision stating the reasons why the probation directive was issued, identifies the noncompliant principles or standards and other documentation requirements, explains the reasons and recites the evidence indicating noncompliance, advises the program of its obligations, and provides a deadline for a response.

Upon expiration of the probation directive deadline, the Board decides on the program's compliance with the C-BEN Quality Framework or requirements as noted. The Board may:

- Vacate the probation directive if it is determined that the response adequately demonstrates compliance with the C-BEN Quality Framework and granting renewal of approval;
- Continue the probation directive pending the receipt of additional information or further reports from the program;
- Order a special review; or
- Withdraw approval.

The Board notifies the program of its decision concerning the response to probation directive within 30 days. In all cases, the Board will allow the program sufficient time to respond to any findings before making a final decision on the program's approval status. The Board will not consider substantive changes when a program is under a probation directive.

3.3.4 Deny Initial or Withdraw Approval: A program seeking initial approval may be denied and a program seeking renewal may have approval withdrawn. The Board may deny initial or withdraw approval on the basis that the program does not meet the C-BEN Quality Framework.

4.0 Notification and Public Disclosures of Approval

C-BEN specifies how an approved program may refer to its status. A program may refer to its approved status only as follows:

4.1 Initial and Renewal of Quality Approval: C-BEN staff provides written notice to the program director no later than 30 days after the Board makes its decision to grant, deny, or withdraw quality approval.

4.1.1 Authorized Statement: (Name of Program) is approved by the Competency-Based Education Network as a competency-based education program for learners in (subject matter area).

4.1.2 Other Unapproved Programs: If the sponsoring institution offers other programs not currently approved by C-BEN, the sponsoring institution’s marketing materials must clearly indicate and identify the programs that are approved by C-BEN and distinguish them from other programs offered.

If C-BEN staff determine that a program failed to comply with the authorized statement, the staff may require the program to take immediate corrective action or recommend Board action including withdrawal of the program’s approval.

4.2 Probation Directive: C-BEN staff provide written notice to the program director no later than 30 days after the Board makes a decision to place a program on probation.

4.3 Public Disclosures: C-BEN provides written notice to the public of all decisions listed above within 24 hours of its notice to the program.

4.4 Resigning or Voluntarily Withdrawing Approval: C-BEN posts a notice of a program’s decision to resign or withdraw approval on its website within 30 days of receiving notification from the program.

4.5 Approval Lapses: C-BEN posts a notice 30 days after the program’s approval lapses following a lack of communication, lack of required documentation, or lack of action indicating the program’s intent to complete all the steps in the approval process.

4.6 Scope of Public Information: C-BEN makes available to the public and in C-BEN publications, including its website and related publications the following information for approved competency-based education programs:

- Program name, address, telephone number, email address, and website;
- Sponsoring institution name, type, and website;
- Current program status (approved, probation, or withdrawn);
- Name of program director;
- Dates of initial approval and current approval expiration;
- Program type (direct assessment, term-based, or credit-based);
- Educational hours format (in-person or distance education);
- Program format (full-time or part-time);
- Program length;
- Tuition amounts;
- Summary of information pertaining to an adverse action;

4.7 Confidentiality of Records: Information pertaining to the Board’s actions is confidential and is not shared with third parties, other C-BEN approved programs, the media, or the public except as authorized by the program or as required by government regulation, judicial or administrative processes, and other legal requirements.

4.8 Sharing Information with Government Entities and Other Accrediting Organizations: C-BEN grants all reasonable special requests for approval information made by other accrediting organizations and government entities. Requests for information from such entities must be in writing and submitted to the Executive Director and must state the name and address of the program for which information is sought, the nature of the information requested, and the purposes for which the information is to be used.

4.9 Authorized Disclosure of Information: When a program requests specific confidential approval information to be released to third parties, the program director or other designated individual must provide a program-initiated acknowledgement or written release on official letterhead to the Executive Director stating the precise information to be released and the party or parties to whom the information should be provided.

4.10 Correction of Misleading or Inaccurate Information: C-BEN requires an approved program to correct any misleading or inaccurate information it releases. C-BEN will notify the program of the misleading or inaccurate information and request that the program immediately make the correction, post a notice of the correction, and document to C-BEN that the correction was made. Failure to correct any misleading or inaccurate information within 10 days may result in the Board putting the program on probation.

