



## APPLICATION FOR APPROVAL

### PROGRAM MODIFICATION To add Course Prep Hours to Non-Degree Programs Measured in Academic Credit Hours

---

**PLEASE ALLOW 60 DAYS FOR APPROVAL OF A COMPLETE APPLICATION**

<b>INSTITUTION</b>	
<b>STREET ADDRESS</b>	
<b>CITY, STATE, ZIP CODE</b>	
<b>CHIEF ADMINISTRATOR (CA)</b>	
<b>CA TELEPHONE/EXTENSION</b>	
<b>CA EMAIL ADDRESS</b>	
<b>NAME OF PROGRAM</b>	
<b>DATE OF APPLICATION</b>	
<b>DATE OF NEXT ACCREDITATION VISIT</b>	

---

**Council on Occupational Education**  
7840 Roswell Road  
Building 300, Suite 325  
Atlanta, GA 30350

Submit completed application to [marcia.cox@council.org](mailto:marcia.cox@council.org)

*(June 2019)*

**GENERAL INFORMATION:**

This application is to be used for non-degree Title-IV eligible programs measured in academic credit hours. The purpose of the application is to determine the number of course prep hours for which a program may be eligible for supplementary federal financial aid. (Refer to “Dear Colleague” letter, U.S. Department of Education GEN-11-06, issued March 18, 2011.)

Institutions must prepare and submit to the Council a Program Modification Application for each program conforming to the above description. The Program Modification application must indicate the nature and estimated time requirements of the **out-of-class** homework, research, or other unsupervised learning (or “course prep”) activities assigned for each course in a COE-approved program of study. If the institution submits a Change-in-Existing-Program application to revise the length of a program already approved by the Council for course prep hours, a new Program Modification application reflecting these changes must also be submitted to COE.

The Council will evaluate the application and validate the number of homework or course prep hours assigned in a program. These courses prep hours will help determine the number of financial aid credit hours for which each program may be eligible by the U.S. Department of Education. Although an institution may assign as many course prep hours as it feels is appropriate, the Department will allow a maximum of 25% of a course’s scheduled in-class hours to be designated as course prep hours for financial aid purposes. The Council will allow a maximum of 2 course prep hours per week for a clinical, internship or externship course—for a total of 20 course prep hours for each quarter clinical/internship/externship course, or 30 course prep hours for each semester clinical/internship/externship course. In calculating a course’s eligible financial aid credit hours, the Department may consider only a course’s in-class clock hours (lecture, lab and work-based activity) plus the lesser of either the ED-allowable prep hours or the school’s assigned prep hours for each course.

The clock hours that comprise a program’s course prep time (homework, research, or other unsupervised learning activities) are *not* added to the program’s official clock hours as approved by the Council. A program’s official clock hours will still be comprised only of its lecture, laboratory, and work-based learning hours. While the Program Modification application is designed to calculate the number of course prep hours for the purpose of determining financial aid eligibility, the Council will continue to approve programs in academic credit hours as cited in Standard 2, Criterion B-36 (*Handbook of Accreditation, 2019 Edition*).

**IMPORTANT:** It is the institution’s responsibility to assure that the following four conditions exist with respect to the course prep assignments indicated in this application: (1) the assignments support the learning objectives of the program; (2) the assignments are graded; (3) the course prep grades are weighted appropriately in determining the student’s final grade for the course; and (4) the course prep activities are evaluated annually as part of the program’s overall evaluation by the institution.

<b>I attest that all information relative to this application is true and correct:</b>	
<hr/>	
<b>SIGNATURE OF CHIEF ADMINISTRATOR</b>	<b>DATE</b>

**EACH APPLICATION MUST BE TYPED AND SUBMITTED SEPARATELY VIA EMAIL.**  
**The file should be labeled accordingly: “School Name PM App Program Name DDMMYY”**  
**(For example: “Acme Business College PM App Medical Assistant 12OCT19”)**

**Email digital copy of the application to: [marcia.cox@council.org](mailto:marcia.cox@council.org)**

**Mail application fee with copy of application cover page to the Council.**

## **INSTRUCTIONS FOR COMPLETING THE FEDERAL FINANCIAL AID CLOCK HOUR/CREDIT HOUR CHART:**

*The application is only for non-degree, Title IV-eligible programs offered in academic credit hours and already approved by the Council on Occupational Education.*

- (1) List the name of the program as it appears on the institution's COE Approved Programs List. Enter the program's CIP Code
- (2) At the top of the form indicate the total number of the program's required clock hours and academic credit hours. List the number of clock and credit hours available via distance education.
- (3) List each course name in the far left column. List the number of clock hours required for lecture, lab and work-based activity for each course. Also, indicate if the lecture, lab or work-based activities clock hours are available via distance education.
- (4) Enter the Total In-Class Clock Hours.
- (5) Based on information included in the Course Prep Chart section of the application, enter the number of Assigned Course Prep (homework) Clock Hours for the course.

