

# Guidelines on Direct Assessment Theological Education

*Approved by the Board of Commissioners of the ATS, June 2026*

NOTE: These guidelines align with Standard 3.10, which continue the expectation of the *Standards* to treat direct assessment programs as experiments requiring Board approval. Schools anticipating submission of an application to the US Department of Education to be eligible for Title IV funding should adhere to these guidelines.

## Overview

Direct assessment education is both an educational philosophy and an academic model that “begins with the end in mind.” Direct assessment programs work with key constituencies (internal and external) to develop a coherent set of competencies related to knowledge, skills, and behaviors that prepare graduates for particular professions. Unlike traditional education models, direct assessment programs hold “learning constant” while “time varies.” That means all students, regardless of how much or how little time it takes, must demonstrate mastery of every competency for their program. Direct assessment programs help students master various competencies through a series of well-designed learning activities facilitated and approved by faculty that may or may not involve classroom time or traditional courses.

In the United States, the Department of Education (USDE) categorizes such programs into three basic types: (1) those based on courses and/or credits, (2) those not based on courses and/or credits, called “direct assessment” programs, and (3) hybrid programs that are a blend of both. The first type does not require Department approval; the second and third types do if students are to be eligible for US Title IV financial aid. Direct assessment components of hybrid programs are required to address these fourteen factors. Traditional components of hybrid programs are expected to fulfill requirements of the Commission on Accrediting’s *Standards of Accreditation* appropriate for those components.

Grace Theological Seminary is the only Commission-accredited school to implement a direct assessment program. In 2017, the Board granted approval for Grace Theological Seminary to offer direct assessment MDiv and MA programs as a five-year experiment and in 2022 granted ongoing approval for the program as an exception to Standards 3.9-10. Their *Deploy* programs were the first Commission-accredited direct assessment programs granted approval by the USDE to be eligible for Title IV aid.

## Fourteen Factors in Evaluating Direct Assessment Degree Programs

Any Commission-accredited school planning to offer one or more degrees through direct assessment theological education either completely or as a hybrid, must submit a *Petition for an Educational Experiment-Direct Assessment* that, among other things, addresses the following factors (see *Commission Standard 3.10* and *Policies and Procedures*, IV.G). See petition outline at the end of these guidelines. The school may not begin the program(s) until/unless it receives approval from the Board of Commissioners. Any Title IV school approved to offer direct assessment programs must also seek and receive approval from the USDE if it desires Title IV eligibility for those students (see [34 CFR §668.10](#) and the Feb 14, 2024 USDE guidance for [Applying for Title IV Eligibility](#) for Direct Assessment [Competency-Based] Programs).

1. *A rationale for the direct assessment program*, including what needs it will meet and how it will demonstrate student achievement, how it aligns with the school’s mission, and a succinct description of the program, including program goals and a structure that ensures quality and learning. The school must also document how the proposed program will be supported by its administrative and financial resources. (see Standards 1.1, 10.1, and 10.3).

2. *An admissions process* that provides clear information to students outlining the structure and expectations of the program, tuition and fees, and academic policies, and determines prior to matriculation in the direct assessment program whether a student has the capacity to complete the program and is therefore eligible to enroll in that program (see Standards 7.3-4).
3. *A list of clearly articulated competencies* for the direct assessment program, which align with the expectations of the applicable degree program standards. The proposal must include competency definitions, documented instructional engagement, learning outcomes that students must attain to be awarded the credential, feedback cycles that document ongoing formation, and behavioral-based performance indicators potential graduates must demonstrate in order to earn the desired credential. Keep in mind that competencies are not equivalent to courses, assignments, nor activities, but rather represent integrated demonstrations of knowledge, skills, and intellectual behaviors. The proposal must describe structured learning activities designed, reviewed, and approved by faculty to help students move from their current levels of performance utilizing new learning to achieve intended outcomes. The proposal must describe faculty-designed developmental learning pathways including the learning activities associated with each competency, such as seminars, synchronous or asynchronous online sessions, reading and writing assignments, exams, ministry activities, study groups, mentoring sessions, church-based activities, etc. (see Standards 3, 4, and 5).
4. *A summary of how those competencies were developed*, including the involvement of faculty and other professionals (e.g., church leaders), with evidence that graduates of the program will find appropriate placements (see Standards 7.10-11 and 8.8).
5. *A coherent plan for assessing those competencies*, based on the institution's established program and process of evaluation, including direct and indirect measures and especially performance-based assessment tools, as well as clear rubrics and benchmarks, that are aligned with criteria named in expected outcomes. Examples of evaluated performance include such learning activities as simulations, ministry demonstrations, observed performance, role plays, and contextual ministry artifacts. "Mastery" should be clearly defined with the expectation that students will demonstrate a pre-determined level of achievement of all competencies before any degree is awarded. Evaluation also ensures regular review of direct assessment programs describing how evidence is documented, how consistency is ensured, and identification of any areas of weakness in order to make immediate improvements (see Standards 2.5-6).
6. *Involvement of qualified faculty* with appropriate subject matter expertise who are engaged in design, delivery, and oversight of program content as well as evaluation of how and how well the competencies are achieved, along with other persons or agencies involved in student evaluations. The petition must list faculty and others who will be involved, their roles, specific activities, and qualifications. While those other than faculty may be assigned important roles in supporting or assisting students in direct assessment theological education, they must not replace the essential role of faculty or instructors (see Standard 8).
7. *Regular and substantive interaction between qualified faculty and students, as well as among a viable student community of learning*. Direct assessment is not a form of correspondence education (not allowed under *Commission Standards of Accreditation*) but requires faculty-guided learning through intentionally designed learning activities, as well as faculty monitoring of student progress. Documented "regular and substantive interaction" ensures that instructors give individual student feedback; initiate substantive, learning-related mentoring conversations with students; guide

