Background

A. Council of Regional Accrediting Commissions (C-RAC) Definition of Competency Based Education

The Council of Regional Accrediting Commissions (C-RAC), of which ACCJC is a member of, adopted a Statement on Competency-Based Education (CBE), defining it “as an outcomes-based approach to earning a college degree or other credential. Competencies are statements of what students can do as a result of their learning at an institution of higher education…The curriculum is structured around the specified competencies, and satisfactory academic progress is expressed as the attainment or mastery of the identified competencies. Because competencies are often anchored to external expectations, such as those of employers, to pass a competency, students must generally perform at a level considered to be very good or excellent.”

B. Federally Recognized Approaches to Competency Based Education

While there is no federal definition for competency based education in general, federal guidelines recognize three approaches which institutions may pursue:

1) Credit-based approach using credit hour or clock hour;

2) Direct assessment approach based on student’s demonstration of competencies, in lieu of credit hours or clock hours, as a measure of student learning

3) Hybrid approach which uses a combination of credit hours or clock hours and direct assessment of student learning competencies.

C. Title IV Funding Requirements

To be eligible for Title IV funding, competency based education programs must meet federal requirements.

1) Credit-hour or clock-hour competency based programs can be accommodated under current Title IV funding statutory and regulatory provisions.

2) Institutions seeking to offer a direct assessment or a hybrid approach to their programs, must obtain ACCJC approval through the substantive change process.

3) Institutions must apply to the United States Secretary of Education for the first program they offer as a direct assessment or hybrid approach in order to be eligible for Title IV funding. Subsequent programs from the same institution will not require the Secretary’s approval for Title IV funding.

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1 C-RAC Statement on Competency-Based Education (June 2015)
2 34 C.F.R. § 668.10
Policy Requirements

A. Institution Responsibility

For the purposes of complying with applicable regulatory requirements, institutions seeking to offer a direct assessment approach must establish and document a methodology to reasonably equate the direct assessment program to credit or clock hours.

B. Commission Responsibility

In order for a direct assessment program to be eligible for Title IV funds, ACCJC is required to do the following:

1) Evaluate the institution’s offering of direct assessment program(s) based on ACCJC’s standards and include the program(s) in the institution’s grant of accreditation or pre-accreditation, and

2) Review and approve the institution’s methodology for each direct assessment program’s equivalence in terms of credit hours or clock hours.

Applicant institutions seeking ACCJC accreditation and offering only CBE-based programs will follow the eligibility and candidacy process, in addition to having the relevant aspects of their application reviewed by the Commission using these principles.

1st read by Commission: 01/15/2020
Council of Regional Accrediting Commissions (C-RAC)
Statement on Competency-Based Education

The seven regional accrediting commissions share a common understanding of terms used to define competency-based education and its most recent application in programs that use direct assessment as the means to recognize student learning.

**Definition**: In general, competency-based education (CBE) is an outcomes-based approach to earning a college degree or other credential. Competencies are statements of what students can do as a result of their learning at an institution of higher education. While competencies can include knowledge or understanding, in the main they emphasize what students can do with their knowledge. Students progress through a degree or credential program by demonstrating competencies specified at the course level and/or program level. The curriculum is structured around the specified competencies, and satisfactory academic progress is expressed as the attainment or mastery of the identified competencies. Because competencies are often anchored to external expectations, such as those of employers, to pass a competency, students must generally perform at a level considered to be very good or excellent.

**Structure**: Competency-based education has two principal approaches:

1. a course/credit-based approach, and
2. a direct assessment approach.

In a **course/credit-based approach**, the demonstration of competencies is embedded into a conventional curriculum comprising courses to be completed to earn credits toward a degree or credential. Course/credit-based programs generally enroll students in traditional academic terms and award credits for courses successfully completed. Students may accelerate their learning and receive credit for the course when they have demonstrated mastery of the competencies by passing a summative assessment. Institutions may elect to create two academic transcripts, one that displays the credits earned (and grade point average or GPA) and one that specifies the competencies attained.

**Direct assessment**, (a term used by the Department of Education), represents a subset of competency-based education, one that is not based on semesters (or academic terms) or credits. The direct assessment approach thus disregards conventional courses and bases the evaluation of student achievement and the award of a degree or credential solely on the demonstration of competencies. Direct assessment programs allow students to proceed at their own pace rather than to progress through courses offered in a traditional academic term. Because conventional grades are not assigned and no term length is imposed, the transcript reflects competencies attained rather than grades and/or credit.

