



COLORADO
Department of
Higher Education

Awarding Academic Credit for Prior Learning in Colorado's Public Institutions of Higher Education



2021

The Colorado Department of Higher Education

Report to the education committees of the Senate
and the House of Representatives

Statute: C.R.S. §23-5-145.5.



**This report was prepared by the
Colorado Department of Higher Education (CDHE)
pursuant to C.R.S. §23-5-145.5.**

September 2021

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Jared Polis
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As Colorado continues to recover from the pandemic, we must assist Coloradans in earning the postsecondary credentials they need for near-term employment and long-term economic stability.

One way to do that is by helping students earn credit for the learning that takes place outside of college. Studies show that students who earn credit for prior learning are more likely to complete their academic program and finish in a shorter amount of time compared to students who do not earn any credit for prior learning. Based on data from national studies, students in Colorado could potentially save \$5 million a year from expanded opportunities for prior learning credit.

In 2020, the General Assembly passed House Bill 20-1002 on awarding college credit for work-related experience. The legislation includes two mandates for the Colorado Department of Higher Education.

- Develop a plan to award transferrable college credit for work-based experiences by January 1, 2022.
- Conduct a study of expanding credit for prior learning opportunities at public colleges and universities, so that students could test out of any course in the undergraduate curriculum. This report is the fulfillment of this second legislative directive.

Colorado colleges and universities have awarded credits to students with work experience or specialized training—including military training—for more than 40 years. Since 2008, state-level policy has guided institutions on awarding academic credit for prior learning. Revisions and additions to policy over time have increased opportunities for students to earn credit from Advanced Placement, International Baccalaureate, the College-Level Examination Program (CLEP), DANTES Subject Standardized Tests (DSST), and military education and occupations. HB20-1002 extends this effort to work-related experience, including learning presented by an industry credential, technical certificate, or professional license.

A recent paper from the Western Interstate Commission on Higher Education (WICHE), recognizes the value of work-related experiences. In *Recognizing prior learning in the COVID-19 Era: Helping displaced workers and students one credit at a time*, the authors advocate for strategies that help workers earn new credentials of value efficiently, stating:

"...policies and practices in which institutions, employers, and students themselves can recognize and validate learning that takes place outside of the institution can and should be one focus of efforts to accelerate the recovery...from work experience, on-the-job training, formal corporate training, military training, volunteer work, self-study, and myriad other extra-institutional learning opportunities."

This report dives into institutional practices to award credit for prior learning, the potential costs to institutions of expanding these efforts, and the benefits to students and the state.

Sincerely,

A handwritten signature in black ink that reads 'Dr. Angie Paccione'.

Dr. Angie Paccione
Executive Director



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Executive Summary

House Bill 20-1002 directed the Colorado Department of Higher Education to conduct a study concerning awarding academic credit for prior learning within Colorado's public institutions of higher education and to report on these activities to the education committees of the Senate and the House of Representatives.

This report includes elements required by C.R.S. §23-5-145.5(2) including:

- I. The **processes** by which a student can receive academic credit for any course in the undergraduate curriculum, free of tuition, through prior learning assessment (PLA);
- II. The potential **benefits** to students of expanded credit for prior learning opportunities; and
- III. The potential **costs** incurred by institutions and the ability to recover said costs.

Processes

Since 2008, the state-level policy has guided institutions on prior learning assessment and awarding academic credit for prior learning (CPL)¹ when learning aligns with the college curriculum.

All public institutions in Colorado are compliant with current prior learning assessment policies.

Processes for assessing prior learning include national/standardized exams, local/challenge

exams, portfolio review, skill demonstrations, and other individualized assessments.

State law requires that institutions allow students to test out of courses within GT Pathways.

Institutions are not required to assess learning for other courses or offer portfolio review outside of the Joint Services Transcript, but many institutions voluntarily engage in a portfolio review at some scale.

¹ *Prior learning assessment* (PLA) is the evaluation of experiences outside of higher education for potential alignment with the college curriculum. *Credit for prior learning* (CPL) is the

awarding of academic credit when the learning is aligned. In this report, the two terms and acronyms are used interchangeably unless otherwise indicated.

Benefits

National studies by the Council for Adult and Experiential Learning have demonstrated that students who earn credit for prior learning (an average of 15 credits per learner) have better postsecondary outcomes than those who do not—they complete degrees at higher and faster rates than students without CPL. This can help Colorado reach its postsecondary attainment goals and also further close equity gaps in attainment.

