



*Southern Association of Colleges and Schools  
Commission on Colleges  
1866 Southern Lane  
Decatur, Georgia 30033-4097*

## **DIRECT ASSESSMENT COMPETENCY-BASED EDUCATIONAL PROGRAMS**

### **Policy Statement**

Academic credit has provided the basis for measuring the amount of engaged learning time expected of a typical student enrolled not only in traditional classroom settings but also laboratories, studios, internships and other experiential learning, and distance and correspondence education. Students, institutions, employers, and others rely on the common currency of academic credit to support a wide range of activities, including the transfer of students from one institution to another.

In recent years, some institutions have recognized the potential of innovative learning models and have developed creative programs that allow students the flexibility to learn at the pace that makes sense for them, both in career-technical and degree programs. Students progress in these programs by demonstrating their achievement of specific skills or knowledge. These programs, commonly called competency-based programs, fit into traditional learning models that measure progress in credit or clock hours, but increasing numbers do not. Direct assessment competency-based educational programs use the direct assessment of student learning in lieu of measuring student learning in credit or clock hours.

The purpose of this policy is to provide guidance to institutions and evaluation committees on the Commission's expectations regarding the establishment and review of direct assessment competency-based programs and its hybrids as defined below.

**Definitions.** For the purpose of the application of this policy and in accord with federal regulations, the Commission uses the following definitions:

Competency: A competency is a clearly defined and measurable statement of the knowledge, skill, and ability a student has acquired in a designated program.

Competency-Based Educational Programs. A competency-based educational program is outcome-based and assesses a student's attainment of competencies as the sole means of determining whether the student earns a degree or a credential. Such programs may be organized around traditional course-based units (credit or clock hours) that students must earn to complete their educational program, or may depart from course-based units (credit or clock hours) to rely solely on the attainment of defined competencies.

Direct Assessment Competency-Based Educational Programs (*also referred to in this policy as direct assessment programs*). Federal regulations define a direct assessment competency-based educational program as an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, uses direct assessment of student learning relying solely on the attainment of defined competencies, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program using the results of the assessment.

Hybrid Direct Assessment Competency-Based Educational Programs (also referred to in this policy as hybrid programs). A hybrid competency-based educational program combines course-based competencies (clock and credit hours awarded) with non-course based competencies (no clock or credit hours awarded).

**Characteristics of a Direct Assessment Competency-Based Educational Program.** A direct assessment program has several characteristics:

1. It does not subscribe to conventional notions of the clock hour, seat time, term length, or the credit hour; rather, it relies on the student's ability to demonstrate clearly defined and measurable competencies in a designated program.
2. It is designed and delivered within the framework of the program's defined knowledge, skills, and competencies as demonstrated by students, rather than in terms of prescribed courses.
3. A student may acquire the requisite competencies from multiple sources and at various times other than, or in addition to, the learning experiences provided by the institution. As such, the length of time it takes to demonstrate learning may be different for each student.
4. It often allows for alternative approaches to teaching and learning.
5. It may rely almost exclusively upon students using direct assessment testing models to demonstrate their mastery of program and degree content.

**Direct Assessment as a Substantive Change.** Because the initiation of a direct assessment or a hybrid program constitutes the addition of courses or programs that represent a significant departure, either in content or method of delivery, from those offered when the institution was last evaluated, each program is considered a substantive change that requires approval by SACSCOC Board of Trustees. Substantive change policy statements related to direct assessment and hybrid programs, as well as to other types of substantive changes, can be found in Appendix A of this document.

**Commission Obligations in the Review of Direct Assessment Competency-Based Educational Programs.** In accord with federal policy as it relates to direct assessment competency-based programs only, SACSCOC is required to (1) evaluate the institution's offering of direct assessment programs and include them in the institution's grant of accreditation and (2) confirm the institution's claim of the direct assessment program's equivalence in terms of credit or clock hours and any other information that the DOE may require to determine whether to approve the institution's application. As with the identification of non-compliance with other standards of the *Principles of Accreditation*, the Commission is obligated to take action in accord with that used in relation to other standards of non-compliance. Because SACSCOC requires approval of direct assessment and hybrid programs, once approved, the offering of both types of competency-based programs will be included in the institution's award of accreditation.

