**TOPIC: PROPOSED REVISIONS TO CCHE POLICY SECTION I,**

**PART X: PRIOR LEARNING ASSESSMENT, TO COMPLY WITH**

**HB20-1002 (A PLAN TO AWARD TRANSFERRABLE COLLEGE**

**CREDIT FOR WORK-RELATED EXPERIENCE)**

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1. **SUMMARY**

This discussion item presents proposed revisions to the Commission’s prior learning assessment (PLA) policy to address the statutory requirements of HB20-1002: Concerning a Statewide Policy for Awarding College Credit for Work-Related Experience (Appendix A).

1. **BACKGROUND**

The Commission approved a process for establishing a statewide policy on prior learning assessment at its May 2015 meeting. The current policy is designed to ensure that credits awarded for prior learning by one institution are not lost in transfer and provide transparent information to students, families, and advisors. The policy addresses national/standardized exams such as Advanced Placement (AP) and International Baccalaureate (IB), course challenge or “test out options” for GT Pathways/general education, and military courses and occupations and Defense Language Proficiency Tests (DLPT) appearing on Joint Services Transcripts. The focus of the policy is on awarding PLA credit for GT Pathways/general education courses, which form the core of nearly all transferable degree programs. The policy is intentionally designed to better ensure that students are able to transfer credits, without loss, when PLA is earned.

The most recent revisions to the policy were made by the Commission in May 2018 in response to House Bill 17-1004, which required governing boards “to adopt, make public, and implement a prior learning assessment policy for awarding academic credit for college-level learning acquired while in the military.” HB17-1004 also stated that beginning June 1, 2018, institutions were to “accept in transfer from within the institution and from other state institutions of higher education prior learning assessment credit…unless the Colorado commission on higher education adopts a new policy prior to June 1, 2018.” The Commission’s revised PLA policy includes tables identifying specific military courses and occupations and the GT Pathways credit awards associated with each.

In a similar vein, House Bill 20-1002 directs the General Education Council, in collaboration with the Commission to “create, adopt, and implement a plan…to award postsecondary academic credit for courses in GT pathways or a statewide degree transfer agreement for learning demonstrated from work-related experience.” The plan is to be adopted by the Commission by January 1, 2022 and implemented by the beginning of the 2022-23 academic year. The bill also includes a mandate to the Department to conduct a study of expanding prior learning assessment at Colorado public institutions of higher education such that a student could ask to “test out” of any course in the undergraduate curriculum. That study was completed and delivered to the education committees of the House and the Senate by the deadline of September 1, 2021.

House Bill 20-1002 was one of a handful of bills that emerged from the Making Higher Education Attainable Interim Study Committee following the 2019 interim. It was introduced during the first week of the 2020 legislative session and included a fiscal note outlining required implementation funding of $283,647, which included a full-time staff person for two years. When the General Assembly reconvened following its COVID-related pause, the bill was stripped of its fiscal note and amended to enable the Council, Commission, or Department to seek external funds for the purposes of developing the plan. The amendment clarified that “the plan shall not be created, adopted, or implemented unless sufficient money is available from gifts, grants, or donations to cover the costs of creating, adopting, and implementing a plan.”

1. **STAFF ANALYSIS**

**Funding**

Even before the bill was signed the staff approached implementation with optimism that sufficient funds could be raised to do the work. The staff began pursuing funding opportunities from foundations and other philanthropic sources and landed a $25,000 grant from Lumina Foundation that enabled initial work with the Council for Adult and Experiential Learning (CAEL). CAEL worked with the staff and the General Education Council to determine current industry job needs through review of job openings, labor market data, existing competency-based models, and certifications to create an overview of how GT Pathways relates to current Colorado labor market needs. CAEL also recommended a process for future work and planning to address the mandates of HB20-1002. CAEL completed its work in October 2020.