Colorado in-state students can save an average of \$750 on a three-credit course earned via CPL

(based on Department data from 2020-21), which translates into a potential savings of \$3,750 for every 15 credits earned. If Colorado accelerated CPL for adult students in a manner that aligns with national studies, approximately 5,500 students would benefit, saving those students a total of over \$20 million in tuition and fees.

The costs of attendance associated with the time spent in college, including housing, other living expenses, and lost wages, would also be reduced as CPL students save an average of 9-14 months in school.

Costs

Costs to institutions vary substantially depending on the course that is challenged and whether the course had been challenged previously. In addition to faculty assessor time, institutions incur costs to develop and sustain a robust CPL infrastructure.

A reasonable estimate of costs across assessment methods is approximately one hour of faculty or assessor time for each credit awarded for prior learning. Using figures from national studies and state-level salary data, institutions statewide would incur faculty costs of approximately \$1 million annually.

Assuming 2.0 FTE per institution is required for effective administration and support of expanded CPL processes, institutions would incur additional costs of approximately \$6.2 million annually (assuming \$100,000 in annual costs per FTE), bringing total institutional costs statewide to approximately \$7.2 million annually.

Students with CPL credit earn an average of 17.6 more credits from their institutions than students without CPL credit. Institutions that expand CPL have the potential to generate an average of \$4,400 per student in additional revenue through tuition and fees; applying this figure to institutions statewide would result in revenues of approximately \$6 million annually.

The benefit-cost analysis suggests that adult students in Colorado could save \$5 million annually from expanded PLA processes that enable testing or assessing out of any course in the undergraduate curriculum. Institutions would incur annual costs of approximately \$7.2 million compared to potential revenue gains of \$6 million. Charging students an administrative fee of 25% of tuition and required fees could generate \$1.25 million annually, making CPL a potentially revenue-neutral practice for institutions.

Introduction

Project Background

House Bill 20-1002 included two mandates related to work-based experience. The first is a charge to the General Education Council—in collaboration with the Colorado Commission on Higher Education—to develop a plan to award transferrable college credit for work-related experience, including experience that may lead to an industry credential, technical certificate, or industry license. The second mandate directs the Colorado Department of Higher Education to conduct a study concerning awarding academic credit for prior learning (CPL) at Colorado’s public institutions of higher education² (including learning from work-related experience) and to report these activities to the education committees of the senate and the house of representatives. This report is the fulfillment of that legislative directive. The report includes the elements of the required report listed in section 23-5-145.5(2), Colorado Revised Statutes, namely:

- I. Identify and describe the processes by which a student can receive academic credit for any course in the undergraduate curriculum, free of tuition, through successful completion of a portfolio assessment, individual assessment, examination, or any combination thereof that is appropriate to the learning outcomes of the course.
- II. Identify and describe the potential benefits to a student, including but not limited to impact on the student’s overall attendance cost, whether a policy would accelerate the time to complete a postsecondary credential, and the impact on the state’s goal to increase credential attainment rates.
- III. Identify and describe the costs to institutions to develop and maintain processes to grant academic credit to a student for prior learning and the ability to recover administrative costs from students' requestion the prior learning assessment.

² In this report, the term “community colleges” is used to refer to institutions within the Colorado Community College System as well as Aims Community College and Colorado Mountain College. The term “universities” is used to refer to all of Colorado’s public universities and Fort Lewis College.

Assessing and Awarding Credit for Prior Learning

The Council on Adult and Experiential Learning (CAEL) defines prior learning assessment as *the evaluation and assessment of an individual's life learning for college credit, certification, or advanced standing toward further education or training*. The Colorado Community College System adds that prior learning includes *the knowledge or skills that have been attained outside the traditional academic environment and that have not been previously evaluated for and awarded college* (CCCS <https://internal.cccs.edu/academic-affairs/academic-initiatives/prior-learning-assessment/>).

The practice of assessing learning for college credit has been around for decades: CAEL first published guidance on this practice in the 1970s and produced a seminal study in 2010, *Fueling the Race to Postsecondary Success*, which demonstrated the significant impact of CPL on students' ability to complete a college degree or certificate.

The results of the study, which examined the effect of CPL on student outcomes at 48 higher education institutions, indicated that CPL students had better graduation rates and persistence compared to students who did not receive CPL credit and that CPL students also completed their degrees in a shorter period. The report also examined institutional CPL policies that had the greatest impact on student degree completion.

Students who earned credit through CPL were 2-3 times more likely to complete a certificate or degree (Klein-Collins, 2010). This was true regardless of institutional size or level (two-year or four-year); institutional control (private not-for-profit, private for-profit, or public); the student's assessed academic ability or grade point average; the student's age, gender, or race/ethnicity; and whether the student received financial aid.

