



COMPETENCY-BASED LEARNING

Policy Considerations

1. How much evidence do we have of whether competency-based learning is effective in meeting its stated purposes? Given the variety of forms that CBL can take, what research is necessary, and what questions need to be addressed satisfactorily, before the state takes further steps to direct, enable, or encourage implementation across the state?
2. How does competency-based learning (CBL) fit within a state legal framework in which each child has a constitutional entitlement to an opportunity to achieve the goals of basic education? Does the state's unique constitutional framework and legal history make implementation of competency-based models for progressing through school more challenging than elsewhere, or is there sufficient flexibility built into the law?
3. What supports do schools and districts need to implement competency-based models successfully? What lessons are to be learned in this regard from the experience in New Hampshire?
4. What role can the state most appropriately and usefully take on to encourage and support successful implementation of competency-based models of learning? Are legislative actions needed, or can this support be provided best through other means?

What Is Competency-Based Learning?

"Competency-based learning" (CBL) is broadly defined as an approach to education that rejects seat time, course completion and traditional grading as units of learning in favor of demonstrations of proficiencies or "competencies," at a student's own pace. It has had wider application thus far in postsecondary education than in K-12 education, but there is rising interest in the idea in K-12. This stems in part from the availability of newer technologies to support non-traditional modes of instruction. Proponents may prescribe a range of elements as integral to the concept. Arriving at a working definition of competency-based learning is further complicated by the use of a variety of terms for the approach that may, or may not, be used synonymously from place to place. These include, for example, "personalized learning," "student-centered learning," "proficiency-based learning," and "performance-based learning."

The Glossary of Education Reform, by the Great Schools Partnership, defines competency-based learning as follows:

Competency-based learning refers to systems of instruction, assessment, grading, and academic reporting that are based on students demonstrating that they have learned the knowledge and skills they are expected to learn as they progress through their education. In public schools, competency-based learning systems use state learning standards to determine academic expectations and define "competency" or "proficiency" in a given course, subject area, or grade level (although other sets of standards may also be used.) . . . The general goal of competency-based learning is to ensure that students are acquiring the knowledge and skills that are deemed essential to success in school, higher education, careers and adult life. If students fail to meet

expected learning standards, they typically receive additional instruction, practice time, and academic support to help them achieve competency or meet the expected standards.¹

That definition, on its face, does not seem so different from what schools are trying to achieve in our current, standards-based system. “In practice, competency-based learning can take a wide variety of forms from state to state or school to school – there is no single model or universally used approach,” the Partnership says.

The U.S. Department of Education (USED) defines “Competency-based learning or personalized learning” more in terms of its practical application and the forms it can take:

Transitioning from seat time, in favor of a structure that creates flexibility, allows students to progress as they demonstrate mastery of academic content, regardless of time, place or pace of learning. Competency-based strategies provide flexibility in the way credits can be earned or awarded, and provide students with personalized learning opportunities. These strategies include online and blended learning, dual enrollment and early college high schools, project-based and community-based learning, and credit recovery, among others.²

One of the most influential voices for competency-based learning has been the International Association for K-12 Online Learning, or iNACOL. A new report released with an organization called Competency Works defines “competency education” in more operational terms. “The five-part working definition of competency education describes the elements that need to be put in place to re-engineer the education system to reliably produce student learning:

- Students advance upon demonstrated mastery;
- Competencies include explicit, measurable, transferrable learning objectives that empower students;
- Assessment is meaningful and a positive learning experience for students;
- Students receive timely, differentiated support based on their individual learning needs;
- Learning outcomes emphasize competencies that include application and creation of knowledge, along with the development of important skills and dispositions.”³

Why Competency-Based Learning?

The fundamental critique of traditional education systems based on seat time, course completions, grade point averages, progression through grades based on age, and standardized, summative assessments is that (1) they do not recognize that individual children learn in different ways and at different paces, and (2) they do not prepare students well for the challenges of college and career in the present day.

