



Direct Assessment Competency-based Programs

Substantive Change Application Background Information

The U.S. Department of Education requires institutions wishing to have direct assessment competency-based programs considered for Title IV eligibility acquire approval from their regional accrediting body prior to filing their applications with the Department. Institutions are encouraged to understand the Department's expectations as outlined in its [guidelines](#) published on March 19, 2013.

Federal Definition of Direct Assessment Competency-based Programs

A *direct assessment program* is an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program utilizing the results of the assessment.

Direct assessment of student learning means a measure by the institution of what a student knows and can do in terms of the body of knowledge making up the educational program. These measures provide evidence that a student has command of a specific subject, content area, or skill or that the student demonstrates a specific quality such as creativity, analysis or synthesis associated with the subject matter of the program. Examples of direct measures include projects, papers, examinations, presentations, performances, and portfolios.

Elements of Good Practice

When determining whether to approve a direct assessment competency-based program, the Commission will expect an institution to demonstrate the following elements of good practice. These elements are derived from the Commission's Criteria for Accreditation and Assumed Practices and align with elements that it typically reviews in substantive change. The [Criteria Booklet](#) outlines these expectations.

Philosophy and Framework for Competency-based Education. The institution has a clearly defined purpose and philosophy undergirding its direct assessment competency-based education. It has clearly defined goals and a framework for its direct assessment competency-based programs that ensures quality and learning.

Structure and Coherence of the Program. The institution has outlined the structure of the direct assessment competency-based program and established clearly defined competencies related to the program and the learning outcomes that students must attain to be awarded the credential. The program has a clearly-defined beginning, middle and end, and the institution has a mechanism for monitoring student progress towards acquisition of competencies and attainment of the credential being awarded at the end of the program. Expectations for student work and the means for assessing the learning and competencies acquired through that work are clearly defined. The competencies required for the program build a unified body of knowledge that is consistent with a discipline or career path; that is, they are not taken as merely discrete units or for desultory purposes.

Application of Academic Policies. The institution has determined how its already-established academic policies in such areas as Satisfactory Academic Progress, academic discipline, probation and suspension apply to students in the direct assessment competency-based program, and it makes appropriate amendments to its academic policies where appropriate. The institution shows how it determines when a student in the program is not making sufficient progress and should be

moved to a traditional course-based format to complete his or her academic program or when other disciplinary action should be taken, including academic probation or suspension.

Student Eligibility. The institution has a mechanism for determining prior to matriculation in the direct assessment competency-based program whether a student has the capacity to complete the program (as demonstrated by tests of computer skills and sufficient academic preparation, for example) and therefore is eligible to enroll in that program. Even an open-admissions institution should have such a mechanism for determining a student's eligibility to enroll in a direct assessment competency-based program.

Information to Students. The institution provides clear information to students outlining the structure and expectations of the program, tuition and fees, and academic policies that apply to students in the program. This information is clearly communicated to students prior to their matriculation.

Student Support Services and Access to Academic Resources. The institution offers student support services that appropriately guide students in these programs. In addition, the institution is prepared to assist students who drop out of a direct assessment competency-based program in making the transition back to a traditional course-based format so as to ensure that those students can continue to progress towards a degree or certificate.

Eligibility, Development, and Engagement of Faculty/Instructors. Faculty or instructors with subject matter expertise in the student's discipline and in general education play a formative role in the direct assessment competency-based student's academic program. While faculty with subject matter expertise design the curriculum, this faculty or other similarly qualified faculty or instructors also regularly engage with students during the course of the program, provide expert assistance and support to students in the program, and have a meaningful role in directing and reviewing the assessment of competencies. Program faculty should be well suited for this role by interest and experience and receive appropriate professional development and support from the institution in executing this role. While mentors or counselors may have an important role in direct assessment competency-based programs in supporting or assisting students, they should not replace faculty or instructors with subject-matter expertise. In addition, the number of mentors and counselors assigned to the program should be sufficient to work with enrolled students and qualified to advise students at the college level.

