Credit for Prior Learning: Putting Standards for Policy in Place

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Abstract

In order to complete a credit for prior learning (CPL, the acronym preferred here to describe a variety of prior learning assessment strategies) program review for a Trade Adjustment Assistance Community College Career Training (TAAACT) grant, staff members in the College and University Partnerships office at the American Council on Education (ACE) developed a set of potential standards by which CPL policy can be reviewed. Six standards, each with quality indicators, are proposed for reader review. The standards have been piloted in selected settings; ACE is suggesting a future webinar to further explore the standards and to identify ways to make them useful for CPL programs across the U.S.

Introduction

In December 2015, the College and University Partnership (CUP) unit of the American Council on Education (ACE) was asked to complete a review of prior learning assessment policy for Iowa community colleges. In an effort to move beyond a focus on practice, CUP developed a draft set of policy standards to use in the Iowa project and to pilot with other institutions. The draft standards are now ready for a review by a wider audience, including the PLAIO audience. We ask for your feedback and encourage individuals or institutions to communicate with us as potential contributors for further review and improvement of this draft. We welcome your feedback.

Background

In the United States, some form of CPL has been in place since World War I when returning military veterans were provided opportunities to demonstrate their skills and knowledge to gain high school credentials and enter postsecondary education. For decades since those early efforts, through organizations such as the ACE, The College Board, and the Council for Adult and Experiential Learning (CAEL), rigorous practice guidelines for third-party validation, standardized examinations, and portfolio assessment have been provided and updated nationally and internationally.

And yet, colleges and universities are faced with ongoing policy issues and practical questions when creating pathways for the successful application of CPL from military and workplace training, community service, self-study, and other forms of extra-institutional learning to the college curriculum. "We don't have a policy for that." "It's always been the practice here." "I don't remember the rationale for why we do CPL this way." "This is how it was designed when I arrived in this job." These are some of the remarks we have often heard at the institutional level that hinder CPL transfer and application. When we begin to dig a little deeper into examining institutional policies, many times we find informal practice in place of a clear policy framework that guides CPL operations. We also find vague policies that make practice implementation difficult for colleges to manage and for students to navigate.

The national push for boosting adults' postsecondary credential completion rates along with new sources for

learning, a focus on competency-based assessment, and alternative credentialing, have put CPL policy front and center in the attainment of credentials conversation. How do policies, or lack thereof, advance or hinder access and completion? How do institutions develop policies that will reflect institutional goals and academic priorities?

A common lexicon is a good place in which to start. Effective policy requires clear language and definitions and stakeholder consensus. A comprehensive framework that is rooted in the mission and culture of the institution and reviewed and refreshed will reflect the changing nature of the institution and the students it serves. One practitioner underscores the critical importance of such an approach: "We are taking incremental steps in expanding policy and practice that is built on history, rather than tearing down foundation" (Cohn as cited in Lakin, 2015). That kind of approach increases stakeholder support and adoption. On the other hand, ill-defined policies often produce ambiguity among constituencies about the commitment to CPL and decrease the likelihood of sustained and effective practice.

To consider the diverse paths on which institutional policy begin to develop and take shape also is informative. For example, another college system with which we worked is now considering its history with CPL. "Policy has been floating around for several years. It has been 'fits and starts.' Our existing policy is broad. We say we accept CPL and list the options. To do a policy update, we've begun by documenting what we do now" (Anonymous community college administrator, personal communication, March 23, 2017). Still, once the documentation is in place, how will the institution know that its updated policies are comprehensive and ensure academic quality?

For that college system and many others, the impetus for policy focus is student demand. For example, student veterans bring their Joint Services Transcripts (JST) to college campuses and request transfer credit. Returning adult students who stopped out of college decades ago now return with workplace learning to supplement their existing transcripts. "Boot Camps" deliver learning experiences that align closely with the college curriculum, and students of all ages are accessing standardized tests, such as CLEP (College Level Examination Program) and AP (Advanced Placement). To adequately serve the wide variety of students who come with prior learning, comprehensive policies are critical tools.