4.11 Record Retention: C-BEN maintains at its offices in electronic form complete and accurate records of the following:

- Last full approval review for each program, including the Application for Review, Assessment Report Rubrics, Team Lead Report, Response to Team Lead Report, annual report data, periodic review reports, and a copy of programs' most recent Program Assessment Report.
- All decisions made by C-BEN regarding approval and substantive change decisions including all correspondence significantly related to those decisions; and
- Minutes of all C-BEN meetings.

5.0 Program Notifications

5.1 Notification Reports: The program informs C-BEN immediately of any actions it plans to take itself—or actions taken against the program by other agencies—if those actions have the capacity to affect the reputation of the Board, the program's good standing with the Board, and/or its acceptance by the public. This includes the program's resolution of any complaints in a forthright, prompt, amicable, and equitable manner to the Board's satisfaction. Any Board decisions are not retroactive. Programs receive notification no later than 30 days following the Board's decision.

5.2 Review of Notification Reports: C-BEN reserves the right to order a comprehensive review of a program whenever it has concerns that the program is not in compliance with the C-BEN Quality Framework and/or procedures. In all cases, C-BEN allows the program sufficient time to respond to any findings before a final decision is made regarding the program's approval status.

6.0 Petitions and Waivers

An approved program, or a program seeking initial approval, submits a petition to C-BEN when requesting a waiver of any C-BEN Quality Framework Principles, Standards, or procedures and documents the rationale for the request. A program may submit a petition for an alternative interpretation of any C-BEN Quality Framework Principles or Standards to address the program's unique mission. Petitions are not requested simply because a program does not like a principle or standard or does not care to be subject to it. Petitions are only submitted for a significant reason as it applies to the program's mission.

6.1 Waiver Process: The program submits a letter and provides supporting documentation at least 45 days prior to the next Board meeting when seeking a waiver to an existing C-BEN Quality Framework Principle or Standard. A program submits a fee along with the letter and supporting documentation. The program should check with C-BEN staff for the exact submission timeframe. The Board reviews the program's petition and supporting documentation and votes to either approve or deny the petition. C-BEN notifies the program of its decision no later than 30 days.

6.2 Waiver Granted: C-BEN may choose to grant a waiver of its principles, standards, or procedures when a program is able to demonstrate through a well-documented petition that: 1) extenuating circumstances are present that indicate the normal application of the principle, standard, or procedure will create an undue

hardship on the program or its learners, or 2) the waiver meets the underlying purpose and intent of the principle, standard, or procedure. Petitions are granted for a period of one year for programs seeking initial approval and for a maximum of five years for approved programs.

- 6.3 Waiver Denied:** If a petition is denied, the program may not resubmit a petition for the same request. C-BEN notifies the program of its decision no later than 30 days.

7.0 Maintaining Quality Approval

The program maintains approval on an ongoing basis by remaining in continuous compliance with all C-BEN Quality Framework principles, standards, procedures, and eligibility requirements. The program maintains continuous operations; educates participants in support of its mission; fulfills all C-BEN reporting requirements in a timely manner; maintains compliance with all applicable local, state, and federal requirements; and pays all C-BEN fees in a timely manner, as applicable.

- 7.1 Annual Continuous Improvement Reports:** Every year, C-BEN requires an Annual Continuous Improvement Report (ACIR) submission by all approved competency-based education programs. The ACIR and Annual Fee must be submitted by January 31. The ACIR and all supporting documentation are submitted to C-BEN staff. The Board monitors continuous improvement and learner achievement based on the program's mission, goals, and outcomes. If the Board observes significant or consistent declines in learner achievement, the Board may require the submission of additional information.
- 7.1.1 Mission, Goals, and Outcomes:** A program reports any changes to the mission, goals, or outcomes.
- 7.1.2 Enrollment:** A program reports any enrollment numbers of new and active learners for the reporting year.
- 7.1.3 Program Competencies:** A program reports any increase or decrease in program competencies during the reporting year.
- 7.1.4 Curriculum:** A program reports any changes to the curriculum.
- 7.1.5 Financial Condition:** A program reports any increase or decrease in financial resource allocation in the reporting year.
- 7.1.6 Completion Data:** A program reports on learner completion/graduation rates for the previous reporting year.
- 7.1.7 Instructional Team:** A program reports any changes to the instructional team for the previous reporting year.
- 7.2 Failure to Submit Annual Continuous Improvement Report and Dues:** If an approved program fails to submit an Annual Continuous Improvement Report and the Annual Fee on time, C-BEN may withdraw approval effective the deadline for submission. Within 10 days following the annual fee submission deadline, C-BEN sends a written notice of delinquency advising the program that its approval may be withdrawn. If C-BEN does not receive a response from the program, Annual Fee, and Annual Continuous Improvement Report within 30 days of the delinquency notice, a letter is sent to the program communicating the withdrawal of approval effective January 31.
- 7.3 C-BEN Review and Follow-Up Action:** C-BEN staff acknowledges the successful submission of all Annual Continuous Improvement Reports. C-BEN staff may request additional supporting documentation, as necessary.