Students who earned credit through CPL were 2-3 times more likely to complete a certificate or degree.

In 2020, CAEL produced a follow-up study in partnership with the Western Interstate Commission for Higher Education (WICHE). *The PLA Boost* involved a larger set of participating colleges and 230,000 adult students (Klein-Collins, et al., 2020), and affirmed the results of the 2010 study in articulating the significant impact of CPL on student success. In a companion piece to this study, the researchers noted the importance of expanding CPL efforts in the COVID-19 era:

The recovery from the pandemic and related economic downturn will take years, not months...with a large number of displaced workers, re-skilling and up-skilling must be part of the solution, and policies and practices that can help these workers efficiently earn new credentials of value will be a crucial part of the recovery. Policies and practices in which institutions, employers, and students themselves can recognize and validate learning that takes place outside of the institution can and should be one focus of efforts to accelerate the recovery...from work experience, on-the-job training, formal corporate training, military training, volunteer work, self-study, and myriad other extra-institutional learning opportunities.

Principles of Practice in Credit for Prior Learning

CAEL has identified [10 Standards for Assessing Learning](#) and [10 Principles for Effectively Serving Adults](#) that create a framework for best practice in providing CPL opportunities to students. Taken together and informed by additional experience from the field, a set of guiding principles can be generated for successfully offering CPL to adult students. The best practices associated with these principles were used to frame the study of current practice in Colorado.

CPL Guiding Principles

1 Access to Opportunity and Transparency of Process

Access to CPL opportunities includes removing institutional barriers to the assessment of prior learning, reaching out to students and offering support, ensuring equitable access to information across all constituents (*e.g., students, staff, faculty*), and consistent messaging to avoid miscommunication. Transparency means that the information is well documented and accurate and is readily available in a manner that does not require an extensive search of institutional websites. Transparency also means that students have what they need to make informed choices before engaging in course challenges or portfolio review, and that faculty have access to the information they need to conduct evaluations and share resources with students and with faculty colleagues. Local functional teams support the flow of information to students and staff and ensure equity across departments, especially if the institution operates with a decentralized, department-specific process.

2 Defined Competencies and Multiple Measures of Assessment

Standardized practices in defining knowledge and competencies within the institution (*and ideally, within and across industries*), is essential for the assurance that learning developed outside of the higher education context is truly college level and applies to a given course or program of study. The creation of assessment rubrics associated with these competencies supports the equitable evaluation of learning. The use of multiple measures of assessment to include standardized and locally developed exams, skill demonstrations, portfolios, and personal interviews help to ensure equity across student demographics and sources of learning.

3 Maximizing Credit Applied to Degree Pathways

Students are not well served by the awarding of credit for prior learning that does not “count” toward a degree or certificate. The minimal use of elective credit ensures that CPL accelerates the student’s work toward program completion while authentically recognizing knowledge, skills, and abilities. Careful consideration of credits awarded regarding the program of study, financial aid, and future transfer implications must be part of the work of faculty and registrars in supporting students.

4 Evaluation by Faculty and Industry Subject Matter Experts (SME)

Assessment of competencies from prior learning should reflect the depth and breadth developed through the academic curriculum. To create a professional practice in the assessment of prior learning, faculty should be offered professional development opportunities to identify competencies, create assessments, review student portfolios, and evaluate industry training and credentials. Efficiencies of scale—such as through the development of credit crosswalks and repositories of developed assessments—are necessary to minimize the workload impact of PLA on faculty and staff and to build trust across the institution.

5 Low Cost to Students with Available Payment Options

The operational costs of credit for prior learning are not based on tuition costs; rather, they reflect the real cost of faculty time to create assessments and review portfolios, and administrative support of operating a CPL system. Fees for specialized assessments and portfolio reviews are usually assessed to students regardless of the outcome (whether a credit is awarded or not). Given the up-front costs to students, they ideally would be supported through financial aid or another student fund created for PLA purposes. Different payment options such as installment plans also help to promote access to credit for prior learning opportunities.

6 Supportive Institutional Leadership

Supportive institutional leadership is best demonstrated through providing resources for CPL activities. Colleges and universities that are successful with CPL implementation have dedicated staffing or designated funds for faculty and staff compensation to conduct the assessment. Colleges with exemplary CPL offerings see the ROI of supporting CPL upfront and the subsequent revenue through increased tuition dollars from persisting students and the positive completion metrics that brings.

