

Prior Learning Assessment and Competency-Based Education: An Overview of Programs, Policies, and Practices

Ileri Valenzuela

Research and Planning Group for California Community Colleges

Donald MacIntyre, PhD

Research and Planning Group for California Community Colleges

Becky Klein-Collins

Council for Adult and Experiential Learning

John Clerx

Moran Technology Consulting

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CAEL



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The authors of this report are:

- Ileri Valenzuela, senior researcher, RP Group;
- Donald J. MacIntyre, consultant, RP Group;
- Becky Klein-Collins, associate vice president, CAEL; and
- John Clerx, consultant, Moran Technology Consulting.

Executive Summary

Introduction

How can we help significantly more students reach their educational goals and improve their employment outcomes? How can we reign in the growing time burden and ballooning costs students must shoulder throughout their educational journey? How can we recognize the learning and experience the vast number of nontraditional students bring when they come to our colleges seeking a path to improved career opportunities and family-sustaining wages?

These are some of the key questions the Los Angeles Area Chamber of Commerce (L.A. Area Chamber) is seeking to answer in collaboration with Los Angeles Trade Technical College (LATTC), in part through the implementation of a Pathways to Academic, Career, and Transfer Success (PACTS) framework (for more information, see text box). LATTC and the L.A. Area Chamber are interested in using this initiative to “**construct a new paradigm that allows for the delivery of education based on student learning and competencies rather than on instructional seat time and traditional course completion**” (Klein-Collins, 2012). In turn, LATTC is seeking to implement prior learning assessment (PLA) as a first step in a continuum towards developing a competency-based education (CBE) program (see text boxes on p. iii and v for definitions of these approaches).

To inform this effort, the L.A. Area Chamber and LATTC commissioned the Research and Planning Group (RP Group) to conduct research, in collaboration with the Council for Adult and Experiential Learning (CAEL) and the Moran Technology Group (Moran), on the **factors that foster and interfere with implementing a PLA and CBE programs**, including local, state, and federal policies and regulations; formal and informal structures; and cultural norms. This report brings together key findings, implications, and recommendations resulting from this collaborative research effort.¹ The following **executive summary pulls out the findings that will be most actionable for the L.A. Area Chamber and LATTC**, offering highlights on the national context for PLA and CBE, followed by insights on the state and local landscape. It concludes with recommendations for LATTC and the L.A. Area Chamber to consider when pursuing PACTS’ development.

Pathways to Academic, Career, and Transfer Success (PACTS)

PACTS is a sequence of postsecondary instructional programs and activities, with coordinated supportive services, designed to provide individuals with the competencies they need to successfully access a college education, attain industry-recognized and postsecondary credentials, and obtain a career that pays family-supporting wages and offers opportunities for advancement and growth.

¹ CAEL and Moran produced separate reports of their findings; *Prior Learning Assessment and Competency-Based Education: a National Overview and Policy Review: Prior Learning Assessment and Competency-Based Learning Policies*, respectively. The RP Group did not produce a separate report, but rather conducted original research solely for the purpose of this project and integrated its research findings with the previous work done by CAEL and Moran to provide a full and coherent picture of the national, state, and local landscape for PLA and CBE.

Ultimately, this research reveals a **considerable opportunity for this local partnership to serve as a state, if not national, leader in both modeling effective PLA and CBE practices through its PACTS framework, and in advocating for policy changes** that pave the way for more students to take advantage of this innovative educational approach.

National Context for PLA and CBE

CAEL's research, provides a comprehensive examination of the current state of PLA and CBE in the U.S. Ultimately, this research reveals that while PLA and CBE policy and practice vary considerably across the country, common policy and implementation issues are emerging as more states and their higher education institutions embrace these approaches.

National Context for PLA

CAEL's examination of PLA includes (1) college motivations and methods for implementing PLA, (2) factors that commonly affect PLA delivery, (3) state-level policies and accreditation regulations impacting implementation, and (4) student participation in PLA. This research also highlights models for PLA including standards of effective practice recently developed by CAEL and emerging PLA innovations from two states. We summarize some of these findings below.

Motivations and Methods for PLA

Motivations. CAEL's research reveals that colleges are motivated to pursue PLA because it can allow students to **save time, save money, and avoid redundant class work** (Klein-Collins, 2010). Other motivations for and benefits of PLA may include helping encourage students to **complete their degrees, attracting students with work experience to higher education, and allowing learners to circumvent courses in subjects they already know**. Additionally, PLA may have social justice implications because it **recognizes the value in a range of life experiences**, particularly students who are employed, in the military, or economically disadvantaged.

Methods. This research indicates that when looking at the national context, the **provision of prior learning assessment is all over the map and is typically decentralized**. Different methods of PLA are often offered through a variety of offices or departments on college campuses. Methods may include (but are not limited to):

- Standardized exams (e.g., Advanced Placement, College-Level Examination Program);
- Individualized assessments (e.g., student portfolios evaluated by faculty);

Prior Learning Assessment (PLA)

- *Offers educators a way to evaluate learning that an individual has acquired outside of a traditional academic setting*
 - *Assesses learning that may have been attained through a variety of ways (e.g., work experience, employer training programs, military training or experience, independent study, non-credit courses, volunteer or community service, travel, non-college courses, and/or seminars)*
 - *Can lead to the granting of college credit, advanced standing toward further education or training, or certification*
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- Exams, termed “credit-by-exam” in California and “challenge exams” in other states; and
- Evaluated non-college programs (e.g., National College Credit Recommendation Service, American Council on Education).

In general, **each individual institution adopts its own approach to PLA implementation.** While some institutions have robust PLA programs, others opt to offer students limited PLA options. Some colleges and universities will only recognize assessment through external standardized tests while other offer the full gamut of assessment options.

PLA Implementation and Related Policy Issues

This research finds that multiple factors are at play in PLA delivery, including the following:

- **Fees Associated with PLA:** Typically, each institution determines their own fee structure for the various types of PLA methods.
- **Financial aid:** PLA costs are rarely covered through financial aid, yet institutions are creatively circumventing federal regulations to deliver this approach. In some cases, veteran students also leverage GI Bill benefits to pay for some (not all) PLA options. That said, the Department of Education is currently testing the use of financial aid for PLA through a multi-institution initiative.
- **Credit limits:** Institutions, as well as the policies of their accrediting bodies, dictate the maximum number of credits awarded in a PLA program, and credit limits can range considerably.
- **Transferability of PLA credits:** Transferability is generally determined by individual institutions and by the type of assessment method. No uniform policies exist governing how PLA credits appear on student transcripts.
- **Public awareness of PLA:** Limited awareness of PLA among students, faculty, and administrators can hamper adoption and participation.
- **Faculty perceptions:** Faculty may have concerns about the academic rigor of PLA and about the potential for weakening their departments through reduced enrollments.

At present, states typically direct their higher education systems to establish PLA policy (rather than stipulating a system-wide approach). At the same time, this research finds that the growing interest in PLA across the country’s higher education systems has recently encouraged a number of **states to develop policies that address some of the factors impacting implementation**, as outlined above, including policies related to fees, transferability and transcription of credits, and awareness raising of and transparency about options and restrictions. In addition, states are **developing policies to support the expansion of this approach**, including policies addressing the following issues:

- **Assessment processes and methods**, specifically defining which methods of PLA are to be accepted and how they are administered;
- **Veterans**, specifically recognizing the skills and learning acquired through military experience;

- **Capacity building**, or increasing the ability of colleges to offer PLA; and
- **Workforce system participation**, specifically encouraging the promotion and incorporation of PLA into workforce system initiatives.

Regional Accreditors and PLA

Along with state policies that set the stage for how PLA is promoted and delivered, colleges must also recognize guidelines established by their regional accrediting body when pursuing prior learning assessment. Like state policy, **the seven regional accrediting agencies take different approaches to regulating PLA**. While they all require that PLA be comparable to the results of institutionally-provided learning experiences, each accreditor has different guidelines for demonstrating these results. Some accreditors set specific limits on PLA credits awarded, and others restrict PLA to undergraduate degree programs. Some accreditors have specific standards of good practice and others direct institutions to standards articulated by CAEL (Fiddler, M. & Marienau, C., 2009).

Student Engagement with PLA

Student Usage. Prior learning assessment usage rates are not reported to state or federal agencies. CAEL has conducted its own research (2010, 2014) on PLA usage, which indicates that a number of **factors such as race/ethnicity, type of institution, and course of study can have an effect on student PLA usage rates**. For example, its 2014 analysis showed that the usage rates for White students was 42 percent, while the rate for Hispanic students was 15 percent. In looking at the data more closely, CAEL found that the low participation rate for Hispanic students was most closely associated with this group's higher enrollment numbers at institutions with fewer PLA options, less of a PLA-promoting culture, and policies that limit the flexibility the student has to use PLA towards the attainment of a degree, suggesting that PLA usage among Hispanics is an issue of access rather than of ethnicity.

Degree completion. Significant research has been done by CAEL and others that examines the relationship between PLA credit-earning and degree completion. A 2010 study conducted by CAEL showed that **students who earn PLA credit have higher graduation rates than those who do not**. An examination of the data indicates that 43 percent of those who earned PLA credit achieved a bachelor's degree, while another 13 percent attained an associate's degree (versus 15 percent and 6 percent respectively for students who did not earn PLA credit). Notably, CAEL also found that **underserved student populations can benefit from PLA even more so than other student groups**. For example, Hispanic students participating in PLA at the bachelor's degree level demonstrate completion rates eight times higher than non-PLA Hispanic students.

Competency-based Education (CBE)

- *Allows students to earn their degrees by demonstrating specific knowledge and skills related to programs of study as well as general skills, abilities, and behaviors*
 - *Enables students to demonstrate knowledge and skills gained through work, the military, or in a classroom as well as through direct participation in the program's educational offerings*
 - *Measures progress by demonstrating achievement of specific learning outcomes using various forms of assessment instead of simply completing a set number of academic terms or credit hours of instruction*
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National Context for CBE

CAEL’s research also explores motivations and benefits of CBE, identifies factors impacting and considerations for CBE implementation, and provides a high-level examination of related state and federal policy. It identifies CBE models at two- and four-year institutions and highlights national efforts to support the expansion of these programs. Finally, it shares information on the tracking of student participation in CBE. We summarize some of these findings below.

Motivations for CBE

CAEL’s research highlights several potential motivations for and benefits of implementing this approach. CBE requires programs to **communicate explicit expectations to students**, articulating a clear set of competencies students must demonstrate to receive credit. CBE is also a good **fit for nontraditional students and adult populations** that may not be well served through traditional models of postsecondary education. CBE programs are **student centered** and designed to meet students where they are, allowing each individual student to build on what he/she knows and be an active participant in his/her learning. CBE focuses on **what students know and can do** and requires them to **apply knowledge and skills** across settings. **Coaching and student supports** are critical components of CBE programs, including mechanisms to help students stay on track as they progress.

CBE Implementation and Related Policy Issues

CAEL identifies through its research the following implementation factors and policy considerations for colleges and universities operationalizing a competency-based education program (Klein-Collins, 2013).

- **Competency framework:** Defining the competencies that are required of all graduates is one of the most—if not *the* most—important part of any CBE program. These competencies should meet academic and industry standards in order to ensure program value in the marketplace.
- **Learning activities and technology:** Many CBE programs are leveraging technology to depart from formal, instructor-led courses, allowing students to learn on their own through online courses, modules, and/or resources; others are using a “hybrid” approach, offering students this independent option alongside traditional courses within a competency-based program.
- **Methods of assessment:** Rigorous and valid assessments are key to CBE. Programs typically offer a range of assessments, customized to the competencies themselves, and they can use objective assessments and/or ones that require application of skills and knowledge.
- **Student support:** A common practice of institutions has been to incorporate various forms of support to facilitate student success, including (1) course-level mentors who provide subject matter assistance to individual students engaging with specific learning activities, and (2) program-level coaches who guide and support the students through the entire program.
- **Federal financial aid:** Since financial aid is designed to cover the costs of credit-hour-based instruction, federal financial aid through Title IV program or through the GI Bill is not a good

fit for CBE programs, which are designed to recognize student learning outcomes that may be acquired outside of credit-based courses.

- **Credit hour alignment:** CBE programs differ in how they relate the competencies and/or course modules to the credit hour, with some equating individual learning modules directly to credit hours and others creating complicated frameworks that map competencies back to individual learning outcomes of specific courses.
- **Pricing:** CBE pricing models vary widely. Some colleges charge tuition on a credit hour basis, others charge by the assessment, and still others require a flat rate over a defined period.

Little effort has been made to advance CBE adoption through either federal or state policy change. Yet, CAEL notes a number of institutions that have found ways to implement their CBE programs within the current policy context. Some institutions operate their programs within the traditional **federal financial aid framework by developing very clear crosswalks between their competency framework and the credit hour.** Others have leveraged the federal regulation related to “direct assessment,” defined as “an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others” (Klein-Collins, 2012). Since 2013, the Department of Education has granted the **direct assessment designation** to six institutions for their CBE programs. At the state level, legislatures have been slow to create policies that would facilitate the development and expansion of CBE. State policies that do exist around CBE appear to focus primarily on K-12 and career technical education.

At the ground level, CAEL’s research also finds that many **practitioners have misconceptions and concerns about how this approach will impact students, faculty, and program quality, despite growing support for CBE.** For example, some have the expectation that CBE is faster and cheaper than traditional programs, yet, in some cases, achieving a degree may take longer—and be more rigorous—since students must satisfactorily demonstrate required competencies to progress. Others believe that CBE relies solely on multiple choice testing to prove competency, rather than the full breadth of assessments often used. Still others express concern about the revised role of faculty in CBE delivery, worrying about their capacity to serve as a facilitator of learning, the underutilization of their knowledge and expertise, and the potential loss of support for their research endeavors. Many stakeholders worry that students cannot learn college-level competencies in short, discrete online modules, and that not all students will thrive in the CBE model, depending on factors such as learning style and academic readiness. **Addressing these concerns upfront with faculty will be critical to the success of a CBE program.**

Regional Accreditors and CBE

The emergence of CBE programs is forcing regional accreditors to establish guidelines and processes for evaluating direct assessment programs. CBE programs can be very different from an institution’s normal offerings, and so **launching a new CBE program may require that the institution submit to a “substantive change” review.** Additionally, the Department of Education’s direct assessment process requires that institutions receive approval for their CBE programs from the regional accreditor before applying.

In its research into accreditation in California, CAEL found that **the Accrediting Commission for Community and Junior Colleges (ACCJC) has not reviewed or approved any CBE programs for California community colleges**; in turn, it is not in a position to provide any guidance to institutions at this time.

Student Engagement with CBE

Currently, research on student engagement with and outcomes resulting from CBE participation is nascent due to the relative newness of many CBE models. A number of organizations (e.g., CAEL, Mathematica, New American Foundation, National Institute for Learning Outcomes Assessment) are documenting these developing efforts and will have more information to offer in the near-term.

California Context for PLA and CBE

RP Group’s research also examined PLA and CBE policies and practices in California, looking at both the public higher education systems—University of California (UC), California State University (CSU), and California Community Colleges (CCC)—as well as private nonprofit and for-profit colleges and universities in the state. Below we review these findings, starting with research related to the state’s public and private universities followed by insights on PLA and CBE in California Community Colleges.

PLA and CBE in California’s Public and Private Universities

This research indicates that the **UC system maintains limited PLA options**. UC only offers college credit to students who have taken and scored well on Advanced Placement (AP) and International Baccalaureate (IB) exams. UC does not grant credit for work experience, military/recruit basic training, vocational or technical training, or remedial academic or personal enrichment courses. In addition, it does not grant credit for exams such as those from the College-Level Examination Program (CLEP).

The CSU system does utilize PLA, primarily mirroring how PLA is implemented and utilized at the national level. For example, each campus limits how many credits can be awarded through PLA programs, and the number of credits varies among colleges. In 2010, the CSU endorsed a system-wide policy that provided guidelines for the use of CLEP examinations as the basis for awarding general education credit. This policy applies both to CSU students and those planning to transfer to a CSU campus. In addition to CLEP exams, the only other external standardized exams accepted system-wide are the AP and IB exams.

This research **did not yield any examples of CBE within the UC and CSU systems**. However, this absence of examples does not mean that individual faculty members are not defining certain competencies that they expect their students to demonstrate during their face-to-face courses or in online courses.

This research uncovered nine examples of PLA in the state’s private higher education sector, including at Dominican University of California, University of Redlands, and Marymount California University (for a description of examples please see pgs. 28-30 of the full report). In

comparison with the UC and CSU systems, that will only grant credit for prior learning to students that score well on a limited number of externally developed standardized tests as described in the section above, institutions in the private education sector evaluate learning that an individual has acquired outside of a traditional academic setting through a variety of ways such as: work experience, employer training programs, military training or experience, independent study, non-credit courses, volunteer or community service, travel, non-college courses or seminars.

At the same time, the RP Group found only two examples of CBE programs in California at Brandman University and Fielding Graduate University (see pgs. 31-32 for a full description of these two programs).

PLA and CBE in California Community Colleges

Policy Context for California Community Colleges

To set the context for examining PLA and CBE in California Community Colleges, this research provides a high-level overview of the process for making educational policy in the state. This review outlines the hierarchy of parties involved in policy development, review, and passage as dictated by the California Education Code, including the California Community Colleges Board of Governors (BOG), the California Community Colleges Chancellor's Office (CCCCO), and the Academic Senate for the California Community Colleges (ASCCC). Besides having to adhere to the California Education Code and California Code of Regulations (CCR), community colleges also operate under local district rules and regulations as well as those of individual colleges. Lastly, community colleges also have to be in compliance with the policies and procedures promulgated by the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association of Schools and Colleges (WASC).

Given these players and layers, the research underscores the complexity of the policy making process, emphasizing that this overall state hierarchy will determine the level at which various new policies and changes to existing policies need to be addressed. **If changes to the state's Education Code are needed to facilitate PLA and CBE delivery, legislative changes and a legislative strategy will be required. Changes to Title 5, California Code of Regulations (CCR), will necessitate a strategy that involves the BOG, as well as the CCCCCO and ASCCC, and its consultation process.** Keeping in mind the governance and regulatory structure described above will be important in understanding where the levers to make changes can be found.

PLA in California Community Colleges

Generally speaking, California community colleges **do not have uniform practices and policies for awarding credit for prior learning** with one exception. The BOG has established student fees for exams associated with credit-by-exam; these fees are equal to the per unit enrollment fee, which is currently \$46 per unit.

Credit-by-exam appears to be the primary mechanism supported by the system for recognizing prior learning. California Education Code (Title 5, Section 55050 entitled *Credit by Examination*) states that **the governing board of each of the 113 colleges is mandated to establish credit-by-exam policies, and the passage of AB 1025 (Public postsecondary education: credit by**

examination) in 2013 directed CCCs to provide information to students about credit-by-exam options for relevant courses. While individual college governing boards establish procedural credit-by-exam policy, the regulations stipulate clearly that **faculty—not the governing boards—determine the nature and content of each exam.**

Notably, the **ASCCC has passed a number of resolutions in support of offering students the credit-by-exam option for prior learning.**² The ASCCC’s most recent resolution passed in spring 2014, entitled *Awarding Credit Where Credit is Due: Effective Practices for the Implementation of Credit by Exam*, is the most robust resolution on this issue to date. In alignment with the commitment to ensuring open access and serving adult learners, the resolution states that “colleges should seek to maximize the opportunities for credit-by-exam as is appropriate to meet the needs for their student populations, while maintaining academic excellence” (Kawaguchi, DeGroot, Holcroft, Pilati, & Short, 2014, p. 5).