All Annual Continuous Improvement Reports are reviewed and summarized by C-BEN staff with significant changes reported and presented to the Board. Annually, at its mid-year meeting, the Board considers any significant, salient items reported by programs and initiates further follow-up actions as necessary.

7.3.1 Additional Clarifying Documentation: A program may be asked by C-BEN to submit additional information based on the activities reported from the previous year.

7.3.2 Comprehensive Review: C-BEN may require a program to undergo a comprehensive review based on the activities reported from the previous year.

8.0 Special Reviews

8.1 Special Review: A special review is a focused evaluation ordered by the Board as a result of unusual circumstances or failure by the program to meet its obligations to the Board. The Board's requirement of a special review may be triggered because of the following:

- 8.1.1** A serious or an unusually large number of learner or other complaints (e.g., "whistle-blower" complaints);
- 8.1.2** State investigations or legal action taken against the program or the sponsoring institution;
- 8.1.3** A program's failure to maintain quality approval;
- 8.1.4** Reported negative financial conditions or events;
- 8.1.5** A probation directive issued by the Board;
- 8.1.6** Governmental complaints against the program or sponsoring organization; or
- 8.1.7** Similar serious concern.

If the program refuses to undergo a special review or observe timelines specified by the Board for executing the special review, the program will be reported to the Board for action including probation or withdrawal of approval.

Board-ordered special reviews are conducted in a timely fashion. In no case will the time frame for reporting and conducting the special review extend beyond 12 months from the date the Board is first made aware of any condition requiring a special review.

9.0 Complaints (Approved Programs, Programs Seeking Approval, and C-BEN)

9.1 C-BEN Complaints: Complaints that reasonably allege instances of noncompliance with C-BEN Quality Framework principles, standards, and procedures by approved programs, programs seeking initial approval, program assessment review team members, Board members, and staff are investigated in a fair and timely manner.

9.2 Submitting Complaints: C-BEN accepts written complaints that include the complainant's name, contact information, and a summary of the complaint. Where circumstances warrant, the complainant may remain anonymous to the program, however, all identifying information must be provided to C-BEN. Written complaints must provide the following information:

- The basis of any allegation of noncompliance with C-BEN Quality Framework principles, standards, and procedures;
- All relevant names, dates, and a brief description of the actions forming the basis of the complaint;
- Copies of any available documents or materials that support the allegations; and
- A release authorizing C-BEN to forward a copy of the complaint, including identification of the complainant to the program. In cases of anonymous complaints, or when the complainant requests

his/her name to remain confidential, C-BEN considers how to proceed and whether the anonymous complaint sets forth reasonable and credible information that a program may be in violation of C-BEN Quality Framework principles, standards, and procedures and whether the complainant's identity is necessary to investigate the allegations.

9.3 Definition of Complaint: A complaint is defined as notification to C-BEN by any person or entity (including, but not limited to, any participant, faculty, or staff of an approved program; any member of the general public; any representative of a federal, state, or local government; and any member of any other institution or organization) that sets forth reasonable and credible information that:

- An approved program;
- A program seeking initial approval; or
- Program assessment review team members, Board members, or C-BEN staff are not in compliance with one or more of C-BEN Quality Framework principles, standards, or procedures.

Where issues of curriculum delivery, support services, or program fees are concerned, learner complainants must have exhausted all efforts to resolve their complaint with the program before considering filing a complaint with C-BEN. Where issues of educational quality or compliance with C-BEN Quality Framework principles, standards, or procedures are not central to the complaint, C-BEN will refer the complainant or complaint to the appropriate federal or state agency or private entity with jurisdiction over the subject matter of the complaint and may provide a copy to the program.