From California to Tennessee and locations in between, states have passed legislation requiring their higher education institutions and systems to create institutional policy on the acceptance and transfer of extra-institutional learning, including military and workplace training, and nationally recognized examinations. Philanthropic funders including Lumina and Gates Foundations have supported new initiatives to expand CPL policy and practice and to track outcomes. The U.S. Department of Labor, through four rounds of Trade Adjustment Assistance Community College Career Training (TAACCCT) grants, required consortia and state grantees to create CPL policies as an integral part of their projects. Members of the U.S. Department of Labor's Registered Apprenticeship College Consortium must have a CPL policy in place for the transfer of apprenticeship programs and other extra-institutional learning. Experimental programs through the U.S. Department of Education, such as Educational Quality through Innovation Partnerships Landscape (EQUIP) have offered institutions and partner organizations the space to explore new CPL-related policies that support credit for prior learning pathways. Trends in quality assurance, alternative credentialing, accreditation, and collaborative partnerships across sectors have encouraged a fresh look at policy.

The Practice Problem – The Iowa Project

One recipient of a TAACCCT grant referenced above was the Iowa-Advanced Manufacturing Consortium (I-AM), which was awarded a four-year Department of Labor grant in October 2012. This grant enabled Iowa's 15 community colleges to build capacity for training skilled workers in the state's advanced manufacturing sector. The grant focused on seven areas of advanced manufacturing (welding, CNC [Computer Numerical Control]/Tool and Die, Industrial Maintenance, Industrial Automation, Manufacturing Technology, Robotics, and Transportation and Logistics) and could focus on either credit or non-credit programming. An emphasis on CPL was a significant strategy for the I-AM grant; in addition to the grant's expected outcomes on training and workforce development, various features of CPL were either introduced or upgraded by each of the 15 community colleges. At the end of the grant period, ACE conducted of a review on the use of CPL at the 15 schools. This review served three major purposes: first, to determine the extent to which institutions had either created or extended current CPL policy; second, to evaluate the extent to which the institutional CPL "process maps" were coherent, student friendly, and encouraged use; and third, specifically, the grant impact statements were reviewed to determine the extent to which the institution saw long-term benefits from the work required of the grants, both in the technical areas and in the development and use of CPL tools.

ACE's CUP staff has years of experience supporting the implementation of CPL in the country's colleges and universities. Staffers often provide training workshops to state systems and other groups. Many of these workshops focus broadly on CPL initiatives and implementation, while others are specific to military and corporate credit recommendations and mapping of those recommendations to institutional curricula. As early as 1993, ACE established guidelines for students who wished to use CPL (Sullivan, 1993). Even with that extensive background, CUP staffers soon realized that our collective experience and focus on practice was not sufficient to carry out the Iowa project. We needed a set of established standards by which the I-AM institutions' CPL policies could be reviewed, and a set of standards was not readily available.

If you use Google to search for "credit for prior learning policy," you will find a plethora of information about CPL practices and institutional policy statements, but the standards by which policy statements may be developed and then examined for quality are more difficult to find. The most commonly referenced set of guidelines comes from the CAEL in the 2017 version of "Assessing Learning: Quality Standards and Institutional Commitments" (Younger & Marienau, 2017), although others (e.g., Travers & Evans, 2011; Travers, 2013; Travers & Mandell, 2015) also provide key considerations for establishing and implementing CPL programs with integrity. CAEL's ongoing work with CPL has resulted in other informative documentation on policy, including CAEL's 2015 state policy report (Sherman & Klein-Collins, 2015) that provides strategies to advance policy considerations. There also are a variety of policy statements generated by state departments of education (e.g., The Tennessee Prior Learning Assessment Task Force [2012] and Montana Board of Regents of Higher Education [2017]) as well as policy statements from institutions such as SUNY Empire State College and other adult-focused institutions, including some in Canada who use Prior Learning Assessment Recognition (PLAR) to describe CPL initiatives, that have either a long history of serving adult learners or are beginning this service through established and well-thought-out infrastructure.