student theological reflections; lead synchronous discussions; provide competency coaching; and review of ministry artifacts (see Standard 3.9).

8. *Clarity on how, where, and when the program will be delivered*, with attention to issues of location (e.g., onsite, offsite, online), of building a community of learning, of degree length (how long it will typically take to complete). The school must document a system using a combination of credit hours and credit hour equivalencies, or clock hour and clock hour equivalencies, for monitoring student progress that shows how the school determines when a student in the program is not making sufficient academic progress and what penalties or solutions are available to address the situation. If the program is to be offered in other countries and/or other languages, the school must describe its resources and capacities to support students in those other countries and/or other languages (see Standard 1.4).
9. A system to note any competencies awarded at the outset of the program through *prior learning assessment* that describes the process and criteria for determining such an award, as well as making clear what remains to be learned by each student enrolled in the program. Transcripts clearly distinguish between competencies awarded through prior learning assessment and those earned through the direct assessment program (see Standards 3.13, 7.4, and 7.7).
10. *Due attention to formation*, including—as appropriate to the degree—intellectual, human, spiritual, and vocational formation, as well as how any required supervised ministry experiences will be provided and evaluated. The petition must describe both a) how students in the program will be mentored, and b) document the training, development, and ongoing evaluation of mentors (such as calibration of assessors, inter-rater reliability processes, and periodic review of scoring consistency) to ensure constancy in mentoring and achievement of outcomes (see Standard 3.1).
11. *Description of support services and resources* that will be available to students, including library services and resources, technology services and resources, and student services and resources, detailing how those will be delivered, as well as the qualifications of those providing them (see Standards 6.2, 7.5, and 10.9).
12. *Description of how the direct assessment program meets graduate-level workload expectations*, that the work required and the outcomes achieved are comparable to current generally accepted standards of graduate education, e.g., the normal expectations and calculations used for credit hours and/or class hours. The school should be able to demonstrate the number of credit hours and/or class hours that are equivalent to the amount of student learning being directly assessed for this program and how that equivalence is calculated. A direct assessment program must demonstrate that it has appropriate rigor and quality consistent with the norms of graduate theological education and with the Commission *Standards of Accreditation*. All such programs should demonstrate intentional developmental progression from introductory to advanced levels of competency performance (see Standard 3.2).
13. *Record of any student complaints* received by, or available to, the agency (see Standards 1.6 and 7.6).
14. *Evidence of compliance with the institution's program responsibilities under Title IV*, including the most recent student loan default rate data and results of any financial or compliance audits (see Standard 1.6).

## Petition for an Educational Experiment-Direct Assessment

The Petition for an Educational Experiment-Direct Assessment must thoroughly and succinctly address the following criteria and provide evidence. Schools should consult with their liaison regarding submission details as a digital form has not been developed.

1. *Describe the rationale* for the direct assessment program, including what needs it will meet and how it will demonstrate student achievement, how it aligns with the school's mission, and a succinct description of the degree program, including program goals and a structure that ensures quality and learning. The applicant must also document how the proposed program will be supported by the institution's administrative and financial resources (see Standards 1.1, 10.1, and 10.3).
2. *Describe the admission process* to the program, including information provided to students outlining the structure and requirements of the program, tuition and fees, and academic policies. Provide examples of how the admission process determines prior to matriculation whether a student has the capacity to complete the direct assessment program and is therefore eligible to enroll in the program (see Standards 7.3-4).
3. *Describe the program's clearly articulated competencies* and how those align with the expectations of the applicable degree program's standards. Include competency definitions, documentation of instructional engagement, learning outcomes that students must attain to be awarded the credential, feedback cycles that document ongoing formation, and behavioral-based performance indicators that potential graduates must demonstrate to earn the degree. Keep in mind that competencies are not equivalent to courses, assignments, nor activities, but rather represent integrated demonstrations of knowledge, skills, and intellectual behaviors. Describe structured learning activities designed, reviewed, and approved by faculty that utilize new learning to help students move from their current levels of performance to achieve intended outcomes. Describe the faculty-designed developmental learning pathways including the learning activities associated with each competency, such as seminars, synchronous or asynchronous online sessions, reading and writing assignments, exams, ministry activities, study groups, mentoring sessions, church-based activities, etc. Include sample competency maps, rubrics, and assessment examples where available (see Standards 3, 4, and 5).
4. *Summarize how the competencies listed above were developed*, including the involvement of faculty and other professionals (e.g., church leaders), with evidence that graduates of the program will find appropriate placements (see Standards 7.10-11 and 8.8).
5. *Summarize here and provide a link to a coherent plan for evaluating the program's competencies*, based on the institution's established program and process of evaluation, including direct and indirect measures and especially performance-based assessment tools, as well as clear rubrics and benchmarks, that are aligned with criteria named in expected outcomes. Examples of evaluated performance could include such learning activities as simulations, ministry demonstrations, observed performance, role plays, and contextual ministry artifacts. Define "mastery" and describe how students will demonstrate a pre-determined level of achievement of all competencies before any degree is awarded. Describe how mastery thresholds were established, who approves them, and how consistency is maintained across evaluators. The evaluation plan must also include regular and comprehensive review of the direct assessment program describing how evidence is documented, how consistency is ensured, and identification of any areas of weakness in order to make immediate improvements (see Standards 2.5-6).