Assessment of Student Learning. The direct assessment competency-based program relies on a strong foundation for assessment established by the institution, with demonstrated capacity to assess student work at the course and program level in general education and in the major. At all levels, assessment supports academic improvement. The comprehensive student learning outcomes and goals in the program are reviewed regularly and reflect concepts generally agreed on by the related discipline(s).

Evaluation and Improvement Systems. The institution ensures that it regularly reviews its direct assessment competency-based programs, particularly in the initial years of the programs, to ensure that it identifies any areas of weakness in the programs and makes immediate improvements.

Distinguishing the Direct Assessment Competency-Based Program From Prior Learning Assessment. The direct assessment competency-based program provided by the institution is clearly distinguished from assessment of prior learning that may take place at the outset of the program. When students demonstrate competencies at the beginning of a program on the basis of prior learning, transcripts and other documents should make clear that these competencies are awarded as prior-learning credit. Once the institution has identified prior-learning credit for each student, other competencies should be awarded only after the student has completed the modules that form the program or demonstrated mastery of the competencies defined by them.

Institutional Contribution. The institution offering the direct assessment competency-based program is able to identify and articulate the educational contribution it provides to students in this program. Such contribution may take the form of modules, engagement with faculty, exercises, assessment of student learning or other activities that either expand the

student's knowledge beyond any prior learning that the student may have demonstrated at matriculation or that assist the student in documenting how prior learning translates to the attainment of competencies required for receiving an academic credential.

Billing and Title IV. While the institution may charge a fee for its assessment of a student's prior learning as well as its transcription of competencies, the institution charges tuition only for those courses, modules, components, and services that the institution contributes to the development or formation of the direct assessment competency-based student or for the term in which the student is enrolled in the direct assessment competency-based program. Similarly, the institution assists students in seeking Title IV student aid funds for those courses, modules or components of the educational program that the institution contributes to the development or formation of the student.

Formal Processes for Evaluating Student Work: The institution has a mechanism for determining how modules and competencies in the direct assessment competency-based program are equivalent to traditional courses and credit hours in a conventional course-based program, and how they are related to accepted expectations of academic achievement and rigor, as based on the following principles:

1. Student work performed in direct assessment competency-based programs (e.g., demonstrated mastery of tasks, assignments, or competencies) must be equivalent or superior to student work performed in traditional courses (e.g., successful completion of tests, assignments, or projects).
2. Student learning outcomes and goals in direct assessment competency-based programs offered by the institution must be equivalent or superior to student learning outcomes and goals defined by the discipline in a traditional academic program.
3. The application of student learning assessments (e.g., examinations; portfolios; projects; capstone presentations; other recognized demonstrations of mastery; etc.) must be equivalent or superior to the outcome assessments that are used in traditional courses.

Transcription of Student Work: The institution is able to demonstrate that students in the direct assessment competency-based program are achieving at least the same outcomes and goals, and at the same academic level of rigor, as in traditional programs and courses offered by the institution. The institution prepares and maintains a transcript for each student documenting both the competencies earned and equivalent courses or credit hours based on the expectations noted above. The transcript is prepared and updated during the course of the student's academic program so that it is available in the event that a student transfers to another institution or drops out prior to completing the direct assessment competency-based program. Such equivalencies are also available at the program level for state and federal agencies and accrediting agencies that may need to review them. In addition, the transcript provides clear and sufficient information for other institutions and employers to understand the student's accomplishments.

External Contractors. If the institution has contracted with an external organization to provide some or the entire direct assessment competency-based program, including course materials provided to students, the institution ensures that it retains sufficient control of the development and implementation of the program. The Commission's policies for approval of contractual relationships requires the institution to seek approval of the contract at the same time it seeks approval to initiate a direct assessment competency-based program.