Credit for Prior Learning in Colorado

Since 2008, the state-level policy has guided institutions on prior learning assessment and awarding academic credit for prior learning. Revisions and additions to policy over time have increased opportunities for students. Current state law and commission policy addresses Advanced Placement, International Baccalaureate, the College-Level Examination Program (CLEP), DANTES Subject Standardized Tests (DSST), military education and occupations, and other learning that appears on the Joint Services Transcript issued by the United States Department of Defense. Additionally, state law requires that institutions allow students to test out of courses within GT Pathways either through national/standardized exams or through institutionally developed challenge exams.

At present, institutions are not required to assess learning presented through a portfolio beyond that which appears on a Joint Services Transcript. Many institutions do voluntarily engage in a portfolio review at some scale. In some cases, students are required to take a course that teaches them how to inventory their past experiential learning, how to identify a course or courses that align best with their accumulated learning, and how to develop a portfolio and make their case for course credit. Colorado colleges and universities have awarded credits to students with work experience or specialized training—including military training—for more than 40 years. Public and institutional policy has evolved to help organize this work in all public institutions of higher education. The Advanced Placement (AP) and International Baccalaureate (IB) programs are probably the best known and most broadly accepted forms of prior learning awarded for credit.

The first public policy to call out prior learning was the Student Bill of Rights (2008) which stated that students have the right to challenge general education courses to “test out” without paying tuition. This was later revised (in 2016) to specify

“core courses,” which are those general education courses that are part of the GT Pathways, the statewide transfer curriculum for general education.

In 2015, the Colorado Community College System Board approved a system-wide policy for PLA Credit. The Colorado Commission on Higher Education (CCHHE) followed suit with a revision of its policy on prior learning assessment to include at learning documented on the Joint Services Transcript, following HB17-1004 and directives related to learning demonstrated through military service (see <https://cdhe.colorado.gov/get-credit-for-what-you-already-know>). Most recently, [HB20-1002](#) directs the Commission to create a statewide plan for aligning work-related experience with transferrable academic credit that counts toward a student’s postsecondary credential.

All the policies associated with CPL identify the benefit of prior learning assessment for students, the need to have transparent practices that can be easily accessed by students, the requirement of institution-specific policy and procedures, and the acceptance of [Guaranteed Transfer Pathways \(GT\)](#) credit in transfer among public institutions regardless of how the credit is earned. Community college system institutions operate under a shared PLA credit manual and have standardized their CPL delivery based on this and system board policy. As is often the case, the two local district colleges in the state have mostly emulated CCCS Policy.

Four-year institutions in the state have local policies and procedures associated with meeting the requirements of state statute. All colleges are required to document the process in place for the evaluation of prior learning that is documented on the Joint Services Transcript (JST). Beyond this, public institutions are not currently required by statute or commission policy to evaluate student portfolios.

Research Methodology

National Data

This report includes a landscape analysis of existing CPL practices at Colorado's degree-granting colleges and universities. A review of national and regional research and exemplars of CPL program offerings across the country was used to identify best practices as defined previously. Colorado's current practices were examined with the principles articulated earlier; these same principles were used to formulate recommendations for sustainability and improvement.

The literature review included both peer-reviewed articles and professional publications from national, state, and regional sources. The availability of research materials specific to Colorado was limited to information associated with Colorado's Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant activities (McKay and Douglas, 2020), which includes only the state's community colleges.

While Colorado CPL student performance measures are not yet available for review, data being collected will soon be available for review by the community college system. Additionally, Department staff have been working with institutional registrars and research officers to develop a more robust CPL-related data collection system per commission policy.

The benefits to students of CPL were identified through national data; given the large, national dataset used for both 2010 and 2020 studies by CAEL, it is reasonable to extrapolate findings to the Colorado context and expect that statewide impact will not be different from those seen on a national scale.

Colorado-Specific Data

The review of processes in place at Colorado institutions included:

1. A review of institutional websites and other published materials related to CPL opportunities, policies, procedures, and costs. This was done to experience the student perspective of the process aligned with the best practices of accessibility and transparency.
2. A survey was sent to institutions. Recipients were asked to answer a series of questions related to their institutional practice (see survey questions in appendix). This information was collected to assess alignment with best practices of access and transparency, course equivalency considerations, low cost, and payment support.
3. Following submission of the survey responses, designated contact persons were interviewed with qualitative questions related to the operability of CPL on their campuses and their perceptions of opportunities and barriers associated with expanding CPL practices (see interview questions in appendix). These addressed the best practices associated with access and transparency, course equivalencies, faculty evaluation, and supportive institutional leadership.