What the CUP staff discovered at the beginning of the Iowa project, however, were individually developed institutional guidelines that frequently reflected processes and procedures rather than any statements tied to a set of guiding standards by which CPL policy might be developed or evaluated.

Approach Taken

The Iowa project began with a literature review on best practices for CPL, noted above, and on overall policy development and evaluation. Although several good sources were found and are listed in the reference section of this article, two documents proved to be particularly useful. A short piece by Douglas E. Mitchell (1986) provided practical means by which policy may be evaluated within large settings and a UNESCO education policy document addressed conceptual framework for policy analysis (Haddad & Demsky, 1995).

Next, the staff turned to guidelines available from national associations and regional accrediting bodies. The "Joint Statement on the Transfer and Award of Credit" cooperatively developed by the American Association of Collegiate Registrars and Admissions Officers, American Council on Education, and the Council for Higher Education Accreditation in 2001, and recently revised to reflect changes to the higher education environment, provided foundational guidelines on transfer of credit and acceptance of CPL (AACRAO, ACE , & CHEA, 2017). Regional accrediting bodies, specifically the Middle States Commission on Higher Education (n.d.), The Commission on Colleges of the Southern Association of Colleges and Schools (n.d.), and the WASC Senior College and University Commission (2013), set expectations for quality assurance of CPL for their member institutions. Grounded in this literature, and mindful of the practice problem, CUP began to draft a set of CPL policy standards.

Development of Standards

Development of the standards was a reiterative and collaborative process. Informed by the literature review, the following six key components, which were consistently portrayed in the literature as elements of quality standards, were identified: philosophy and academic framework, integrity, faculty ownership of the academic process, service to students, documentation of transfer credit, and processes for continuous quality improvement. These six components were then defined and CUP staff worked to develop consensus around indicators for each component. Throughout the development and review process, the staff refined and edited the standards through reiterative discussions. Once the staff had reached agreement on the final set of standards, a simple checklist was designed to document the extent to which the standards were evidenced in policy statements. Our next project was to pilot this early checklist against webpage information found on five sites of institutions not in the Iowa group of colleges, but considered national leaders in CPL. The pilot process demonstrated that not all indicators could readily be found on institutional web pages; adjustments to the indicators were modified accordingly. Finally, we used the draft standards with the Iowa community colleges' review and presented the findings as part of the American Council on Education (2016) report of the IAM project. In addition, we used the draft standards as part of an ACE program review at Metropolitan State University-Denver in the fall of 2016. During this review, two CUP staff members used the draft standards independently and then addressed inter-rater reliability issues discovered during the joint review process. Subsequently, a small, diverse group of colleges and universities affiliated with CUP and its work on CPL policy and implementation reviewed the standards and again critiqued them for clarity and usefulness.

The current set of standards still contains six components (modified slightly from the original set, see below), each with two or more stated indicators. The standards are intended for the review of CPL policy as evidenced in policy documents and public statements, although it would be possible to use the standards as a guide for larger program review efforts that would include data collected through focus groups or interviews. The standards, with indicators, and checklist are included as appendices to this article.

A Closer Look at the Standards

The current set of standards includes the following six items, each with a set of indicators that helps to define each standard and provide further description.

1. Philosophy and Academic Framework: CPL policy is grounded in the institution's philosophical and academic framework and is consistent with institutional mission, goals, and approaches to learning.
2. Integrity: CPL policy ensures that all stakeholders (including institutional representatives, students, and any external contributors) promote integrity in the evaluation and documentation of prior learning.
3. Faculty Qualifications and Engagement: CPL policy assures the involvement of qualified faculty or other subject matter experts.
4. Student Services: CPL policy assures that students receive effective services.
5. Credit Management: CPL policy clearly identifies how credits are organized and applied to student records.
6. Planning, Resources, and Improvement: CPL policy assures current and continuous improvement by providing sufficient infrastructure to support policy implementation.

