Direct Assessment: What it Means and Why it Matters

Higher Learning Commission
April 18, 2016

Cathrael Kazin, JD, PhD
Chief Academic Officer
College for America
Overview

1. What is "direct assessment"?
2. How does it relate to competency-based education?
3. What are the implications for accreditation and federal financial aid?
4. Now what?
Does "direct assessment" refer to a ...

1.  
2.  
3.  
4.  
5.  

Term used in educational testing?

Synonym for competency-based education?

Provision of Title IV of the Higher Ed Act?
You’re right!

Term used in educational testing ✓

Synonym for competency-based education ✓

Provision of Title IV of the Higher Ed Act ✓
Educational testing meaning of “Direct Assessment”

Indirect Assessment

- Asks students about their perceptions of their learning, rather than measuring it directly
- Examples:
  - NSSE or CCSSE
  - Alumni surveys

Direct Assessment

- Measures learning directly
- Examples:
  - Exams
  - Projects
  - Papers
  - Performance-based assessments
Competency-based education:

- Assesses learning directly rather than relying on proxies, like credit hours and seat time*
- Focuses on what students can do with what they know
- Requires explicit goals for learning
- Allows multiple attempts to demonstrate mastery

*But CBE may require “translation” into credit hours for administrative or regulatory purposes
Great resources for CBE

COMPETENCY-BASED EDUCATION NETWORK

DOL Competency Pyramids

CBE Design Planner

Interactive Tool
5 Stages
- Research
- Design
- Development
- Implementation
- Evaluation & Evolution

Especially helpful for industry-facing programs

http://www.cbenetwork.org/
www.careeronestop.org/competencymodel
Title IV of the Higher Education Act (HEA) provides that:

"Instead of using credit hours or clock hours as a measure of student learning, instructional programs may use direct assessment of student learning.... Examples of direct measures include projects, papers, examinations, presentations, performances, and portfolios."
Sounds good, right?

There's only one little problem....

The school's application to the US Department of Education [for direct assessment] must "specify the equivalent number of credit or clock hours for a direct assessment program" and "explain how it determined the equivalent number of credit or clock hours for the program, i.e., its methodology for determining these equivalencies."

In other words, you still have to translate back to clock hours or credit hours (seat time)
What's the problem?

- The regulations constrain CBE
  - Focus on measuring time, not learning
  - Focus on inputs, not outcomes
- No aid for Prior Learning Assessment (PLA)
- Hybrid programs not eligible
Few approvals under Direct Assessment
Fear of fraud and abuse
The US Government provides $150 billion in federal grants, loans, and work-study funds each year to more than 13 million students.

Source: https://studentaid.ed.gov/sa/about
College for America at SNHU

Southern New Hampshire University
Nonprofit, accredited

College for America

Built for working adults
Flexibly-paced; self-scheduled; online

Cost efficient
$3,000 a year; “all you can learn”

Workforce relevance
Real-world projects based on in-demand competencies

SNHU.edu

Traditional residential campus

©2014 Southern New Hampshire University. All rights reserved.
Students demonstrate mastery of competencies by completing Projects: authentic, engaging activities that enable students to develop and demonstrate competencies in a realistic setting.

AA
- Curating a virtual art exhibit
- Creating a marketing plan
- Developing a budget for international travel

BA
- Analyzing market data
- Creating advertisements
- Producing patient-facing fact sheets
**Assessment**

- Students submit their Projects to a trained **Reviewer**, who
  - Provides encouraging, targeted, and actionable feedback to students within 48 hours of submission
  - Uses Project **Rubric** and extensive narrative comments
  - Has an advanced degree, subject-matter expertise and real-world experience
- Students may re-submit work as many times as they need to demonstrate mastery

**Rubric** has multiple dimensions but is binary

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Mastery?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Op-ed makes a clear argument for or against GMOs</td>
<td></td>
</tr>
<tr>
<td>Op-ed develops argument</td>
<td></td>
</tr>
<tr>
<td>Organizer analyzes the validity and soundness of the three editorials' arguments</td>
<td></td>
</tr>
<tr>
<td>Op-ed's argument is supported with relevant and meaningful evidence</td>
<td></td>
</tr>
<tr>
<td>Op-ed is clear and easy to understand</td>
<td></td>
</tr>
<tr>
<td>Op-ed has no major errors in spelling and mechanics</td>
<td></td>
</tr>
<tr>
<td>Op-ed is expressed in student's own words; any direct quotations or paraphrases are identified (using any format)</td>
<td></td>
</tr>
</tbody>
</table>
Academic Offerings