RP Group’s research reveals that most community colleges now have policies that recognize and award credit for military coursework, and some, but not all, CCCs award credit for prior learning via national standardized tests (e.g., AP and IB exams). **Awarding of credit in CTE areas for articulated high school work, including courses in Regional Occupational Career Programs, is perhaps the one area of credit-by-exam that has gained limited traction in the state.** Education Code Title 5 regulation § 55050 Credit by Examination permits high school students to earn college credit through credit-by-exam and also waive the residency requirement for this student population. In 2005, the ASCCC introduced and encouraged the legislature’s passing of SB 70, which established the Statewide Career Pathways: Facilitating School to College Articulation initiative to expand the use of articulation agreements between high schools and community colleges. However, a number of local policies and practices have prevented this option from being fully implemented and insufficient inter-segmental coordination remains a barrier to articulation in California.

CBE in California Community Colleges

California community colleges have been slow to embrace CBE as a method of awarding credit. A review of California’s higher education policy finds that in the **current regulatory environment, independent study courses may be a prime vehicle for competency-based learning**, where the student independently develops the competencies needed to get credit for a course. Title 5 CCR § 58051 Method for Computing Full-Time Equivalent Student (FTES) includes provisions allowing a community college district, for the purpose of reporting enrollment for funding, to include “approved courses or programs of independent study who are under the supervision, control, and evaluation, but not necessarily in the immediate presence, of an academic employee of the district who is authorized to render such service.”

Different accounting procedures are used to calculate apportionment for independent study courses. **Computation for a full-time equivalent student (FTES) is based on units not hours; funding is not tied to seat time.** This alternative accounting method is important because it emphasizes learning and content, rather than focusing on hours of contact. Since independent study courses are assigned a unit-based accounting method, which must be applied to all courses offered in this

² ASCCC resolutions #09.05 (fall 2008), #09.08 (fall 2010).

manner, any course can be taught as independent study, which in turn can lend itself to a competency-based learning model within classes in any discipline and across the curriculum. While there is considerable latitude in how an independent study course can be conducted, regulations regarding faculty contact hours require that students in these courses have comparable access to the instructor as learners enrolled in a traditional course in addition to regularly scheduled office hours. This requirement may act as an obstacle to implementing CBE through this mechanism.

While the adoption of CBE appears relatively underdeveloped across CCCs, two very recent initiatives, the Los Angeles Healthcare Competency to Career Consortium (see pgs. 40 - 41 for a full description of this initiative), and the California Community Colleges' Bachelor's Degree Pilot program (see pgs. 41 – 42) for a description of the pilot) could pave the way for further innovations.

Los Angeles Community College District (LACCD) Context for PLA and CBE

This research also looked at the policy context for PLA and CBE within the Los Angeles Community College District (LACCD), of which the Los Angeles Trade Technical College (LATTC) is a part. As noted earlier, all California community college districts must establish and maintain policies related to credit-by-exam. This research reveals two credit-by-exam policy requirements unique to LACCD not found in Title 5. First, **students must meet a 12-unit residency requirement within any of the nine colleges in the LACCD. Second, the district only permits students to earn a maximum of 15 credits through credit-by-exam.**

Otherwise, Moran's research finds that LACCD policy reflects the credit for prior learning regulations of Title 5. As such, **LACCD faculty have significant control over the PLA process.** For example, faculty solely determine the content and type of PLA. Credit-by-exam can only be awarded for courses for which discipline faculty have developed some method of assessing prior learning, giving discipline faculty who are responsible for the "examination" considerable latitude in defining an exam.

Additionally, faculty may accept an examination conducted at a location other than the community college for the purpose of awarding credit for prior learning. While this policy permits external certifications (e.g., Microsoft Office User Certification) to serve as an examination for course(s) covering the competencies certified by the exam, it could also pose a credit transferability issue for students. Ultimately, the researchers surmise that **the exclusive role of the faculty in this process may create differing responses** among different discipline faculty within a college and among faculties in the same discipline at other colleges within the LACCD. In turn, **students may not experience reliable and consistent PLA policy.**

LACCD policies also address the option for students to receive PLA credit through certain external examinations such as AP, IB, and CLEP. The district recommends the use of AP and IB exams for General Education and competency requirements for the associate's degree, CSU General Education Certification, and the Inter-segmental General Education Transfer Curriculum. In the case of the CLEP, the district has developed an elaborate matrix that (1) lists all the CLEP exams and scores, and (2) articulating these exams and scores with the general education requirements for an associate's degree met by achievement of a satisfactory score. In all cases, the determination of

course equivalency is done at the college level, in accordance with the district shared governance policy.

While LACCD has a policy for awarding credit for military service, it is very limited. While the regulation cites the Army/American Council on Education Registry Transcript System, which provides a variety of credit recommendations based on military training, the only credit allowed under this regulation is Health and Physical Education.

LACCD has a specific policy on granting Administration of Justice credit for training at a public law enforcement academy that meets the standards of the California Peace Officers Standards Commission; training at private agencies does not apply. One hour of credit may be granted for each 50 hours of training; students can receive a maximum of 18 units for prior law enforcement academy training.

It should be noted that Moran found **no specific mention of policies related to competency-based education within LACCD policies and practices.** At the same time, as mentioned in the section above, Title 5 provision allowing for the accounting for independent study courses to be based on credits not hours creates the possibility for this mechanism to be used as part of a competency-based education framework.

Recommendations for Facilitating PLA and CBE Innovation at LATTC

In looking at the overall national, state, and local context, several opportunities emerge to advocate for policy changes and approaches that will facilitate the broader adoption of PLA and CBE. Below, we outline a series of policy recommendations and implementation suggestions, identified as “low hanging fruit” that California Community Colleges can readily address in the near term.

Policy Recommendations

To specifically advance PLA and CBE as part of the PACTS framework currently being implemented at LATTC, we recommend the following LACCD policy revisions.

Eliminate District-Level Unit Restrictions on Credit for Prior Learning

In the short term, modify LACCD Board Rule (BR) 6702—*Credit-by-Examination*, to eliminate the requirement that a student must complete 12 units before taking any course through credit-by-exam, which is not required by Title 5, CCR. Even more important, is the elimination of the 15-unit credit-by-exam maximum in the district’s BR 6702.10—*Limitation on Petitioning for Examination* and BR 6702.11—*Maximum Units Allowable*, especially since Title 5, CCR, § 55050 does not have this limitation.

Provide Credit for Law Enforcement Academy Training

Modify Administrative Regulation E-113—*Credits for Units Earned for Law Enforcement Training* to eliminate the 18-unit maximum and recognize the experience of individuals who have completed police academy training.

Offer Credit for Military Training

Veterans would also benefit significantly from a modification of LACCD Administrative Regulation E-118—*Military Credit*, allowing course credit for all course equivalencies listed in Army/American Council on Education Registry Transcript System, which provides a variety of credit recommendations based on military training. Presently, LACCD only allows credit for Health and Physical Education. To secure faculty backing for this change, LACCD can look to the ASCCC Curriculum Committee’s spring 2014 recommendation: “Local senates, particularly colleges with large population of students with prior learning from non-collegiate experiences such as military service, need to recommend policy regarding the use of credit-by-exam as a means for students to earn course credit” (Kawaguchi L. et al, 2014).

Accept Credit Recommendations from Other External Evaluations of Prior Learning

Research conducted for this report indicates that the LACCD has already adopted several policies on military credit, CLEP, and AP; however, they could also consider using other credit recommendations cited by CAEL in a *College Productivity Series* paper entitled “State Policy Approaches to Support Prior Learning Assessment” (2012) Sources include:

- Credit recommendations listed in the American Council on Education (ACE) National Guide to College Credit for Workforce Training and the ACE Military Guide; and
- Credit recommendations listed by National College Credit Recommendation Service.

Leverage Independent Study Options

Given that independent study offers a potential avenue for offering CBE, we recommend that LATTC expand the use of this mechanism beyond its current practice. Moran’s research reveals that at present, the only courses within the LACCD that are offered through independent study are subject-specific “Directed Studies” courses, in which the student completes an individual project with an instructor and receives credit for completing a specific course (e.g., Administration of Justice 185—Directed Study Administration of Justice). Given the language in Title 5, CCR, it would be possible to offer a specific course (e.g., Administration of Justice I—Introduction of Administration of Justice) as an independent class, thus allowing an instructional modality other than classroom lecture for any course without changing state of LACCD policy.

Implementation Suggestions

In addition to the abovementioned policy recommendations, this research reveals a number of specific suggestions to ensure effective delivery of PLA and CBE at LATTC. These are outlined below.

Develop a Specific Plan for Student Outreach

Significantly increase transparency and communication with students with respect to the PLA options available to them. Ensure that students have access to all of the information they need to understand how the program works, whether and how they will receive grades for their work, how

progress is tracked and posted, whom to contact for help, etc. Moreover, PLA options are often not applicable to traditional students; therefore, specifically engage nontraditional learners who are typically older, working, and often supporting families.

Offer a Centralized Location for PLA Services

For the most part, PLA services are offered in many places on a college campus rather than being centralized in one location, which can overwhelm and confuse students. Offer PLA options in a central location to facilitate ease of use.

Build College-Wide Commitment to and Support for PLA and CBE

Develop buy-in from all segments of the college, given that implementation of PLA and CBE has implications for several areas of the institution (e.g., admissions and records, advising, instruction, student services). Particularly work with faculty to secure their investment in and support for PLA and CBE and to ensure their understanding of its academic rigor and pedagogical validity. Involve faculty in the design, development, and implementation of any program. Communicate to faculty any new expectations and provide training and professional development to help them transition to new roles.

Increase Collection of Student Outcomes Data and Program Evaluation

Given the dearth of student outcomes data collected for PLA and CBE, develop or contract for new learning management systems that will track student enrollment and progress in a way that allows for flexibility in the pace of student progress. The new system may need to have interoperability with a college's main student information system and may need to be able to track student progress in a way that satisfies Title IV requirements.

Engage Employers

Involve employers throughout the process of designing a PLA and/or CBE program, especially for career and technical programs. They can help inform the competency framework, the types of authentic assessments that should be used, and ongoing program improvements. Their involvement will help to ensure that the program is meeting business and industry needs, and employers who are involved may be more apt to consider graduates for future employment.

Conclusion

This research underscores that the L.A. Area Chamber and LATTC have the opportunity to be at the forefront of a major change effort designed to advance PLA and CBE, translating these findings into effective practice that improves the outcomes of participating students, models the way for other institutions, and inspires positive policy revisions. Given interest expressed by the legislature, the CCCCO, and the ASCCC in recognizing the prior learning of adult learners, reducing time to degree, and decreasing costs borne by students, the forces for change may be moving positively in LATTC's direction. However, to succeed, LATTC will need to engage all key stakeholders from start to finish.

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Introduction

The Research and Planning Group for California Community Colleges (RP Group) contracted with the Los Angeles Area Chamber of Commerce Foundation (L.A. Area Chamber) to lead a collaborative research project with the Council for Adult and Experiential Learning (CAEL) and the Moran Technology Group (Moran) on prior learning assessment (PLA) and competency-based education (CBE) (see side bars for definitions of these approaches).

PLA and CBE were popular among many of the adult-focused educational initiatives launched in the early 1970s. While colleges have consistently used these approaches since that time, they have both gained considerable attention and popularity in recent years. These methods are gaining the attention of policymakers, foundations, and educators given growing national concern that the U.S. needs to produce more college-educated workers to remain competitive in the global economy. Coupled with this concern are worries about the ballooning cost of a college education and the length of time it takes students to earn a degree. In this environment, PLA and CBE have the potential to play an even more prominent role in our higher education systems.

The goal of this study was to glean information that would support advocacy for changes in policies and practices at the national, state and local level necessary to specifically strengthen PLA and CBE programs in California Community Colleges. To accomplish this goal, the project leaders aimed to: (1) provide an overview of the implementation of prior learning assessment and competency-based education at the national level and within the state of California, and (2) identify specific policies and regulations of the Los Angeles Community College District (LACCD) and the Los Angeles Trade Technical College (LATTC) that would have implications on LATTC's efforts to implement the Pathways to Academic, Career, and Transfer Success (PACTS) framework that is being supported by the L.A. Area Chamber (see side bar describing the PACTS framework on p. 2).

Project Methodology

The RP Group directed this study and coordinated the work of each contributing organization; each research partner assumed responsibility for core components of the research.

Prior learning assessment

- *Offers educators a way to evaluate learning that an individual has acquired outside of a traditional academic setting*
- *Assesses learning that may have been attained through a variety of ways (e.g., work experience, employer training programs, military training or experience, independent study, non-credit courses, volunteer or community service, travel, non-college courses, and/ or seminars)*
- *Can lead to the granting of college credit, advanced standing toward further education or training, or certification*

Competency-based Education

- *Allows students to earn their degrees by demonstrating specific knowledge and skills related to programs of study as well as general skills, abilities, and behaviors*
 - *Enables students to demonstrate knowledge and skills gained through work, the military, or in a classroom as well as through direct participation in the program's educational offerings*
 - *Measures progress by demonstrating achievement of specific learning outcomes using various forms of assessment instead of simply completing a set number of academic terms or credit hours of instruction*
-

In addition to overseeing the project, the RP Group focused specifically on exploring the California state-level landscape—examining related literature, reviewing public information on PLA and CBE policies and practices, and conducting one-hour interviews with eight practitioners in California. The research resulted in the documentation of:

- Public and private universities and community colleges in California engaged in PLA and CBE;
- Specific practices used in the implementation of PLA and CBE in California;
- Changes made to local policies and practices as a result of implementing PLA and CBE in California; and
- Key successes achieved and challenges encountered in implementing PLA and/or CBE in California.

PACTS is a sequence of postsecondary instructional programs and activities, with coordinated supportive services, designed to provide individuals with the competencies they need to successfully access a college education, attain industry-recognized and postsecondary credentials, and obtain a career that pays family-supporting wages and offers opportunities for advancement and growth.

Through these activities, the RP Group additionally:

- Analyzed ACCJC accreditation implications for PLA and/or CBE implementation;
- Examined state and federal financial aid considerations when implementing PLA and/or CBE both for the institution and the student; and
- Explored the implications for articulation between California community colleges (CCCs) and four-year institutions when implementing PLA and/or CBE.

The RP Group’s summary of this state-level landscape can be found in sections II and III of this report (pgs. 27 – 40).

CAEL’s primary responsibility was to capture and present the national landscape related to PLA and CBE outside California. CAEL employed a research process parallel to the RP Group’s—examining related literature, reviewing public information on PLA and CBE policies and practices, and conducting 30- to 60-minute interviews with 15 practitioners across the country. In addition, CAEL also drew upon their own work and years of expertise with PLA and CBE. This work examined the following aspects of PLA and CBE implementation *outside* of California:

- Specific practices used in the implementation of PLA and CBE at two- and four-year institutions;
- Federal, state, and local policies, regulations, and statutes that have impacted the implementation of PLA and CBE and policy changes resulting from PLA and CBE implementation;
- Impact of accreditation standards on the implementation of PLA and CBE;
- Effect of PLA and CBE on student access to financial aid;
- Effect of PLA and CBE on articulation between two- and four-year institutions;
- Key successes achieved and challenges encountered in implementing PLA and CBE; and
- Data showing the impact of PLA and CBE on student success.

CAEL’s summary of these national findings can be found in section I of this report (pgs. 4 - 26).

The Moran Technology Group's primary responsibility was to place the research findings from the national and statewide landscapes into context for LATTC, LACCD, and CCCs broadly. This work included an examination of:

- Policies at LATTC and LACCD specifically and CCC districts in general that have implications for the implementation of PLA and CBE;
- Changes that would need to be made to local college and/or district policies and practices in order to effectively implement PLA and CBE; and
- California Education Code and Title 5 regulations that have implications for the delivery of PLA and CBE and changes required for effective implementation.

To fully understand this policy and regulatory environment, Moran conducted a review of California Department of Education's Title 5 Education Code and Regulations, the Los Angeles Community College District's administrative and board regulations pertaining to PLA/CBE, and LA Trade-Technical College's regulations pertaining to PLA/CBE. Moran's findings are summarized in sections IV and V of this report (pgs. 39 – 48).

Ultimately, the combined research team of the RP Group, CAEL, and Moran worked together to triangulate finding from these three research components and develop an understanding of the benefits and challenges of, lessons learned about, and considerations for successful PLA and CBE implementation by LATTC, LACCD, and California community colleges in general.

Reader's Guide

This report offers a synthesis of the extensive research produced through the collaborative effort among the RP Group, CAEL, and the Moran Group. CAEL and Moran produced separate reports of their findings; *Prior Learning Assessment and Competency-Based Education: a National Overview and Policy Review: Prior Learning Assessment and Competency-Based Learning Policies*, respectively. Given the substantial amount of information gathered by each organization, it is beyond the scope of this report to include all of the rich details that emerged from the collective research efforts. Therefore, the authors have opted to provide CAEL and Moran's reports separately to the L.A. Area Chamber and LATTC for reference.

The RP Group did not produce a separate report, but rather conducted original research solely for the purpose of this project and integrated its research findings with the previous work done by CAEL and Moran to provide a full and coherent picture of the national, state, and local landscape for PLA and CBE. This report begins with an overview of the national context for PLA and CBE. We then drill down to the state level, first looking at policy and practice for these approaches in California public and private universities followed by the California Community Colleges. From there, we move to the local level, looking at related policy issues in the Los Angeles Community College District. Finally, we wrap up with a series of policy and practice recommendations for facilitating the adoption of these approaches by LATTC.

I. PLA and CBE at the National Level

The following section provides a national context for prior learning assessment and competency-based education policy and practice based primarily on research conducted by CAEL.³ We begin with a discussion of PLA and then turn to CBE, looking at implementation approaches, factors impacting delivery, policy considerations, and models for each approach. Where available, we provide student participation and outcome data.

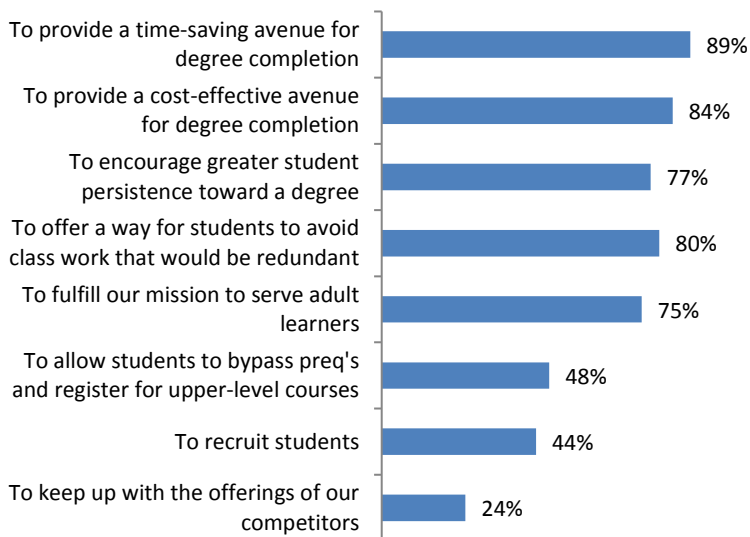
National Context for PLA

Below we provide an overview of how PLA is being carried out across the country, including college motivations and methods for implementing PLA, factors that commonly affect PLA delivery, and state-level policies and accreditation regulations impacting implementation. We then look at student participation in PLA and the impact on their completion of degrees. Following this review of the national context, we examine models for PLA including standards of effective practice recently developed by CAEL and emerging PLA innovations from two states that demonstrate these standards.