**Institutional Obligations.** The Commission's requirements, policies, processes, and procedures are predicated on the expectation that an institution operates with integrity in all matters, including the maintenance of academic quality in the establishment of direct assessment competency-based educational programs. An institution is responsible for the academic quality of any credit or clock hour unit or any competency-based unit recorded on the institution's transcript, whether applied to a direct assessment or a hybrid program. In determining whether to approve a direct assessment or hybrid program, the Commission expects that the institution will comply with the following practices and procedures: (1) adhere to initial obligations and an expected framework; (2) ensure compliance with appropriate SACSCOC requirements and standards outlined in the *Principles for Accreditation* and with Commission policy; and (3) follow procedures for the notification and approval of the substantive change.

#### **1. Adherence to Initial Obligations and an Expected Framework**

Report the initiation of direct assessment and hybrid programs. The institution has an obligation to notify the Commission and seek approval for the offering of such programs. Once approved, the direct assessment and hybrid programs will be included in the institution's award of accreditation. To secure

federal financial aid, the institution must also seek approval from the U.S. Department of Education—only if the entire program is a direct assessment competency-based program.

*Identify institutional contributions.* The institution offering the direct assessment 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 upon entry into the direct assessment or hybrid competency-based program or that assist the student in documenting how prior learning translates to the attainment of competencies required for receiving academic credit.

*Ensure the integrity of accreditation and awards.* Because SACSCOC accreditation that has been awarded to a member institution is not transferable—either in actuality or appearance—SACSCOC prohibits the use of its accreditation to authenticate courses, programs, or awards offered by organizations not so accredited. If the SACSCOC-accredited institution has contracted with an external organization to provide part of or the entire direct assessment 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 require the institution to seek approval of the contract at the same time it seeks approval to initiate a direct assessment and a hybrid program.

## **2. Compliance with Appropriate SACSCOC Requirements and Standards**

Requirements and standards in the *Principles of Accreditation* which affect direct assessment and hybrid programs are listed below. They should be considered when developing contracts, completing the substantive change prospectus, and demonstrating compliance. In addition, the prospectus template for approval of this substantive change refers to Commission policies that are applicable to competency-based programs.

*Institutional Mission.* The institution has a clearly defined mission and philosophy undergirding its direct assessment and hybrid programs. It has clearly defined goals and a framework for its programs that ensure an appropriate design for quality and learning, as appropriate for higher education. (CR 2.1)

*Information to Students.* The institution provides clear information to students outlining the structure and expectations of the direct assessment and hybrid programs, tuition and fees, and academic policies that apply to students in the programs. This information is clearly communicated to students prior to their admission to the direct assessment and hybrid programs. (Standard 10.5)

*Structure and Coherence of the Program.* The institution outlines the structure of the direct assessment and hybrid programs and establishes clearly defined competencies related to the program and the learning outcomes that students must attain to be awarded the credential appropriate to higher education. 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. In undergraduate degree programs, the institution requires the successful attainment of competencies of a general education component at the collegiate level that is a substantial part of the degree, ensures breadth of knowledge, and is based on a coherent rationale. The institution clearly defines expectations for student work and the means for assessing the learning and competencies acquired through that work. The competencies required for the program build a unified body of knowledge that is consistent with a program or career path; that is, they are not taken as merely discrete units. (CR 9.1, CR 9.2, and CR 9.3)

*Student Admissions and Eligibility.* The institution has an appropriate mechanism for determining prior to admission in the direct assessment program whether a student has the capacity to complete an educational credential within the program and, therefore, is eligible to enroll in that program. Even an open admissions institution should have such a mechanism for direct assessment competency-based

alternatives. (Standard 10.5)

Assessment of Programs and Student Learning. The institution regularly reviews its direct assessment and hybrid programs in light of its mission in order to ensure that it identifies any areas of weakness in the programs and implements timely improvements. (Standard 8.2.a)

The direct assessment and hybrid programs rely on a strong foundation for assessment established by the institution, with demonstrated capacity to evaluate student work at the course and program level in general education and in the major or concentration. At all levels, assessment supports academic improvement. The comprehensive student learning outcomes in the academic program area are reviewed regularly and reflect concepts generally agreed on by the related academic program(s). (Standard 8.2.a, Standard 8.2.b, and Standard 9.7)

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

- Student work performed in courses/units comprising direct assessment and hybrid programs (e.g., demonstrated mastery of tasks, assignments, competencies, etc.) are equivalent to student work performed in traditional courses (e.g., successful completion of tests, assignments, projects, etc.)
- Student learning outcomes and program outcomes in direct assessment programs offered by the institution are equivalent to student learning outcomes defined by the academic program in a traditional academic program.
- The application of student learning assessments (e.g., examinations, portfolios, projects, capstone presentations, and other recognized demonstrations of mastery, etc.) in direct assessment and hybrid programs are equivalent to the outcome assessments that are used in traditional courses.

