



Middle States Commission on Higher Education

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Substantive Change Request Instructions Direct Assessment Programs (100% Direct Assessment Based) Effective July 1, 2015

Overview

Context

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 in order for them to be included within the scope of an institution's accreditation.¹

Competency-based Education (CBE) programs are defined as follows:

“...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.”²

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.”³

¹ Middle States Commission on Higher Education [MSCHE], “Substantive Change Policy Statement,” <http://www.msche.org>

² (U.S. Department of Education [USDE], “Competency-Based Education (CBE) Experiment Reference Guide,” p. 1-1).

³ Ibid, p. 1-2.

The U.S. Department of Education (USDE) requires that the Commission approve all purely direct assessment programs be approved through the substantive change process. USDE considers inclusion of such a program to be a substantive change and therefore requires institutions to obtain Commission approval of each direct assessment program prior to disbursing Title IV aid to students in the program. The purpose of this document is to outline the procedures for submitting a substantive change request for this type of program...

For the purposes of helping institutions complete this application, footnotes are provided throughout this document, which reference regulatory requirements, specifically as they pertain to programs of this type. Information provided in these footnotes should not be understood to represent the extent of all regulatory or Commission requirements. Where questions about expectations for reporting exist, institutions are encouraged to refer to the source documents cited in these footnotes or to Commission documents, where applicable, for further clarification. Institutions are also encouraged to contact appropriate Commission staff should there be further questions.

Process for Approval

USDE requires that the Commission review the institution's general approach to CBE, approve the program's clock or credit hour equivalency and the methodologies employed, and approve the program as a direct assessment program.⁴

Institutions are required to submit substantive change requests for each program of this type.⁵ For the first two programs of this type, the Commission requires that the first two programs be approved through its complex substantive change process.

The approval process occurs in two stages. The first stage begins when an institution submits an appropriate substantive change request for including a direct assessment program within the scope of the institution's accreditation.

1. Request for approval of the first two programs of this type are considered by the Commission to be complex substantive change requests, requiring submission of an appropriate substantive change request document, visit to campus by one or more consultants, submission of a consultant report to the Commission, and submission of such information to the Commission's Committee on Follow-up and Candidate Institutions. Consistent with the Commission's protocols, that Committee then makes a recommendation to the full Commission;

⁴ For direct assessment programs, the institution must ensure that the academic year using credit hour equivalencies includes competencies equivalent to an amount of learning associated with a minimum of 24 semester hours or 36 quarter hours and at least 30 weeks of instructional time. Institutions using clock hour equivalences must include competencies equivalent to an amount of learning associated with a minimum of 900 clock hours and at least 26 weeks of instructional time. The institution's policy must establish clock or credit hour equivalences for each of the CBE program's required competencies. Source: U.S. Department of Education [USDE], "Competency-Based Education (CBE) Experiment Reference Guide," p. 2-4 to 2-5.

⁵ (U.S. Department of Education [USDE], "Competency-Based Education (CBE) Experiment Reference Guide," p. 2-4 to 2-5); 34 CFR 602.22; 35 CFR 668.10.

2. After the review is completed the full Commission will take an appropriate action, including acknowledging receipt of the request and including the program within the scope of the institution's accreditation; deferring approval pending submission of additional information; or denying the request, in which case the institution may re-submit the request once necessary changes have been made, unless otherwise specified by the Commission. Any of the above actions may include a request for follow-up activities and reports as the Commission deems appropriate.⁶
3. After the first two programs have been approved by the Commission, institutions complete this form, but the program(s) move through the Commission's substantive change process.⁷

⁶ Middle States Commission on Higher Education, "Substantive change procedures," [http://www.msche.org/documents/SubChangeProcedures072415\(accepted\).pdf](http://www.msche.org/documents/SubChangeProcedures072415(accepted).pdf).

⁷ Middle States Commission on Higher Education [MSCHE], "Substantive Change Policy Statement," <http://www.msche.org>

**Substantive Change Request
Approval of a Direct Program
(100% Direct Assessment Based)**

Cover Sheet

Please note that the shaded boxes will expand when text is entered.

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

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

Name of person completing this request: [Click here to enter text.](#)

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

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

E-mail: [Click here to enter text.](#)

Accreditation Liaison Officer (ALO) name and contact information (if different from above):

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

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

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

E-mail: [Click here to enter text.](#)

Address of Institution: [Click here to enter text.](#)

For questions regarding this request, please contact (check the appropriate box):

The person submitting it The institution's ALO

Anticipated starting date of the new arrangement: [Click here to enter text.](#)

**Please sign by typing the names of the individuals identified in the space provided.
By signing and submitting this cover sheet, the individuals below indicate that they are
aware of this Complex Substantive Change request in its entirety and agree to its review by
the Middle States Commission on Higher Education.**

Signature of person submitting the request: [Click here to enter text.](#)

Signature of ALO (if different from above): [Click here to enter text.](#)

Signature of President or Chief Academic Officer: [Click here to enter text.](#)

Institutional Accreditation Overview

What is the date for the next regularly scheduled accreditation review : [Click here to enter text.](#)
(Self-Study or PRR) by MSCHE?