¹ Great Schools Partnership. (May 14, 2014). The Glossary of Education Reform. “Competency-Based Learning. Retrieved June 8, 2015 from <http://edglossary.org/competency-based-learning/>

² U.S. Department of Education. “Competency-Based or Personalized Learning.” Retrieved June 5, 2015 from <http://www.ed.gov/oii-news/competency-based-learning-or-personalized-learning>

³ C. Sturgis. (June 2015). Implementing Competency Education in K-12 Systems. International Association for K-12 Online Learning (iNACOL) and CompetencyWorks. <http://www.inacol.org/resource/implementing-competency-education-in-k-12-systems-insights-from-local-leaders/>

“We know that students learn differently, requiring more or less time for different reasons,” iNACOL and Competency Works assert. “Students may have different approaches to learning, with some students preferring to take more time upfront to dive more deeply into learning to master new skills or content. Certainly the levels of academic support available outside of school differ. All of these dynamics lead to students learning at different paces.” (Sturgis, 2015, pp. 8-9)

The current system, CBL advocates say, can leave too many students, especially those with disadvantages, without the learning to be successful after school.

The traditional system produces gaps in learning because it is established around a time-based Carnegie Unit credit that guarantees a minimal exposure to content without a guarantee of learning. In combination with an A-F grading system – which can be easily corrupted as a measure of learning by providing points for behavior, allowing for measurements based on assignments instead of learning, and masking student progress through the averaging of grades – accountability for learning is eroded. (Sturgis, 2015, p. 9.)

In remarks to a NASBE legislative forum in March, Susan Patrick, told state board members and staff from around the U.S. that “true competency-based education tells us where a child is at every point in her education.” If you don’t know that, she said, gaps open and persist through school and beyond.⁴

The director of the Connecticut Association of Public School Superintendents, Joe Cirsuolo, declares in a news article on a CBL initiative in one district that there has been a need for “educational transformation for decades. Public school was expected to give every kid a chance to learn. It was all about access. Now it is every kid has to learn.” Cirsuolo described student-centered learning as “teaching kids in a manner that they have the time to learn . . . teaching in a manner with how they are comfortable learning and teaching kids things they are interested in learning,” with Common Core standards as the foundation.⁵

In a convening on competency-based education in New Hampshire earlier this year, Gene Wilhoit, former executive director of the Chief State Schools Officers, and now with the Center for Innovation in Education, stressed that higher expectations for students, demographic shifts in our schools, and the demand of the workplace for higher skills make imperative the adoption of a new system of personalized learning. “The goal we have established for all of our children to be college and career ready is the right one for them and for our nation,” Wilhoit said. “The ‘schooling’ experience as it now exists is out of alignment with the lofty goal we have set. We will reach our aspirations only when we cast aside historic perceptions and practices about how one acquires knowledge and skills.”⁶

Concerns about Competency-Based Education

Competency-based education, however termed, is not without its critics. Some of the concerns cited in the even-handed treatment by Great Schools are:

- CBL will require already overburdened teachers to spend large amounts of time on extra planning and preparation, and require new programs of professional development without proven design;

⁴ Susan Patrick. Presentation to National Association of State Boards of Education. March 23, 2015. Author’s notes.

⁵ J. Coe, “Student-centered learning is based on competency, rather than seat time.” *The Hartford Courant*. June 4, 2015.

⁶ G. Wilhoit, “Scaling Innovations and Leading Change toward Personalized Learning.” New Hampshire Convening on Competency Education. May 11, 2015.

- CBL has been mostly a school or district-level initiative up to now, and would be prohibitively difficult to implement with fidelity at a statewide level;
- Parents will fear that abandonment of traditional letter grades, transcripts, and other familiar academic reporting tools will disadvantage students in applying to college and eliminate competitive dimensions of achievement, such as GPA and class rank;
- There is insufficient evidence that competency-based learning, in its various forms, will actually work as intended.

Other concerns cited in the literature are safeguarding sensitive student information, while also being able to use it to individualize learning, and developing methods for monitoring and assessment that reliably evaluate the impact of CBL on student learning.⁷

Assessment and validation of results seems a particular challenge (as it's bound to be in such a shift). A reviewer of a major work in the field, Bramante and Colby's *Off the Clock: Moving Education from Time to Competency* (2012), notes that the authors "don't fully justify the rigor of their quality-control metrics for ensuring true mastery – the lynchpin for ensuring New Hampshire's program hasn't, and doesn't, devolve into a weak-kneed credit-recovery program rather than a bona fide competency-model."⁸

In a debate at *Education Next*, Benjamin Riley, founder of the teacher preparation group [Deans for Impact](#), challenges the very premises of CBL's inseparable relative, personalized learning. Both "the path argument" – students will learn more if they have more power over what they learn, and the "pace argument" – students will learn more if they have more power over when and how quickly they learn – fly in the face of what we know from cognitive science about how children learn, he contends.