These strategies will be responsive to the complexity of learning and the accumulation and integration of knowledge expected for the educational degree or credential. (CR 8.1, CR 9.2, and Standard 10.7)

Faculty. Faculty or instructors with subject matter expertise in the student's academic program and in general education play a formative role in the competency-based student's academic program. While qualified faculty with subject matter expertise design the competency-based program's 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 are well suited for this role by qualifications 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 competency-based programs in supporting or assisting students, they do not replace faculty or instructors with subject-matter expertise. In addition, the number of mentors and counselors assigned to the competency-based program is sufficient to work with enrolled students and qualified to advise students at the college level. (Standard 6.2.a, Standard 6.2.b, Standard 6.2.c, Standard 6.5, and Standard 10.4)

Institutional Responsibility for Awarding the Credential. The institution offering a direct assessment 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 academic credit. For an undergraduate program, the institution demonstrates its contribution to be at

least 25 percent of the academic program; for a graduate program, it demonstrates a contribution of at least one-third of the direct assessment program. (Standard 9.4 and Standard 9.5)

*Application of Academic Policies.* The institution determines how its already-established academic policies in such areas as academic discipline, probation and suspension apply to students in the direct assessment program, and it makes appropriate amendments to its academic policies where appropriate. It is clear how the institution 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. The institution develops policies that address SACSCOC and/or federal requirements, including credit hour definitions, transcript recording and reporting, the assessment and award of credit for prior learning, and the roles of faculty members and other educational professionals. (Standard 10.1 and Standard 10.7)

*Acceptance and Awarding of Credit or a Unit of Competency.* The institution demonstrates that students in the direct assessment or hybrid competency-based program are achieving at least the same outcomes and at the same academic 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 the equivalent courses or credit hours based on 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 competency-based program. Such equivalencies are also available at the program level for state and federal agencies and for the Commission in their review of the program. In addition, the transcript provides clear and sufficient information for other institutions and employers to understand the student's accomplishments. (Standard 10.7)

The direct assessment programs provided by the institution are 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. (Standard 10.7 and Standard 10.8)

*Contractual Agreements.* The institution provides notification to SACSCOC of agreements involving direct assessment programs, providing signed copies of agreements, and providing any other documentation or information required by SACSCOC policies and procedures for review. In addition, the member institution ensures that SACSCOC has timely access to its contracted external organization's materials and accreditation-related activities. (Standard 10.9)

*Student Support Services and Access to Academic Resources.* The institution offers student support services that appropriately guide students in these competency-based programs. In addition, the institution is prepared to assist students in a timely manner who drop out of these programs 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. (CR 12.1) The institution provides and supports student and faculty access and user privileges to learning resources consistent with the competency-based academic programs. (CR 11.1)

*Fees and Compliance with Title IV Funding.* 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 in the development or formation of the student or for the term in which the student is enrolled in the direct assessment program. Similarly, the institution assists students in seeking Title IV student aid funds for those courses, modules or components of the academic program that the institution contributes to the development or formation of the student. It develops policies that address the disbursement of financial

aid, and tuition charges and refunds. (Standard 10.2 and Standard 13.6)

### 3. Procedures for the Notification and Approval of Direct Assessment and Hybrid Programs

Before initiating direct assessment or hybrid competency-based educational programs (degree, diploma, and certificate), an institution must seek prior approval when the programs have either of the following characteristics:

- The entire program is direct assessment and relies exclusively on measured achievement of competencies rather than student learning through credit or clock hours, or
- At least 50 percent of the competency-based program is direct assessment.