Research Results

Insights from the Literature

Institutions across the country are expanding their offerings to a growing adult student population. Journal articles, books, professional conference presentations, papers from trade associations and non-profit organizations, and college and university websites offer insights into what institutions are doing, what they identify as barriers to implementation, and how they are setting goals for continuous improvement.

POTENTIAL BENEFITS: *National Data*

In 2020, CAEL partnered with the Western Interstate Commission for Higher Education (WICHE) on the study *The PLA Boost* (Klein-Collins, et al., 2020), which explored the benefits of CPL for adult learners. The study included data gathered from 72 postsecondary institutions and 230,000 adult students. Data showed that *having PLA credits is associated with better student outcomes like higher credential completion, cost savings, and time savings. Further, PLA boosted completion rates for adult students of color, low-income adult students, and adult students across the academic performance spectrum.*

This report represents the best data available on CPL and student outcomes. The outcomes first identified in the *Fueling the Race* report are further supported in *The PLA Boost*; students who earn CPL persist and complete certificates and degrees at higher rates in a shorter amount of time. Additionally, they generate additional revenue for institutions through improved retention compared to students without CPL. Hispanic students, Pell Grant students, and adult students at community colleges had higher completion rates from CPL than students overall.

PLA boosts adult student completion rates
<ul style="list-style-type: none"> • 17% greater than students without PLA • But only 11% of adult students earned college credit through PLA
PLA can help close equity gaps in completion
<ul style="list-style-type: none"> • Hispanic adults 24% boost in completion • Pell Grant Recipients 19% • Adult at community colleges 25%
On average, students earned
<ul style="list-style-type: none"> • 15 PLA credits • 12 PLA credits through methods other than military credit
Time savings
<ul style="list-style-type: none"> • 9-14 months for degree earners with 12 or more PLA credits compared to students without PLA credit
Save money
<ul style="list-style-type: none"> • \$1,500-\$10,200 estimated savings for adult students across different types of institutions
Institutional gain:
<ul style="list-style-type: none"> • Adult students with PLA end up taking on average 17.6 additional course credits
Adult student credential completion rates
<ul style="list-style-type: none"> • 49% with PLA • 27% without PLA

Extrapolating from national data to the state context enables an estimate of the potential benefit to Colorado students. Using Department of Higher Education data from Fall 2019, just over 50,000 students enrolled in degree-granting public colleges and universities were adults aged 25 and older. If Colorado accelerated CPL for adult students at the same rate as found in national studies (11% of the cohort), approximately 5,500 students would benefit. Using the 15-credit average noted above would translate to a potential savings of \$3,750 per student, based on average tuition and required fees at public institutions, for a total student savings of over \$20 million. The costs of attendance associated with the time spent in college, including housing, other living expenses, and lost wages, would also be reduced as CPL students save an average of 9-14 months in school.

Given that students with CPL credit earn an average of 17.6 more credits, institutions that expand CPL have the potential to generate an average of \$4,400 per student in additional revenue through tuition and fees (before accounting for financial aid and other discounts). Assuming this per-student revenue is generated over four years, this translates into approximately \$6.2 million annually.

BEST PRACTICE: *Policy Leadership*

The National Conference of State Legislators published a review of best practices in state CPL policies in 2020. Among the exemplars cited was Colorado's [HB17-1004](#) military credit legislation. Other examples included Mississippi with legislation related to credit for apprenticeships, Florida for a cross-sector approach to awarding work-based learning credit, and California with its community college system approach to centralizing policy and procedures.

BEST PRACTICE: *Defined Competencies*

SUNY Empire State University has published a myriad of resources and research associated with developing and assessing course competencies and outcomes. Their Global Learning Qualifications Framework (GLQF), an open-sourced resource for students and faculty, guides the process of identifying and assessing learning for college credit (SUNY GLQF, 2021).

The work of the National Centers of Academic Excellence in Cybersecurity (CAE-CDE) is an excellent example of a partnership among government, industry, and higher education in developing a closely aligned competency framework. Higher education institutions across the country, including Colorado, gain Center of Excellence status through adherence to teaching and assessing a shared set of competencies or knowledge units. The use of this framework in assessing cybersecurity credentials creates a better defined and nationally transparent path to credit for adult learners.

BEST PRACTICE: *Multiple Measures*

SUNY Empire State is also nationally known for its practice of enrolling and supporting students in a CPL portfolio process when they enter the institution (Benke, et al., 2012). The basic tenet of this work is that learning needs to be recognized no matter where it occurs. To this end, Empire State offers mentorship support in developing a PLA portfolio to be used as the foundation of the student's individualized learning program design. On average, SUNY bachelor's degree students earn 36 advanced standing credits through CPL. Associate degree candidates earn an average of 23 advanced standing credits. The volume of portfolio development and assessment at Empire State is unparalleled and offers a clear picture of how technology can expand CPL offerings while minimizing the institutional cost and staff time typically required.