"Am I suggesting that we return to the "factory model" of education? If factory model implies the dry recitation of facts to students, no, I am not. But to the extent that the stereotype represents what's actually happening in classrooms (which I'm skeptical of), the problem is not the seating arrangement or lack of smartphones; it's the pedagogy," Riley says. "Effective instruction requires understanding the varying cognitive abilities of students and finding ways to impart knowledge in light of that variation. If you want to call that 'personalization,' fine, but we might also just call it 'good teaching.'"⁹

Competency-Based Initiatives in the States

According to iNACOL and CompetencyWorks, nearly 90 percent of states have created some room for competency-based innovations. Districts in Alaska, California, Florida and other states, their 2015 report says, are transitioning to competency education with little or no supporting state policy. The report categorizes state policy in this way:

- Advanced States – Those states with clear policies that are moving toward proficiency-based, where it's more than just an option. (Maine, New Hampshire, Iowa, Colorado, Arizona, Oregon.)
- Developing States – Those states with pilots for competency education, credit flexibility policies, or enhanced policies for equivalents to seat time. (18 states, including Connecticut, Ohio, Minnesota and Idaho.)

⁷ S. Cavanagh, "What Is 'Personalized Learning'? Educators Seek Clarity." *Education Week*. October 20, 2014.

⁸ L... Bonnot, Review of F. Bramante and R. Colby, *Off the Clock: Moving Education from Time to Competency*. *Education Next* (April 26, 2012).

⁹ B. Riley and A. Hernandez, "Should Personalization Be the Future of Learning?" *Education Next*, April 4, 2015. Retrieved on May 16, 2014 from <http://educationnext.org/personalization-future-learning/>

- Emerging States – Those states with waivers or task forces. (17 states, including New York, Michigan, Texas and *Washington*).
- No Policies – Those states with seat time and no competency education policies. (Ten states, including Massachusetts, Illinois, Nevada and California.)

USED cites three states for their efforts in competency-based education: Ohio, Michigan and New Hampshire. We'll briefly describe them here.

Ohio Credit Flexibility Plan – Ohio's State Board of Education adopted a plan in 2009 that allows students to earn high school credit by demonstrating subject area competency, completing classroom instruction, or a combination of the two. Credit flexibility examples include:

- Traditional coursework
 - Distance learning
 - After school programs
- Educational options
 - Educational travel
 - Independent study
 - Internships
 - Community service
- Career-tech blend
 - Program credit
 - Academic credit
- Testing out, governed by local board policies

The benefits cited by Ohio's Department of Education for the credit flexibility plan will be familiar to anyone who's spent time with the literature of competency-based education:

- Creates more learning choices for students
- Focuses on performance, not time
- Accommodates different learning, paces and interests
- Promotes integration of different subjects
- Recognizes the importance of student engagement and ownership
- Matches pacing to learning capacity

Districts wishing to adopt a local credit flexibility plan must file a waiver application with the Department.¹⁰

Michigan Seat Time Waiver – [Legislation](#) enacted in 2010 allows a school district or public academy (charter school) that wishes to offer pupils access to online learning options and the opportunity to continue working on a high school diploma without physically attending at a school facility to do so under a seat time waiver from the Michigan Department of Education. Students must meet both

¹⁰ S. Hefner. Ohio Department of Education. "Credit Flexibility." (June 2010.) Retrieved June 15, 2015 from <http://education.ohio.gov/Topics/Quality-School-Choice/Credit-Flexibility-Plan> , and USED, Competency-Based and Personalized Learning.

attendance and participation requirements set in law. As of this year, fourteen districts and public academies had approved waivers under this act, with a variety of forms and purposes.¹¹

New Hampshire Statewide CBL Initiative -- New Hampshire has taken competency-based education further than any other state by far. The Granite State is the first, and so far only, state to make a statewide shift to advancing students based on mastery of subjects rather than time in school. New minimum standards adopted by New Hampshire's State Board of Education in 2005 abolished the Carnegie unit and established that a high school student must demonstrate mastery of course competencies in order to gain credit toward a diploma.