***The Council will evaluate the application and complete the remainder of the Clock Hour/Credit Hour Chart.***

- (6) To calculate the course prep hours allowed by the Department of Education for the purpose of federal financial aid, the Council will multiply the course's Total In-Class Clock Hours by .25 ("point two-five"). The resulting number represents the maximum number of prep clock hours the Department will allow for the course for the purpose of calculating federal financial aid. For clinical, internship or externship courses, the maximum allowable course prep hours are 20 (for quarter credit hour programs) or 30 (for semester credit hour programs). Under the Allowable Course Prep Clock Hours column, the Council will enter the lesser of these two numbers: the number entered by the institution in the Assigned Course Prep Clock Hours cell, or the number derived by dividing the Total In-Class Clock Hours by .25.
- (7) The Total Allowable Clock Hours is the sum of the course's Total In-Class Clock Hours and the Allowable Course Prep Clock Hours.
- (8) The Equivalent Financial Aid Credit Hours may be calculated by dividing the Total Allowable Clock Hours by 37.5 for semester credit hour programs, or by 25 for quarter credit hour programs. The Department of Education—not COE—will make this calculation.
- (9) **Submit a \$250 application fee, per program, with the application.**

**The Program Modification Application may be revised as needed by the institution. If the program's name, total clock and/or credit hours, location or delivery format change, the revision must be approved by the Commission using the appropriate change-in-existing program application or Miniform (available under the Resources tab of the agency's web site: [www.council.org](http://www.council.org)). If there are changes to a program's COE-approved course hours, a new Program Modification Application should be submitted.**

## **INSTRUCTIONS FOR COMPLETING THE COURSE PREP CHART:**

### ***Program Name:***

List the name of the program as approved by the Council

### ***Course Name:***

List the name of the individual course that is a required part of the program

### ***Number of Clock Hours:***

List the Lecture, Laboratory, Work-Based Activities and Total In-Class Clock Hours for each course.

### ***Assigned Course Prep Clock Hours:***

List the estimated number of total hours to complete all the homework activity assigned for this course.

### ***Describe the Type of Course Prep Work:***

List the nature of the homework to be assigned for the course. Be mindful that students must submit this homework to instructors for evaluation and grading; therefore, the type of homework must be appropriate for turning in to the course instructor. The homework assigned must also be completed outside of class. Consequently, quizzes and tests (which are typically taken under supervision in the classroom) would not be listed as out-of-class course prep work. Clinical activities are also not considered "outside course prep" work since they are generally done under the supervision of a preceptor.

### ***Estimated Homework Completion Time for the Term:***

Enter an estimate of the number of total hours to complete the homework for the entire course.

### ***Learning Objectives for the Course Prep Work:***

List the objectives of the assigned homework. *This should not be the same as the course objectives.* Here you are to briefly list the objectives of the specific homework assignment.

### ***Course Prep documentation to be submitted to and graded by the course instructor:***

List the specific homework items students are expected to submit to their instructors. The information listed here should be consistent with the response in the section called "Describe the Type of Course Prep Work." Reminder: this must be documentation for work prepared *outside of class* and apart from work done during supervised work-based activities. Do not list tests, quizzes or presentations here since these are typically done in class.