Motivations and Methods for Implementing Prior Learning Assessment

Over the last two years, CAEL conducted surveys of the PLA policies and practices at 79 public institutions of higher education (two- and four-year) in five different states. The top reasons survey participants adopted PLA policies were to **allow students to save time, save money, and avoid redundant class work**. Other motivations for and benefits of PLA may include helping encourage students to complete their degrees, attracting students with work experience to higher education, and allowing learners to circumvent courses in subjects they already know. Additionally, PLA may

Figure 1: Top Ten Reasons Institutions Offer PLA



CAEL, 2010

have social justice implications because it recognizes the value in a range of life experiences, not just those available to the privileged, particularly for students who are employed, in the military, or economically disadvantaged. *Figure 1. Top Ten Reasons Institutions Offer PLA* displays primary college motivations for offering PLA (CAEL, 2010).

³ Unless otherwise noted, content for this section derives primarily from the CAEL report *Prior Learning Assessment and Competency-Based Education: a National Overview*, developed for the purposes of this project, and therefore we do not provide specific citation information for this content. When highlighting content from other sources, we provide specific citations.

CAEL notes that **students can secure credit in a number of ways** that include, but are not limited to:

1. **Standardized exams**, including:
 - Advanced Placement (AP) Examination Program;
 - International Baccalaureate (IB) exams;
 - College-Level Examination Program (CLEP);
 - The DANTES Subject Standardized Tests (DSST Exams);
 - Excelsior College Examination Program (UExcel); and
 - Thomas Edison State College Examination Program (TECEP).
2. **Individualized assessments** through which students prepare a portfolio encapsulating their learning from both out-of-classroom experiences and non-credit coursework (e.g., online courses); faculty members with relevant expertise to award credit, including instructors within the institution or those at outside organizations, then evaluate these portfolios
3. **Exams** developed by college faculty, referred to as “credit-by-exam” in California and termed “challenge exams” in other states, which allow for the assessing and assigning of relevant credit
4. **Evaluated non-college programs** such as the fee-based evaluations conducted by the National College Credit Recommendation Service (NCCRS) and the American Council on Education (ACE) of training that is offered by employers or the military; some employers also collaborate with local colleges to evaluate training they provide, resulting in credit earned by successful completers of that training

Furthermore, credit can also be offered by institutions based on a **formal review of apprenticeship training, certifications, or licenses**.

This research indicates that when looking at the national context, the **provision of prior learning assessment is all over the map and is typically decentralized**. Different methods of PLA are often offered through a variety of offices or departments on college campuses. It is up to each individual institution to adopt its own policies and procedures. While some institutions have robust PLA programs, others opt to offer students limited PLA options. Some colleges and universities recognize only assessment through external standardized tests while others offer the full gamut of assessment methods. *Figure 2. Assessment Methods Offered by Two- and Four-Year Institutions* (CAEL, 2010) shows the different PLA options offered by two- and four-year institutions.

In analyzing these methods, CAEL infers that PLA methods such as CLEP are more common, generally speaking, than methods like portfolio assessment. At the same time, CAEL’s findings reveal that **community colleges in a handful of states were much more likely to accept less widely-used methods such as portfolio assessment, performance assessment, and credit for certifications, licenses, and apprenticeships than four-year institutions**. Despite the dissimilarities in PLA policies and practices across institutions, many do share a common desire to save students time and money, as well as to avoid redundant coursework; some also see it as a way to potentially encourage student persistence.

Factors Impacting Implementation of Prior Learning Assessment

Next, we describe factors that colleges and universities across the country commonly grapple with when implementing PLA, such as fees associated with PLA, number of credits students can earn through prior learning assessment options, transferability of these credits to a receiving institution, and public awareness of the opportunity.

Fees Associated with PLA

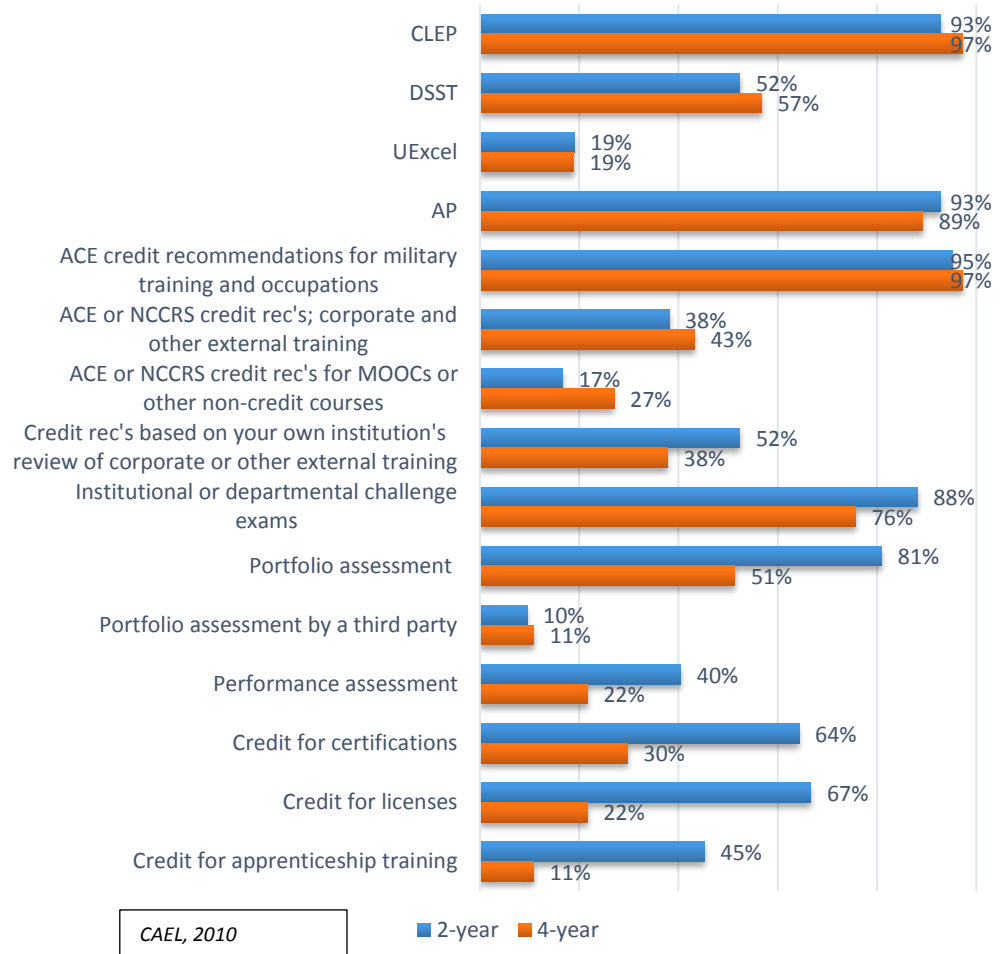
Opting to consider credit for prior learning options comes with a

cost. **Each college or university determines their own fee structure for the various types of PLA methods.** For example, the fees associated with standardized tests are not uniform and are rarely covered through financial aid as noted in the following section (see *Financial aid and the GI Bill*, below). Some institutions charge only what the vendor charges (typically between \$80 and \$100 per exam); others add another \$20 to \$25 test administration fee; and still others charge a small fee for posting the resulting credit to the student's transcript. The fees for challenge exams can range from no charge to \$250. Similarly, portfolio assessment fees vary widely, with prices ranging from \$25 to \$250 per portfolio, or a percentage of what the tuition would have been for the course being challenged. Most postsecondary institutions do not charge fees for non-college training.

Financial Aid and the GI Bill

This national examination reveals that a number of **institutions are creatively circumventing federal financial aid regulations** to deliver PLA. CAEL (2014) explains that some institutions offer a credit-based portfolio development course and include the cost of a portfolio assessment in the total price of the course. Title IV will cover the full cost of the course, which includes the assessment. Another approach is through cost of attendance. CAEL discovered some institutions

Figure 2. Assessment Methods Offered by Two- and Four-Year Institutions.



building PLA into every student's total cost of attendance. Therefore, PLA costs are covered for every student. Still other institutions treat challenge exams like a traditional course for the purposes of financial aid, since it is tied to a specific credit-bearing course at the institution and the student's learning is directly evaluated by institutional faculty (portfolio assessment would have this same logic).

CAEL notes that as part of a multi-institution experimental program announced in July 2014, the Department of Education will be permitting select institutions to cover reasonable costs of prior learning assessment with financial aid, and students can be given three credits to count towards their Pell enrollment status for the time they take to prepare a portfolio. The lessons from this experiment may inform changes to the eventual reauthorization of the Higher Education Act.

CAEL further explains that the GI Bill is slightly different as its regulations stipulate that the costs of national standardized exams (e.g., CLEP, DSST, and UExcel) are covered. However, it does not make provisions to cover the costs of institutionally-administered portfolio assessment and other forms of PLA. The approval in 2014 by the Department of Veteran Affairs of CAEL's LearningCounts portfolio assessment service as a national exam allows veterans to use GI Bill benefits for portfolio assessment through this avenue.

Credit Limits

The **maximum number of credits** that can be awarded in a PLA program is **dictated by the particular institution a student may be attending as well as the policies and guidelines set forth by different accrediting bodies**, such as the Accrediting Commission for Schools (ACS) and the Western Association of Schools and Colleges (WASC). CAEL's research shows that the PLA credit limits for an associate's degree range from 15 percent to 75 percent, which amounts to a range of 20 to 45 academic credits; for a bachelor's degree, it ranges from 15 percent to 80 percent or from 30 to 90 academic credits, with 30 credits being a common limit for a bachelor's degree. In addition, some institutions have the same credit limits regardless of the type of PLA offered, while others have different credit limits for different PLA methods, whether it be standardized exams, credit by exam, or individualized assessments.

Transferability of PLA Credits between Institutions

The issue of transferring PLA credit between institutions of higher education is complex. Just as there are no uniform policies or practices that establish agreed-upon assessments for prior learning across the different segments of higher education, neither are their uniform policies that govern how PLA credits transfer from one institution to another nor are recorded on students' transcripts.

Transferability of PLA credits is often determined by each individual institution and by the type of assessment method used. For example, institutions that accept PLA credits from external standardized exams (see *Motivations and Methods for Implementing PLA*, p. 4), often base the number of academic credits they will award on a particular cut score determined by that institution.

Transferring credit earned through faculty-developed challenge exams and/or portfolio assessments is perhaps even more challenging than transferring credits earned through standardized external examinations. Many institutions are often reluctant to offer PLA credit based on challenge exams and/or portfolio assessment methods because they may not necessarily align with the standards of

the institution whose faculty did not conduct the original evaluation. CAEL's research finds that for many years, community colleges were reluctant to engage much with PLA in part because of the issues around the transferability of PLA credits. They were concerned about their students who had the intention of eventually pursuing bachelor's degrees at four-year institutions. **The good news is that a number of community colleges and systems of higher education are now taking on the challenge to streamline the transferability of PLA credits.**

Public Awareness of the Opportunity

While institutions can establish policies and practices around PLA, such as the number of credits awarded, methods used, and cost, if faculty support for and student awareness of PLA does not exist, it is unlikely that this approach will get much traction at a college or university. In many respects, student awareness of PLA can be the "Achilles heel" of a PLA program. Many institutions rely on their website, printed materials, and academic advisors to inform students about the opportunity to earn credit in this way. Notably, CAEL found in one study (Klein-Collins & Olson, 2014) that 25 percent of the institutions surveyed did not actively promote PLA—reflective of the level of their commitment to this approach. **If students do not know that PLA is available at their institution, it is not surprising that student usage is so low.** As noted by one practitioner interviewed by RP Group, word of mouth seems to be the most common methods by which students learn about PLA.

Faculty Support for PLA

Even when it is decided that offering PLA credit is the right choice for an institution, there are sometimes obstacles that need to be overcome internally before a successful PLA program can be established. Faculty support is imperative for any academic program to be effective, and PLA is no exception. An American Council for Education (ACE) study found that faculty push-back can be a major challenge for institutions wishing to begin a PLA program, since some faculty or educational professionals harbor concerns about the academic rigor of PLA when compared to traditional methods. A good PLA policy should address the issue of faculty buy-in by providing ample training and exposure to the workings of PLA (Lakin, *et al.*, 2015).

These observations on faculty buy-in of PLA were supported by CAEL's state system survey. Among institutions, it was reported by about half of schools that some faculty understand and embrace PLA but others do not, and about a fifth of schools said that very few faculty understand PLA. Only one out of 10 institutions said that most of their faculty understand and embrace PLA.

Part of the reason that some faculty or staff might be wary of PLA credit is that data on its effectiveness is not often widely reported or discussed at the institutional level.

Faculty buy-in is key to a successful PLA program. Yet, **CAEL's research indicates that faculty may have concerns about awarding credit for prior learning**, expressing apprehensions about the academic rigor and soundness of PLA compared to traditional coursework. Additionally, faculty may harbor concerns that PLA will weaken departments by lowering their enrollments. In some cases, this enrollment reduction could affect funding or other ways that departments are rewarded within the institution.

State Policies for Prior Learning Assessment

To complete its portrait of the national landscape, CAEL examined key state policies regarding PLA, drawing on prior research conducted in 2012 in partnership with HCM Strategists, which resulted in the publication *State Policy Approaches to Support Prior Learning Assessment: A Resource Guide for State Leaders*. This review indicates that the growing recognition of PLA has recently encouraged a number of states to develop policies that address barriers to implementation outlined in previous sections (e.g., credit recognition, and fees) and that support the expansion of prior learning assessment options. The scan of these emerging policies additionally shows that these policies are also aimed at improving the performance of higher education, workforce development systems, and career and technical education.

The scan of state policies conducted by CAEL and HCM Strategists centered on key policy issues impacting the design, delivery, and promotion of PLA. **The examples provided below can be found in *State Policy Approaches to Support Prior Learning Assessment: A Resource Guide for State Leaders* (<http://www.cael.org/pdfs/college-productivity-resource-guide2012>); we provide specific page numbers where these policy examples can be referenced in this resource guide.**

- **Establishment of PLA policy.** Typically, a state policy will direct the state’s higher education system to develop PLA policies, rather than stipulating what a system-wide policy for PLA should be. This approach reflects long-standing recognition that higher education policy is best determined by the higher education system or by individual institutions. Examples of this policy approach can be found in Washington, Hawaii, Oregon, and Maryland (see p. 5).
- **Transparent institutional policies.** These policies ensure that students have access to information about PLA options and restrictions, including what PLA methods are used at each institution, what degree programs accept PLA credit, what specific policies are regarding the transfer of PLA credit, what limits exist for applying PLA credits to major requirements, whether PLA credits count toward the residency requirement, etc. Transparency is specifically mentioned in the policies of Colorado, Minnesota, Alabama, Washington, Florida, and Oregon (see p. 5).
- **Assessment processes and methods.** Some state policies specifically define which methods of PLA are to be accepted and how they are administered. For example, Minnesota’s system policy stipulates that all colleges and universities must “provide opportunities for an admitted student to demonstrate college-level learning through nationally recognized examinations” such as CLEP, IB, AP and others (see p. 6). It also requires colleges to accept the credit recommendations from the American Council on Education (ACE), but it allows individual institutions to decide whether to offer other PLA methods such as portfolio evaluation. North Dakota defines “additional forms of degree credit” as including standardized examination, challenge examination, evaluated non-college coursework, portfolio evaluation, and “articulated credit” (see p. 6). Alabama legislation provides guidelines for PLA, along with details on how portfolio assessment is to be administered (see p. 6).
- **Fees.** Some state systems provide guidance on what their colleges and programs should charge for PLA services. For example, Colorado community college policy stipulates, “The evaluation fee to be charged will be determined by each college, but shall not exceed 50 percent of the

standard tuition rate” (Sherman, Klein-Collins, & Palmer, 2012). Meanwhile, Alabama policy specifies that the charge for portfolio review shall be \$25 for each portfolio (one portfolio for each course for which credit through experiential learning is requested), and students seeking credit “through examination or nationally recognized guidelines are not charged a fee for PLA or for credits awarded through PLA” (see p. 6).

- **Transfer of PLA credit.** One challenge noted earlier is that many institutions will not accept PLA credit in transfer. Oklahoma’s policy addresses this problem directly by stipulating that institutions must accept each other’s PLA credits in transfer (Sherman, et al, 2012) (see p. 6).
- **Transcription and credit recognition.** States may choose to specify how PLA credit is presented on a student’s transcript. Minnesota’s policy states that “Credit awarded for prior learning or earned by examination may be noted either in the term when it was earned or in the transfer section” and that the type of special credit must be noted in parentheses immediately below the course (see p. 7).
- **Veterans.** Recently, a number of states have adopted legislation designed to recognize the skills and learning acquired by veterans through their military training and experience. Some states require commissions or boards to develop the policies while other states require institutions to establish policies to award this credit. Specifically, Massachusetts, Hawaii, Alaska, Colorado, Missouri, Nebraska, Oregon, Rhode Island, South Carolina, Tennessee, Utah, Washington, Indiana, and Minnesota require state institutions to adopt policies to award credit to veterans with military course credits based on ACE recommendations (see p. 7).
- **Raising awareness and encouraging student PLA participation.** Simply because an institution offers PLA it does not necessarily mean that students will know about it or know how to ask for it. Oregon’s legislation directs the higher education system to set goals for increasing student participation in PLA and establish an advisory group to track progress in meeting those goals (see p. 8).
- **Capacity building.** State policy can also be used to build the capacity of PLA offerings at colleges and universities. Oregon’s legislation directs the system to “improve prior learning assessment practices across all institutions of higher education” and “create tools to develop faculty and staff knowledge and expertise in awarding academic credit for prior learning and to share exemplary policies and practices among institutions of higher education.” Similar legislation was passed in Washington State (see p. 8).
- **Workforce system and PLA.** States can also craft policy that encourages or directs the workforce system to promote and support PLA in its own programs. For example, in Indiana, the State Workforce Innovation Council (SWIC) introduced a resolution to encourage the use of PLA for Workforce Investment Act participants and directed the Department of Workforce Development to develop and implement guidance regarding the proper usage of PLA within the WorkOne system (see p. 8).

Regional Accreditors and Prior Learning Assessment

Along with state policies that set the stage for how PLA is promoted, delivered, and assessed, regional accrediting bodies play an important role in assuring the quality in higher education. They also have clear policies and guidelines for prior learning assessment. Seven accrediting bodies in the United States work to ensure the quality of higher education. While they all require that PLA be comparable to the results of institutionally provided learning experiences, each accreditor has different guidelines for demonstrating these results. Some accreditors set specific limits on PLA credits awarded, and others restrict PLA to undergraduate degree programs. Some accreditors have specific standards of good practice and others direct institutions to the standards articulated by CAEL (see text box on next page, *CAEL's Standards for Assessing Learning*, and additional information in the following section *Standards of Good Practice and Innovative Models*).

CAEL notes that in addition to regional accreditors, many degree and certificate programs may be dependent upon the approval of specialized accreditors (e.g., Association to Advance Collegiate Schools of Business). In turn, such programs interested in PLA should contact their specialized accreditors. The specialized accreditor may be willing to approve PLA as part of a program if the institution clearly shows how students are meeting required standards.

Models for Prior Learning Assessment

Keeping this larger national context for PLA implementation in mind—including what motivates colleges to pursue this approach, which factors and policies impact PLA delivery, and how students

CAEL's Standards for Assessing Learning

1. Credit or its equivalent should be awarded only for learning, and not for experience.
2. Assessment should be based on standards and criteria for the level of acceptable learning that are both agreed upon and made public.
3. Assessment should be treated as an integral part of learning, not separate from it, and should be based on an understanding of learning processes.
4. The determination of credit awards and competence levels must be made by appropriate subject matter and academic or credentialing experts.
5. Credit or other credentialing should be appropriate to the context in which it is awarded and accepted.
6. If awards are for credit, transcript entries should clearly describe what learning is being recognized and should be monitored to avoid giving credit twice for the same learning.
7. Policies, procedures, and criteria applied to assessment, including provision for appeal, should be fully disclosed and prominently available to all parties involved in the assessment process.
8. Fees charged for assessment should be based on the services performed in the process and not determined by the amount of credit awarded.
9. All personnel involved in the assessment of learning should pursue and receive adequate training and continuing professional development for the functions they perform.
10. Assessment programs should be regularly monitored, reviewed, evaluated, and revised as needed to reflect changes in the needs being served, the purposes being met, and the state of the assessment arts.