***Time of Notification*** An institution offering direct assessment or hybrid competency-based educational programs must provide written notification of the change to the President of SACSCOC when it begins to offer 25 percent of a direct assessment program; that is, when a student can earn 25 percent of an educational credential (e.g., degree, diploma, certificate) based on measured achievement of competencies rather than credit or clock hours. The institution seeking approval to offer an entire program that is direct assessment or where at least 50 percent of the competency-based program is direct assessment must notify the President of SACSCOC six months in advance of the initiation of 50 percent of the educational credential based on measured achievement of competencies rather than credit or clock hours.

***Submission of a Prospectus*** An institution seeking approval of a direct assessment competency-based program or a hybrid direct assessment program should complete the screening form included as Appendix B of this document. After Commission staff have reviewed the document, the institution will receive a response either asking it to complete a full prospectus for approval of the proposed program or notifying the institution that the program does not constitute either a direct assessment or hybrid direct assessment competency-based program.

If the institution is directed to complete a prospectus, it must be submitted by **March 15** for consideration at the June meeting of the SACSCOC Board of Trustees, or by **September 1** for consideration at the December meeting of the SACSCOC Board of Trustees to allow ample time for review and approval. The institution will be provided a link to the appropriate prospectus form when it is sent the SACSCOC letter requesting a prospectus. Four copies should be submitted to the President of SACSCOC as a print document, or an electronic device (e.g., flash drive, CD or DVD). Upon receipt of the prospectus, it will be forwarded to the SACSCOC Board of Trustees for review and approval at its next scheduled meeting: June or December.

#### ***Options of the Committees on Compliance and Reports Following Review of the Prospectus***

The Committee on Compliance and Reports, a standing committee of the SACSCOC Board of Trustees, will review the prospectus and any additional material submitted, and will take one of the following actions:

1. accept the prospectus, recommend approval of the program, and authorize a substantive change committee visit. A committee visit is required within six months after the initiation of the program,
2. defer action and seek additional information, or
3. recommend denial of approval and continue the institution's accreditation. The reason for denial of approval may have been caused by an institution's current non-compliance with a standard or policy. Consequently, denial may be accompanied by monitoring or imposition of a sanction.

#### ***Options of the Committees on Compliance and Reports Following Review by a Substantive Change Committee***

The report of the Substantive Change Committee, together with the response of the institution to

any recommendations contained in that report (due within five months of the Committee visit), will be reviewed by the Committee on Compliance and Reports. The Committee may recommend one of the following actions:

1. continue the institution in accreditation, with or without a monitoring report,
2. continue the institution in accreditation, impose a sanction, and request a monitoring report, with/without a special committee visit (mandatory visit if placed on Probation), or
3. remove accreditation, subject to the provisions of SACSCOC policies and procedures.

**Document History**

*Approved: SACSCOC Board of Trustees, December 2013*

*Edited: May 2016*

*Edited for the 2018 Edition of the Principles of Accreditation: August 2018*

## Appendix A

### Substantive Change Policy Statements Related to Direct Assessment and Hybrid Direct Assessment Competency-Based Educational Programs

1. The [\*Principles of Accreditation: Foundations for Quality Enhancement\*](#) applies to all programs and services of SACSCOC-accredited institutions wherever they are located or however they are delivered. Failure to comply with the *Principles* or with procedures referred to in this policy could result in the institution being placed on sanction or being removed from membership.
2. Denial of approval of substantive change is not appealable. An institution that fails to gain approval of the substantive change may resubmit a revised prospectus or application following the guidelines and time frames described in this policy statement.
3. An accredited institution in the appeals process or in litigation with SACSCOC is not eligible for consideration of substantive change.
4. The SACSCOC substantive change policy applies only to SACSCOC-accredited institutions. Applicant and candidate institutions may not initiate substantive change.
5. An institution may withdraw its prospectus/application or may discontinue substantive change at any time during the review process by submitting a formal letter of withdrawal to the President of SACSCOC.
6. Once an institution submits its prospectus or application and the document is reviewed by either the Committee on Compliance and Reports or by SACSCOC staff prior to approval by the Board, any information included therein that indicates possible non-compliance with any of the Core Requirements or Comprehensive Standards may lead SACSCOC to further review the institution, even if the prospectus is withdrawn or approval of the change is denied.
7. SACSCOC staff conducts a preliminary review of all changes requiring final approval by the SACSCOC Board of Trustees. All substantive changes described in this procedure are referred to the Board of Trustees for final approval.
8. If an institution fails to report or to gain approval of this type of substantive change prior to its implementation, both the prospectus/application and the issue of late submission will be referred to the SACSCOC Board of Trustees for action.
9. All final decisions regarding the accreditation status of an institution are made by the SACSCOC Board of Trustees. Denial of substantive change and the imposition of sanctions are not appealable actions.
10. The date of the letter of approval of a substantive change is considered the date on which the change is included as part of the institution's accreditation.
11. If an institution fails to follow SACSCOC substantive change policy and procedures, it may lose its Title IV funding or be required by the U.S. Department of Education to reimburse it for money received by the institution for programs related to the unreported substantive change. In addition, the institution's case may be referred to SACSCOC Board of Trustees for the imposition of a sanction or for removal from membership.