# FEDERAL FINANCIAL AID CLOCK HOUR/CREDIT HOUR CHART

<b>Program Name</b>		<b>CIP Code</b>	
---------------------	--	-----------------	--

**LIST ALL COURSES OFFERED WITHIN THE PROGRAM.** Make additional copies of this page as needed.

<b>TOTAL REQUIRED CLOCK HOURS:</b>		<b>SEMESTER CREDIT HOURS:</b>		<b>QUARTER CREDIT HOURS:</b>	
<i>Total number of clock hours available via distance education:</i>		<i>Total number of semester hours available via distance education:</i>		<i>Total number of quarter hours available via distance :</i>	

These columns to be completed by the Council

<b>COURSE NAME</b> (Use one line for EACH COURSE within the program.)	<b>LECTURE</b>		<b>LABORATORY</b>		<b>WORK-BASED ACTIVITIES</b>		Total In-Class Clock Hours	Assigned Course Prep Clock Hours	Allowable Course Prep Clock Hours	Total Allowable Clock Hours	Equivalent Financial Aid Credit Hours
	Clock Hours	DE*	Clock Hours	DE*	Clock Hours	DE*					
<b>TOTAL ALL COLUMNS</b>											

GRAND TOTALS

\* Place an 'x' in the DE column if any course instruction is available via distance education delivery.  
 Course Prep Hours are NOT added to the lecture, laboratory or work-based activities hours in deriving the total hours for the course or program.

## COURSE PREP CHART

**Instructions:** Please complete the chart describing each course that is offered within the program.  
Make additional copies of this page as needed so that each course in the program is accounted for.

<b>PROGRAM NAME</b>			
<b>Course Name:</b>			
<b>Number of Clock Hours:</b>	<b>Total In-Class Clock Hours (Lecture + Lab + Work-Based Activity)</b>	<b>Total Assigned Course Prep Hours</b>	<b>Textbook/Author/Publisher (if applicable)</b>
<b>Describe the Type of Course Prep Work:</b>			
<b>Estimated Homework Completion Time for the Term:</b>			
<b>Learning Objectives of the Course Prep Work:</b>			
<b>Course Prep documentation to be submitted to and graded by the course instructor</b>			
<b>Course Name:</b>			
<b>Number of Clock Hours:</b>	<b>Total In-Class Clock Hours (Lecture + Lab + Work-Based Activity)</b>	<b>Total Assigned Course Prep Hours</b>	<b>Textbook/Author/Publisher (if applicable)</b>
<b>Describe the Type of Course Prep Work:</b>			
<b>Estimated Homework Completion Time for the Term:</b>			
<b>Learning Objectives of the Course Prep Work:</b>			
<b>Course Prep documentation to be submitted to and graded by the course instructor</b>			

(June 2019)

## **The Program Modification Application: Applying for “Course Prep” Hours to supplement Federal Financial Aid Awards**

In 2011 the U.S. Department of Education (ED) developed a method for supplementing a student’s financial aid award by counting unsupervised out-of-class homework (or “course prep”) hours towards a program’s financial aid credit hours. Financial aid credit hours—which are not to be confused with a program’s *academic* credit hours—determine the amount of a student’s Pell Grant or federally-backed student loan. The intention of the ED is to acknowledge and award the significant amount of work that students are expected to do ***outside of the classroom***.

### ***Program Eligibility***

The enhancement of a student’s federal financial aid credit hours with course prep assignments is *only available for credit-hour, non-degree programs* which have met prior ED requirements for financial aid eligibility. Also, the Department has limited the amount of course prep hours available to supplement the financial aid credit hours for a program to no more than 25% of the program’s in-class hours as approved by the institution’s authorizing state agency and its accreditor. Allowable homework hours for work-based activity courses (internships, externships or clinical assignments) are limited by COE to two hours per week—or a total of 20 hours for quarter-hour courses or 30 hours for semester-hour courses.

### ***ED Requirements***

In this new regulation the Department has charged the institution’s accrediting agency with the responsibility of reviewing and approving the homework to be completed by the student. There are four primary conditions that the ED has established for a program whose students may be eligible to benefit from these additional federal financial aid credit hours: (1) the assigned out-of-class homework must support the learning objectives of the course; (2) the homework assignment must be submitted to the course instructor and evaluated; (3) the homework grades must comprise a portion of the student’s final grade for the course; and (4) the institution must regularly evaluate the effectiveness of the course prep work in achieving the program’s learning objectives and goals. The ED also requires the institution’s accreditor to review compliance with course prep requirements during scheduled accreditation visits.