The indicators can be used to determine the scope of each standard and to confirm the elements that might exist if the standard is present.

For example, Standard One focuses on institutional philosophy and approach to teaching and learning. The standard emphasizes institutional mission and education philosophy. To date, three indicators have been identified to operationalize this standard.

- *CPL policies have an underlying philosophy and an identified pedagogical framework that is student centered and acknowledges the continuity of prior learning with current and future student learning*. This indicator requires that approaches to CPL are considered to be part of the institution's educational framework. CPL is often seen as a "service" to students or a credit-acquisition strategy. This component reinforces the notion that CPL is, more importantly, a student learning experience that should align with the institution's existing pedagogical framework and emphasis on learning.
- *CPL policy identifies a set of best practices that has informed policy development.* Quality CPL policies are not only grounded in the mission and academic framework, but they also follow a set of best practices that inform policy development, whether these best practices come from professional organizations or state agencies.
- *The CPL policy states how it aligns with the institution's mission and goals.* A clear statement of alignment would include: 1) alignment of the mission and CPL philosophy, and 2) alignment of CPL policy to other institutional policies.

Another example is Standard Three, which emphasizes the need for policy statements to specifically address faculty qualifications and engagement in the CPL process, and is more pragmatic. It currently includes two indicators:

- *The CPL policy includes a statement as to the required qualifications of faculty members who complete credit reviews and make credit recommendations*. In some institutions, a single faculty member is responsible for the CPL credit recommendations; in other settings, a faculty panel makes credit awards. Other institutions rely on outside subject matter experts (or SMEs) to identify credit awards. Each institution can help to ensure the integrity of the recommendation process by specifying reviewer qualifications, typically indicating that the qualifications are consistent with other faculty credential guidelines.
- *CPL policy includes protection against conflict of interest on the part of faculty reviewers.* Faculty should be asked to confirm that they have no conflict of interest when reviewing student work. Examples of conflict of interest may include personal relationship with students or a formal relationship with the setting in which the learning was delivered and/or developed.

Next Steps for Standards Development

For members of the CUP unit at ACE, the Iowa project was useful in thinking about the connection between policy and practice implementation. For most institutions, to begin practice and then later step back to see how to put those practices into a policy framework is easier. However, keeping policy in in mind from the beginning can be helpful to institutions as they make decisions about their CPL program. It also helps to maintain quality and integrity throughout all aspects of a CPL program.

The CUP unit is not the only group working on policy and policy standards development. One example is the Northeast Resiliency Consortium (2015), a member of the Achieving the Dream network, which has developed a set of PLA Standards framed with five critical factors in mind: 1) philosophy, mission and policy; 2) institutional support; 3) program parameters; 4) professional development; and 5) program evaluation.

From a broader perspective, the "Joint Statement on Transfer and Award of Credit" (AACRAO, ACE, & CHEA , 2017) reflects the changing landscape of higher education and the multiple sources for learning, training and education. Its set of guiding principles recommends that institutions consider the balance in the use of accreditation status in transfer decisions, comparability, consistency, effective and transparent public communication, and a commitment to address innovation. In conjunction with the revision of the Joint Statement, AACRAO recently led a group of organizations, associations, and institutions to move beyond the general principles of the Joint Statement and help institutions navigate the complex world of transfer and prior learning. "A Guide to Best Practices: Awarding Transfer and Prior Learning Credit" (AACRAO, 2017) offers a starting point and resources to institutions developing or reviewing policies on the transfer and award of credit. The "50-State Comparison: Prior Learning Assessment Policies" (Whinnery, 2017) resource from the Education Commission of the States (ECS) analyzes ways in which states approach PLA policy, providing a foundation for a better understanding of what policy has been put into place. Additional review of system-level initiatives, programs and collaborations can help inform us on how policy has driven practice.