CAEL, 2009

are taking advantage of these opportunities—we now turn to exploring standards of effective practice and examples of how states are carrying out their PLA programs in alignment with these standards.

In addition to identifying emerging policies that support PLA, CAEL articulated standards for assessing prior learning in Fiddler & Marienau (2009), now adopted by a number of accreditors (see sidebar, *CAEL's Standards for Assessing Learning*, pg. 11). In turn, many institutions are using these standards as a measure of the quality of their PLA programs.

In the research conducted for this study, CAEL showcases 11 different examples of innovative models for offering prior learning assessments that demonstrate these standards. While it is beyond the scope of this report to include a description of all 11 models, we highlight two examples below, one from a community college and the other from a state-wide system of higher education.

Pennsylvania Community College Collaboration: College Credit FastTrack

In February 2015, the Pennsylvania Commission of Community Colleges (PACCC), a membership association that represents the state's 14 community colleges, launched an innovative, system-wide PLA solution called College Credit FastTrack. The College Credit FastTrack initiative was supported by a \$2.5M Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant from the Department of Labor. Each community college in the state assigned a representative to a designated working group, which met monthly to identify commonalities in PLA practices across institutions and develop guiding principles for a standardized PLA procedure. The end product of these efforts was the development of the College Credit FastTrack website; a single, web-based entry portal for all students who are interested in PLA.

The College Credit FastTrack website guides students through a number of stages in exploring their PLA options. After creating an online account, students select a targeted institution (typically, the institution at which they are currently enrolled) and are able to begin exploring existing courses that may correspond with their learning experiences. Students are connected with a PLA advisor who provides a one-on-one consultation about the various PLA options and offers guidance in submitting an application for PLA participation. Each community college has selected a group of internal advisors for this role, which ensures that contextual factors at individual institutions are incorporated into the advising process

Upon approval of a student's application and the completed payment of a \$125 assessment fee, the system guides students through a standardized process for developing and submitting an e-portfolio to demonstrate their college-level learning. The portal offers guidelines, tutorials, and other materials to assist students in this process. An assessor is then assigned to evaluate the e-portfolio. Each community college has a designated group of assessors who are tasked with evaluating all portfolios submitted for their institution. Assessors are provided with a system-wide training on portfolio evaluation, and PACCC is currently engaged in efforts to expand the pool of trained assessors. Following the submission and evaluation of each portfolio, assessors make recommendations for potential academic credit. All participating institutions have agreed that the credit recommendations produced through the College Credit FastTrack system are transferable across all community colleges in the state.

In addition to the portfolio development and assessment system, the website contains a collection of information and resources about other PLA options offered at the state's various community colleges, which students may choose to explore. The College Credit FastTrack system includes mechanisms to track and record the activity of participating students, and since its launch in February 2015, about 200 students have created profiles within the portal (Taken from *State Policy Approaches to Support Prior Learning Assessment – 2015 Edition, forthcoming.*)

Texas College Credit for Heroes

The state of Texas initiated a program called *College Credit for Heroes* (CCH). Administered by the Texas Workforce Commission (TWC), the initiative's launch was supported by approximately \$5 million in state Workforce Investment Act (WIA) funds that were allocated for a TWC Comprehensive Veterans Initiative. With a goal to “maximize college credits awarded to veterans and service members for their military experience in order to expedite their transition into the Texas workforce,” the CCH program has supported a selection of institutions in developing new models for assessing and awarding credit for military training experience.

In the first phase of this initiative, seven community colleges were selected to begin developing new programs and models that support the goals of CCH and could potentially be replicated or expanded to other institutions in the state. Phase I activities focused on the allied health professions, and a number of the selected institutions developed accelerated degree programs which were designed to streamline the transfer of military training credits and facilitate degree completion.

An additional outcome of the first phase was the development and launch of the College Credit for Heroes Website (<https://www.collegecreditforheroes.org/>), developed by Central Texas College. This centralized web portal allows service members and veterans in Texas to request an official evaluation of their military training, which can potentially result in credit toward a civilian degree or credential. After setting up an account in the CCH system, users are guided through a process to request an evaluation of their military training experiences. From there, they can have those evaluations sent to any Texas college of their choice. They are prompted to contact the advisor at their selected school in order to determine the potential credit awards resulting from their military training evaluation, and to discuss their options for moving forward.

In December 2013, all 13 colleges in the Texas A&M University System were added as participating CCH institutions, which means that they all agree to accept credits recommended through the CCH system, where appropriate. (Taken from *State Policy Approaches to Support Prior Learning Assessment – 2015 Edition, forthcoming, Sherman, A., Klein-Collins, B., & Palmer, I.*)

Student Engagement with Prior Learning Assessment

Now that we have an understanding of how states and colleges across the county are approaching PLA implementation from both a policy and practice perspective, we next take a national look at how students are taking advantage of these opportunities. Below we offer data on student participation in PLA and the relationship between credits earned by PLA and degree completion rates.

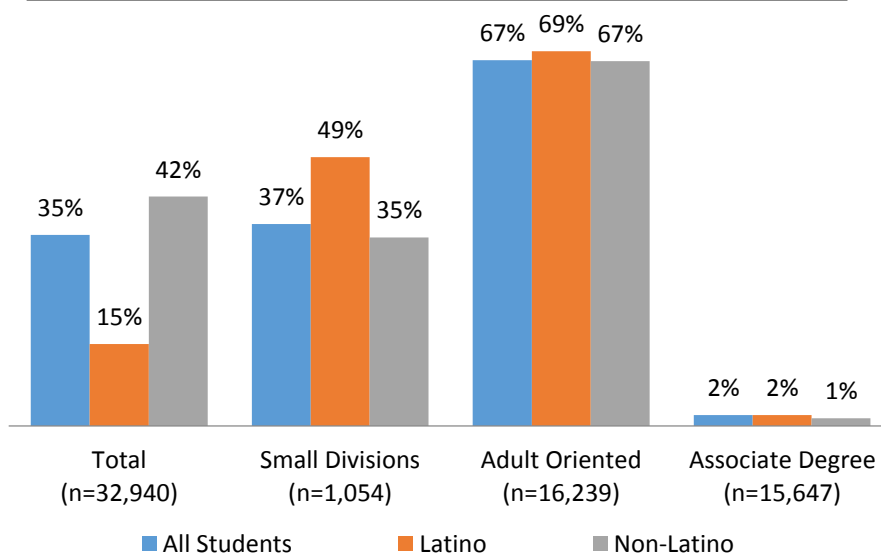
PLA Usage Rates

The usage rate for PLA, meaning the percentage of students who use PLA, is a difficult number to assess, since this is typically not reported to state or federal agencies. Therefore, the only source of data are individual research initiatives. For examples, CAEL’s 2010 PLA study, *Fueling the Race to Postsecondary Success*, a study of 48 institutions that offered PLA, found that 25 percent of students earned at least some PLA credit (Klein-Collins, 2010), while a 2014 follow-up study of 10 institutions found that 35 percent of students used PLA (Klein-Collins & Olson, 2014). However, the rate at which students earn PLA credit can vary considerably depending on a number of factors, including ethnicity, institution type, and area of study.

These same studies found considerable differences in PLA usage rates across race/ethnicity. The 2010 study found that White non-Hispanic students were the most likely to use PLA, at 33 percent, while Black non-Hispanic students had a usage rate of 24 percent, and Hispanic students 15 percent. The primary purpose of the 2014 study was to investigate what may be behind the different PLA usage rates. In that study, the overall PLA usage rate was 42 percent for non-Hispanic students and 15 percent for Hispanic students, verifying that there was indeed a notable difference in PLA usage rates. However, when these data were analyzed by institution type, it was found that Hispanics participated in PLA at comparable rates to non-Hispanics at each type of institution (Figure 3). Hispanic enrollment, however, was concentrated at associate degree institutions, which, in this

particular study, have lower PLA usage across all student groups. It is important to note that the researchers did not conclude that low PLA usage is always the case at associate degree institutions. Rather, the associate degree institutions participating in this study were institutions where there have historically been fewer PLA options in terms of methods, less of a PLA-promoting culture, and policies that often limit the flexibility a student has in the degree plan. In our study, these were the institutions that happened to have the highest Hispanic enrollments.

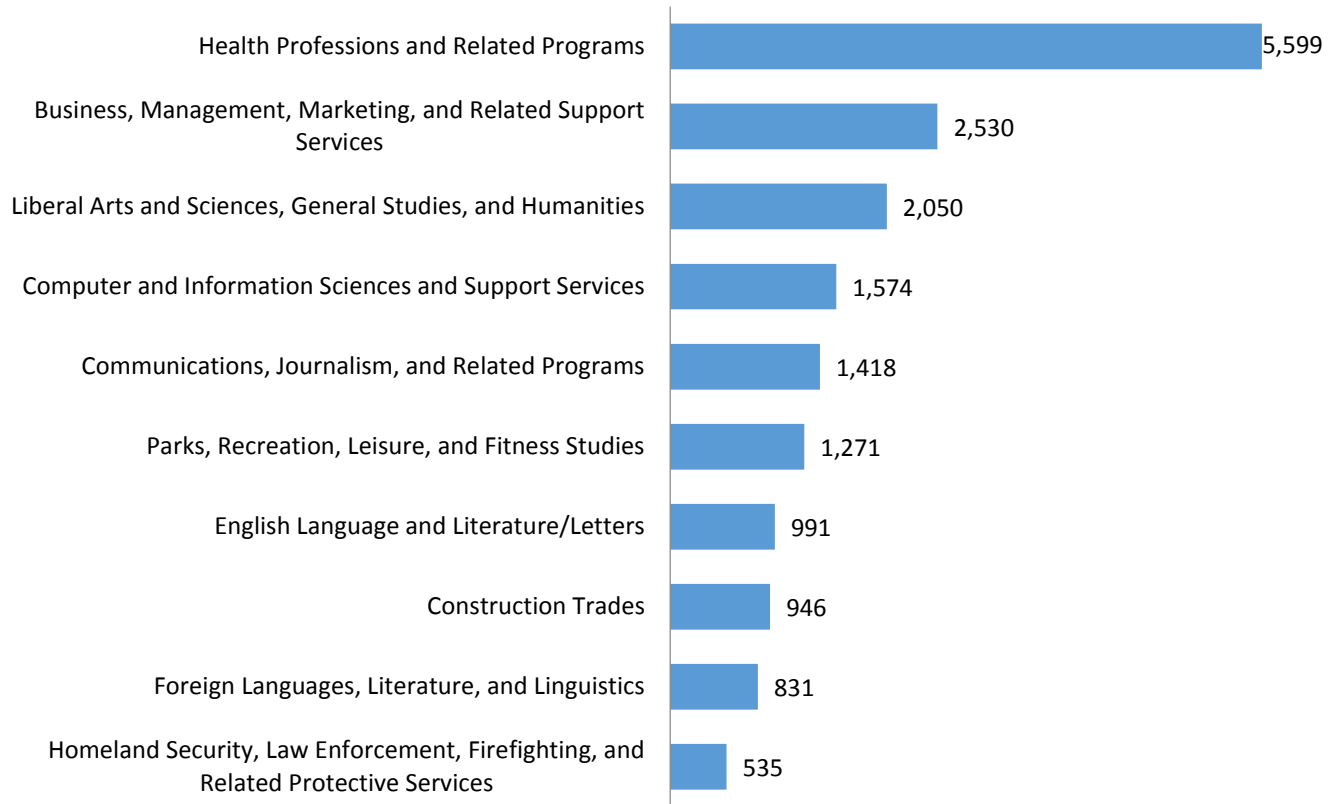
Figure 3. PLA take up rates for students by ethnicity and institution type



Given that these institutions have recently expanded their PLA offerings and enhanced their PLA policies and practices, researchers expect to see larger PLA usage rates at these institutions in more recent student cohorts.

There have also been interesting findings about the areas of study for which students use PLA. In the 2014 study, within the 10 participating institutions, CAEL found that the areas of study for which students were most likely to earn PLA credit were health professions and related programs; followed by business, management, marketing, and related support services; and then liberal arts and sciences, general studies, and humanities (Figure 4).

Figure 4. Most popular disciplines by number of students earning PLA credit



CAEL 2014

Overall, Hispanic students in the 2014 study were six times more likely to earn PLA credit for foreign language than were non-Hispanic students. Therefore, it is understandable that many institutions are choosing to steer Hispanic students in this direction as a first step in PLA credit-earning. For Hispanic students, foreign language credit was also highly associated with likelihood of earning credit in another area of study; about half of Hispanic students who earned credit in foreign language also earned credit in another area.

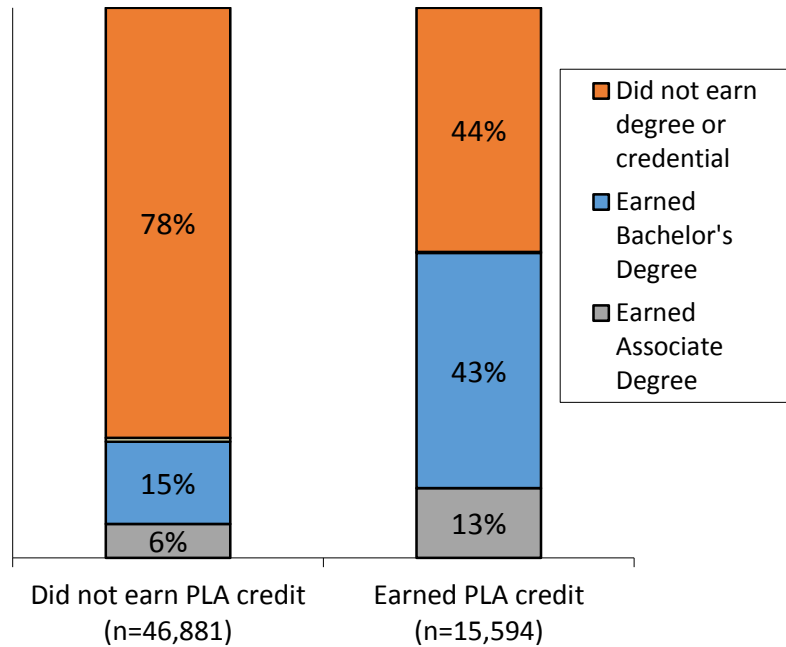
Graduation and Persistence

Studies have found that students who earn PLA credit have higher graduation rates than their peers who do not earn PLA credit. A 2010 Council for Adult and Experiential Learning (CAEL) study of more than 60,000 students at 48 institutions found that more than half (56 percent) of students with PLA credit earned a postsecondary degree within seven years, while only 21 percent of non-PLA

students did so – at the associate degree level, PLA students completed degrees at twice the rate of students with no PLA credit (Klein-Collins, 2010) (Figure 5).

This trend held true across institutional size, level, and control, and regardless of student demographic characteristics, GPA, or socio-economic status. The same study found that even among students that did not earn a degree during the seven-year period, students with PLA credit were faring better than those without. Over half of non-graduating PLA students had 80 percent or more of the credits needed to graduate, while only 22 percent of non-PLA students had made similar progress.

Figure 5. Degree earning for PLA and non-PLA students (CAEL 2010)



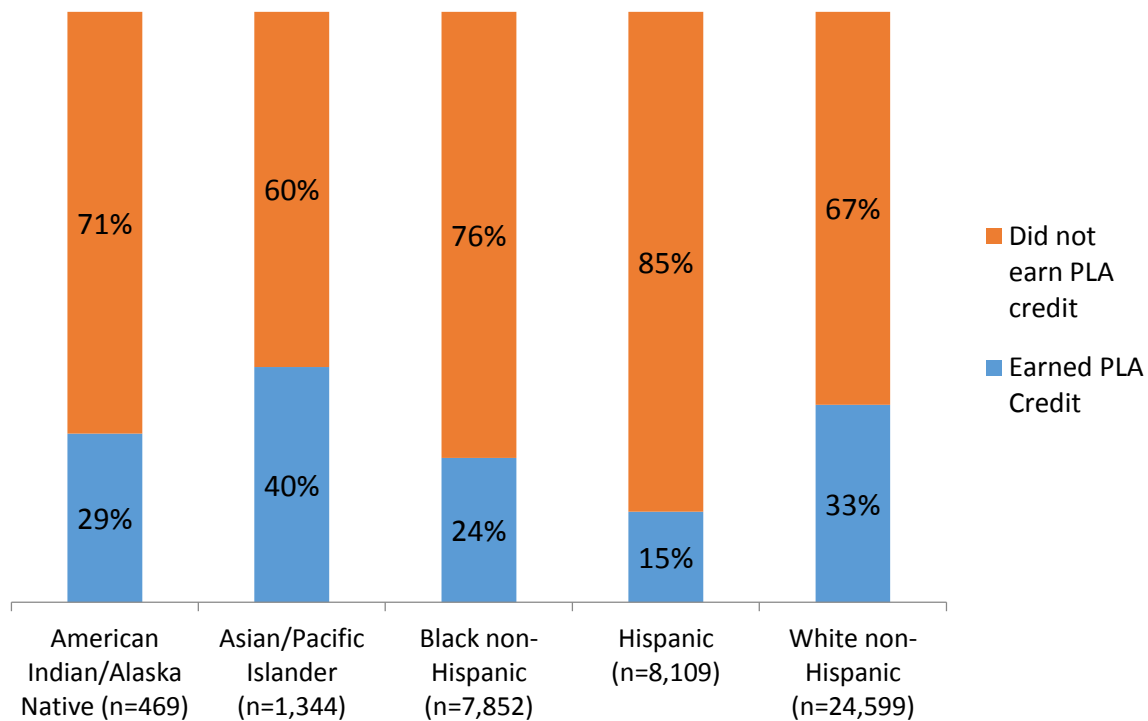
Other studies have arrived to the same conclusion. A

University of Maryland University College (UMUC) study examined student graduation rates over the course of four years, and found that students participating in the PLA program had higher graduation rates (Hoffman, et al., 1996). In another study that analyzed data from four community colleges, researchers found that the degree completion rate for students with PLA was more than twice that of students with no PLA credit: 28 percent compared to 12 percent (Hayward & Williams, 2015).

Benefit for underserved

Underserved populations have been shown to benefit from PLA as much or even more than other students. CAEL's 2010 study on PLA found that, while graduation rates were higher for PLA students, this difference was most dramatic among Hispanic students. Hispanic students at the bachelor's degree level graduated at a rate that was almost eight times higher than that of Hispanic non-PLA students (Figure 6) (Klein-Collins, 2010).

Figure 6. Graduation rates for PLA and non-PLA students, by ethnicity



CAEL 2010

Another study of Hispanic students at four community colleges showed a similar outcome. Hispanic students earning PLA were five times more likely to graduate than Hispanic students that did not earn PLA credit (Hayward & Williams, 2015).

One finding of concern in the CAEL study, however, was that Hispanic students were less likely to participate in PLA overall. The CAEL study, for example, found that only 15 percent of adult Hispanic students took advantage of PLA, compared to 24 percent of Black students and 33 percent of white students (Klein-Collins, 2010). CAEL conducted a follow up study in 2014 to learn more about what is behind the lower Hispanic participation rate. The study found that the low participation rate for Hispanic students was most closely associated with this group's higher enrollment numbers at institutions with fewer PLA options, less of a PLA-promoting culture, and policies that limit the flexibility the student has to use PLA in the degree plan. The study's findings suggest that PLA usage among Hispanics is an issue of access rather than of ethnicity (Klein-Collins & Olson, 2014).