Initial efforts by state education officials to also set in law the competencies schools would require and how students would be assessed on them foundered on New Hampshire's strong tradition of local control. Instead every district was directed to come up with its own conception of the skills and knowledge needed to earn a diploma. The result is that the law has been implemented differently from one district and charter school to another – sometimes in a way faithful to the intent, sometimes not. Lacking the ability to provide direction from the state, the New Hampshire Education Department has put its effort into providing resources, technical assistance and other support to schools and districts in implementing the law.¹²

To address one of the thorniest problems for competency-based learning, the Education Department developed the Performance Assessment of Competency Education, or PACE. “PACE is a first-in-the-nation accountability strategy that offers a reduced level of standardized tests together with locally developed performance assessments,” the Department says, “These assessments are designed to support deeper learning through competency education, and to be more integrated into students’ day-to-day work than current standardized tests.” (N.H. DOE, 2015.)

Discussions began with the U.S. Department of Education in 2012 to explore prospects for a waiver of ESEA assessment requirements to take PACE option across the state. After much more work, USED approved on March 5 of this year a November 2014 waiver application by the state to pilot PACE in four districts. Under the waiver, the four LEAs will administer New Hampshire state assessments in reading/language arts and mathematics once each in elementary, middle and high school and will administer PACE in every grade K-12. The state was authorized to increase the number of PILOT LEAs to eight in year 2 of the pilot, subject to conditions.¹³ At the NASBE forum in March, New Hampshire State Board member Bill Duncan said the state has four more districts ready to go next year, and that the Board hopes to have 20 more after that.¹⁴

¹¹ Michigan Department of Education (MDE). “Seat Time Waiver.” *Pupil Accounting Manual, 2014-15*. Retrieved June 17, 2015 from http://www.michigan.gov/documents/mde/5-O-B_SeatTimeWaivers_329678_7.pdf, and MDE, “Summary of Seat-Time Waivers.”

¹² K. Schwartz, “Going All In: How to Make Competency-Based Learning Work.” Mindshift. KQED.org (June 15, 2014), and S. Stainburn, “Taking Competency-Based Learning from Policy to Reality.” *Education Week*. (June 4, 2014.)

¹³ U.S. Department of Education. Letter from Deborah Delisle, Assistant Secretary, to Hon. Virginia M. Barry, Commissioner of Education, State of New Hampshire. March 5, 2015.

¹⁴ B. Duncan. Presentation to National Association of State Boards of Education. March 23, 2015. Author’s notes.

It's worth noting that in 2011 New Hampshire joined a national collaborative, facilitated by the Council of Chief State School Officers (CCSSO), called the [Innovation Lab Network](#) (ILN). According to CCSSO, the ILN "is a group of states taking action to identify, test, and implement student-centered approaches to learning that will transform our public education system," grounded in principles of competency-based education such as personalized learning, anytime/anywhere opportunities, and comprehensive systems of learner supports. Twelve states, including California and Oregon, were in the collaborative at this writing.¹⁵

Achieve CBP State Partnership – Achieve, the organization that played a key role in development of the Common Core State Standards, has formed a Competency-Based Pathways State [Partnership](#) to provide support to states in advancing competency-based routes to college and career readiness.

Participating states commit to pursuing policy and implementation changes in graduation requirements, assessments and accountability. States need to address all three in order to reach a cross-cutting, accepted definition of competency (or depending on the state's terminology, proficiency or mastery) that equates to a college- and career-ready level of performance. This is essential to ensure rigorous determinations of student competency on the CCSS and other college- and career-ready standards.

Colorado, Connecticut, Delaware, Kentucky, Maine, Michigan, New Hampshire, Ohio, Oklahoma, Oregon, Rhode Island and Vermont are participating in the CBP State Partnership.¹⁶

Achieve has developed a state policy framework to set forward key decisions, options and policy levers for states pursuing these changes. The definition of "competency" embedded in the framework is adapted from the one developed by iNACOL and CompetencyWorks.

Competency-Based Provisions in Washington

The State of Washington has made moves toward competency-based learning, if incrementally and unsystematically. Because of the malleable definition of CBL, it is difficult to pinpoint those that would meet the standard. They would consist at a minimum, however, of the following.

Definition of credit – In November 2011 the State Board of Education adopted [WAC 180-51-050](#), which eliminated the time-based definition of a high school credit and replaced it with one based on proficiency or competency. The change is explained concisely on the SBE [web site](#):

What is the definition of a high school credit?

WAC 180-51-050 defines a high school credit to mean:

- (1) Grades nine through twelve or the equivalent of a four-year high school program, or as otherwise provided in RCW 28A.230.090(4):
 - (a) Successful completion, as defined by written district policy, of courses taught to the state's essential academic learning requirements (learning standards). If there are no state-adopted learning standards for a subject, the local governing board, or its

¹⁵ R. Colby, "Building a New Framework for Competency Education in New Hampshire. New Hampshire Convening on Competency Education. May 11, 2015; CCSSO, Innovation Lab Network, retrieved June 17, 2015 from http://www.ccsso.org/What_We_Do/Innovation_Lab_Network.html , and Sturgis, Implementing Competency Education, p. 6.

