

# Issue Paper 1

## Program Integrity and Improvement Issues

**Issue:** Clock to Credit Hour Conversion

**Statutory Cites:** None

**Regulatory Cites:** §668.8(k)

**Summary of Change:** Under §668.8(k)(2)(i) of the current regulations, an undergraduate educational program is considered to be a clock hour program for title IV, HEA purposes if it is required to measure student progress in clock hours (1) to receive State or Federal approval or licensure to offer the program, or (2) for graduates to apply for licensure or the authorization to practice the occupation that the student is intending to pursue.

Under §668.8(k)(2)(ii) of the current regulations, an undergraduate educational program is considered to be a clock hour program for title IV, HEA purposes if the hours for the program have been converted from clock hours to credit hours but the resulting credit hours do not comply with the definition of a credit hour in 34 CFR 600.2.

Under §668.8(k)(2)(iii) of the current regulations, an undergraduate educational program is considered to be a clock hour program for title IV, HEA purposes if the institution does not offer all the underlying clock hours for a converted program and requires attendance in the clock hours that are the basis for the credit hours awarded.

The proposed changes would eliminate §668.8(k)(2) and (k)(3) to streamline the regulatory requirements governing clock to credit hour conversions and minimize confusion among participating institutions, while maintaining the conversion formula for such programs to ensure that similar amounts of aid are paid to students for similar levels of academic coursework.

### Change:

#### §668.8 Eligible Program

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(k) *Undergraduate educational program in credit hours.* ~~(1) Except as provided in paragraph (k)(2) of this section, if~~ an institution offers an undergraduate educational program in credit hours, the institution must use the formula contained in paragraph (l) of this section to determine whether that program satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and the number of credit hours in that educational program for purposes of the title IV, HEA programs, unless—

~~(1)~~ The program is at least two academic years in length and provides an associate degree, a bachelor's degree, a professional degree, or an equivalent degree as determined by the Secretary; or

~~(2)~~ Each course within the program is acceptable for full credit toward that institution's associate degree, bachelor's degree, professional degree, or equivalent degree as determined by the Secretary provided that—

(A*i*) The institution's degree requires at least two academic years of study; and

(B*ii*) The institution demonstrates that students enroll in, and graduate from, the degree program.

~~(2) A program is considered to be a clock-hour program for purposes of the title IV, HEA programs if—~~

~~(i) Except as provided in paragraph (k)(3) of this section, a program is required to measure student progress in clock hours when—~~

~~(A) Receiving Federal or State approval or licensure to offer the program; or~~

~~(B) Completing clock hours is a requirement for graduates to apply for licensure or the authorization to practice the occupation that the student is intending to pursue;~~

~~(ii) The credit hours awarded for the program are not in compliance with the definition of a credit hour in 34 CFR 600.2; or~~

~~(iii) The institution does not provide the clock hours that are the basis for the credit hours awarded for the program or each course in the program and, except as provided in §668.4(e), requires attendance in the clock hours that are the basis for the credit hours awarded.~~

~~(3) The requirements of paragraph (k)(2)(i) of this section do not apply to a program if there is a State or Federal approval or licensure requirement that a limited component of the program must include a practicum, internship, or clinical experience component of the program that must include a minimum number of clock hours.~~

(1) *Formula.* (1) Except as provided in paragraph (l)(2) of this section, for purposes of determining whether a program described in paragraph (k) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and of determining the number of credit hours in that educational program with regard to the title IV, HEA programs—

(i) A semester hour must include at least 37.5 clock hours of instruction;

(ii) A trimester hour must include at least 37.5 clock hours of instruction; and

(iii) A quarter hour must include at least 25 clock hours of instruction.

(2) The institution's conversions to establish a minimum number of clock hours of instruction per credit may be less than those specified in paragraph (l)(1) of this section, if the institution's designated accrediting agency, or recognized State agency for the approval of public postsecondary vocational institutions, for participation in the title IV, HEA programs has not identified any deficiencies with the institution's policies and procedures, or their implementation, for determining the credit hours, ~~as defined in 34 CFR 600.2~~, that the institution awards for programs and courses, in accordance with 34 CFR 602.24(f), or, if applicable, 34 CFR 603.24(c), so long as—

(i) The institution's student work outside of class combined with the clock-hours of instruction meet or exceed the numeric requirements in paragraph (l)(1) of this section; and

(ii)(A) A semester hour must include at least 30 clock hours of instruction;

- (B) A trimester hour must include at least 30 clock hours of instruction; and
- (C) A quarter hour must include at least 20 hours of instruction.