BEST PRACTICE: *Access and Transparency*

Ivy Tech Community College in Indiana is notable for offering outward-facing information sources to students on CPL for assessments, military experience, and work-based learning through its website (<http://www.ivytech.edu/pla>). The process for accessing prior learning assessment opportunities is simple, straightforward, and well supported by institutional staff. Students are given the guidance they need throughout the process; a series of efficiencies are in place to keep students moving through the steps to assessment.

Ivy Tech is also a leader in the nation with its series of published PLA Credit Crosswalks. Significant work by Ivy Tech faculty has resulted in a shared repository of evaluated credentials, courses, and exams to give students consistent information and to minimize the duplication inherent in the evaluation process across colleges.

Credit for Prior Learning in Colorado

All of Colorado's 29 public degree-granting institutions of higher education were included in the study of CPL.

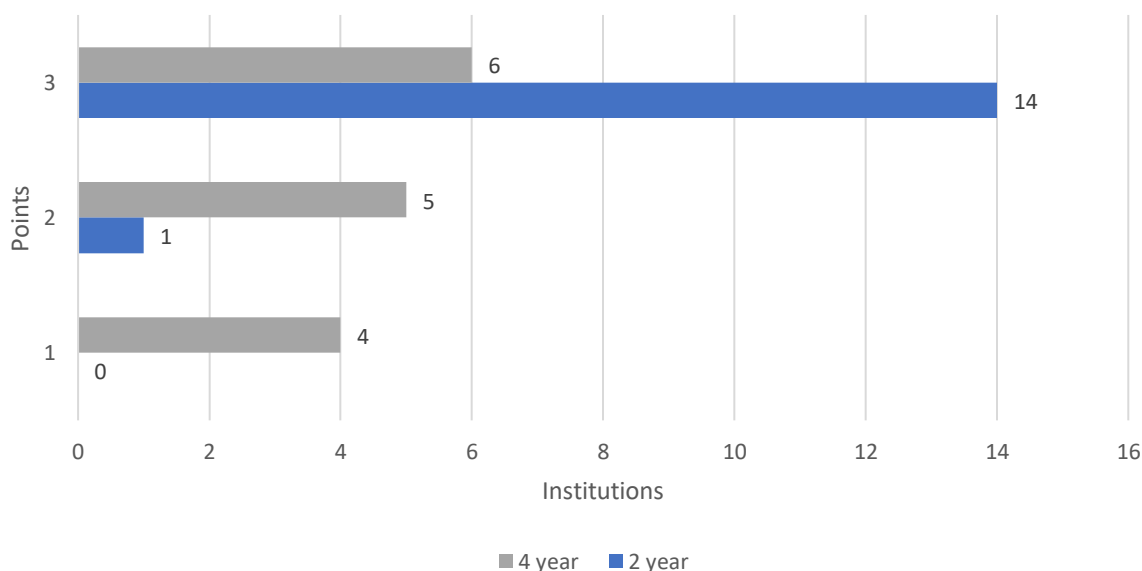
Search of Websites

To obtain a snapshot of the transparency of a CPL process, a "passive search" was conducted using the websites of institutions. To emulate the student experience, search terms such as "credit for prior learning", "prior learning assessment", "credit for work experience", and "credit for what I already know" were entered. Institutions were given one point each for the availability of general CPL information, specific application process information, and available contact information. The scores were equated to a transparency scale with one point being least transparent and three points being most transparent.

A good majority of institutions had student-facing information that could easily lead to available opportunities. Those that excelled in this had navigable information and application processes that welcomed students and underscored the value of their prior learning. In many instances, though, specifics about the process of applying for CPL evaluation were absent or students were referred to the associated department without specific contact information. Nearly all of the community colleges surveyed earned three points, while universities (including Fort Lewis College) were grouped fairly evenly by one, two, and three points.

In compliance with Commission policy, all the institutions had information on their websites about the Joint Services Transcript with specific guidance for active military and veterans.

FIGURE 1: Website Search



Survey of Institutions

A survey inquiring about CPL practices was administered to public institutions of higher education in Colorado. The survey inquiring about CPL practices was sent to all public institutions of higher education in Colorado. The survey was sent to persons designated by the chief academic officer at the 29 institutions (13 CCCS institutions, 2 local district colleges, and 14 universities, including Fort Lewis College and CU Anschutz). All 29 institutional representatives completed the survey.