In terms of CUP's efforts with policy standards, we are interested in sharing our preliminary work with the PLAIO community in order to gain the perspective of CPL practitioners. Collaborative conversation on the CPL Policy Standards could provide guidelines for policy development and strategies for reviewing, refining, and refreshing policies. This would help all of us to broaden considerations, identify gaps, and learn more about the ways in which policy advances or hinders practice implementation. Our hope is that members of the PLAIO community will contribute to the discussion by considering their current policy initiatives within the Standards Draft and to provide feedback as to how effective the standards are for institutions that are either developing or reviewing policy.

We would like to find out from the PLAIO community what suggestions it has for revisions to the standards. How are they helpful in thinking about developing and sustaining institutional policies? How do they support practice? What do institutions already have in place? What are current roadblocks when establishing new policy? What types of collaborative efforts in developing institutional policy would be helpful? Has policy development helped to position institutions in their efforts to increase adults' credential completion? With those questions in mind, we would like to use PLAIO as a platform for further discussion on CPL policy development, beginning with a webinar to share feedback, resources, and challenges.

Closing Thoughts

Effective policy aligns with and supports the institution's mission, demonstrates ongoing commitment from senior leadership, recognizes the diverse learning needs of students, and ensures that CPL is part of a thoughtfully planned degree program. Ultimately, policy affects students' opportunities and success. To

provide transparency in policy, equity in carrying out that policy into practice, and subsequently, portability for students' college-level learning, we need to take a closer look at the problems and opportunities current CPL policy represents and continue to enhance tools and strategies for ongoing development and review. The quality and integrity of CPL practices are dependent on a close scrutiny of policy and the development of standards for that policy, which ultimately impacts students reaching their educational and employment goals.

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Appendix A

Credit for Prior Learning Policy Standards – Iowa Pilot
(for the review of CPL policy and related policy documents)

Standard One: Philosophy and Academic Framework

CPL policy is grounded in the institution's philosophical and academic and framework and is consistent with institutional mission, goals, and approaches to learning

Indicators:
- CPL policies have an underlying philosophy and an identified pedagogical framework that is student centered and acknowledges the continuity of prior learning with current and future student learning.
- CPL policy identifies a set of best practices that has informed policy development.
- The CPL policy states how it aligns with the institution's mission and goals.

Standard Two: Integrity

CPL policy ensures that all stakeholders (including institutional representatives, students, and any external contributors) promote integrity in the evaluation and documentation of prior learning.

Indicators:
- CPL policy adheres to standards from regional, state, and professional accrediting bodies concerning the award of credit for prior learning.
- CPL policy ensures fairness, consistency, balance and flexibility in the awarding of credit.
- CPL policy mandates the assurance of college-level learning in all credit awards.
- CPL policy acknowledges multiple and diverse sources of student learning and encourages the use of multiple methods to assess prior learning.
- CPL policy mandates evidence-based credit recommendations.
- CPL policy development considers the interests of relevant stakeholders, including students and employers.
- CPL policy includes a statement of fees or other costs associated with prior learning assessment.
- CPL policy assures that credit is awarded only one time for any individual learning experience.
- CPL policy assures the protection of academic integrity in ways that are consistent with existing institutional academic policy.
- CPL policy follows institutional guidelines and governance processes for academic policy approvals.
- CPL policy assures confidentiality of student artifacts and the protection of the proprietary nature of any training materials submitted for review.

Standard Three: Faculty Qualifications and Engagement

CPL policy assures the involvement of qualified faculty or other subject matter experts.

Indicators:

- CPL policy includes a statement as to the required qualifications of faculty members who complete credit reviews and make credit recommendations.
- CPL policy includes references protection against conflict of interest on the part of faculty reviewers.

Standard Four: Student Services

CPL policy assures that students receive effective services.

Indicators:

- CPL policy clearly articulates eligibility requirements for students who wish to earn credit for prior learning.
- CPL policy provides that qualified personnel provide an assessment of student preparedness to engage in CPL processes.
- CPL policy requires that student advising is provided by qualified and trained personnel.
- CPL policy assures that students will receive an accurate and timely review of CPL transcripts or other materials.
- CPL policy includes a clearly identified student appeal process.
- CPL policies are clear and transparent and are widely communicated and readily available to faculty and students.