6. *Describe the involvement of qualified faculty* with appropriate subject matter expertise who are engaged in design, delivery, and oversight of program content. Describe faculty involvement, as well as other persons or agencies involved, in evaluations of how and how well students have achieved each competency. List faculty and others who are involved, their roles, specific activities, and qualifications. Describe how faculty workloads are calculated, including advising/mentoring ratios, assessment loads, and sustainability planning for anticipated program growth. While those other than faculty may be assigned important roles in supporting or assisting students in direct assessment theological education, they must not replace the essential role of faculty or instructors (see Standard 8).
7. *Describe regular and substantive interaction between qualified faculty and students*, as well as among a viable student community of learning. Describe how such interaction is explicitly designed in the curriculum, is initiated by faculty with subject matter expertise, and is documented both for the regularity and quality of the interaction. Provide documentation of how “regular and substantive interaction” ensures that instructors give individual student feedback; initiate substantive, learning-related mentoring conversations with students; guide student theological reflections; lead synchronous discussions; provide competency coaching; and review ministry artifacts (see Standard 3.9).
8. *Clarify how, where, and when the program will be delivered*, with attention to issues of location (e.g., onsite, offsite, online), of building a community of learning, and of degree length (how long it will typically take to complete). Provide examples of the system for monitoring student progress that shows how the school determines when a student in the program is not making sufficient academic progress and the actions available to address the situation. Provide examples of pacing expectations, subscription/payment periods, inactivity thresholds, re-engagement policies, and faculty intervention processes. If the program is to be offered in other countries and/or other languages, describe the school’s resources and capacities to support students in those other countries and/or other languages (see Standard 1.4).
9. *Describe the process to recognize any competencies awarded through prior learning assessment* that may take place at the outset of the program and the process and criteria for determining such an award. Provide examples of how transcripts clearly distinguish between competencies awarded through prior learning assessment and those earned through direct assessment provided by the institution and how competency completion is communicated externally (see Standards 3.13, 7.4, and 7.7).
10. *Describe how the program gives due attention to formation*, including—as appropriate to the degree—intellectual, human, spiritual, and vocational formation, as well as how any required supervised ministry experiences will be provided and evaluated. Describe both a) how students in the program will be mentored, and b) document the training, development, and ongoing evaluation of mentors (such as calibration of assessors, inter-rater reliability processes, and periodic review of scoring consistency) to ensure constancy in mentoring and achievement of outcomes (see Standard 3.1 and the appropriate degree program Standards).
11. *Describe the support services and resources that will be available to students*, including library services and resources, technology services and resources, and student services and resources, and how those will be delivered, as well as the qualifications of those delivering those resources and services. Describe the technology infrastructure in place to track competencies, document mastery, distinguish mastery completion from competencies awarded through prior learning assessment,

calculate equivalencies, and maintain auditability/compliance records (see Standards 6.2, 7.5, and 10.9).

12. *Describe how the direct assessment program meets graduate-level workload expectations, i.e., that the work required and the outcomes achieved are comparable to current generally accepted standards of graduate education, e.g., the normal expectations and calculations used for credit hours and/or class hours. Describe how the program monitors intentional developmental progression from introductory to advanced levels of competency performance. Demonstrate that the program has appropriate rigor and quality consistent with the norms of graduate theological education and with the Commission *Standards of Accreditation*. Document the number of credit hours and/or class hours that are equivalent to the amount of student learning being directly assessed for this program and the methodology that is used to calculate equivalence (see Standard 3.2).*
13. *Provide the record of any student complaints received by, or available to, the agency (see Standards 1.6 and 7.6)*
14. *Provide evidence of compliance with the institution's program responsibilities under Title IV, including the most recent student loan default rate data and results of any financial or compliance audits (see Standard 1.6).*