C-BEN will not intervene on behalf of individuals in cases of personnel action, nor will it review a program's internal administrative decisions in such matters as admissions decisions, academic honesty, assignment of grades, and similar matters unless the context of the allegation suggests that unethical or unprofessional conduct or action may have occurred that might call into question the program's compliance with an C-BEN Quality Framework principles, standards, or procedures.

Further, C-BEN will not intervene on behalf of individuals in cases where the situation giving rise to the complaint had occurred so long ago that investigating and ascertaining the facts might prove to be problematic. The Executive Director will exercise professional judgment in determining which cases meet these criteria. In addition, if, for any reason, C-BEN suspects any type of unethical behavior, including fraud and abuse, by an accredited program or a program seeking initial, C-BEN reserves the right to investigate the allegations.

9.4 Records of Complaints: C-BEN maintains a record of all complaints. Complaints received against approved programs and the manner of their resolution are retained for two approval cycles. Complaints received against programs seeking initial approval are retained for a period of five years. C-BEN also considers these complaint files when it acts on a program's grant of initial or renewal of approval. The complaints are analyzed according to how the program handles and resolves them. Additionally, all other complaint files are summarized and presented to C-BEN. The complaint summary provides an analysis of any unresolved complaints, nature and source of complaints, and other information collected from the complaints received.

9.5 Complaints Against Accredited Programs: When C-BEN grants approval, it expects the program to remain in compliance with C-BEN Quality Framework principles, standards, or procedures throughout the approval period. Therefore, one of the principal concerns of C-BEN when it receives a complaint about an approved program is whether the program is in compliance with published principles, standards, and procedures. The burden of proof rests with the program to prove that it is meeting C-BEN Quality Framework principles, standards, and procedures at all times, including proving compliance after approval is granted. Another concern of C-BEN involves the methods, policies, philosophy, and procedures followed by the program for handling complaints on an ongoing basis. C-BEN expects its approved programs to have operational procedures in place for fairly and promptly resolving complaints so that they do not become a matter for concern by outside agencies. C-BEN will consider a complaint even if the program is involved in litigation with

C-BEN or other third parties. Therefore, in investigating a specific complaint against an approved program, C-BEN also examines whether or not the program has effective methods for handling participant complaints on a routine basis. This examination includes verifying if the program's procedures are equitable, consistently applied, and effective in resolving complaints. Finally, C-BEN is concerned with the frequency and pattern of complaints about an approved program. C-BEN expects the program to monitor all complaints it receives and expects the program to take steps to assure that similar complaints do not become repetitive or routine.

9.6 Complaint Actions: When C-BEN receives a complaint against a program seeking initial approval or an approved program, C-BEN's procedures for responding to complaints consists of the following steps:

- 9.6.1** Following receipt of the complaint, C-BEN staff sends a letter or email to the complainant acknowledging receipt of the complaint and explains the process followed for investigating the complaint.
- 9.6.2** C-BEN staff conducts an initial review of the complaint to determine whether it provides information or allegations that reasonably suggest that a program may not be in compliance with C-BEN Quality Framework principles, standards, or procedures. If additional information or clarification is required, the Executive Director (acting on behalf of the Board) sends a request to the complainant. If the requested information is not received within 15 days, the complaint may be considered abandoned and may not be investigated by C-BEN.
- 9.6.3** If the Executive Director determines after the initial review of the complaint that the information or allegations do not reasonably demonstrate that a program is out of compliance with C-BEN Quality Framework principles, standards, or procedures, the complaint may be considered closed and will not be investigated by C-BEN. The complainant is notified in writing.
- 9.6.4** If the Executive Director determines after the initial review of the complaint that the information or allegations reasonably suggest, but do not provide enough information to ascertain that a program may not be in compliance with C-BEN Quality Framework principles, standards, and procedures, the Executive Director notifies the program that a complaint has been filed. The notice summarizes the allegations, identifies the C-BEN Quality Framework principles, standards, or procedures that were allegedly violated, and submits a copy of the original complaint to the program. The program is given 30 days to provide a response, except for:
 - 9.6.4.1** If a news article or media broadcast carries a negative report on a C-BEN-approved program, the program is required to respond to the statement within 15 days.
 - 9.6.4.2** In cases when the complaints are from learners concerning curriculum delivery, support services, or tuition fees, the program is required to respond directly to the learner within 15 days to address his/her concerns.
- 9.6.5** The Executive Director reviews the complaint and the program's response for compliance with the C-BEN Quality Framework principles, standards, and procedures.
- 9.6.6** If the Executive Director concludes that the allegations do not establish there has been a violation of the C-BEN Quality Framework principles, standards, or procedures, the Executive Director will consider the complaint closed, no further action is required, and the complainant is notified in writing.
- 9.6.7** If the Executive Director concludes that the allegations may establish a violation of C-BEN Quality Framework principles, standards, or procedures, the Executive Director takes one of the following actions:

9.6.7.1 Postpone the final action on the complaint for a period not to exceed 60 days if there is evidence that the program is making progress in addressing the complaint. In the case of postponement of action, the complainant is informed of the status of the complaint and its final action. NOTE: The failure of the program to resolve the complaint by the end of the 60-day period is then referred to the Board for consideration and action.

9.6.7.2 Notify the program that, on the basis of the information provided, C-BEN determined that the program is failing to meet the C-BEN Quality Framework principles, standards, and procedures and that C-BEN is taking appropriate action. Such action may include requiring the program to take specific corrective action and report back to the Board and/or conducting a Special Review of the program. If circumstances warrant, the Board may initiate action, including the need to place the program on probation, that may result in the withdrawal of the program's approval. If appropriate, Board actions may also include referring the matter to federal, state, or local agencies for review and possible action.

9.6.8 In all instances, the Executive Director sends a letter to the complainant and the program regarding the final disposition of the complaint, and a record of the complaint is retained on file at C-BEN offices subject to C-BEN's document retention policies. NOTE: The failure of the program to provide either a response to the complaint or any additional information as requested by the Executive Director within the specified time frames are considered a violation of C-BEN's policy on complaints and is referred to the Board for consideration and action.

9.6.9 An adverse action against a program arising from a complaint is not taken until the program has had an opportunity to respond to the complaint within the time frames established by C-BEN.

9.7 **Complaints Against Programs Seeking Initial and Renewal of Approval:** C-BEN posts on its website and publishes a list of programs seeking initial and renewal of approval and encourages third-party comments. If a complaint (as defined above) is received about a program seeking initial or renewal of approval, the procedures followed for handling the complaint are the same as for handling a complaint as described above.

10.0 Substantive Changes

A substantive change is one that may significantly affect a program's mission, quality, scope, or control. Substantive changes are reviewed to assure that changes to curriculum, instructional modalities, locations, scope of offerings, and program ownership are made in compliance with the C-BEN Quality Framework. The Board's review of the application seeks to determine whether the substantive change adversely affects the capacity of the program to continue to meet the C-BEN Quality Framework. Board approval is required before the program can implement the substantive change. The program seeking a substantive change follows C-BEN's approval process. Programs may contact C-BEN staff for clarification on what constitutes substantive changes.

Substantive changes include the following:

- A change to the program's mission;
- A change in organizational ownership of the program;
- A change of leadership (e.g., change to the program director);
- Change in curriculum content that represents a significant departure from existing competencies of the program;
- A change in method of program delivery (e.g., term-based to credit-based or direct assessment);
- A substantial increase or decrease in total program competencies; or

The Board monitors changes that are proposed by programs. When the Board ascertains that proposed changes, or an accumulation of changes that singly or in combination are seen to be so significant that it results in transforming the program, the Board may require a comprehensive re-evaluation of the program that may include a special review.

Proposed changes may be so substantial that the Board considers the program granted approval to have effectively ceased and a new program exists. After providing the program an opportunity to demonstrate ongoing compliance with the C-BEN Quality Framework and continuity of the approved program is maintained, the Board may require a re-evaluation of the program or withdraw approval and require the program to re-apply. The Board allows for due process by providing reasonable time for a program to comply with its request for additional information and documentation. In all cases, the Board will allow the program sufficient time to respond to any findings before making any final decision regarding a program's approval status.