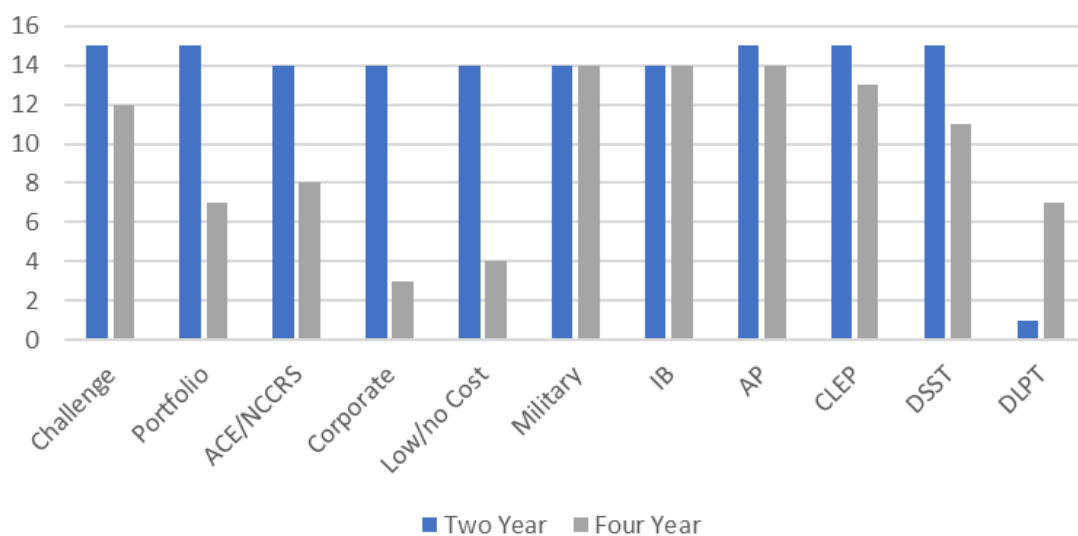
Process Related Questions and Responses

CPL METHODS

Question 1 asked institutions to identify which CPL assessment methods they currently offer. The choices included: national/standardized exams, local/challenge exams, portfolio review, American Council on Education (ACE)/National College Credit Recommendation Service (NCCRS), local evaluation of corporate training, and low/no-cost online courses, and credit for military training and experience. Given state requirements for credit awards for Advanced Placement (AP), International Baccalaureate (IB), and the College-Level Examination Program (CLEP), it was not surprising to learn that all institutions offer these methods of assessment (see the Department’s credit crosswalks at <https://cdhe.colorado.gov/get-credit-for-what-you-already-know>). The majority also accept the DANTES Subject Standardized Tests (DSST) and Defense Language Proficiency Tests (DLPT) even when they don’t appear on the Joint Services Transcript or the specific exams do not appear on published Department crosswalks.

The remaining assessment methods offered differed between community colleges and universities. Community colleges were slightly more likely to offer challenge exams for courses outside of GT Pathways and were significantly more likely to offer portfolio assessment and evaluation of work-based training and industry credentials. Incomplete data reflects CU Anschutz's status as a mostly graduate-level division within CU Denver.

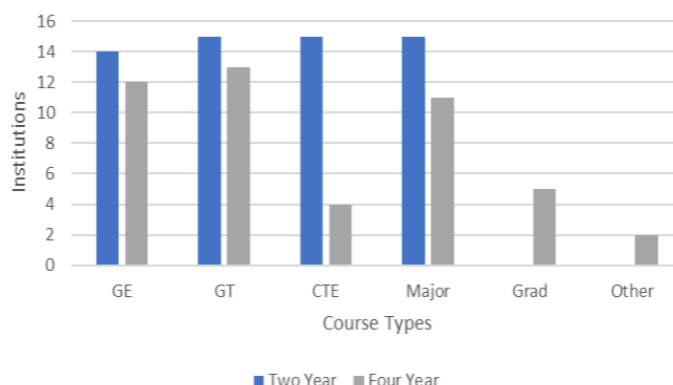
FIGURE 2: Methods of CPL Offered



Process Related Questions and Responses
Courses Available for CPL

Question 2 asked what courses institutions make available for CPL assessment requests. Response options included GT Pathways, other general education (GE) courses, career, and technical education (CTE) courses, courses in the major, graduate-level courses, and others not listed. Again, in keeping with state policy, institutions reported that they allow CPL challenges for GT and other GE courses. CCCS institutions, in compliance with CCCS Board policy, evaluate CPL challenges for all courses offered.