Is it a Self-Study? Or a PRR?

Is the institution currently on warning, probation or show cause by MSCHE? NO YES
If yes, please review the Commission’s Substantive Change policy as it pertains to institutions on warning, probation or show cause.

Has the institution been asked to submit any follow-up reports (monitoring, progress) to the Commission in the last three years? NO YES
If yes, please specify in the area at the end of this section the due date and the topics/Standards that were or will be covered in the report(s).

Has any other regional, national or disciplinary/professional accrediting agency indicated concerns about the institution or any of its branch campuses, additional locations or other sites within the last three years? NO YES

Is the institution being monitored or reviewed by the US Department of Education or other state or federal agency for any reason? NO YES

If the answer to any of the above questions is “Yes,” please explain fully below in the context of this substantive change request. These factors will be considered in the review and decision making process.

Approvals

Please indicate any approvals required for the institution to close this substantive change and the dates approval was received or is expected.

- Institutional (e.g., faculty, Board) Date(s): [Click here to enter text.](#) NA
- System approvals Date: [Click here to enter text.](#) NA
- State approval Date: [Click here to enter text.](#) NA
- Other (please specify:) Date: [Click here to enter text.](#) NA

Attach all approvals to the request.

Substantive Change Request
Approval of a Direct Assessment Program
100% Direct Assessment Based

Narrative

The Commission continues its commitment to respecting institutional mission, supporting innovation, and encouraging institutions to engage in continuous quality improvement. Therefore, the Commission's Requirements of Affiliation, accreditation standards, and policies and guidelines apply whenever an institution submits a Substantive Change request. Institutions are responsible for all activities within their charge and should therefore include sufficient information in the Substantive Change Request to enable the Commission to determine that the institution has adequate capacity to administer the direct program.

Documentation should be clearly labeled and organized in ways that facilitate efficient review. Attachments should be limited to documents that are directly referenced in the text of the request. It is acceptable to include attachments that are excerpts from existing documents as long as the information provided fully addresses the questions asked.

To be considered by the Commission, the request must be complete, must be signed, and must include all of the items below.

- A. Provide evidence documenting and explaining the need for the program, including an explanation of how it aligns with the institution's mission and goals and how the institution has determined that there is sufficient student demand for the program.
- B. Describe the student population(s) that will be served by the CBE program. Attach three-year enrollment and financial projections (labeled "Attachment B. 1," "Attachment B. 2," etc.).
- C. Provide a description of the program, including the educational credential offered, the level of credential, and the program curriculum. Explain how the program's learning goals and objectives are clearly defined, directly relate to opportunities for enrolled students to achieve these goals and competencies, how the program's goals and competencies will be effectively communicated to students, and how they are consistent with the program's discipline and/or with student career paths. Also explain the method(s) through which the program will be delivered (campus-based, distance education, correspondence, etc.).
- D. Describe the number of semester, quarter, or clock hours that will be equivalent to the amount of student learning being directly assessed for the certificate or degree. The description should include explanations of:

- Methodolog(ies) the institution will use to determine the number of credit or clock hours to which the program is equivalent;⁸
- Methodolog(ies) the institution will use to determine the number of credit or clock hours to which the portion of a program an individual student will need to complete is equivalent;
- How the institution defines an academic term and the number of semester, quarter and clock hours that are equivalent to the amount of working and learning directly assessed for the degree, and how it will determine or calculates satisfactory academic progress, cohort default rates, completion and retention rates, and other information that is commonly reported to the Commission and state and federal entities.⁹

E. Provide an analysis of how institutional resources necessary to administer the program are available and accessible to ensure program stability and overall quality, including analysis and discussion of the institution’s capacity to engage in the direct assessment of student competencies as part of the overall direct assessment program. Provide three-year financial projections, including an analysis of costs and revenues (labeled “Attachment E. 1,” “Attachment E. 2,” etc.).