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1 Students who are awarded credit or advanced into a program based on demonstrated knowledge or competencies attained before enrollment participate in prior learning assessment (PLA)
hours earned. And as with all competency-based education, students are expected to
demonstrate the competency at a high level of achievement. Students demonstrate the
competencies while they are enrolled in the program; transfer credit or prior learning
assessment is not permitted in direct assessment programs or in the direct assessment
portion of a “partial direct assessment” program. Direct assessment programs establish
“credit-hour equivalencies” for the student learning outcomes they evaluate and may
choose to provide a transcript indicating course/credit equivalencies in addition to the
competency transcript.

In establishing credit hour equivalencies, institutions will be expected to:
1. draw upon their previously defined policies in the credit hour (consistent with
federal regulation); and
2. focus on the amount of learning but not the time component of learning.

A third, hybrid approach, combines the course-based approach and the direct assessment
approach. Hybrid programs allow students to complete a degree or credential through a
combination of direct assessment of competencies and credit hours.

Approval of Competency-Based Education Program by the Accrediting Agency

Course/credit-based programs: The first time an institution offers a credit-based CBE
program, it must be approved by its regional accreditor as a substantive change; the
accreditor will provide guidance about the submission of future CBE programs. A program
may be considered to be competency-based when all of the courses (for the program, for
general education, for the major) have learning goals expressed as competencies
approved at the program level (i.e., any instructor teaching a course will teach it as a
competency-based course) and each student must demonstrate mastery of every
competency in a course to earn credit for the course.

Direct assessment programs: Per federal regulations, direct assessment programs must be
approved by the accreditor because the degree/credential is awarded only on the basis of
the attainment of competencies and not on the award of credit). Therefore institutions
proposing to offer direct assessment programs must submit their plans to their accrediting
agency for approval prior to implementation. Federal regulations require accreditors to
incorporate into their substantive change review an assessment of the sufficiency of faculty
resources to support the program, including the qualifications of instructional staff. In
addition, accreditors are required to evaluate and approve the institution’s methodology for
determining the credit hour equivalence of the direct assessment measures.

2 Institutions that disaggregate the faculty roles (e.g., as subject matter experts, mentors,
coaches, assessors) must demonstrate the sufficiency of expertise in the content or
professional area, the availability of content area experts and others to support student
learning and that the various roles add up to perform the functions of traditional faculty.
Hybrid programs: When an institution proposes to offer a program 50% or more of which can be completed via direct assessment (as defined above), it must submit its plans for approval as a substantive change prior to implementation.\(^3\)

Institutions are directed to their regional accreditor for specific substantive change policies and guidelines and application directions.

**Evaluation Considerations:** In evaluating competency-based and direct assessment programs, regional accreditors will include the following considerations:

1. The institution demonstrates the capacity to offer competency-based or direct assessment programs, including administrative capacity and significant expertise in assessment to ensure the reliability and validity of the assessments.
2. Most learning outcomes emphasize performance, not simply knowledge.
3. Competencies are externally referenced (e.g., by convened groups of employers, professional advisory committees, or licensure requirements).
4. The institution ensures “regular and substantive interaction” with faculty, as defined by the Department of Education, and appropriate services for students.
5. The institution demonstrates that the competencies for a degree cohere to support the claims being made for the qualifications of graduates, including at the undergraduate level those traditionally associated with general education and the major or concentration.
6. The institution demonstrates that the level and complexity of the competencies are congruent with the achievement expected at a particular degree level (e.g., a competency in oral presentation skills for a B.S. in management is demonstrated at the baccalaureate level).
7. The quality of demonstration of the competence is judged to be at or near the ‘excellent’ range for each competency.
8. A student must pass each competency in order to earn the degree or certificate.
9. The institution follows good practices in assessment and measurement (e.g., determines reliability and validity, has multiple forms or prompts for each competency).
10. A high proportion of the competencies represent authentic demonstrations.
11. The institution validates the quality of its program through feedback from students and graduates as well as measures appropriate to the external reference of the competencies (e.g., licensure passage rates, earnings of graduates, feedback from employers who helped articulate the desired competencies).

5.25.2015

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\(^3\) The Department of Education also requires accreditor approval for any partial direct assessment program. Institutions should check with their accreditor regarding specifics.