## Appendix B

### Screening Form for the Approval of Direct Assessment Competency-Based Educational Programs

#### Purpose of the Screening Form

An institution that intends to seek approval for one or more direct assessment competency-based educational programs (degree, certificate, diploma) should first complete the attached screening form so that Commission staff can determine whether the program requires prior notification or approval.

#### Definitions

For the purpose of the application of the Commission's policy, the Commission uses the following definitions:

Competency-Based Educational Programs. A competency-based educational program is outcome-based and assesses a student's attainment of competencies as the sole means of determining whether the student earns a degree or a credential. Such programs may be organized around traditional course-based units (credit or clock hours) that students must earn to complete their educational program, or may depart from course-based units (credit or clock hours) to rely solely on the attainment of defined competencies.

Direct Assessment Competency-Based Educational Programs (*also referred to in this policy as direct assessment programs*). Federal regulations define a direct assessment competency-based educational program as an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, uses direct assessment of student learning relying solely on the attainment of defined competencies, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program using the results of the assessment.

Hybrid Direct Assessment Competency-Based Educational Programs (*also referred to in this policy as hybrid programs*). A hybrid competency-based educational program combines course-based competencies (clock and credit hours awarded) with non-course based competencies (no clock or credit hours awarded).

#### Programs that Require Prior Approval

An institution must seek prior approval when it offers a direct assessment competency-based educational program characterized by the following:

1. The entire educational program is direct assessment and relies exclusively on measured achievement of competencies rather than student learning through credit or clock hours; or
2. At least 50 percent of the competency-based program is direct assessment; that is, 50 percent or more of the educational program relies on measured achievement of competencies rather than credit or clock hours.

An institution is required to provide formal notification when it begins to offer 25 percent of a direct assessment program; that is, when a student can earn 25 percent of an educational program based on measured achievement of competencies rather than credit or clock hours.

#### Directions

Please complete the following screening form and send it to:

*Dr. Belle S Wheelan  
ATTN: Substantive Change  
Southern Association of Colleges and Schools Commission on Colleges  
1866 Southern Lane  
Decatur, GA 30033-4097*

After reviewing the completed form, Commission staff will determine whether (1) the institution has provided sufficient information to constitute notification or (2) the institution will need to complete a Substantive Change Prospectus for Direct Assessment and Hybrid Direct Assessment Competency-Based Programs.

**Directions:**

Please provide responses to each of the questions below:

Date of submission: \_\_\_\_\_

|    |  |  |
|----|--|--|
| 1. | Name of Institution:<br>(City, State)  |  |
| 2. | Institutional Contact Person:  | Name:<br><br>Phone number:<br><br>Email Address:   |
| 3. | Name of Proposed Educational Program (e.g. degree, diploma, certificate as well as major, concentration, or other designated area of study, if applicable)             |  |
| 4. | In lieu of credit or contact hours, check the percentage of the program that relies solely on the attainment of defined competencies as a measure of student learning. | <input type="checkbox"/> 100% defined by attainment of competencies<br><input type="checkbox"/> 75-99% defined by attainment of competencies<br><input type="checkbox"/> 50-74% defined by attainment of competencies<br><input type="checkbox"/> 25-49% defined by attainment of competencies |
| 5. | Will this program be formally identified as a “direct assessment” program?   | Yes <input type="checkbox"/> No <input type="checkbox"/>   |
| 6. | Will Title IV student financial aid be offered for this program?   | Yes <input type="checkbox"/> No <input type="checkbox"/>   |