F. Describe how the program’s overall educational quality will be assured including a description of how programmatic learning outcomes and objectives will be regularly assessed. At a minimum, the description should include the following:

- A list of clearly-articulated statements of expected program-level student learning outcomes and how they will be aligned with any direct assessments used by the program to evaluate student performance with regard to these programmatic outcomes;

⁸ Under USDE guidelines, these programs must establish a methodology to reasonably equate the direct assessment program (or the direct assessment portion of any program) to credit or clock hours for the purpose of complying with regulatory requirements. (U.S. Department of Education [USDE], “Competency-Based Education (CBE) Experiment Reference Guide,” p. 2-4 to 2-6).

⁹ Institutions must ensure that their defined academic year for semester-based or trimester-based programs include a minimum of 24 semester hours or 36 quarter hours. These institutions must also ensure that a *week of instructional time* is any seven-day period in which it makes available to the students enrolled in the program the instructional materials and faculty support that enable students to engage in educational activity, which includes, but is not limited to, participation in regularly scheduled learning sessions (in which students have opportunities to directly interact with faculty members and appropriately qualified professionals), participation in faculty-guided independent study, consultations with a faculty mentor to discuss academic course content, etc. If the program is direct assessment only, educational activity also includes development of academic action plans when developed in consultation with qualified faculty members as long as they address competencies identified by the institution. The institution’s satisfactory academic progress (SAP) programs must evaluate a student’s SAP upon the student’s completion of each of the program’s academic years, as measures in weeks of instructional time. The institution must also include procedures to determine whether a student has completed sufficient competencies to complete the program within the maximum time frame; for undergraduate programs, this is no more that 150% of the program’s published length, as defined in the definition of “maximum time frame” in 34 CFR 668.34 (b). Sources: 34 CFR 668.10(a) (3) (iii); U.S. Department of Education [USDE], “Competency-Based Education (CBE) Experiment Reference Guide,” p. 2-4 to 2-6).

- A description of how direct assessments will be regularly and systematically analyzed to ensure their appropriateness for use in evaluating student achievement of competencies, particularly by qualified faculty and/or appropriately qualified professionals;
- A description of how programmatic student learning outcomes will be regularly assessed, including:
 - Explanation(s) of how the institution will ensure the dissemination and discussion of programmatic student learning assessments results, faculty and/or appropriately qualified professionals, and other relevant stakeholders;
 - Explanation(s) of how this program's assessment process will be used for documenting success and/or improving student learning and curriculum;
 - Explanation(s) of how the program's assessment results will be used to support academic planning;
 - Explanation(s) of how the institution will periodically evaluate the overall assessment process of the program;
- In cases where the program has been awarded programmatic accreditation, identify the accreditor, provide the latest team report in an appendix, describe the latest action(s) the accreditor has taken, and indicate if the program accreditor has reviewed the program as a direct assessment program;
- Provide a description of policies, procedures, and assessment approaches that will be used by the institution to ensure overall academic rigor and student achievement of the program's student learning outcomes;
- Provide an explanation of how students' achievement of programmatic student learning outcomes will be comparable to those in traditional program formats.

G. Describe how the direct assessment program will be administered, including the following:

- Information about how and when the institution will determine on an individual basis what each student enrolled in the program needs to learn;
- A description and analysis of how direct assessments will be conducted and how direct assessment processes will be managed to ensure appropriate progression of students through the program, including:
 - Descriptions of policies and procedures defining the methods by which learning can be evaluated, the level and amount of credit available by evaluation, and how these policies will be published and consistently implemented;
 - Descriptions of policies and procedures regarding the award of credit for student learning that define the acceptance of such credit based on the institution's curricula and standards, and how these policies will be published and consistently implemented;

- Descriptions of procedures regarding the recording of evaluated learning by the awarding institution, and how these procedures will be published and consistently implemented. The description should also contain information about how transcripts will:
 - Be kept and maintained for each student and which document both competencies and equivalent courses in terms of credit hours
 - Be regularly updated
 - Contain information that is clear and sufficient for other institutions and employers for the purposes of transfer out of the program, enrollment in programs (e.g., graduate programs) after completion of the direct assessment program, and employment.
 - analysis demonstrating that the credit awarded will be appropriate to the subject and the degree context into which it will be accepted; and,
 - analysis demonstrating that evaluators of student learning in the direct assessment program will be knowledgeable about the subject matter and about the institution’s criteria for determining student achievement of program competencies.
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- Explanation and analysis of how faculty and other professionals who will be evaluating the achievement of direct assessments in the program are appropriately prepared and qualified for the positions they hold, with roles and responsibilities that are clearly defined and sufficiently numerous to fulfill those roles appropriately, and who participate in sufficient professional development to engage effectively within a direct assessment modality;¹⁰
 - Explanation and analysis of how faculty and other qualified professionals will play a meaningful role in the direct assessment of specific competencies and in areas requiring subject matter expertise¹¹;
 - Explanation and analysis of how regular and substantive–student-faculty interaction will be achieved in the program and how the quality of such interactions will be regularly monitored, assessed, and evaluated, including:
 - How students who are struggling or who might otherwise wish to interact with faculty will be able to do so;

¹⁰ See note on “regular and substantive interaction” below. Faculty and other appropriately prepared professionals are not required to administer and/or grade all assignments; some assessments could be exam-based and machine graded, but those forms of assessment would not be considered substantive interaction (U.S. Department of Education [USDE], “Competency-Based Education (CBE) Experiment Reference Guide,” p. 3-11).