- 10.1 Change of Mission:** A program seeking to substantively depart from its core mission requires prior approval because the program's approval is predicated on its core mission. A significant revision to the program's core mission signals a change throughout the program. These are the steps programs complete in obtaining Board approval for this substantive change:
- 10.1.1 Change of Mission Application Part 1:** A program submits a Change of Mission Application Part 1, 30 days prior to the next C-BEN meeting. The completed application and documentation are presented to the Board for initial approval.
 - 10.1.2 Substantive Change Implementation:** Once the change of core mission is fully implemented, the program submits a Change of Mission Application Part 2, including required documentation.
 - 10.1.3 Change of Mission Substantive Change Decision:** The Board reviews all documentation submitted to date and approves or denies the substantive change, in compliance with the C-BEN Quality Framework. C-BEN notifies the program in writing within 30 days of the Board's action and notifies other relevant constituencies in accordance with policy 4.0 Program Notifications.
- 10.2 Change of Ownership:** A "change of ownership" is any transaction or combination of transactions that would result in a change in the control of an approved program. Quality approval does not automatically transfer with a program when all or a majority share of its interests are sold or when a program changes ownership or control. If the new ownership desires to continue the program's approved status, it must notify the Board before the change is made. Failure to obtain approval results in withdrawal of approval as of the date of the change of ownership.
- 10.2.1 New Ownership:** The program's proposed new owners and administrators possess sound reputations, record of integrity, and ethical conduct in their professional activities, business operations, and relations. The proposed new owners are free from any association with misfeasance, including owning, managing, or controlling any educational operations that entered into bankruptcy or closed, to the detriment of learners.
 - 10.2.2 New Ownership Capacity:** A proposed transfer of ownership is approved based on the new owners' capacity to oversee a C-BEN-approved program. The new ownership's financial condition includes sufficient resources to continue sound operations in fulfillment of all commitments to enrolled learners. The new ownership's financial stability allows the program to remain in compliance with the C-BEN Quality Framework.

These are the steps programs complete in obtaining Board approval for this substantive change:

- 10.2.3 Change of Ownership Application Part 1:** A program submits a Change of Ownership Application Part 1, 30 days prior to the next C-BEN meeting. The completed application and documentation are presented to the Board for initial approval.
- 10.2.4 Substantive Change Implementation:** Following the change of ownership, the program submits a Change of Ownership Application Part 2, including required documentation.
- 10.2.5 Change of Ownership Substantive Change Decision:** The Board reviews all documentation submitted to date and approves or denies the substantive change, in compliance with the C-BEN Quality Framework. C-BEN notifies the program in writing within 30 days of the Board’s action and notifies other relevant constituencies in accordance with policy 4.0 Program Notifications.
- 10.3 Change of Leadership:** a program seeking to appoint a new program director requires prior approval to verify the administrative capacity in compliance with the C-BEN Quality Framework. These are the steps programs complete in obtaining Board approval for this substantive change:
- 10.3.1 Change of Leadership Application Part 1:** A program submits a Change of Leadership Application Part 1, 30 days prior to the next C-BEN meeting. The completed application and documentation are presented to the Board for initial approval.
- 10.3.2 Substantive Change Implementation:** Following the change of ownership, the program submits a Change of Leadership Application Part 2, including required documentation.
- 10.3.3 Change of Leadership Substantive Change Decision:** The Board reviews all documentation submitted to date and approves or denies the substantive change, in compliance with the C-BEN Quality Framework. C-BEN notifies the program in writing within 30 days of the Board’s action and notifies other relevant constituencies in accordance with policy 4.0 Program Notifications.
- 10.4 Change in Curriculum:** A program seeking to change curriculum content that represents a significant departure from the existing curriculum; make a change in the delivery method of the program (e.g., credit-based to term-based or direct assessment); or a substantial increase or decrease in total program competencies requires prior approval to verify the revised curriculum and support services continue to meet the C-BEN Quality Framework. These are the steps programs complete in obtaining Board approval for this substantive change:
- 10.4.1 Change in Curriculum Application Part 1:** A program submits a Change in Curriculum Application Part 1, 30 days prior to the next C-BEN meeting. The completed application and documentation are presented to the Board for initial approval.
- 10.4.2 Substantive Change Implementation:** Following the change in curriculum, the program submits a Change in Curriculum Application Part 2, including revised curriculum and undergoes special review.
- 10.4.3 Change in Curriculum Substantive Change Decision:** The Board reviews all documentation submitted to date and approves or denies the substantive change, in compliance with the C-BEN Quality Framework. C-BEN notifies the program in writing within 30 days of the Board’s action and notifies other relevant constituencies in accordance with policy 4.0 Program Notifications.

