



Middle States Commission on Higher Education
3624 Market Street, Philadelphia, PA 19104-2680
Phone: 267-284-5000 Fax: 215-662-5501 www.msche.org

CBE/Direct Assessment Programs
Substantive Change Screening Form
Effective October 1, 2015

Context

As explained in MSCHE's Policy on Degrees and Credits (effective June 26, 2009), direct assessment programs are those "in which credits and degrees are awarded based solely on successful student demonstration of expected competencies, and not through credit hours or clock hours."

The U.S. Department of Education (USDE) further defines a competency-based/direct assessment program as follows:

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.

To be an eligible program, a direct assessment program must meet the requirements in 34 CFR 668.8 including, if applicable, minimum program length and qualitative factors. Because a direct assessment program does not utilize credit or clock hours as a measure of student learning, an institution must establish a methodology to reasonably equate the direct assessment program (or the direct assessment portion of any program, as applicable) to credit or clock hours for the purpose of complying with applicable regulatory requirements. The institution must provide a factual basis satisfactory to the

U.S. Secretary of Education for its claim that the program or portion of the program is equivalent to a specific number of credit or clock hours.¹

Accreditation or the reaffirmation of accreditation is granted to cover an institution as it exists at the time of evaluation. MSCHE requires that substantive changes be presented to the Commission for prior review and approval of CBE/direct assessment programs in order for them to be included within the scope of an institution's accreditation because, in the judgment of both the Commission and USDE, the addition of these programs represents a "significant departure from existing offerings."² Important definitions of competency-based and direct assessment programs are as follows:

Competency-based Education (CBE) programs:

"...a CBE program is one that organizes content according to what a student knows and can do, often referred to as a "competency." CBE programs also generally have very clear claims for student learning, stress what students can do with the knowledge and skills they acquire, and have assessments that provide measurable evidence of competency. Student progress is determined by mastery of each competency. Because CBE focuses on whether students have mastered these competencies, there is a focus on learning outcomes rather than time spent in a classroom."³

Direct assessment programs 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 education program. These measures provide evidence that a student has mastered 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."⁴

¹ 34 CFR §668.10

² Middle States Commission on Higher Education [MSCHE], "Substantive Change Policy Statement," <http://www.msche.org>; 34 CFR 602.22(a).

³ (U.S. Department of Education [USDE], "Competency-Based Education (CBE) Experiment Reference Guide," p. 1-1).

⁴ Ibid, p. 1-2.

MSCHE-accredited institutions desiring to include CBE /direct assessment programs as part of their educational offerings must seek approval from both the Commission and the U.S. Department of Education; such programs are not Title IV eligible until both the Commission and USDE grant formal approval. Where applicable, institutions must also seek approval from their state agencies and program accreditors.

The Commission requires approval of all programs in which 100 percent of student progression through a program is completed through direct assessment (and not through the completion of credit hours). The Commission must approve the institution's general approach to CBE, the program's clock/credit hour equivalencies, must ensure that faculty and other professionals in the program are appropriately qualified, that the program is designed with the expectation that that regular and substantive interaction between students and faculty and/or appropriately qualified professionals is regular and substantive.⁵ Institutions are encouraged to refer to the appropriate substantive change template for further information about what is required as part of this process.

USDE is currently receiving applications from institutions wishing to participate in its Experimental Sites Initiative (ESI) for the following types of CBE/direct assessment programs:

- CBE programs in which 100% of student progression through the program is through the accumulation of credit or clock hours
- CBE/direct assessment programs in which more than 50% (but less than 100%) of student progression through the program occurs through the completion of direct assessments
- CBE/direct assessment programs in which less than 50% of student progression through the program occurs through the completion of direct assessments

Institutions are reminded that participation in these ESI initiatives is contingent upon acceptance of these programs into the initiative by USDE. The Commission will then work with institutions to obtain Commission approval through the substantive change process.

Purpose of this Form

The purpose of this form is to enable institutions to have conversations with Commission staff about next steps in the process and is only used to help refer institutions to appropriate steps in the process. Completed screening forms should be submitted electronically to SC@msche.org. After submission of the form, institutions will be notified regarding next steps in the process.

⁵ U.S. Department of Education, "Competency-Based Education (CBE) Experiment Reference Guide," pp. 2-4 to 2-5; 3-10.

Direct Assessment Screening Form Questions

I. Institutional and Program Information

Name of institution: [Click here to enter text.](#)

Date of Submission: [Click here to enter text.](#)

Name of person submitting form: [Click here to enter text.](#)

Title of person submitting form: [Click here to enter text.](#)

Email address: [Click here to enter text.](#)

Phone: [Click here to enter text.](#)

Name of degree program: [Click here to enter text.](#)

Certificate or Degree level: [Click here to enter text.](#)

II. Screening Questions

Please answer the following screening questions. In order for an institution to qualify as eligible for review of a direct assessment program by the Commission, it must answer yes to the following questions:

1. 100 percent of student progression through the program will be completed through direct assessment.
Yes No
2. Competencies, student work, and progression through the program are not defined in terms of credit or clock hours.
Yes No
3. Direct assessments will be used to demonstrate student competencies irrespective of course structures, faculty-student relationships, and institution-designed and implemented criteria
Yes No
4. The institution will establish (or has established) a methodology to reasonably equate the direct assessment program to credit or clock hours
Yes No

(Please Continue on Next Page)

5. The program will be designed so that interaction between students and faculty and/or appropriately qualified professionals will be regular and substantive.
Yes No

In the section below, in 100 words or less, please explain how the program will be designed to ensure that student-faculty interaction will be regular and substantive.

[Click here to enter text.](#)

In the section below, in 100 words or less, indicate the mode(s) through which student-faculty interaction will be facilitated (in-person, distance education, etc.).

[Click here to enter text.](#)

III. Additional Questions for the Commission's Information

1. At least 25 percent of the program will be administered by a third party provider
Yes No
2. If this is an undergraduate program, students complete less than 75 percent of the program through prior learning assessment. If this is a graduate program, students complete less than 67 percent through prior learning assessment.
Yes No
3. This is the institution's first CBE/direct assessment program.
Yes No
4. The institution requires state approval for a direct assessment program .
Yes No
5. The institution requires approval for a direct assessment program by a program accreditor (e.g., NCATE, ABET, AACSB).
Yes No
6. The institution is applying to the U.S. Department of Education in order to have this program designated as an Experimental Sites Initiative (ESI)?
Yes No
7. If the answer to Question # 6 is yes, which of the following Experimental Sites Initiatives will this program be a part of (check all that apply)?

CBE/Direct Assessment Programs: Substantive Change Screening Form

CBE: 100% credit hour based

CBE: > 50% direct assessment

CBE: < 50% direct assessment

Additional Information;

[Click here to enter text.](#)