¹⁶ Achieve. Competency-Based Pathways. Retrieved June 22 from <http://www.achieve.org/CBP>

designee, shall determine learning standards for the successful completion of that subject; or

(b) Satisfactory demonstration by a student of proficiency/competency, as defined by written district policy, of the state's essential academic learning requirements (learning standards).

The change was part of SBE's overall review of graduation requirements and move towards a career- and college-ready graduation requirements framework.

The recommendation to change the time-based definition of a credit emerged from the work of the Implementation Task Force (ITF), a group of education practitioners appointed by SBE to recommend policy changes needed to implement new graduation requirements. The ITF recommended that a non-time-based policy would:

- Place the focus on student-centered learning.
- Allow districts more flexibility to meet the increased credit requirements.
- Allow districts to determine, and individualize, how much course time is needed for students to meet the state's standards.

It merits a more systematic examination of how districts have operationalized this still-recent change than has taken place thus far. In the basic education compliance report used to meet the agency's responsibilities under [RCW 28A.150.250](#), SBE asks each district to detail its requirements for high school graduation. Staff reported in a [presentation](#) to the Board at the January 2015 meeting that 82 districts, or about 33 percent of all K-12 districts, offered competency-based credits for the graduating class of 2015.

Waiver of credit-based graduation requirements – In November 2004 the State Board of Education adopted [WAC 180-51-055](#) (Alternative high school graduation requirements). This rule authorizes a district, or a school with the approval of the district, to apply to the Board for waiver of one or more of the requirements of the chapter of SBE rules on graduation requirements. The first section explains the 2004 Board's rationale.

(1) The shift from a time and credit based system of education to a standards and performance based education system will be a multiyear transition. In order to facilitate the transition and encourage local innovation, the state board of education finds that current credit-based graduation requirements may be a limitation upon the ability of high schools and districts to make the transition with the least amount of difficulty. Therefore, the state board will provide districts and high schools the opportunity to create and implement alternative graduation requirements.

A full discussion of the waiver available under this section appears in the [materials](#) prepared for the Board's March 2015 meeting, at which Highline School District was granted renewal for four years of the waiver from credit requirements for graduation awarded in 2008 for Big Picture School. Highline is one of only two districts that have submitted requests for credit-based graduation requirements in the 11 years the rule has been in place. Federal Way received a waiver for Truman High School in 2009, but did not seek renewal on expiration.

Why there has been so little interest among high schools and districts in the waiver authorized by WAC 180-18-055, and how much additional flexibility it truly provides when a credit is no longer defined in terms of seat time, may be questions worth exploration by the Board.

WAC 180-51-001 – In 2000 the State Board of Education adopted WAC 180-51-001 (Education reform vision), a statement setting forth the Board’s aspirations to shape graduation requirements for a performance-based education system. The WAC evokes some of the themes of competency-based learning discussed in this memo.

(1) The state is shifting from a time and credit-based system of education to a standards and performance-based education system. Certain ways of thinking about time must shift in order to support the ongoing implementation of school reform. The board's long-term vision of a performance-based education system includes:

(a) No references to grade levels or linking a student's educational progress to a particular age. Instead, learning is viewed in terms of developmental progress, academically and vocationally, so that while the curriculum may be sequential the student moves through it at her or his developmental pace, regardless of age;

(b) An understanding that in the absence of other important information, a student's grade point average and performance on the Washington assessment of student learning do not provide a complete picture of the student's abilities and accomplishments;

(c) An understanding that our concept of school needs to expand and take into account that education and learning are about connected learning experiences, which can and do occur inside and outside the physical boundaries of a school building; and

(d) An understanding that students do not all learn in the same way (there are multiple learning styles), that teachers do not all instruct in the same way (there are multiple teaching styles and strategies), and these facts suggest that it should be possible to assess students' performance and achievement in multiple ways while maintaining common, high expectations and standards for learning.

This vision can be seen to manifest itself in the elimination of the time-based definition of credit in 2004 and the personalized pathways component of the college- and career-ready graduation requirements adopted by the Board as WAC 180-51-068 in 2014, as well as the objective alternative assessments for high school graduation in RCW 28A.655.061.

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