11.0 Non-Substantive Changes

Non-substantive changes are those changes that require a program to notify C-BEN but do not require prior approval. The following are non-substantive changes:

- 11.1 **Increase or Decrease of Competencies:** Programs are expected to ensure competencies and curriculum remain relevant. Programs may increase or decrease 30 percent of approved competencies. The program is responsible for maintaining ongoing compliance with the Quality Framework.
- 11.2 **Customized or Individualized Programs:** Programs may customize or individual already approved programs to meet the existing or emerging needs of a specific group of individuals, employers, or industry. This may require content revisions to existing competencies and content within a program. The program is responsible for maintaining ongoing compliance with the Quality Framework.
- 11.3 **Non-Substantive Change Review:** C-BEN reserves the right to direct a program to the substantive change process when it appears that the changes may affect compliance with published Quality Framework.

12.0 Reviewing, Adopting, and Circulating Changes

C-BEN initiates a systematic review of its Quality Framework at regular five-year intervals. These reviews assess the effectiveness of the approval process to support the development and ongoing accessibility of quality competency-based education programs. These reviews are designed to align the Quality Framework to address changes in regulatory requirements, learner needs, and higher education best practices.

- 12.1 **Seeking Feedback:** Prior to commencing the review process, C-BEN notifies member programs, external evaluators, Board members, and communities of interest to seek feedback, recommendations, and suggestions for thoughtful improvements on the Quality Framework.
- 12.2 **Review Process:** C-BEN reviews the Quality Framework individually and comprehensively against the data collected over the past five years and in consideration of comments received. This process results in proposed changes to the Quality Framework published for review and feedback from C-BEN-accredited programs.
- 12.3 **Call for Comment:** Proposed changes to C-BEN Quality Framework are published during a specified call for comment period not less than six weeks in duration.
- 12.4 **Revision Approval:** C-BEN collectively reviews all feedback and either approves or denies proposed changes to the Quality Framework.
- 12.5 **Implementation:** Following the adoption of proposed changes, revisions are implemented within twelve months.
- 12.6 **Effective Dates:** Programs are required to come into compliance with all approved and implemented changes within 12 months from the published adoption date.

Part III: Quality Framework

Download the full Quality Framework
for Competency-Based Education Programs at

www.cbentwork.org



Part IV: Appendices

1.0 Glossary

Admissions Disclosures Check List: A C-BEN created check list that identifies the required items programs must incorporate when publishing admissions criteria. The admissions offer disclosures check list outlines the policies that must be disclosed to learners prior to, and as a part of, the admissions process. This check list is Exhibit [Insert Number] and submitted as a part of the Program Assessment Report.

Annual Continuous Improvement Report (ACIR): C-BEN requires all accredited competency-based education programs to submit a report and fees annually by January 31st.

Assessment: A form of measuring participants' advancing mastery of major components within the curriculum and achievement of competencies.

Asynchronous: A method of using technology to provide distance or online educational methods, instruction, and learning when learners do not engage in activities in the same place at the same time for all learners (e.g., email, discussion boards, etc.).

Competency: A set of knowledge, skills, abilities, and intellectual behaviors that collectively demonstrate successful performance in a given context.

Development Guides: A set of scaffolded performance indicators intended to allow programs to understand stages of development for a competency-based education program. Each stage (e.g., initial, emerging, developed, highly-developed) is intended to build on and include the expectations from the previous stage.

Educational Methods: Represents the various performance-based activities (e.g., role play, case studies, simulations) a program uses to deliver instruction.

Element: the label or shorthand for the principle being described.

Formative Evaluation: Assessment methods used to monitor learning and provide ongoing feedback to learners throughout the academic experience. Results can be used by the instructional team to improve their teaching and increase learning.

Goals: Describe the general aims or purposes of the program administration and its curriculum. Effective goals are broadly stated, meaningful, achievable, and lead to measurable outcomes. Achievement of goals inform curriculum development, continuous improvement efforts, financial stability, strategic planning, and program sustainability.

In-Person: Educational methods that occur face-to-face and in the physical presence of the instructional team and learner(s).

Key Indicators: Types of measurable performance metrics identified by the program to gauge its performance over time. The program identifies quantitative and qualitative metrics that best communicate achievement of its mission and goals. The results of this data inform continuous improvement efforts.

Mission Statement: A formally adopted statement of the fundamental reasons for existence, shared purposes and values and reflects the learner population served. The mission guides growth, continuous improvement, and strategic initiatives.

Outcomes Achievement: Data collected by the program that demonstrates learners gained the competencies as published by the program. A program evaluates learner achievement data throughout and at the end of the program to inform continuous improvements.

Performance Indicators: A measurement that describes how effectively an institution is achieving the principle and standards.