- Certificate in Healthcare Management Fundamentals
- AA in General Studies with a concentration in Business
- AA in Healthcare Management
- BA in Healthcare Management with concentrations in Communications and Global Perspectives
- BA in Communications with concentrations in Healthcare and Business
- BA in Management with concentrations in Operations and Logistics; Insurance Services; and Public Administration
Regional Accreditors Announce Common Framework for Defining and Approving Competency-Based Education Programs

Washington, DC — The Council of Regional Accrediting Commissions (C-RAC) today released a joint statement outlining the criteria that accreditors will use in defining and approving competency-based education (CBE) programs.

"As accreditors, we have seen growing interest among institutions in developing competency-based education, including programs that use a direct assessment approach. However, there has been limited guidance to help institutions better understand the expectations for these programs, including for purposes of eligibility to participate in federal student aid programs," said Barbara Brasington, Chair of C-RAC and President of the Commission on Institutions of Higher Education, NEASC.

In addition, C-RAC understands that the Department of Education will soon release guidance, focused on CBE, for institutions seeking to participate in the recently announced "experimental sites" program. "This alignment and new level of collaboration are welcome signs and are good for all those involved — most importantly the many students who will benefit from the expansion of these new opportunities," said Paul LeBlanc, President of Southern New Hampshire University and a member of the Steering Committee of C-BAC, the Competency-Based Education Network.

Although CBE is not new, enhanced interest has been propelled by increased expectations that college graduates meet the skill needs of employers and by the increasing capacity of institutions to assess student learning. "The key is to promote this expansion of CBE while also ensuring the quality and integrity of the academic program. Between our statement and the new guidance from the Department of Education, we believe these goals can be accomplished, thereby supporting increased innovation at our member institutions," added Brasington.

A copy of C-RAC's statement follows.

C-RAC Guidelines on CBE

COURSE/CREDIT-BASED

DIRECT ASSESSMENT
Course/credit-based approach

- CBE embedded in conventional curriculum
- Acceleration of learning possible
- Credit received when summative assessment passed
Direct assessment approach

- Disregards conventional courses
- Bases both the evaluation of student achievement and the award of a degree or credential solely on the demonstration of competencies
C-RAC “Musts”

If you are regionally accredited, whichever approach you pick, you need to show:

1. Administrative capacity and significant expertise in assessment
2. Performance over knowledge
3. External referencing of competencies, if appropriate
4. “Regular and substantive” faculty interaction and appropriate student services
5. Coherence between competencies and institution’s claims for graduates
More C-RAC “Musts”

6. Degree-level appropriateness of competencies
7. Demonstration of competencies at/near “excellent” level
8. Demonstration of each relevant competency
9. Good assessment/measurement practices
10. Competencies are authentic demonstrations
11. Quality of program validated
Watch out especially for “Regular and Substantive”

CORRESPONDENCE COURSE

- Students are totally on their own
- No regular and substantive faculty interaction
- Burdens is on student to initiate

CBE

- Robust support from various sources
- Student has regular and substantive interaction with faculty
- Not exclusively student-initiated
If you do CBE...

**COURSE/CREDIT BASED CBE**

If regionally accredited → must follow C-RAC Guidelines

**DIRECT ASSESSMENT CBE**

If regionally accredited → must follow C-RAC Guidelines

*Plus*

Department of Education requirements
Dear Colleague Letter
March 19, 2013


Competency-Based Education Programs - Questions and Answers
December 19, 2014

https://ifap.ed.gov/dpcletters/GEN1423.html
This is (mostly) uncharted territory. Regardless of whichever route you take, it is essential to work closely with your Financial Aid office from the beginning, as soon as you start to design your CBE or direct assessment program.
“If we are to be required to assess educational quality and learning by virtue of how long a student sits in a seat, we have focused on the wrong end of the student.”

Laura Palmer Noone