Standard Five: Credit Management

CPL policy clearly identifies how credits are organized and applied to student records.

Indicators:

- CPL policy allows for credits to be applied to the full complement of degree requirements: general education, major requirements, major electives, general electives.
- CPL credits are appropriately identified on the student's transcript in accordance with guidelines of AACRAO or other professional associations.
- CPL policy is articulated clearly in terms of its relationship to other academic policies, such as transfer of credit.
- CPL policy alerts students to any implications for financial aid as a result of CPL credit awards.
- CPL policy identifies any maximum caps on CPL credit awards.

Standard Six: Planning, Resources, Improvement

CPL policy assures current and continuous improvement by providing sufficient infrastructure to support policy implementation.

Indicators:

- CPL policy is regularly reviewed through established institutional processes and may be revised according to those processes.
- CPL policy encourages structured data collection and analysis, including established tracking of student benefit and success and an identified financial model for cost-benefit analysis.

Appendix B

CPL Policy Standards Rubric – Iowa draft 2

Indicator	Present	Not Present
Standard 1: Philosophy and Academic Framework		
CPL policies have an underlying philosophy and an identified pedagogical framework that is student centered and acknowledges the continuity of prior learning with current and future student learning.		
CPL policy identifies a set of best practices that has informed policy development.		
The CPL policy states how it aligns with the institution's mission and goals.		
Notes		

Standard 2: Integrity		
CPL policy adheres to standards from regional, state, and professional accrediting bodies concerning the award of credit for prior learning.		
CPL policy ensures fairness, consistency, balance and flexibility in the awarding of credit.		
CPL policy mandates the assurance of college-level learning in all credit awards.		
CPL policy acknowledges multiple and diverse sources of student learning and encourages the use of multiple methods to assess prior learning.		
CPL policy mandates evidence-based credit recommendations.		
CPL policy development considers the interests of relevant stakeholders, including students and employers.		
CPL policy includes a statement of fees or other costs associated with prior learning assessment.		
CPL policy assures that credit is awarded only one time for any individual learning experience.		
CPL policy assures the protection of academic integrity in ways that are consistent with existing institutional academic policy.		
CPL policy follows institutional guidelines and governance processes for academic policy approvals.		
CPL policy assures confidentiality of student artifacts and the protection of the proprietary nature of any training materials submitted for review.		
Notes:		

Standard Three: Faculty Qualifications and Engagement		
CPL policy includes a statement as to the required qualifications of faculty members who complete credit reviews and make credit recommendations.		
CPL policy includes references protection against conflict of interest on the part of faculty reviewers.		
Notes:		

Standard Four: Student Services		
CPL policy clearly articulates eligibility requirements for students who wish to earn credit for prior learning.		
CPL policy provides that qualified personnel provide an assessment of student preparedness to engage in CPL processes.		
CPL policy requires that student advising is provided by qualified and trained personnel.		
CPL policy assures that students will receive an accurate and timely review of CPL transcripts or other materials.		
CPL policy includes a clearly identified student appeal process.		
CPL policies are clear and transparent and are widely communicated and readily available to faculty and students.		
Notes:		

Standard Five: Credit Management		
CPL policy allows for credits to be applied to the full complement of degree requirements: general education, major requirements, major electives, general electives.		
CPL credits are appropriately identified on the student's transcript in accordance with guidelines of AACRAO or other professional associations.		
CPL policy is articulated clearly in terms of its relationship to other academic policies, such as transfer of credit.		
CPL policy alerts students to any implications for financial aid as a result of CPL credit awards.		
CPL policy identifies any maximum caps on CPL credit awards		
Notes:		

Standard Six: Planning, Resources, and Improvement		
CPL policy is regularly reviewed through established institutional processes and may be revised according to those processes.		
CPL policy encourages structured data collection and analysis, including established tracking of student benefit and success and an identified financial model for cost-benefit analysis.		
Notes:		