National Context for CBE

We now turn to a discussion of the national context for implementation of competency-based education (see definition in text box on next page). This section of the report explores motivations and benefits of CBE based on CAEL's research in this area. We then review factors impacting and considerations for CBE implementation followed by a high-level review of related state and federal policy. We then offer a few examples of CBE models at two- and four-year institutions and highlight national efforts to support the expansion of these programs. The section concludes with information on student participation in CBE.

Motivations for Competency-Based Education

Competency-based education programs have value not always present in more “traditional” education programs. CAEL’s research highlights several potential motivations for and benefits of implementing this approach, including the following.

- **CBE requires programs to communicate explicit expectations to students** given that a defining element of CBE design is the articulation of a clear set of competencies students must demonstrate to receive credit.
- **CBE is a good fit for nontraditional students and adult populations** that may not be well served through traditional models of postsecondary education. These populations may include full-time workers and returning adult students with a deep knowledge base from previous college studies as well as from their life and work experiences.
- **Coaching and student supports are critical parts of CBE programs**, including mechanisms to help students stay on track as they progress.
- **CBE programs depend on evidence that the student can apply knowledge and skills across settings**, compared to traditionally-delivered educational programs that often focus on specific content and application in limited settings. Offerings that emphasize competencies require students to demonstrate agility in using skills and knowledge meaningfully, and in real-world settings.
- **CBE focuses on what the students know and can do, not on how much time the students spend in learning activities**, compared to traditional degree programs that organize learning experiences based on time spent in learning activities.
- **CBE programs are student centered** and designed to meet students where they are, allowing each individual student to build on what they already know and to become more of an active participant in their learning. Students can acquire knowledge and skills at their own pace and do not need to sit through instruction in topics they have already mastered.

Competency-based education is a flexible way for students to get credit for what they know, build on their knowledge and skills by learning more at their own pace, and earn high quality degrees, certificates, and other credentials that help them in their lives and careers. Students in these programs show what they know and how well they know it through multiple ways of evaluating learning. This is another choice for learning offered at many institutions, through a variety of programs, with full support to help students when needed.

Competency Based Education Network, 2015

Factors Impacting Implementation of Competency-Based Education

Keeping these potential benefits and motivations in mind, CAEL identifies through its research the following factors and considerations for colleges and universities operationalizing a competency-

based education program.⁴ We then offer a summary of major concerns articulated by educators, surfaced by CAEL in its research.

Competency Framework

In order for a CBE degree to have any value in the marketplace, it is important that the **underlying set of competencies that are required for that degree meet academic and industry standards**. Defining the competencies that are required of all graduates is one of the most—if not *the* most—important part of any CBE program.

Learning Activities and Technology

Many of the newer CBE programs are **leveraging technology to depart from formal, instructor-led courses**. Instead, students learn on their own through online courses, online competency-based modules (using adaptive learning technologies), or open educational resources that are guided by faculty facilitators or coaches.

Other, newer programs are taking a “hybrid” approach, offering students this independent option alongside traditional courses within a competency-based program; students take formal, instructor-led courses to complete some competencies, while taking the independent learning approach to complete others.

Methods of Assessment

Rigorous and valid assessments are key to the whole CBE endeavor. CBE programs typically offer a range of different assessments that are customized to the competencies themselves. Skills and knowledge may be **assessed through objective assessments** (e.g., multiple-choice tests); however, the program must also **assess the students’ ability to apply those skills and knowledge in real-world situations**. Assessments that are truly competency-based will require critical thinking and integration of learning from different subject areas. In some CBE programs, the assessments resemble workplace projects and assignments; in others, the assessments comprise learning portfolios or essays in which students must demonstrate their learning.

Student Support

Any learning program needs to consider how to provide support to students, especially self-paced CBE programs that have the added challenge of students who are engaging in a very individualized way with learning materials, without a formal instructor guiding them every step of the way. A common practice of institutions has been to incorporate various forms of student support. Often, there are **at least two student support functions: (1) course-level mentors or coaches** who provide subject matter support to individual students as they engage with specific learning activities

⁴ Portions of this section include material that has been previously presented in earlier CAEL-authored or co-authored publications: *Assessment’s New Role in Degree Completion* (Klein-Collins, 2014); *Sharpening Our Focus on Learning: The Rise of Competency-Based Approaches to Degree Completion* (Klein-Collins, 2013), and *Competency-Based Education: What the Board Needs to Know* (Klein-Collins, Ikenberry, & Kuh, 2014).

and resources, and **(2) program-level coaches** who guide and support the students as they navigate the entire program.

Pricing

Like PLA, **CBE programs vary widely, and so do the pricing models.** Some CBE programs maintain a close enough connection to the credit hour and can charge tuition on that basis. Some charge by the assessment or groups of assessments. In some newer CBE programs, students pay a flat rate for a period of time (e.g., six months), during which they can learn and demonstrate as many competencies as they are able. In this model, students who can proceed quickly through the competency assessment can potentially save money and time.

Alignment with the Credit Hour

CBE programs also differ in how they relate the competencies and/or course modules to the credit hour. Some programs equate individual learning modules, individual competencies, or learning “blocks” of multiple modules directly to credit hours (or, in some cases, fractions of credit hours). Other institutions have more complicated frameworks that map competencies back to individual learning outcomes of specific institutional course offerings; as students complete competencies, they also are credited with “completing” those equivalent courses and credit hours. Currently, there is value in creating some kind of crosswalk back to the credit hour (and even to courses) for the purposes of Title IV funding, as is described later in the report. Whether and how the institution’s competencies map back to the credit hour can have important implications for a student’s federal financial aid eligibility. Programs that establish clear processes for converting competencies to credits hour can qualify for funding under normal Title IV regulations (e.g., Western Governors University and Northern Arizona University), while programs that do not establish as clear a process may need to obtain special “Direct Assessment” designation from the Department of Education. Providing course equivalencies is also important for other reasons:

- Institutions may want to ensure that students have the ability to transfer in credit from previous college experiences.
- Institutions may want to be able to offer students the ability to change their minds and enroll in a traditional program without losing work they completed in the CBE program.
- Students may need or value a “dual transcript” that shows both competencies and credit hours. Institutions may also need to consider whether and how to show grades for the work of the student in a competency-based program. A version of the student transcript that shows both grades and courses/credit hours can be important if the student intends to pursue a subsequent degree or credential.

Educator Concerns

While CAEL’s research finds many proponents of CBE, it also notes practitioner misconceptions and concerns about this approach, as described below.

- **Expectation that CBE is faster and cheaper than traditional degree programs.** Although CBE methodologies can often be leveraged to expedite credential completion for students who have already mastered significant competencies, not every CBE student experiences this type of

degree acceleration. In fact, the field has recognized that in some cases, completing a degree may take longer—and be more rigorous—since students cannot progress without satisfactorily demonstrating the required competencies. The CBE approach, by raising the bar on ensuring quality in the college degree, does not necessarily result in all students achieving degrees more quickly. With respect to reduced cost, it is not yet known whether newer CBE models are sustainable at the low tuition prices that are currently part of the models. The costs to update and improve the curriculum and technology on a regular basis may not, ultimately, be feasible with very low tuition prices. There is still much to learn about the various business models and the financial viability of these approaches.

- **Use of multiple-choice testing to prove competency.** Some in higher education are hesitant to engage with CBE due to an impression that these programs rely heavily—on, or exclusively—on standardized testing methods to measure competencies. They hear the word “assessment” and think “multiple-choice test.” CBE stakeholders agree that using standardized testing alone is not sufficient for assessing the complex competencies that are needed in our current economy. In order for a CBE program to ensure that its graduates are truly competent in these high-level skill areas, a variety of assessment methods need to be used, many of which could likely benefit from new advancements in technology. Such rigorous evaluation methods in use today include authentic assessments that require students to apply their knowledge and skills in various contexts, such as workplace assignments, skill demonstrations, portfolios, work samples, and so on.
- **Different use of faculty.** In CBE programs, faculty are less likely to have the traditional instructional role; although, they are often involved in developing the curriculum, and they may serve as learning facilitators who work one-on-one with students, as needed, in their areas of expertise. This shift in occupational duties marks a major variation in how the faculty’s role is defined at an institution and in their relationship with learners, leading some critics to wonder how students can be learning if the faculty are not teaching in the more traditional sense. Besides these changes in responsibilities, faculty may also feel that they are not prepared to serve as coach or facilitator, or they may feel as though their expertise and content knowledge is not being utilized to the fullest.
- **Disaggregation of teaching and learning from the role of research by faculty.** An additional concern is that with the changing role of faculty in innovations like CBE, along with the pricing models that go with them, institutions may not be able to support the other role of faculty in higher education: research. Faculty have traditionally played an important role not merely in knowledge transfer but also in knowledge creation. Critics argue that new models like CBE, with its more transactional role for faculty and lower price point, will not support the knowledge creation role of faculty, a cornerstone of what we have come to see as a high-quality higher education system. There is concern that this transformation may undermine the traditional power of the faculty within an institution.
- **Difficulty in mastering competencies in a short time period.** Many stakeholders have expressed concern that students may not be able to learn college level competencies in short, discrete online modules. Some learning requires time, repetition, and incremental progress. In other words, many believe that seat-time may be necessary for certain fields, subjects, or competencies.

- **Departure from the credit hour.** Several CBE programs are avoiding use of the credit hour as it is not a real measure of student learning. This transition makes it difficult for the institutions to comply with Title IV regulations regarding financial aid, as noted above. Federal officials are being asked to change the rules to accommodate these new programs; a request that is difficult to implement because, without having some other way to measure a student's progress or success and without guidelines for judging the quality of CBE programs, there may not be enough safeguards against fraud and abuse.
- **Question of appropriateness of CBE for every student.** Not all students will thrive in the CBE model, depending on their learning style and other factors. It is likely, for example, that successful CBE students are more highly self-directed and independent learners. Many CBE programs recognize this reality and have taken steps to address it: some counsel the students before enrollment about the demands of the program, some require students to try out the model through a free online trial course, and some use sophisticated data analytics to determine when students need additional guidance and support. A related concern is that CBE may not be appropriate for students needing remedial assistance in writing or math. Some CBE programs are exploring ways to link students to needed assistance, both in virtual and face-to-face environments.
- **Technology support and interoperability.** The online aspect of many CBE programs, as well as their deliberate design for scalability, requires that CBE program designers have the technology systems to support the programs. Needed technology tools include learning management systems (LMS) for the competencies, courses and modules; student information systems (SIS); adaptive learning platforms; online assessment tools; customer relationship management tools; and analytics and reporting platforms (Eduventures, 2015). One significant challenge related to the technology is for the competency-based LMS to be able to interface with the SIS that is also used by the credit-based side of the institution. The big name SIS packages are designed around courses and credit hours, and so some institutions are having to develop software to translate competencies into courses and credit hours for the purposes of tracking student progress, or for preparing a "dual transcript" that lists both competencies and the equivalent courses and credit hours.

Federal and State Policies for Competency-Based Education

In general, national leaders and policy makers are beginning to embrace the notion of innovation in higher education, and the support is largely bipartisan. Several CBE programs have been developed in response to the visions of Republican governors, President Obama referenced PLA in his 2013 State of the Union address, and in 2014, a bill to advance CBE was introduced in Congress with bipartisan support.

Federal Policy

Federal policy impacting CBE primarily relates to financial aid regulations. Federal financial aid is designed to cover the costs of credit-hour-based instruction. For that reason, **federal financial aid through Title IV or through the GI Bill is not a good fit for CBE programs**, which are

designed to recognize student learning outcomes that may be acquired outside of credit-based courses.

Federal financial aid policy has historically focused solely on the costs of credit-hour-based instruction and does not recognize instruction that is based on student learning outcomes. In spite of these barriers, CAEL notes that a number of **institutions have managed to operate their CBE programs within the traditional financial aid framework by developing very clear crosswalks between their competency framework and the credit hour.**

Another option supported by federal regulation is “direct assessment,” defined as “an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others” (United States Department of Education Office of Postsecondary Education, 2014, December 18, Competency-Based Education Programs – Questions and Answers). CAEL notes that this regulation has some limitations for CBE programs in that it requires programs to offer ways to define substantive interaction with faculty, satisfactory academic progress, and student academic engagement. The programs must still create a mechanism to link competencies to the credit hour, which most CBE programs have to do to allow for student transfer.

Since 2013, six institutions have been granted the direct assessment designation for their CBE programs by the Department of Education:

1. Southern New Hampshire University’s College for America;
2. Capella University FlexPath;
3. University of Wisconsin’s Extension Flexible Degree Option;
4. Brandman University;
5. Texas State Technical College-Harlingen’s Industrial Systems Technology Program; and
6. Waldman University.

State Policy

CAEL’s research indicates that state leaders appear to be attracted to CBE at the postsecondary level for two primary reasons. CBE programs offer (1) a way for learners to leverage what they know and/or to learn at their own pace and (2) the opportunity to reduce costs through shortening the time required for degree completion.

In the late 1990s, Western Governors University was the product of 19 western governors collaborating on the development and offering of competency-based online degrees. Two newer CBE programs – the University of Wisconsin-Extensions Flexible Option Program and the Texas Affordable Bachelor’s Degree – were both developed in response to their respective governors’ challenges to create a \$10,000 bachelor’s degree (Governor Scott Walker in Wisconsin and Governor Rick Perry in Texas). Florida Governor Rick Scott has also issued this challenge in his state (Kiley, 2012). Despite the examples mentioned above, **legislatures have been slow to act to create state policies that would support the development of CBE programs.** Many state policies that do exist around CBE focus on K-12 and career and technical education (Eduventures, 2015).

Regional Accreditors and Competency-Based Education

The emergence of CBE programs is forcing regional accreditors to establish guidelines and processes for evaluating direct assessment programs. CBE programs can be very different from an institution's normal offerings, and so **launching a new CBE program may require that the institution submit to a “substantive change” review**. Additionally, the Department of Education's direct assessment process requires that institutions receive approval for their CBE programs from the regional accreditor before applying to the department.

In its research into accreditation in California, CAEL found that the Accrediting Commission for Community and Junior Colleges (**ACCJC**) **has not reviewed or approved any CBE programs for California community colleges**; in turn, it is not in a position to provide any guidance to institutions at this time.

Models for Competency-Based Education

CAEL's research finds that individual institutions implementing CBE programs can vary quite a bit in how they operationalize the competency framework and the associated competency-based assessments mentioned above. Some institutions follow a conventional path, developing a competency framework from which the curriculum and individual faculty lesson plans are designed, and assessments are integrated into the regular credit-based course offerings. On the other end of the CBE spectrum, institutions do something entirely different by removing most or all seat-time requirements and focusing instead on having students demonstrate what they know and can do. That is, students aiming for a degree or other credential do not necessarily accumulate 60 credits or take a certain number of 15-week courses. Students instead need to successfully complete the institution's series of program-related competency-based assessments in order to graduate. How they acquire the requisite knowledge and skills can vary—students may bring some learning with them from work or other life experiences, they may learn (and gain competencies) through open educational resources, and/or students may learn through a program's structured online learning modules.

This latter form of CBE is the one that has been getting considerable attention in recent years. This model typically offers students a way to complete a degree or credential at their own pace and at a lower cost. It can be controversial in that it reimagines what the learning process can be and reinvents the role of faculty. Key design principles for this type of model are as follows (Johnstone & Soares, 2014):

- The degree reflects robust and valid competencies;
- Students are able to learn at a variable pace and are supported in their learning;
- Effective learning resources are available any time and are reusable; and
- Assessments are secure and reliable.

Below are two examples of innovative CBE programs summarized by CAEL for this project in *Prior Learning Assessment and Competency-Based Education: a National Overview* (see pgs. 41-44 of the full report for additional examples).

Western Governors University (WGU)

Western Governors University has been operating since the late 1990s. WGU offers online, competency-based degree programs in which students' progress toward a postsecondary degree by passing a series of competency-based assessments. Current credential offerings include teaching licensure and graduate programs, as well as bachelor's and master's degrees in business, information technology, and health professions (especially nursing). WGU does not offer traditional courses. Instead, students learn through online resources curated by WGU faculty, working independently to learn what they need to successfully complete the assessments, with guidance from WGU faculty coaches. For many of the degree programs, WGU students are charged a flat rate of \$2,890 for a six-month term (higher rates are charged for master's of business administration and nursing programs), during which they may complete as many competency-based assessments as they can. Students coming to the program with prior learning—whether from the workplace, military, or massive open online courses (MOOCs)—can use what they already know to complete the assessments more quickly. Several states, including Indiana, Texas, and Washington, have formed partnerships with WGU to offer this approach through their public postsecondary systems.

Sinclair Community College (Ohio), Broward College (Florida), and Austin Community College (Texas)

Since 2012, three community colleges worked together with the support of a Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant to develop a shared approach to CBE, based on the WGU model (Person, Goble & Bruch, 2014). **Sinclair Community College** developed 31 CBE courses delivered in four different modalities: self-paced online, instructor-led online, hybrid/emporium, and web-enhanced classroom. Students can participate in these CBE courses to earn four different short-term certificates, four industry certifications, and three associate's degrees. These CBE courses also formed the foundation of the Accelerate IT program, which is fully self-paced and delivered online, offering three associate's degree options (networking engineering associate, software development, and secure system administration) and six short-term certificates. Tuition is tied to the individual courses, similar to other courses at Sinclair. **Austin Community College** is developing the Accelerated Programmer Training program, consisting of 26 self-paced CBE courses. Some of the courses are online, while others combine online and in-person interaction. The program will offer several certificates in computer programming (e.g., C++, Java, A+) along with an associate's degree in computer programming with an option of web programming specialization. Finally, **Broward College** is developing online, accelerated, competency-based courses for both general education and IT courses that will lead to stackable certificates, which can then articulate with several different associate's degrees in computer science.

National Initiatives Promoting Competency-Based Education

As mentioned earlier, CBE, while not new, is experiencing a recent “revival.” Foundations such as the Lumina Foundation and the Bill and Melinda Gates Foundation are investing in a number of related efforts. Over time, these CBE initiatives will yield valuable information in terms of what does and does not work as more and more institutions implement CBE programs. The following two examples of new initiatives in the CBE field presented (below) come from (CAEL, 2015, p. 45).

While outcome data are not yet available given the newness of these initiatives, there is still value in the early implementation lessons of these initiatives.

CBE Network (C-BEN)

Comprised of a select group of leading CBE institutions, C-BEN members are working together to explore best practices in program design; investigate ways to communicate with the rest of the world about CBE; and evaluate challenging issues like financial aid, program design, and business processes and systems. C-BEN acts as a learning lab for the field. Their work is designed to be shared with all of higher education so that other institutions considering CBE can learn from their findings. In March 2015, C-BEN released a first year findings and discoveries report. The report includes a history of competency-based education and the creation of C-BEN, as well as lessons learned and key takeaways from the first year of work. For more information, visit <http://www.cbenetwork.org/sites/457/uploaded/files/CBENFirstYearReport.pdf>.

CAEL's CBE Jumpstart

CAEL is working with 21 institutions and state systems over a three-year period to train faculty and staff on the basics of CBE and to help them as they begin the planning, design, and development of their individual institutional approaches. One of the institutions in the Jumpstart initiative is Los Angeles Trade Technical College, which is developing a CBE program for its Design and Media Arts pathway that enrolls over 1,200 students each term. For more information, visit www.cael.org/pdfs/2015_cbe_jumpstart_form_final.

Next Generation Learning Challenges/Breakthrough Models Incubator (EDUCAUSE)

The early cohort of this program, which seeks to accelerate the development and implementation of breakthrough models generally in higher education, included Northern Arizona's Personalized Learning Program, Southern New Hampshire University's College for America, and the Texas Affordable Bachelor's Degree. A second cohort was launched in 2014, offering nine institutions technical assistance and financial support to build their new CBE programs. A third round was announced in early 2015 with 11 new institutions. For more information, visit www.educause.edu.