The staff then landed a $250,000 grant from the Strada Education Network for a collection of initiatives designed to transform and accelerate credentialing in response to the COVID pandemic. A portion of these funds were dedicated to implementation of HB20-1002: approximately $90,000, which included 1) payment to consultants to help develop the plan and advise on implementation; 2) funds to support the Colorado Community College System to beta test a process for evaluating work-related credentials for transferrable college credit; and 3) funding to support CDHE staff time and indirect cost recovery. Together, the Lumina and Strada grants have provided $115,000 to enable the staff to advance implementation of HB20-1002 and deliver the draft plan presented to the Commission for discussion.

**Personnel and Process**

The Strada funds were received in mid-December, at which point the staff launched a Request for Proposals for a consultant to help the lead the work of developing the plan. In January the Department entered into a contract with Bitsy Cohn of Cohn Solutions Group. Ms. Cohn is an expert in prior learning assessment and adult-learning initiatives with experience at CAEL, Colorado State University, and the Colorado Community College System. Part of Ms. Cohn’s contract was to assist in research and development for the study of expanded PLA processes at public institutions.

Ms. Cohn picked up where CAEL had left off and worked with the staff and GE Council in developing a process and timeline to fulfill the statutory mandate. Several members of the General Education Council volunteered to be part of a working group to help drive the plan on behalf of the larger council. The group worked between monthly GE Council meetings given the relatively short timeline and need for more intensive detailed work that could not reasonably be completed by the full council. The group was comprised of the following members:

* Alex Ilyasova, University of Colorado, Colorado Springs
* Danen Jobe, Colorado Community College System
* Ruthanne Oriheula, Community College of Denver
* Scott Reichel, Aims Community College
* Shaun Schafer, Metropolitan State University of Denver
* Linda Van Doren, Emily Griffith Technical College

Additionally, the bill names several groups that are to be consulted in creation of the plan, which are listed below along with the dates of consultation (both completed and planned):

* Representatives of institutions, including faculty members and registrars
	+ Open-invitation statewide faculty forum, including the Colorado Faculty Advisory Council (September)
	+ Combined meeting of the Registrar Council and the Department’s Data Advisory Group (September)
	+ Meeting of the Registrar Council (October)
* Representatives of organizations that represent students in Colorado
	+ Young Invincibles 2021 Leadership Cohort (October)
	+ CCCS State Student Advisory Committee (November)
* Representatives of industries with high workforce demand and growing industries identified in the most recent Colorado Talent Pipeline Report and organizations representing them
	+ Convening of industry representatives and workforce partners (February)
	+ Convening of corporate human resources and college/university outreach officers (August)
	+ Convening of advanced manufacturing representatives (September)
	+ Convening of health care industry representatives (November)
* Representatives of the Colorado Workforce Development Council
	+ Participated in February and September convenings with industry partners
	+ Additional meeting to be scheduled for November
* Representatives selected by the Commission
	+ Open-invitation meeting to members of the Standing Committee for Student Success & Workforce Alignment (October)

**Recommended Plan and Revisions to the CCHE PLA Policy**

The process engaged over the past 15 months has resulted in the proposed plan outlined in Attachment D. The plan was developed by the General Education Council grounded in key principles of statutory compliance, transparency, responsiveness to students, equity, workforce connections, and depth and rigor in respect to the integrity of GT Pathways and statewide transfer frameworks. The plan includes a significant role for the Colorado Community College System (CCCS) given 1) the potential for application of work-related experience not just to GT Pathways or to courses within a Statewide Transfer Articulation Agreement, but also to specific courses or requirements within CCCS degree or certificate programs, which may not have guaranteed transferability; 2) existing structure in place for evaluation of work-related experience; and 3) ownership of courses within Statewide Transfer Articulation Agreements, which are courses specific to institutions within CCCS and local district colleges.