¹¹ Qualified means that faculty and qualified professionals have appropriate academic credentials and experience in an applicable knowledge domain, consistent with the Commission’s Standards and relevant criteria. (U.S. Department of Education [USDE], “Competency-Based Education (CBE) Experiment Reference Guide,” p. 3-10).

- How the program is designed so that regular and substantive interaction between students and qualified faculty and/or appropriately qualified professionals occurs with predictable regularity and which ensures that such interactions focus on the academic subject matter in which students are engaged¹².
- Explanation and analysis of how the program will be administered, including how curriculum will be devised, developed, and regularly monitored and supported by qualified professionals, including faculty¹³;
 - Where applicable, explanation and analysis of how the institution's institutional learning outcomes (e.g., general education) will be part of the overall program and how the institution ensures that such outcomes will be achieved by students in the direct assessment program, consistent with the Commission's standards on general education and educational offerings;
 - In cases where a third party provider will play a part in the delivery of the program to students, explanation of how the institution will regularly assess and ensure that it retains sufficient control of the development and implementation of the program and how overall oversight is achieved, and how it will regularly assess and evaluate the involvement of third party providers in the direct assessment program.

H. Describe how the institution will assist students in gaining the knowledge needed to pass the direct assessments in the program and how the institution will ensure the following:

- Access to student support services that are reasonably necessary to enable each student to achieve program and institutional learning goals;
- Identification of students who are not fully prepared for college level study or are having difficulty working within a direct assessment modality and procedures that are in place for referral to relevant courses and support services for such students.

¹² Only programs that require regular and substantive interaction are approved. Faculty-student interaction must not be wholly optional or initiated primarily by the student; interaction that occurs only upon student request (electronically or otherwise) is not considered regular and substantive interaction. However, institutions have some flexibility in how they define "regular and substantive." See USDE guidelines for more information—see note below regarding the term "regular". (U.S. Department of Education [USDE], "Competency-Based Education (CBE) Experiment Reference Guide," p. 3-9 to 3-10).

¹³ Consistent with the points made above about "regular and substantive" student faculty interaction, a program must be designed with the expectation that regular and substantive interaction between students and faculty is an integral part of the program. The term "regular" means that interaction is built into the program's design and occurs with "predictable regularity," which can be event driven and include the completion of certain competencies, a percentage of competencies or the submission of assessments. In cases where individual students choose not to initiate contact with qualified faculty and other appropriately qualified professionals, the program's design must include periodic contact with students. Such contacts might be made through use of email or other social media, but there must be opportunities for substantive interaction built into the program's design (U.S. Department of Education [USDE], "Competency-Based Education (CBE) Experiment Reference Guide," p. 2-4 to 2-5).

- Adherence to the overall institution’s own stated policies and to overall ethical standards, including accurate and comprehensive information regarding financial aid, all tuition and fees, costs associated with the completion of competency assessments, scholarships, loans, refunds, program length, curriculum, and expected student learning outcomes;
- Published and implemented policies and procedures regarding transfer credit, prior learning assessments, and credit for extra-institutional college level learning that state the criteria established by the institution regarding transfer credit¹⁴;
- Systematic procedures that identify students who are not fully prepared for college level study and procedures that are in place for referral to relevant courses and support services for these students.
- Assistance of students who drop out of the CBE program so they might complete comparable programs of study or might otherwise be advised to complete their education;
- Access to learning resources comparable to those offered in traditional programs
- Regular evaluation of the extent to which the institution supports its students toward the achievement of learning competencies and program completion, with reference to the points above.

¹⁴ Institutions must include a process that ensures that Title IV aid is not paid for academic credits resulting from successful assessments of prior learning where the learning was not based on instruction provided during payment periods. With regard to transfer credit, if an institution accepts transfer credit to meet students’ ESI program requirements, the institution’s procedures should include whether it will prorate a student’s maximum time frame based on the number of transfer credits a student has received (U.S. Department of Education [USDE], “Competency-Based Education (CBE) Experiment Reference Guide,” p. 2-6 through 2-7).