US Department of Education's Experimental Sites Initiative

An experimental program launched by the Department of Education's Experimental Sites Initiative in the spring of 2015 will allow several dozen institutions to experiment with small adjustments in regulations (e.g., waivers of how payment periods are defined, or definitions of satisfactory academic progress related to competencies and not credit hours) to allow for federal financial aid in a CBE model. The lessons from this experiment may inform changes to the eventual reauthorization of the Higher Education Act. However, despite the promise of the Experimental Sites Initiatives, there are still considerable challenges with respect to federal financial aid that CBE advocates will need to address in regards to amending the reauthorization of the Higher Education Act. For further information, see www.experimentalsites.ed.gov.

Student Engagement with Competency-Based Education

Currently, research on student engagement with and outcomes resulting from CBE participation is nascent due to the relative newness of many CBE models. A number of organizations, such as CAEL, Mathematica, the New American Foundation, and National Institute for Learning Outcomes Assessment (NILOA), have been documenting these developing models.

However, CAEL's research finds that not everyone is convinced that students can learn with this new way to deliver education and degrees. CAEL asserts that perhaps these doubts are fueled by the fact that there are not universally accepted standards for what constitutes a quality CBE program. Moreover, there are limited to no data available on student outcomes from these newer CBE models, given that so many are new and are serving small student cohorts in their pilot phases.

II. PLA and CBE in California Public and Private Universities

California's public higher education system is comprised of: the University of California (UC) system, the California State University (CSU) system, and the California Community College (CCC) system. In addition to these three public higher education systems, a large number of private nonprofit and for-profit colleges and universities exist in the state. The following section focuses specifically on prior learning assessment and competency based-education policy and practice among California's public and private universities, based on research conducted by the RP Group for this report. Section III (beginning on page 33) will provide a deeper dive into these approaches in the California Community College context.

PLA in California Public and Private Universities

Below we summarize the PLA policies and practices in the UC and CSU systems as well as among private colleges and universities in the state. This review of PLA policies and practices reveals that compared with those of public colleges and universities in many other states, the use of PLA is relatively limited. On the other hand, California's private for-profit and nonprofit universities show more activity and innovation with these approaches.

UC and Prior Learning Assessment

An evaluation of PLA practices and policies within the UC system revealed that these institutions offer limited PLA options. UC only offers college credit to students who have taken and scored well on Advanced Placement (AP) and International Baccalaureate (IB) exams. UC does not grant credit for work experience, military/recruit basic training, vocational or technical training, or remedial academic or personal enrichment courses. In addition, it does not grant credit for exams from the College-Level Examination Program (CLEP) or DANTES Subject Standardized Tests (DSST) exams.

CSU and Prior Learning Assessment

In 1981, the California State University passed Executive Order 365 allowing institutions across the system to award credit for prior learning. For the most part, prior learning assessment within the CSU system closely mirrors how PLA is implemented and utilized at the national level. For example, each campus limits how many credits can be awarded through PLA programs, and the number of credits varies among colleges. What follows is a brief overview of these practices.

In 2010, the CSU system consisting of 23 campuses, endorsed a system-wide policy that provided guidelines for the use of CLEP examinations as the basis for awarding general education credit. This policy applies both to CSU students and those planning to transfer to a CSU campus. In addition to CLEP exams, the only other external standardized exams accepted system-wide are the AP and IB exams. Other standardized exams are given as PLA options to students at some of the CSUs. Half of the CSU's accept credit from examinations given by the American Council on Education (ACE) and or the National College Credit Recommendation Service (NCCRS), and 40 percent of CSUs accept Dantes Subject Standardized Test scores for credit.

PLA Models Offered by CSUs

Credit-by-exam is an option offered by 60 percent of CSUs. Institutions develop these exams internally, and therefore, they are not standardized throughout the CSU system. While not particularly innovative, we provide a few examples of CSUs that have expanded their PLA offerings beyond externally developed standardized examinations (e.g., CLEP).

- **San Francisco State University's (SFSU) Credit by Examination for Experiential Learning (CEEL)** program provides students with the portfolio assessment option. In order to gain credit, a student is advised on the preparation of a portfolio that documents their learning, along with the development of an assessment that will measure their knowledge and skills in that area of study. Individual academic department at SFSU develop these assessments.
- **California Polytechnic University, San Luis Obispo (Cal Poly)** In addition to the credit-by-exam option, Cal Poly expanded their PLA options in 2007 to include student learning portfolios; however, this “new” option was only made available to students matriculated in the Adult Degree Program working toward the Bachelor of Interdisciplinary Studies degree. Academic leaders at Cal Poly state, “The addition of the portfolio process will increase access for older adult students and add more opportunity to recognize college-level learning they have already obtained” (California Polytech State University Academic Senate Resolution, AS-65807, pg. 3).
- **California State University, Bakersfield (CSUB)** grants units of credit for learning, knowledge, or skills-based experience that has been documented and evaluated according to campus policy. The amount of credit for experiential learning is determined only after self and faculty assessments of the scope and quality of the learning. In addition to portfolios, evaluation of experiential learning at CSUB takes other forms, including written examinations, personal interviews, and demonstrations. Frequently, complementary academic study will be required prior to the awarding of credit.

CSUB's PLA options have several restrictions that students need to be aware of:

- Students shall not be awarded Credit for Prior Experiential Learning until they have completed 30 quarter units in residence;
- Credit for Prior Experiential Learning shall not count as resident credit and shall be awarded only on a credit, no-credit basis;
- Credit for Prior Experiential Learning shall not exceed 20 quarter units; and
- Only undergraduates are eligible to receive Credit for Prior Experiential Learning, and the credit may not count for post-baccalaureate credit.

California Private Universities and Prior Learning Assessment

Private postsecondary institutions in California, as well as nationally, do not operate in as highly a regulated environment as California's public institutions of higher education. In turn, **they have the option of being more innovative and expansive in the nature and scope of their PLA programs.**

Many private institutions of higher learning in California have embraced PLA for both philosophical and practical reasons. They hold to certain key principles of adult learning and believe that adults learn in a variety of ways during their lifetimes—and not always within a traditional classroom. They believe that adults should be given the opportunity to demonstrate competencies they have achieved. They also view PLA as a recruiting tool for their adult programs. According to Lisa Haydon of Dominican University, a private Catholic university in the San Francisco Bay Area, “If our PLA program was discontinued, our adult programs would disappear” (L. Haydon, interview, April 25, 2015).

In conducting its research into the California private higher education landscape, the RP Group found that there were a number of PLA programs offered across many private colleges and universities. Similarly to private and nonprofit colleges and universities in other states, **there is much variation in PLA within California’s private higher education sector.** There is also not a consistent pattern in terms of the amount of credits one can earn through PLA, the cost of PLA, and the process for earning credit. What is consistent among these institutions is the basic definition of what constitutes prior learning, namely that at its core, PLA is a way for educators to evaluate learning that an individual has acquired outside of a traditional academic setting. This learning can have been achieved in a variety of ways: work experience, employer training programs, military training or experience, independent study, non-credit courses, volunteer or community service, travel, non-college courses or seminars. An evaluation of such learning can lead to the granting of college credit, advanced standing toward further education or training, or certification.

PLA Models in California Private Universities

Below, we offer examples of how California’s private higher education institutions are implementing prior learning assessment, demonstrating the wide variety of approaches.

- **Dominican University of California’s** Prior Learning Assessment Opportunities Program provides students five different options for earning PLA credit. We list these options, along with the number of credits students are eligible to earn within each area, below.
 - Standardized exams (max 45 units): includes CLEP, Excelsior, Dantes exams;
 - Course challenge (max 12 units): not all courses may be challenged; \$100/unit;
 - Military service (max 8+ units);
 - Portfolio (max 30 units); and
 - ACE/PONSI (max 30 units).

Dominican has a well-developed portfolio process with the following features:

- Students wanting to develop a portfolio must enroll in English 3442: Critical Thinking and Reflective Writing;
- Portfolio can be used for Art, Ethics, World Religion and Interdisciplinary General Education; and
- Portfolio units are not applied to the academic record until 30 units of residency have been met.

- **Marymount California University** provides interested students with a 20-page Prior Learning Assessment Guide (<http://www.marymountcalifornia.edu/sites/default/files/academics/PLA-Manual-Application-2013-4.pdf>) that outlines the steps a student must take to earn PLA credit. Students also receive a checklist that allows them to determine if a PLA portfolio is an appropriate option for them to pursue. The students are also instructed that their prior learning must (1) be verifiable, (2) have a subject-matter knowledge base, and (3) have general applicability outside of the specific situation in which it was acquired. Students are also provided with step-by-step procedures for submitting a portfolio for review, as well as guidelines on how to develop their portfolios.
- **University of Redlands** has offered PLA since the mid-1970s and maintains a solid set of related policies and practices. PLA is offered in the University's School of Business. The school has developed communication and marketing materials that provide clear and detailed information for students interested in PLA. For example, information for military personnel is very clear on what training courses are available to receive PLA credit and how many credits will be awarded for a particular type of training (e.g., four credits for Basic Training, one credit for First Aid and CPR, seven credits for Electrician's Mate Class). The college also awards credit for various professional training courses, licenses, and certifications, as well as non-transferable transcribed courses that have received assessed credits (e.g., two credits for Life Insurance License, three credits Pilot's License, four credits for Six Sigma Green Belt).
- **The University of San Francisco** offers PLA options in its BS in Management degree program. Students can earn up to 21 credits for learning acquired outside the traditional classroom. Students can write essays for credit in any area of learning listed in the program's *Interdisciplinary Studies Assessment: Essay Submissions Handbook*. A content expert evaluates each essay to determine if credit will be awarded for the essay. The student begins to prepare the essay during writing workshops that comprise part of the curriculum for the Interdisciplinary Research and Writing course. For more information, see <https://www.usfca.edu/management/undergraduate-programs/management/interdisciplinary-studies-assessment>.
- **Azusa Pacific University** offers students the opportunity to earn units toward elective or general study requirements. Students have a number of options for earning PLA units, including:
 - Kolb-model Experiential Learning Essays;
 - Credit for military coursework;
 - Credit for examinations such as CLEP and DSST; and
 - Submission of professional/technical training documents.

The maximum number of units that may be earned with PLA is 30, and units may be applied only toward undergraduate degree programs.

- **California Lutheran University** may provide credit for prior experiential learning to students whose prior experience has resulted in college-level learning. The maximum number of credits that may be awarded is 15. All students seeking experiential learning credit must enroll in Learning Resources 300, Adult Portfolio Development Seminar. The seminar assists students

with formulating educational goals; identifying learning styles; relating experiential learning to traditional academic disciplines; and identifying and describing prior learning in written form.

- **John F. Kennedy University's** prior learning assessment model is a course-based process where students demonstrate that they possess college-level knowledge of a subject that has been acquired through specific life/work experiences. Students begin by attending an experiential learning course (BUS 100), which provides students with the basic skills to succeed in the Bachelor of Science in Business Administration program. In addition to assisting students in preparing a portfolio to be submitted for petition for units, the course covers a review of Kolb's Model of Learning, critical thinking, and writing composition skills. A student can receive an additional 12 units for the submitted portfolio in addition to the three units for taking the introductory class.
- **Fresno Pacific University (FPU)** offers students that have completed the necessary prerequisites in their major and have four years of professional experience the opportunity to learn how to reflect upon and make meaning out of their previous learning experiences in order to create learning portfolios. Those portfolios may then be submitted for consideration of college credits up to a maximum of 30 units. There is no guarantee that submitted PLA portfolios will earn any credits, since credits are assessed by students' individual portfolio results. Credit is awarded for college-level learning associated with previous experiences, not for the experiences themselves. Learning narratives include a balance between theory and experience. FPU will only consider credit for experiential learning in academic disciplines currently offered at the university by faculty members who are subject-matter experts. Students may submit PLA portfolios, receive instructive feedback, and then resubmit their portfolios for reconsideration one time, if needed. There is no guarantee that PLA units are transferrable to another institution.
- **Golden Gate University's** course UGP 150: Learning Counts uses prior learning assessment to allow students to demonstrate learning they have acquired through training and experience outside of the higher education classroom. Through the completion of a six-week online course (CAEL 100) that provides instruction on how to prepare a portfolio of evidence of prior learning, students can earn up to 12 units of general elective or discipline-specific credit.

Competency-Based Education in California Public and Private Universities

Like at the national level, private colleges and universities are at the forefront of the resurgence of CBE in California. Below, we summarize findings on the status of competency-based education in the UC, CSU, and CCC systems as well as in private higher education institutions.

UC and CSU and Competency-Based Education

The RP Group's research into CBE programs across California's higher education systems did not yield any examples within the UC and CSU systems. However, this absence of examples does not mean that individual faculty members are not defining certain competencies that they expect their students to demonstrate during their face-to-face courses or in online courses.

California Private Universities and Competency-Based Education

As mentioned previously, competency-based education has had a much slower adoption rate than prior learning assessment. Our research was only able to identify two private universities that offer competency-based degree programs in California: Brandman University and Fielding Graduate University. This absence of examples does not mean that there are not examples of programs that have some CBE components in them. We describe Brandman and Fielding Graduate University's programs below.

CBE Models in California Private Universities

Brandman University

Brandman University, located in Irvine, California **offers a fully online competency-based Bachelor of Science in Business Administration (BSBA) program.** In an article written for *Inside Higher Education* entitled *Mobile Bachelor's Degrees* (2014), author Paul Fain describes the structure of Brandman's CBE degree program. He indicates there are no textbooks; students access 30,000 pages of material on their tablets or smartphones. The program covers over 80 competencies, linked to performance-based assessments (e.g., writing a paper, developing a portfolio, working on a group project). The program is totally non-credit hour based.

Additionally, he explains that the expected time to completion is 30 months. The college charges \$5,400 per year for tuition, which includes all instructional materials—representing one third the cost of traditional programs. In turn, the total cost of this bachelor's degree for some students is about \$12,000; at the same time, some students will take longer and the degree will cost more. Fain also reports that 88 percent of Brandman's students are 25 years of age or older, making them a natural fit for the flexibility of CBE.

According to Fain's findings, **the college transformed an existing undergraduate major into a CBE program, resulting in a program that is institutional and systemic rather than an add-on to the traditional approach.** He also reported that to develop the program, Brandman relied on industry standards to identify the skills and knowledge that students needed for business and drew on federal databases such as those maintained by the Department of Labor to track labor market trends.

Brandman has secured both WASC and Department of Education approvals for the BSBA. Laurie Dodge, vice chancellor of institutional assessment and planning and vice provost at Brandman University indicated that the Department of Education's approval of the program for direct assessment under Federal Regulations, Title 34, Education, §600.10, has been significant to its ability to award financial aid. When enabling CBE participants to access financial aid, a key question programs must answer is what it means to be a full-time student. That is, how many competencies are necessary for a student to be considered full-time? **To address this issue, Brandman's program is divided into six-month terms that can start at any time. Each student is given a bundle of competencies to complete within the six-month term, and students can complete the competencies at their own pace. Financial aid is based on each bundle.** When students complete a bundle, which is when they have attained the required competencies, they are given a new bundle and financial aid accompanies that bundle.

Fielding Graduate University

Fielding was founded in 1974 and currently has its administrative headquarters in Santa Barbara, California. It is accredited by WASC and the American Psychological Association. Its founders envisioned a graduate professional school that would serve midcareer adults who wanted to pursue an advanced degree, but whose personal circumstances and educational needs could not be met by existing institutions of higher learning in the United States.

Furthermore, the founders believed that mature adults learn in ways that differ significantly from those of young adults. The traditional pedagogical method of education—active teacher and passive learner—would not be appropriate to this new experiment in adult professional education. **To accommodate and capitalize upon the learning styles of its students, Fielding developed a supportive learning model that today remains flexible, adult-centered, learner-directed, task-oriented, self-directed and competency-based.**

The self-pacing feature is made possible because there are no courses and no classes at Fielding⁵. Rather, Fielding students must demonstrate competence in a prescribed number of knowledge areas according to specific degree requirements. The knowledge areas are designed to enable students to gain a thorough knowledge of their chosen discipline. All students are required to demonstrate breadth (demonstrated familiarity with basic concepts, theories, and research in the knowledge area as a whole), depth (demonstrated specialized knowledge in one or more subtopics) and the application of their learning (demonstrated application of knowledge to professional practice as well as reflection upon professional and personal experience in order to generate new theory).

Fielding believes that the appropriate outcome of education is demonstrable competence. This means that faculty evaluate mastery of learning rather than specifying methods by which that knowledge is acquired or acting as disseminators of information. Students assume the task of developing an assessment contract for each required and elective knowledge area. An assessment contract, which the student negotiates with a faculty member, describes the student's educational objective within a specified knowledge area, the specific knowledge to be acquired, the methods used to acquire it and a timetable for its completion. **Commonly selected means for documentation of competence include: research papers, examinations, course development, scholarly lectures or videotaped presentations and tutorials.**

⁵ Given the self-paced model of Fielding's programs, current financial aid options available to students are either loans and/or scholarships.

III. PLA and CBE in California Community Colleges

The following section integrates findings on PLA and CBE policy and practice in the California Community College system, based on research conducted by the RP Group and the Moran Technology Consulting Group.⁶ This section starts by setting the context for how policy is generally developed and passed for California’s community colleges. It then takes an individual look at both the current activity and policy landscape for PLA and CBE, outlining relevant policy issues and current efforts to engage students with each approach.

CCC Policy Context

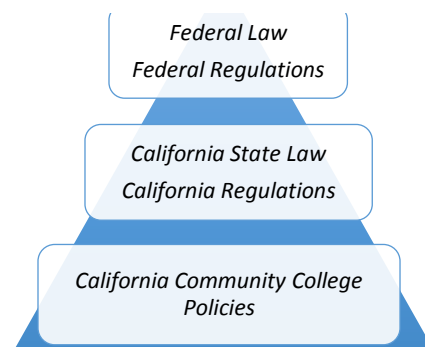
In order to understand how to influence PLA and CBE policy and advance related practice in California’s community colleges, we must first provide a context for how policy is determined for the system. As stated by the Moran Group in its report, it is important not only to know at what level policy changes must be addressed, but to also know the political context in which these changes must be approached.

In 1967, California Education Code (Division 7, Part 43) established the Board of Governors (BOG), which oversees the California Community College system, currently comprised of 113 institutions. The Governor appoints BOG members, who are charged with establishing policies and regulations, and interacting with the state legislature and federal and state organizations. Simultaneously, the 1967 legislation also specifies that the BOG give local districts autonomy for curricula, facilities, personnel, budget, and local tax rates.

The Board of Governors is also responsible for selecting the system’s chancellor. Under the chancellor’s leadership, the California Community Colleges Chancellor’s Office (CCCCO) implements Board of Governors’ regulations, recommends legislation, allocates state funding, oversees the conduct of the colleges, and provides overall leadership to the system.

The BOG legislation further stipulates that the BOG must provide institutional representatives of community college districts opportunities for involvement in the development and review of policy proposals as well as avenues for commenting on proposed legislation prior to its adoption. To that end, the consultation process was established to (1) provide a vehicle for shared decision making between governing bodies at the state, district, and local level and faculty, and (2) allow for faculty expertise of academic disciplines and pedagogy to inform the development and implementation of sound educational policy. The Academic Senate for the California Community Colleges (ASCCC) represents faculty on academic and professional matters in the consultation process. The following areas fall under the faculty purview when it comes to academic and professional matters:

Policy Hierarchy for California Community Colleges



⁶ Unless otherwise noted, content for this section and the following derives primarily from the RP Group’s research for this report and the Moran Group report, *Prior Learning Assessment and Competency-Based Learning Policies for California and the Los Angeles Community College District*, developed for the purposes of this project, and therefore we do not provide specific citation information for this content. When highlighting content from other sources, we provide specific citations.