The Commission’s current PLA policy is included as Appendix C and contains recommended revisions (using Track Changes) for the Commission’s consideration. The recommended revisions are detailed below:

1. Sections 2.08 and 2.09 (Statutory Authority): New sections articulating the statutory authority of the Commission regarding a plan to award transferrable credit for work-related experience.
2. Section 3.05 (General Provisions): Language added regarding application of work-related experience to courses within a Statewide Transfer Articulation Agreement (in addition to GT Pathways).
3. Section 6.00: New section specific to Work-Related Experience Leading to a Credential.
4. **STAFF RECOMMENDATIONS**

**Discussion item only; additional refinement and stakeholder consultation will occur before the Commission will be presented with the revised PLA policy and HB20-1002 implementation plan for adoption.**

1. **STATUTORY AUTHORITY**

Pertinent parts of the applicable statutes have been **underlined and put in bold** to help identify statutory authority for the policy recommendations herein.

**C.R.S. §23-1-108.** Duties and powers of the commission with regard to system wide planning

(7) (a) …The statewide degree transfer agreements shall include provisions under which state **institutions of higher education shall accept all credit hours of acceptable course work for automatic transfer** from an associate of arts, associate of applied science, or associate of science degree program in another state institution of higher education in Colorado. The commission shall have final authority in resolving transfer disputes.

**C.R.S. §23-1-108.5.** Duties and powers of the commission with regard to common course numbering system

(5) **All credits earned by a student in any general education course** identified as corresponding with a course included in the course numbering system [gtPathways] **shall be automatically transferable among all higher education institutions** upon transfer and enrollment of the student… **The commission shall adopt such policies and guidelines as may be necessary for the implementation of this section. Each governing board shall modify its existing policies as may be necessary to accept the transfer of these credits**.

**C.R.S. §23-1-125.** Commission directive - student bill of rights - degree requirements - implementation of core courses - competency test - prior learning

(1) Student bill of rights. The general assembly hereby finds that students enrolled in public institutions of higher education shall have the following rights:

(a) **Students should be able to complete their associate of arts and associate of science degree programs in no more than sixty credit hours or their baccalaureate programs in no more than one hundred twenty credit hours** unless there are additional degree requirements recognized by the commission;

(b) A student can sign a two-year or four-year graduation agreement that formalizes a plan for that student to obtain a degree in two or four years, unless there are additional degree requirements recognized by the commission;

(c) Students have a right to clear and concise information concerning which courses must be completed successfully to complete their degrees;

(d) **Students have a right to know which courses are transferable among the state public two-year and four-year institutions of higher education**;

(e) **Students, upon completion of core general education courses, regardless of the delivery method, should have those courses satisfy the core course requirements of all Colorado public institutions of higher education**;

(f) **Students have a right to know if courses from one or more public higher education institutions satisfy the students' degree requirements**;

(g) **A student's credit for the completion of the core requirements and core courses** shall not expire for ten years from the date of initial enrollment and **shall be transferrable**…

(3) Core courses. The department, in consultation with each Colorado public institution of higher
education, is directed to outline a plan to implement a core course concept that defines the general education course guidelines for all public institutions of higher education. The core of courses shall be designed to ensure that students demonstrate competency in reading, critical thinking, written communication, mathematics, and technology. The core of courses shall consist of at least thirty credit hours but shall not exceed forty credit hours. Individual institutions of higher education shall conform their own core course requirements with the guidelines developed by the department and shall identify the specific courses that meet the general education course guidelines. Any such guidelines developed by the department shall be submitted to the commission for its approval. In creating and adopting the guidelines, the department and the commission, in collaboration with the public institutions of higher education, may make allowances for baccalaureate programs that have additional degree requirements recognized by the commission. If a statewide matrix of core courses is adopted by the commission, the courses identified by the individual institutions as meeting the general education course guidelines shall be included in the matrix. **The commission shall adopt such policies to ensure that institutions develop the most effective way to implement the transferability of core course [gtPathways] credits**.

(4) **Competency testing. On or before July 1, 2010, the commission shall, in consultation with each public institution of higher education, define a process for students to test out of core courses, including specifying use of a national test or the criteria for approving institutionally devised tests. Beginning in the 2010-11 academic year, each public institution of higher education shall grant full course credits to students for the core courses they successfully test out of, free of tuition for those courses**.