### ***Program Modification Application***

COE has developed an application to address this new opportunity made available by the Department. Called the Program Modification Application (because it “modifies” the financial aid credit hours for which a student may qualify), the form includes a standard Clock Hour/Credit Hour Chart to list each course in the program and to show the total number of in-class hours approved by the Council. Additionally, the application requires a brief summary of the homework assigned to each course in the program. This summary includes the type of assigned homework activity (such as textbook end-of-chapter questions, worksheets, case studies, essays, etc.); the estimated number of

hours to complete all the assignments for the term; the learning objectives of the *homework assignments* (not the learning objectives of the course as a whole); and the type of documents turned in by the student to verify completion of the assignments (end-of-chapter assignments, reports, worksheets, etc.). If textbook assignments are required, please state the textbook name, author and publishing company. In responding to the four sections of the application, the descriptions do not have to be too detailed, but neither should they be generic. Bear in mind that the course prep activities allowed by the ED are to be completed outside the classroom; therefore, an in-class quiz that covers last night's reading assignment does not meet this requirement. While the application may be submitted to the Council via email, the \$250 application fee, along with a copy of the front page of the Program Modification application should be mailed to the Council.

### ***Letter of Approval***

The Program Modification applications are reviewed by members of the Council's Accreditation Compliance staff. Once an application is approved, a letter is transmitted to the institution to confirm approval of the course prep hours assigned to a program. The letter will clearly specify the program name, in-class hours, assigned course prep hours, COE-approved course prep hours, and total hours for the course (in-class hours plus approved course prep hours) that may be used to determine a student's financial aid award. Using this approval letter, the ED—not COE—will make the financial aid credit hour calculation. The number of approved course prep hours will also be posted on the Approved Programs List appearing on the institution's *MyCouncil* webpage.

### ***Frequently Asked Questions***

*What programs are eligible to receive additional financial aid credit hours?*

- Non-degree programs approved by the Council in credit hours

*Are homework assignments limited to 25% of a course's in-class hours?*

- No. An instructor may assign as many homework hours as needed to meet a course's learning objectives; but only up to 25% of the course's in-class hours may be counted for the purpose of determining federal financial aid eligibility.

*What kinds of assignments are appropriate for "course prep"?*

- Any assignments that support the learning objectives of the course, are completed *outside the classroom*, are graded by the instructor, and are made available for a COE team member to review. In-class activities (tests, quizzes, presentations, etc.) do not count as homework.

*How long does an instructor need to keep turned-in homework?*

- The Council recommends retaining homework assignments for the duration of the term when a course is offered. Some schools have chosen to keep homework on file for the term following the quarter or semester that a course is offered as well.



*What will a COE team look for when verifying compliance to the new course prep regulations?*

- During an accreditation or substantive change visit a COE team member may ask to see a course syllabus and the homework submitted to the instructor for a particular course, in addition to the Program Modification application submitted by the school for the program. The team member will look to verify that the assignments support the objectives of the course, that they have been graded, and that these grades have been averaged into the final grade for the course.

*When should I submit a Program Modification application to the Council?*

- Program Modification applications should be submitted for programs already approved by the Council. The time to submit the application is after the Council has approved a new program application or after the Council has approved a change in a program curriculum.

*What if a program changes after we have received approval for course prep hours?*

- If the name or clock hours of a program change after the Council has already approved a Program Modification application, a *new* application should be submitted to the Council showing the new name and/or course hours and the new course prep assignments.

*What issues may keep a Program Modification application from being approved by the Council?*

- There are twin problems that slow down an application's approval: too little information about the assigned homework, and too much information. In the first case, the responses about assigned homework are too generic, such as "work related to the course" or "homework as assigned" instead of "12 weekly reports on current health-care topics" or "3 term papers addressing legal challenges to state voter laws". In the second case, some schools send copies of course syllabi, detailed assignment sheets, or even examples of homework assignments to be done by students.
- Valid course prep assignments are done *outside of class*; therefore, under "Documentation demonstrating completion of activity and objectives" do not list quizzes, tests or other activities that take place in the classroom.
- Be mindful of the math. For a 45-hour lecture course an instructor may assign 30 hours of homework to be completed over the course of a 15-week semester; this is only 2 hours of homework a week. However, the ED will only allow 11.25 hours of course prep (or 25% of the course's in-class hours) to be counted for a student's federal financial aid credit hours.

If you have questions about the Program Modification application please contact Marcia Cox at [marcia.cox@council.org](mailto:marcia.cox@council.org) or at (800) 917-2081, ext. 201.