- Curriculum, including establishing prerequisites and placing courses within disciplines;
- Degree and certificate requirements;
- Grading policies;
- Educational program development;
- Standards or policies regarding student preparation and success;
- District and college governance structures, as related to faculty roles;
- Faculty roles and involvement in accreditation processes, including self-study and annual reports;
- Policies for faculty professional development activities;
- Processes for program review;
- Processes for institutional planning and budget development; and
- Other academic and professional matters as mutually agreed upon between the Board and the academic senate.

It is important to note that the ASCCC has considerable political power to influence policy development (for an in-depth discussion on the consultation process and the role of the ASCCC to influencing policy see Consultation Council Handbook, pgs. 1-12). In addition to the BOG's consultation process, the ASCCC has its own resolution process, designed to ensure local community college senates (representing faculty at individual institutions) also have a mechanism to weigh in on education policy and other professional matters. This resolution process is also used at the local level by each college's own academic senate to ensure faculty input into academic policy and other related issues.

Besides having to adhere to the California Education Code, community colleges operate under local district rules and regulations as well as those of the individual college. Lastly, community colleges also have to be in compliance with the policies and procedures promulgated by the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association of Schools and Colleges (WASC).

As can be surmised by the above overview, making and changing higher education policy is not a simple matter. The Moran Group emphasizes that this overall state hierarchy will determine the level at which various new policies and changes to existing policies need to be addressed. **If changes to the state's Education Code are needed to facilitate PLA and CBE delivery, legislative changes and a legislative strategy will be required. Changes to Title 5, California Code of regulations, will necessitate a strategy that involves the BOG, as well as the CCCCO, and its consultation process.** Keeping in mind the governance and regulatory structure described above will be important in understanding where the levers to make changes can be found.

We now turn our attention to the specific policies and practices related to prior learning assessment and competency-based education in the California Community Colleges.

Prior Learning Assessment in CCCs

Below we review the current policy context for PLA as well as provide a snapshot of current activity and insight into how the state is tracking student engagement in this assessment approach.

CCC Policy for PLA

Generally speaking, California community colleges are no different from institutions in other states in that they also **do not have uniform practices and policies for awarding credit for prior learning** with one exception. The BOG has established student fees for exams associated with credit-by-exam; these fees are equal to the per unit enrollment fee, which is currently \$46 per unit.

A review of the regulations governing community colleges at the state level, conducted by Moran (Clerx, 2015), revealed that under California Education Code (Title 5, Section 55050 entitled *Credit by Examination*) the governing board of **each of the 113 colleges is mandated to establish credit-by-exam policies**. Some of these policies include:

- Students seeking to get credit-by-exam need to be in good academic standing.
- Grades given through credit-by-exam must adhere to the district's grading system and should be noted on a student's transcript as earned through the credit-by-exam process.
- Students must fulfill a residency requirement at their college of 12 units in order to qualify for the credit-by-exam option.
- Exam administration fees, if charged by a college, can be no higher than what a student would pay to enroll in the course for which they are seeking to get credit.

While individual college governing boards establish procedural credit-by-exam policy, **the regulations stipulate clearly that faculty—not the governing boards—determine the nature and content of each exam.**

The Moran report also notes that the **Academic Senate for the California Community Colleges has passed a number of resolutions in support of offering students the credit-by-exam** option for prior learning.⁷ These resolutions encourage faculty to utilize the credit-by-exam option to recognize student learning outside of the traditional classroom. The ASCCC's most recent resolution passed in spring 2014, entitled *Awarding Credit Where Credit is Due: Effective Practices for the Implementation of Credit by Exam*, is the most robust resolution on credit-by-exam adopted by the ASCCC to date. In alignment with the commitment to ensuring open access and serving adult learners, the resolution states that "colleges should seek to maximize the opportunities for credit-by-exam as is appropriate to meet the needs for their student populations, while maintaining academic excellent" (ASCCC, 2014, p. 5).

While this option implies that credit will be awarded to students that successfully pass PLA examinations, faculty may use alternative methods such as the assessment of a portfolio or demonstration of competencies via a rubric, instead of a formal exam to award credit. This resolution provides specific recommendations for colleges for establishing credit-by-exam opportunities to students, including the following:

- Establishing clear local policies and practices that are in line with Title 5 regulations;
- Ensuring credit is approved by local academic senates falls under their 10 +1 regulations which govern curriculum and grading policies;

⁷ ASCCC resolutions #09.05 (fall 2008), #09.08 (fall 2010).

- Informing students of negative consequences of opting to earn credit through the credit-by-exam option;
- Posting on colleges' websites any district and campus policies related to credit-by-exam including any fees associated with credit-by-exam and a list of approved courses for which credit-by-exam is available in their course catalog and class schedule;
- Ensuring that the time necessary for faculty to develop and proctor assessments is considered; and
- Ensuring faculty agree on who will proctor the assessments.

While these policies exist at each community college, conversations with faculty and administrators at several community colleges coupled with internet research lead the RP Group researchers lead us to conclude that there has been little effort to encourage faculty, admission and records staff, and others in community colleges to embrace the credit-by exam-option. An articulation officer interviewed by the RP Group for this report mentioned that “one disincentive for faculty to develop credit-by-exam options is that they are not compensated for their time in developing and or proctoring the assessment” (D. Degroot, personal communication, April 4, 2015). Degroot also stated, that not much has been done to inform students about the availability of this option.

Growing national and state interest in shortening the time to degree completion and increasing the number of students who complete degrees has resulted in a relatively recent desire to explore new ways to achieve these objectives. CCCs and state legislators appear to be giving more attention to the credit-by-exam option. This movement is evidenced by the passage of **AB 1025 Public postsecondary education: credit by examination in 2013, which mandates that CCCs provide information to students about credit-by-exam** for courses that allow this option.

This research reveals that colleges appear to be awarding credit for prior learning for specific populations, such as military personnel. The influx of these individuals into higher education institutions is prompting colleges to think about and establish means for these students to get credit for prior experience and training. **Most community colleges now have policies that recognize and award credit for military coursework.**

In other cases, colleges are leveraging existing mechanisms to recognize prior learning. The RP Group's research reveals that some but not all **CCCs award credit for prior learning via national standardized tests such as Advanced Placement (AP) and International Baccalaureate (IB) exams.** However, one reason these exams have not been widely adopted is that four-year universities are under no obligation to accept any credit awarded by any of these external examinations upon student transfer.

Awarding of credit in career technical education (CTE) areas for articulated high school work, including courses in Regional Occupational Career Programs (ROCPs), is perhaps the one area of credit-by-exam that has gained limited traction in the state. California Education Code Title 5 regulation § 55050 Credit by Examination, permit high school students to earn college credit through credit-by-exam and also waive the residency requirement for this student population. In 2005, the ASCCC introduced and encouraged the legislature's passing of SB 70 which established the Statewide Career Pathways: Facilitating School to College Articulation (SCP) initiative. This effort created a system to facilitate the establishment of articulation agreements between high schools and community colleges.

Despite efforts to establish an effective process to award credit for articulated high school work in career and technical programs, **a number of local policies and practices have prevented this option from being fully implemented.** For example, having articulation agreements in place does not automatically mean credit is awarded to students and noted on their transcript. The awarding of credit requires a coordinated inter-segmental effort that begins in a high school class and ends in a community college admissions and records office. Unfortunately, **insufficient inter-segmental coordination remains a barrier to articulation in California.**

Student Engagement with Prior Learning Assessment in CCCs

PLA data are not collected by state or federal agencies; any student usage and outcomes data that are available have been collected through independent studies. Alice VanOmmeren, dean of research, analysis, and accountability with the California Community Colleges Chancellor's Office, shared that, "We [at the Chancellor's Office] do not collect [PLA] data in DataMart or anywhere else in the agency. We are not even sure how many colleges are doing competency exams" (Alice VanOmmeren, personal communication, May 13, 2015).

Competency-Based Education in CCCs

Below we review the current policy context for CBE as well as provide a snapshot of emerging models for this approach in the state.

CCC Policy for CBE

Despite the development of competency-based education programs in the past few years, California community colleges have been slow to embrace this method of awarding credit. Moran's review of California's higher education policy finds that **independent study is perhaps the one area in Title 5, California Code of Regulations (CCR) that has any relevance to competency-based learning.** Title 5 states provisions allowing a community college district, for the purpose of reporting enrollment for funding, to include "approved courses or programs of independent study who are under the supervision, control, and evaluation, but not necessarily in the immediate presence, of an academic employee of the district who is authorized to render such service" (Clerx, 2015, p. 6-7).

Different accounting procedures are used to calculate apportionment for independent study courses. **Computation for Full-time Equivalent Student (FTES) is based on units not hours; funding is not tied to seat time.** Moran's research underscores that this alternative accounting method for independent study courses is important because it emphasizes learning and content, rather than focusing on hours of contact. Because independent study courses are assigned a unit-based accounting method, which must be applied to all courses offered in this manner, any course can be taught as independent study. This in turn can lend itself to a competency based learning model within classes in any discipline and across the curriculum.

The research conducted by Moran also notes that the nature, manner, and place of conducting any independent study courses or program is determined by each community college district, which in turn may lend itself to a competency-based learning model within classes in any discipline and across the curriculum. The Education Code indicates that it will not matter how long it takes the student,

nor how the student develops the competencies, as long as the student acquires and demonstrates a “mastery of the course content as set forth in the outline of record” as required by Title 5, CCR, §55050 (Clerx, 2015, p. 7). In turn, Moran concludes that the **current regulatory environment lends itself to the use of independent study courses as a vehicle for competency-based learning**, where the student will independently develop the competencies needed to get credit for a course.

While there is considerable latitude in how an independent study course can be conducted, **regulations regarding faculty contact hours require that students in these courses have comparable access to the instructor as students enrolled in a traditional course in addition to regularly scheduled office hour.** This requirement may act as an obstacle to implementing CBE through this mechanism. Moran notes that it appears that if a three-unit course, taught through traditional methods, requires 54 hours of instructor contact, the same course, taught through independent study, would require the same number of instructor-student contact hours. While this may make sense in a classroom, where multiple students share instructor contact hours, it makes less sense in an independent study environment, where there is one-on-one contact between the instructor and the student and the instructor’s role is a mentoring one. Moran additionally highlights **the issue of faculty resources, and the attendant cost, that would be necessary to mentor multiple students through independent study courses in this manner.** These are regulations that will have to be addressed if competency-based education in the community college system is to get any traction and be seen as a viable option for students.

CBE Models Offered by CCCs

While the adoption of CBE appears relatively underdeveloped across California’s community colleges, two very recent initiatives, the Los Angeles Healthcare Competency to Career Consortium, and bachelor’s degree pilot program in community colleges, could pave the way for further innovations with this approach.

Los Angeles Healthcare Competency to Career Consortium

The RP Group’s research uncovered a nascent effort of the Los Angeles Community College District (LACCD) that could result in a number of competency-based programs in the health care industry. In fall 2013, the LACCD received \$19.25 million from the Department of Labor and the Department of Education’s Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant program to develop the Los Angeles Healthcare Competency to Career Consortium.

The Los Angeles Healthcare Competency to Career Consortium (LA H3C) is a multi-college project shared among all nine colleges that comprise the LACCD. A consortium of the community colleges, trade-impacted companies, sector intermediaries, the workforce system, and employers in the health-care industry sector will join forces to create an innovative training model for trade-impacted workers and other long-term unemployed in the greater Los Angeles area. The primary focus of the project will be to build upon the progress of the prior year’s TAACCCT grant projects to develop competency-based, stacked, and latticed programs of study, including a common foundation of credentials, certificates of achievement, and associate’s degrees related to the following 11 career pathways in the health science professions:

- Athletic Training and Sports Medicine
- Community and Other Health Aides (Certified Nurse Assistant, Home Health Aide, Geriatric Care Technician, Community Health Worker, Patient Navigators)
- Dental Technician
- Emergency Medical Technician
- Health Information Technology (Health Information Coding Specialists, Medical Billing Assistant, Medical Office Assistant)
- Medical Assistant
- Medical and Clinical Lab Technician (including Sterile Processing Tech)
- Pharmacy Technician
- Radiological Technician
- Registered Nursing (including Licensed Vocational Nurse to Registered Nurse Bridge)
- Respiratory Therapy

The idea behind making the certificates stackable is to allow students as they progress through their program of study to add certificates or shift to another program.

SB 850 – Public Postsecondary Education: Community College Districts: Baccalaureate Degree Pilot Program

In addition to this local LACCD effort, recent passage of SB 850 Public Postsecondary Education: Community College Districts: Baccalaureate Degree Pilot Program in September 2014 may pave the way for additional competency-based education across the state’s community colleges. Supported by the California Community Colleges Board of Governors, this law will allow [15 CCCs to offer bachelor’s degrees as part of a pilot program in specialized, vocational occupational fields.](#)⁸ These programs are to be in place for the 2016-2017 academic year. Career and technical programs by their very nature are competency-based, and these new degree programs will be no different. Under this pilot, Foothill College in the San Francisco Bay Area will develop a dental hygiene program that will use portfolio assessment to document student learning. A brief description of this program is provided below.

- **Foothill College’s Dental Hygiene** program will cover the first two years of the baccalaureate dental hygiene degree and will consist of the general education courses required for the major and supporting science and social science courses, totaling 86 quarter units. The second two years will include 94 quarter units of dental hygiene courses, inter-professional allied health courses, and upper-division general education. Students will complete upper-division general education and writing requirements in the senior year dental hygiene research courses. The dental hygiene curriculum currently has two dental health/research courses. The college plans to add a third research course in the senior year to bring depth to the baccalaureate level. The senior year dental hygiene research/public health courses will include a capstone project. Students will create a comprehensive e-portfolio over their junior and senior years, documenting

⁸http://extranet.cccco.edu/Portals/1/ExecutiveOffice/Board/2015_agendas/January/California_Community_Colleges_Baccalaureate_Degree_RECOMMENDED_PILOT_PROGRAMS_final_Jan-2015.pdf

their projects, research papers, patient competencies, community service, and professional development.

IV. PLA and CBE in the Los Angeles Community College District

As stated in the introduction, an underlying goal of this project is to learn about the regulations, policies and practices that can support and/or hinder the implementation of PLA and CBE learning models within the CCC system and, in particular with the successful implementation and scalability of the Pathways to Academic Success Framework (PACTS) by the Los Angeles Trade Technical College.

Above, we reviewed national and California regulations related to PLA and CBE and elaborated on the particular impact these policies have for implementation of these approaches within the California Community College system. However, we still need to drill down to district- and college-level policies and regulations to develop a comprehensive picture of all the regulations, policies, and practices that the LATTC must consider as it moves forward with the implementation of PACTS.

As one of nine community colleges within the Los Angeles Community College District (LACCD), the LATTC must adhere to district regulations when delivering PLA and CBE. This section begins with a review of the overall context for developing and approving policy in the LACCD. It then reviews LACCD policy specific to PLA and CBE. It concludes with a discussion of implications for this current policy environment as the LATTC seeks to advance the PACTS initiative using PLA and CBE.

LACCC Policy Context

Similar to the consultation process that the BOG must abide by at the state level, local boards of trustees along with local academic senates must follow a shared governance or collegial consultation process before any policy on academic and professional matters is adopted (California Community Colleges Chancellor's Office Consultation Council Handbook, 2014). Moran's research revealed various district-wide consultation processes involving multiple parties (outlined in figure 7) that must be undertaken depending on the type of policy recommendations being made, as described in the California Community Colleges Chancellor's Office Consultation Council Handbook:

Administrative Matters

Recommendations for changes regarding administrative issues can originate from a variety of district-wide administrative committees and councils, but must be appropriately vetted before being presented to the Chancellor's Cabinet, which will make the final recommendation to the chancellor. If these recommendations involve the creation of or revision to board rules, then the chancellor will take these recommendations to the board of trustees for action. If the policy recommendations involve administrative regulations, then the chancellor can act directly on them.

Academic and Professional Matters

LACCD board rules require that before policy changes are made related to academic and professional matters, they must be consulted by the District Academic Senate (DAS) (Los Angeles Community College District (LACCD), Board Rules, chapter XVIII, Article I, 2015). Under DAS policies, the district curriculum committee reviews policy changes involving instruction and

academic policy, and new or revised board rules or administrative regulations. If this committee approves policy changes put forth before them, it will refer them to the executive committee of the district academic senate, which can approve the changes or refer them to the entire district academic senate for review.

In addition, LACCD regulations clearly state that the board of trustees must “rely primarily” on the advice of the district academic senate for the following district-level academic and professional matters (LACCD, Board Rules, chapter XVIII, Article I, 2015):

- Curriculum, including establishing prerequisites and placing courses within disciplines;
- Degree and certificate requirements;
- Grading policies;
- Policies for faculty professional development activities;
- Processes for program review; and
- Faculty roles and involvement in accreditation processes, including self-study and annual reports.

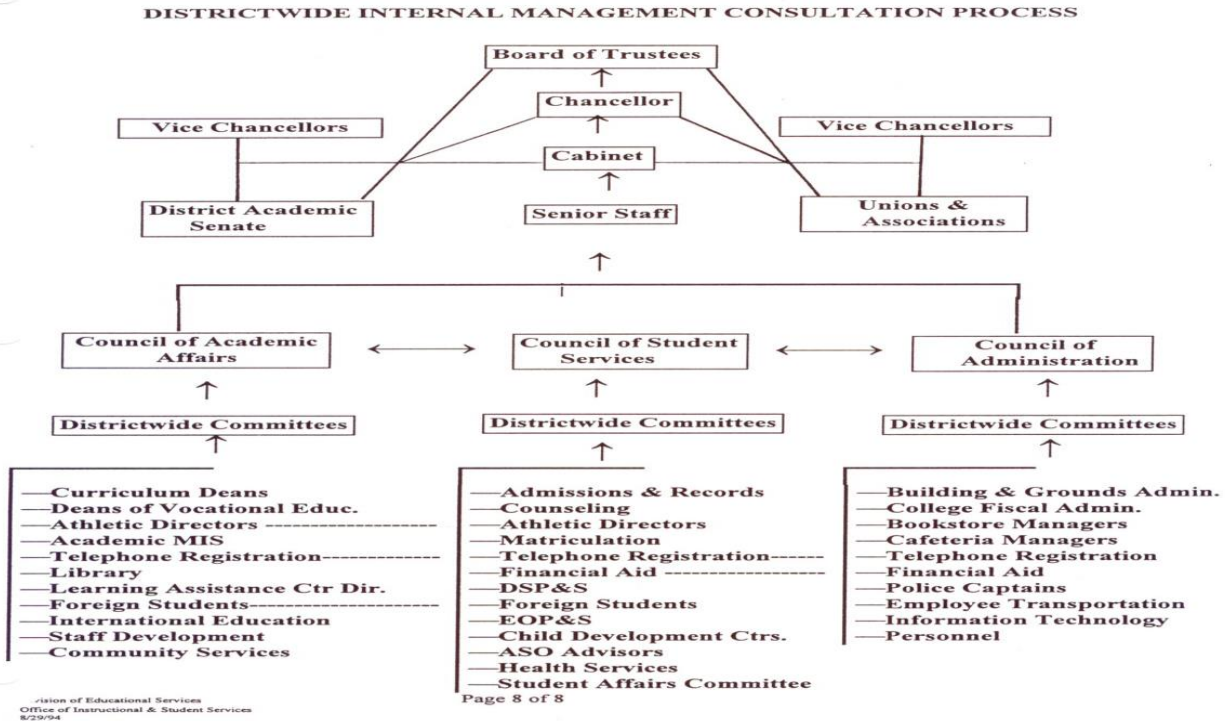
The district-level policy focused on the areas listed below requires that the board of trustees reach mutual agreement with the district academic senate by written resolution:

- Educational program development;
- District and college governance structures as related to faculty roles;
- Processes for institutional planning and budget development;
- Standards or policies regarding student preparation and success; and
- Other academic and professional matters as are mutually agreed on by the board of trustees and the district academic senate.