(4.5) **Prior learning. Beginning in the 2013-14 academic year, each public institution of higher education shall adopt and make public a policy or program to determine academic credit for prior learning.**

**C.R.S. §23-1-108(7)(a).** The commission shall establish, after consultation with the governing boards of institutions, and enforce statewide degree transfer agreements between two-year and four-year state institutions of higher education and among four-year state institutions of higher education.  Governing boards and state institutions of higher education shall implement the statewide degree transfer agreements and the commission policies relating to the statewide degree transfer agreements.  The statewide degree transfer agreements shall include provisions under which state institutions of higher education shall accept all credit hours of acceptable course work for automatic transfer from an associate of arts, associate of applied science, or associate of science degree program in another state institution of higher education in Colorado.  The commission shall have final authority in resolving transfer disputes.

**C.R.S. §23-1-108(7)(b)(II)(A).** …A student who transfers under a statewide degree transfer agreement may be required to complete lower-division courses that are part of the major, but are not part of the statewide degree transfer agreement, if taking the courses does not require the transfer student to take more total credit hours to receive the degree than a native student and does not extend the total time required to receive the degree beyond that required for a native student.

**C.R.S. §23-5-145.5.** Credit for work-related experience - plan - report - definitions - repeal.

…

(3)(a) On or before January 1, 2022, the council, in collaboration with the commission, shall create, adopt, and implement a plan, referred to in this section as the “plan”, to award postsecondary academic credit for courses in GT pathways or a statewide degree transfer agreement for learning demonstrated from work-related experience. In creating the plan, priority may be given to work-related experience that is responsive to workforce demands and growing industries identified by the most recent Colorado talent pipeline report prepared pursuant to section 24-46.3-103 or identified in consultation with the Colorado work force development council in section 24-46.3-101.

(b) The council, commission, or department of higher education, or any combination thereof, may seek, accept, and expend gifts, grants, or donations from private or public sources for the purposes of creating, adopting, and implementing a plan pursuant to this section. The plan shall not be created, adopted, or implemented unless sufficient money is available from gifts, grants, or donations to cover the costs of creating, adopting, and implementing a plan pursuant to this section.

(4) The plan must include:

(a) A process for assessing and aligning work-related experience to the knowledge and competencies required for awarding postsecondary academic credit for courses in GT pathways or a statewide degree transfer agreement, which credit granted must be transferable to another institution pursuant to commission policy regarding GT pathways or a statewide degree transfer agreement; and

(b) A process for evaluating credentials earned by a student at an area technical college pursuant to section 23-60-802 and determining how postsecondary academic credit will transfer from area technical colleges, if appropriate, to public two-year and four-year state institutions of higher education.

(5) The council, in creating the plan, shall consult with:

(a) Representatives of institutions, including, but not limited to, faculty members and registrars;

(b) Representatives of organizations that represent students in Colorado;

(c) Representatives of the Colorado work force development council;

(d) Representatives of industries with high workforce demand and growing industries identified in the most recent Colorado talent pipeline report and organizations representing them; and

(e) Representatives selected by the commission.

(6) Upon completion of the plan, the council, in collaboration with the representatives described in subsection (5) of this section, shall continue to work toward expanding opportunities for awarding postsecondary academic credit for learning acquired from work-related experience not otherwise addressed in this section.

(7) Beginning in the 2022-23 academic year, unless the plan is implemented prior to the beginning of the 2022-23 academic year, an institution shall accept in and transfer within the institution and to other institutions postsecondary academic credit awarded for work-related experience for a course that is GT pathways designated or part of a statewide degree transfer agreement.

**APPENDICES**

Appendix A: House Bill 20-1002 – signed Act, July 8, 2020

Appendix B: House Bill 20-1002 – final fiscal note, LLS 20-0409, July 28, 2020

Appendix C: CCHE Prior Learning Assessment Policy Recommended Revisions

Appendix D: Plan to Award Transferrable College Credit for Work-Related Experience