Principle: A fundamental proposition that serves as the foundation for a system of belief, or behavior, or for a chain of reasoning.

Program Completion Rates: Annually, programs document their completion rates for the previous year for all learners in the Annual Continuous Improvement Report (ACIR).

Program Type: A program is categorized as direct assessment, term-based, or credit based.

Program Assessment: The collection of data used to analyze the program's overall effectiveness and document achievement of the mission and goals.

Program Effectiveness: The extent to which programs are achieving the mission and goals indicative of a C-BEN-accredited program.

Program Assessment Report (PAR): C-BEN requires programs seeking initial or renewal of accreditation to complete a template demonstrating compliance with all published Accreditation Standards.

Sponsoring Institution: An institution that is responsible for oversight and resource support of a competency-based education program. The sponsoring institution monitors and measures the effectiveness of the program to ensure continued alignment with its mission. As a sponsoring institution, the mission and goals vary from the competency-based education program's mission and goals, but demonstrate alignment based on the affiliation.

Standard: A level of quality or attainment, and an idea or thing used as a measure, norm, or model in comparative evaluations.

Summative Evaluation: Assessment methods used at the end of educational methods that focuses on learner performance and achievement of competencies.

Support Services: Resources available to learners and the instructional team to master the competencies. These may include tutoring, remediation assistance, counseling, respite programs, technology support, and other resources determined useful to support successful learner completion and curriculum delivery.

Synchronous: A method of using technology to provide distance or online educational methods, instruction, and learning that occurs at the same time without delay for all participants (e.g., Zoom, Teams, Google Classroom, Facetime, WebEx).

2.0 Quality Assurance Review Team Members and Qualifications

Quality Assurance Review Team?

C-BEN is looking for applicants to join its Quality Assurance Review Team. Selected individuals will be responsible for completing comprehensive reviews of CBE programs, offering an objective, third-party evaluation for continuous improvement purposes.

- **Purpose**

The Quality Assurance Review Team is responsible for comprehensively reviewing a program's quality and determining whether the curriculum, policies, and procedures meet the principles and standards contained in the Quality Framework. As a part of this process, the Team provides written recommendations for continuous improvement. The Quality Assurance Review Team completes the Assessment Report Rubric and provides a recommendation to the C-BEN Board of Directors as to whether the program meets the C-BEN Quality Framework.

- **Quality Assurance Review Team Member Terms**

Quality Assurance Review Team members serve four-year terms. The number of members selected to serve on the Quality Assurance Review Team is determined by the number of new program applicants. Quality Assurance Review Team members are appointed by C-BEN staff.

- **Quality Assurance Review Team Member Qualifications**

C-BEN seeks higher education subject matter experts and administrators who have earned appropriate academic credentials and have related professional experience for the programs under review. Members must complete C-BEN's quality assurance review training. Individuals are eligible to apply who meet the following qualifications:

- Minimum of a bachelor's degree from an accredited institution recognized by the U.S. Department of Education.
- Competency-based education experience (e.g., designing a CBE program, launching a CBE program, overseeing a CBE program).
- Professional experience, preferred.

To review programs at these levels, team members must have earned the following in a related field:

- Associate's Degrees: a bachelor's degree or higher;
- Bachelor's Degrees: a master's degree or higher; or
- Master's or Doctoral Degrees: a terminal or doctoral degree or higher.

- **Expectations**

Members of the Quality Assurance Review Team are expected to:

1. **Use Current Technology.** Members should be comfortable with using and navigating current technology including word processing software, apps, and mobile devices.
2. **Be Available.** Members commit to completing at least one review annually and submit timeframes for best availability.
3. **Work Collaboratively.** Members must participate and work as a team during this peer-review process.
4. **Engage in Professional Writing.** Members must be objective in their assessment of programs' compliance with the C-BEN Quality Framework and communicate compliance and non-compliance in a respectful manner.
5. **Participate in CBE Professional Development.** Members continue to participate in C-BEN conferences, training, and professional development opportunities to remain relevant within the field.
6. **Be Openminded.** Members need to practice openness to new pathways for supporting learner goals and positive outcomes.
7. **Maintain Confidentiality.** Members must commit to holding in confidence all information learned through this program, accepting legal liability for breaches of trust.

COMPETENCY-BASED
EDUCATION NETWORK 

Grow Demand • Build Capacity • Remove Barriers

www.cbenetwork.org

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