Student Matters

If the policy recommendations have a “significant effect on students,” as defined by Title 5 and LACCD, Board Rules, chapter XVIII, Article II then the board’s student affairs committee must be consulted on these recommendations. It is important to note that the board is not required to accept policy recommendations coming from the student affairs committee.

Figure 7. Districtwide Internal Management Consultation Process



PLA and CBE Policy in the LACCD

As noted earlier, all California community college districts must establish and maintain policies related to credit-by-exam. The Moran report cites two credit-by-exam policy requirements unique to LACCD not found in Title 5. First, **students must meet a 12-unit residency requirement within any of the nine colleges in the LACCD.** Second, **the district only permits students to earn a maximum of 15 credits through credit-by-exam.**

Otherwise, this research finds that LACCD reflects credit for prior learning regulations of *Title 5, CCR, § 55050, Credit-by-examination*. For example, faculty solely determine the content and type of PLA. Credit-by-exam can only be awarded for courses for which discipline faculty have developed some method of assessing prior learning. Moran also finds in its research that this policy gives the discipline faculty who are responsible for the “examination” considerable latitude in defining an exam; moreover, it is sufficiently flexible to allow completion of a portfolio documenting previously acquired competencies and knowledge to serve as the “examination.”

Additionally, faculty may accept an examination conducted at a location other than the community college for the purpose of awarding credit for prior learning. The Moran report notes that while this policy would permit external certifications (e.g., Microsoft Office User Certification (MOUC)) to serve as an examination for a course or courses covering the competencies certified by the exam, it could also pose a credit transferability issue for students. Moran explains that **the exclusive role of the faculty in this process may create differing responses between different discipline faculty within a college and between faculties in the same discipline at other colleges within the LACCD.** In turn, students may not experience reliable and consistent PLA policy.

LACCD policies also address the option for students to receive PLA credit through certain external examinations such as Advanced Placement (AP), International Baccalaureate (IB), and College-Level Examination Programs (CLEP). The district recommends the use of AP and IB exams for General Education and competency requirements for the associate's degree, CSU General Education Certification, and the Inter-segmental General Education Transfer Curriculum (IGETC). In the case of the CLEP, the district has developed an elaborate matrix that (1) lists all the CLEP exams and scores, and (2) articulating these exams and scores with the general education requirements for an associate's degree met by achievement of a satisfactory score. In all cases, the determination of course equivalency is done at the college level, in accordance with the district shared governance policy.

While the LACCD has a policy for awarding credit for military service, it is very limited.

Moran's research finds that while the regulation cites the Army/American Council on Education Registry Transcript System (AARTS), which provides a variety of credit recommendations based on military training, the only credit allowed under this regulation is Health and Physical Education. Moran asserts that the LACCD could promote a quicker path to graduation for veterans if it awarded credit in accordance with all the recommendation of the American Council on Education.

Lastly, the **LACCD has a specific policy on granting Administration of Justice credit for training at a public law enforcement academy that meets the standards of the California Peace Officers Standards (POST) Commission;** training at private agencies does not apply. One hour of credit may be granted for each 50 hours of training; students can receive a maximum of 18 units for prior law enforcement academy training.

It should be noted that Moran found **no specific mention of policies related to competency-based education within the LACCD policies and practices.** At the same time, as mentioned above, the Title 5 provision allowing for the accounting for independent study courses to be based on credits not hours creates the possibility for this mechanism to be used as part of a competency-based education framework.

Implications for Advancing PLA and CBE at LATTC

Moran particularly recognizes in its research summary that understanding the LACCD and LATTC political context is critical to informing and selecting strategies designed to promote policy change. Moran underscores that **the consultation process is a political process and, as with all political processes, the more allies one has, the better.**

Moran explains that on the administrative side, it will be important to garner the support of the college and district administrators affected by any proposed changes. At the college level, and across the district, it will be important to gain the support of the vice presidents of academic affairs, the vice presidents of student services, the vice presidents of administration (when policy changes involve fiscal issues), and especially the college presidents. At the district level, it will be important to secure the support of the vice chancellor for educational services, the deputy chancellor and the chancellor. Also, depending on the policy changes being proposed, it may be important to secure the support of the controller and the general counsel.

If the issue at hand is an academic and professional matter, then it will be necessary to court academic senate support, both at the college and district level. It will be important to gain support of the college senate presidents who sit on the district academic senate. Equally, it will be important to **run ideas past the DAS president and second vice president, who chairs the district curriculum committee (DCC),** to see if they are in support of the changes being proposed. While they cannot speak for the DAS or DCC, they can be influential; so, it is important to know where they stand beforehand.

V. Facilitating Innovations in PLA and CBE in California

Making changes to California's higher education and community colleges policies and regulations to facilitate the adoption of PLA and CBE will not be easy given numerous factors. For example, term limits hamper the state legislature's ability to set policy for higher education. Specifically, term limits make it difficult for legislators to gain enough knowledge to create and implement long-term agendas that could benefit our state's community colleges. Additionally, the policies, rules, and regulations governing higher education in California are deeply rooted in the state's Master Plan for Higher Education, enacted in the 1960s under very different economic and political times. While numerous attempts have been made to update this plan to reflect the economic, demographic, and financial realities in which we live today, these efforts have not made enough inroads to truly create the much-needed change. Moreover, the complex consultation and shared governance process of the CCC system presents further challenges to efficient and effective widespread adoption of innovations like PLA and CBE.

Yet, our combined research reveals several opportunities for promoting prior learning assessment and competency-based education across the California Community College system. Below, we outline recommendations for both state policy changes and opportunities at the local LACCD level as well as considerations for ground-level educators eager to adopt and scale this approach at the LATTC and specifically in support of the PACTS initiative.

State-Level Policy Recommendations

Short-term policy changes may be the "low hanging fruit" that would allow PLA and CBE to be strengthened and become more viable options for students to earn college credit. Moran provides an analysis of potential areas for short-term change, as cited below, which would entail revisions to the Education Code and Title 5, California Code of Regulations (Clerx, 2015).

Provide Funding for Prior Learning Credit

One of the disincentives a college faces in awarding credit for prior learning relates to the current funding formula. While California's community colleges receive funding for enrollment, they do not receive funding for credit earned through prior learning assessment, whether through the credit-by-exam process or credit based on external agency recommendations, such as the American Council on Education's *ACE Guides*.

Moran asserts that **awarding credit for prior learning needs to be incentivized. Numerous other states have incorporated some kind of performance-based funding into their formulas.** With such a change, colleges would be rewarded for allowing students to make progress towards their degree. This may involve a dual strategy involving both the legislature and the California Community Colleges BOG. While there are costs associated with providing fiscal incentives for awarding credit for prior learning, such a change may decrease the overall fiscal impact in the long run by reducing the expenses associated with student enrollment in coursework for which they have already mastered the competencies.

According to the National Conference of State Legislatures, 30 states—Arizona, Arkansas, Florida, Illinois, Indiana, Kansas, Louisiana, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, New Mexico, Nevada, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin, and Wyoming—have a funding formula in place that allocates some amount of funding based on performance indicators such as course completion, time to degree, transfer rates, the number of degrees awarded, and/or the number of low-income and minority graduates. Four states—Colorado, Georgia, Iowa, and South Dakota—are currently transitioning to some type of performance-based funding, meaning the legislature or governing board has approved a performance-based funding program and the details are currently being worked out.

Compensate Faculty for Credit-by-Exam Delivery

Moran also notes that an effective credit-by-exam program, especially one that entails assessing prior learning experience, needs significant faculty involvement. **If faculty members are to be actively involved in this process, as is required by Title 5, then they need to be compensated.**

Currently, the only compensation a college can receive for credit-by-exam is a fee from the student, and this fee cannot exceed the fees a student pays for any other class, which are nominal. One approach to shifting this policy could entail **changing the funding formula so that there is apportionment for courses taken via the credit-by-exam process.** Another strategy, one that might be more effective, would be to **fund these courses based on units** (similar to how independent study is funded).

Funding for courses taken via credit-by-exam will require changes to the Title 5, CCR, Division 6—Community College, Chapter 9—Fiscal Support, which contain the state’s funding formulae. While this technically is not an academic and professional matter, **ASCCC support could be helpful in facilitating this change. It will also be critical to secure the support of the CCCC Vice Chancellor for Finance and Facilities,** or support from one or more of the Vice Chancellor’s senior staff members. Garnering this support will be vital, since any changes to the funding formula in Title 5, CCR, Division 6—Community College, Chapter 9—Fiscal Support will be reviewed by the California Department of Finance. Given this, it might also be necessary to seek changes to the Education Code as well.

Use Independent Study as a Vehicle for CBE

Title 5, CCR, § 55240, which addresses the instructor contact requirements for courses taught through independent study, states:

The college shall provide access to the instructor for the students enrolled in courses offered pursuant to this article at least equivalent to that commonly available to students enrolled in courses conducted by other instructional methods in addition to regularly scheduled office hours as practiced at that college.

It appears that this policy mandates that an independent study course require the same number of instructor contact hours per student as that of a course taught through traditional means. While requiring contact hours in the classroom where multiple students share instructor contact hours may make sense, it makes far less sense to require the same number of hours in an independent

environment where there is one-on-one student-instructor contact and the instructor's role is more of a mentoring one.

In order to allow colleges to use independent study as an effective vehicle for competency-based learning, **Title 5, CCR, § 55240 needs to be amended to eliminate the excessive, and fiscally impractical, requirement that the number of student contact hours be equal to those for classes taught by traditional means.** However, before initiating action to change this section of Title 5, CCR, it would be advisable to **request an opinion from the CCC General Counsel** as to whether this regulation actually does require the same number of student contact hours for an independent study class as are required by classes taught traditionally.

Provide Expanded Credit for Military Training

Moran also recommends changing the policy regarding credit for military training, specifically **adding a section to Title 5, CCR requiring community colleges to grant course credit for all course equivalencies listed in Army/American Council on Education Registry Transcript System (AARTS),** which provides a variety of credit recommendations based on military training. This change may be difficult because the AARTS is highly prescriptive. However, this policy revision may be seen as an effective way to address national interest in reducing the time to graduation, decreasing higher education costs, and providing a specific boost to America's veterans.

LACCD Policy Recommendations

In addition to these state-level changes, several policy revisions within the LACCD may help to facilitate the recognition of prior learning at the local level. We outline these below.

Eliminate District-Level Unit Restrictions on Credit for Prior Learning

In the short term, it would be helpful to modify LACCD Board Rule (BR) 6702—*Credit-by-Examination*, to **eliminate the requirement that a student must complete 12 units before taking any course through credit-by-exam,** which is not required by Title 5, CCR. Even more important, Moran recommends the **elimination the 15-unit credit-by-exam maximum** in the district's BR 6702.10—*Limitation on Petitioning for Examination* and BR 6702.11—*Maximum Units Allowable*, especially since Title 5, CCR, § 55050 does not have this limitation.

Moran asserts that these changes would allow for greater flexibility in using credit-by-exam as a mechanism in granting credit for prior learning, especially since BR 6702.13 states that, "The faculty may accept an examination conducted at a location other than the community college for this purpose," and that, "Credit may be awarded for prior experience or prior learning only in terms of individually identified courses for which examinations are conducted pursuant to this Board Rule." Moran further notes that the **ASCCC has formally recognized that, "National and state interest in decreasing time to degree completion and increasing degree production has resulted in an interest in finding novel ways to meet these goals," and that credit-by-exam offers a "mechanism long in existence that can be used to award credit for demonstrated learning"** (Kawaguchi et al., 2014). As a result, the ASCCC has recommended "...that local academic senates consider the needs of their local communities and strive to ensure that all

appropriate exam opportunities are available” (Kawaguchi et al., 2014). These recommendations from the ASCCC could be helpful in encouraging the LACCD’s academic senate to support these revisions to LACCD Board Rule.

Provide Credit for Law Enforcement Academy Training

Moran further notes that individuals who have completed police academy training would benefit if the LACCD were to **modify Administrative Regulation E-113—*Credits for Units Earned for Law Enforcement Training* to eliminate the 18-unit maximum**. Again, this change would align with the “national and state interest in decreasing time to degree completion and increasing degree production has resulted in an interest in finding novel ways to meet these goals” cited in the ASCCC’s fall 2010 resolution 09.08 Credit by Exam Processes.

Offer Credit for Military Training

Moran additionally underscores that **veterans would also benefit significantly from a modification of LACCD Administrative Regulation E-118—*Military Credit***. Adopting recommendations outlined in the American Council on Education’s (ACE) Military Guide, for formal courses and occupations offered by all branches of the military, would represent a major step toward affording veterans the opportunity to earn credit for military training. These recommendations are based on ACE reviews conducted by college and university faculty members who are actively teaching in the areas they review; which should resonate with California Community College faculty. Also helpful is the fact that in spring 2014, the ASCCC Curriculum Committee recommended, “Local senates, particularly colleges with large population of students with prior learning from non-collegiate experiences such as military service, need to recommend policy regarding the use of credit-by-exam as a means for students to earn course credit” (Kawaguchi, et al., 2014). Based on the way the regulation is currently written, the only credit allowed is for Health and Physical Education.

Accept Credit Recommendations from Other External Evaluations of Prior Learning

Moran’s research finds that the Council of Adult and Experiential Learning recommends that higher education systems and institutions consider several sources of external evaluation, as stated in a *College Productivity Series* paper entitled “State Policy Approaches to Support Prior Learning Assessment” (2012). Sources include the following:

- Credit recommendations listed in the American Council on Education (ACE) National Guide to College Credit for Workforce Training and the ACE Military Guide;
- Credit recommendations listed by National College Credit Recommendation Service (NCCRS); and
- Credit demonstrated by successfully passing national for-credit examination programs such as: DSST Exams, Excelsior College Examinations, UExcel Exams, The College Board College Level Examination Program (CLEP) and Advanced Placement (AP) exams.

Research conducted for this project indicates that **LACCD has already adopted policies on military credit, CLEP, and AP.** The need to modify the district’s military credit policy is addressed above, but the district might also consider using the other credit recommendations cited by CAEL.

Leverage Independent Study Options

Moran’s research reveals that at present, **the only courses within LACCD that are offered through independent study are subject-specific “Directed Studies” courses, in which the student completes an individual project with an instructor and receives credit for completing a specific course** (e.g., Administration of Justice 185—Directed Study Administration of Justice). Given the language in Title 5, CCR, it would be possible to offer a specific course (e.g., Administration of Justice I—Introduction of Administration of Justice) as an independent class, thus allowing an instructional modality other than classroom lecture for any course without changing state or LACCD policy.

- The reality of community college students is that many are juggling family responsibilities, full and or part-time work, and child care among other things. For many students, attending classes is a challenge because they often have to fit their classes around work schedules. **Independent study designed around a self-paced competency-based model could provide these students with much needed flexibility** to enable them to meet their educational goals since by definition competency-based education means no class schedules, no commute and no set semesters (*CollegeAffordabilityGuide.org, 2013*).

LATTC Program and Operational Recommendations

In addition to the abovementioned district-wide policy recommendations which concern all nine colleges in the LACCD, Moran’s research also reveals a number of suggestions for programmatic and operational changes that could easily be implemented to ensure effective delivery of PLA and CBE at LATTC, as outlined below.

Develop a Specific Plan for Student Outreach

There is a need for greatly increased transparency and communication with students with respect to the PLA options available to them. It is important to keep in mind that PLA and competency-based programs are likely just as new for the student as they are for the institution. As such, **institutions need to ensure that students have access to all of the information they need to understand how the program works, whether and how they will receive grades for their work, how progress is tracked and posted, and whom to contact for help.**

Moreover, PLA options are often not applicable to the traditional target population of the higher education community, particularly students who are 18 to 24 years old. **Therefore, efforts should specifically engage other potential degree-seeking students who are typically older, working, and often supporting families.** Many of these students do not have degrees, but may have some experience to translate into credit toward college credentials and frequently need support with employment-related skills development.

Offer a Centralized Location for PLA Services

For the most part, PLA services are offered in many places on a college campus rather than being centralized in one location. This decentralization can lead to students feeling overwhelmed by the complexity of the process. **Offering PLA options in a central location would therefore be advisable.**

Build College-Wide Commitment to and Support for PLA and CBE

If PLA and CBE are to get a strong foothold at any community college, it will be critical to have buy-in from all segments of the college. The implementation of PLA and CBE has implications for several areas of a college, such as admissions and records, advising, and instruction.

One critical element is the involvement of faculty to secure their investment in and support for PLA and CBE and to ensure their understanding of its academic rigor and pedagogical validity. **Faculty should be involved in the design, development, and implementation of any program.** Many CBE programs have very different kinds of learning activities that do not involve the traditional instructor-led course. Nevertheless, faculty still play an important role in supporting the learning process by serving as coaches or guides as the student engages with the learning. For colleges looking to develop new or additional PLA and/or CBE programs, an important part of the planning and start-up process would be to **communicate to faculty any new expectations for their roles and provide training and professional development to help them make the transition to those new roles.**

Increase Collection of Student Outcomes Data and Program Evaluation

As already mentioned, there is a dearth of student outcomes data collected for PLA and CBE. One reason these data are not collected is that systems that house and track student academic records have been designed around courses and credit hours. At this time, software solutions are needed that allow colleges to track alternative forms of outcomes data.

In the meantime, **PLA and CBE programs will need to develop or contract for new learning management systems that will track student enrollment and progress in a way that allows for flexibility in the pace of student progress.** The new system may need to have interoperability with the main student information system and may need to be able to track student progress in a way that will satisfy Title IV requirements.

Engage Employers

The **involvement of employers throughout the process of designing a PLA and/or CBE program is advisable**, especially for career and technical programs. They can help inform the competency framework, the types of authentic assessments that should be used, and ongoing program improvements. Their involvement will help to ensure that the program is meeting business and industry needs, and employers who are involved may be more apt to consider graduates for future employment.

VI. Conclusion

The convergence of today's economic, demographic, and technological changes; the ballooning cost of a college education; the length of time it takes the average student to complete a degree; and the need for more college educated and skilled workers are compelling federal and state policymakers, foundations, businesses, colleges, and universities to see the potential of prior learning assessment and competency-based education programs. At the national level, a response to these forces for change is evidenced by several experimental programs focused on prior learning assessment funded by the Department of Education; the investment of foundations such as the Lumina and the Bill and Melinda Gates Foundations in initiatives focusing on competency-based education; and policy changes in a number of states and institutions that support the development and expansion of PLA and CBE programs.

California's higher education institutions have for the most part overlooked the potential of competency-based education and, to a lesser extent, PLA as alternative modalities for students to earn college credit. This lack of attention to the potential offered by PLA and CBE is most evident by the dearth of state, district, and local policies and practices that would allow for the establishment of PLA and CBE programs.

It is an auspicious time for the Los Angeles Area Chamber of Commerce and the Los Angeles Trade-Technical College to become major players in this arena. LATTC's PACTS program has the potential to be an innovative and scalable model that could serve as a "proof point" that PLA and CBE are viable strategies for awarding credit. In addition, the L.A. Area Chamber and LATTC can be leaders in pushing a policy agenda that will support the expansion of an educational framework that allows for the delivery of education based on student learning and competencies rather than on instructional seat time and traditional course completion.

Taking a leadership role will be a challenging endeavor, especially given the highly regulatory environment of California Community Colleges. **However, it is not insurmountable if key stakeholders are engaged from the beginning, policy levers and champions are identified, and the political will is garnered** to create the policy environment that will support and not hinder the development and expansion of PLA and CBE.

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