FIGURE 3: Course Types Available for CPL

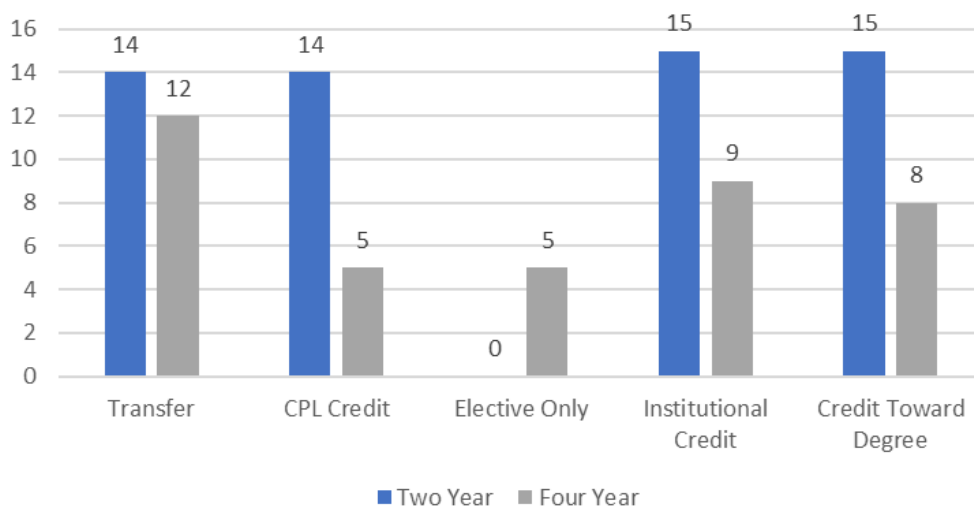


Process Related Questions and Responses
Transcription

Question 3 asked institutions to identify how the credits students earn through CPL assessments are reflected on the student transcript. The available options were as general transfer credit (and its attendant requirements), as elective credit only, as institutional credit that counts toward residency (as required for equivalencies earned through local challenge exams), and/or as credit toward a degree program.

This is another area of consistency supported through state-level guidance in that the Colorado Registrars Council is an organized stakeholder group through CDHE and adheres to the same general transfer policies and principles. The one area that stands, in contrast, is the transcription of CPL credit as elective-only credit reported from some universities.

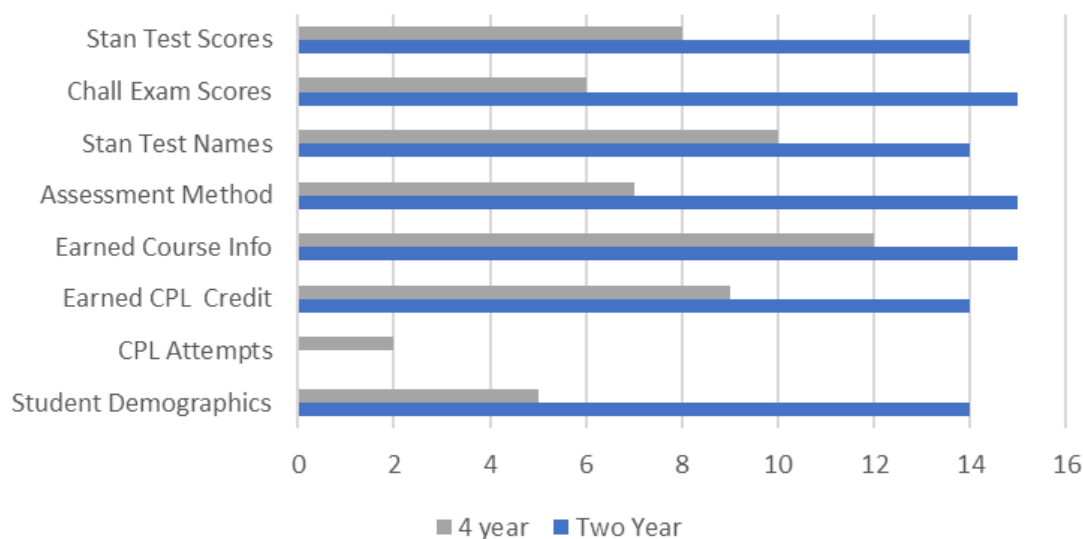
FIGURE 4: Credits reflected on transcript as



Process Related Questions and Responses
Data Collection

Question 4 asked institutions what data they routinely collect in relation to CPL. The choices were: standardized test scores, challenge exam scores, standardized test names, assessment method used, earned course information, earned CPL credit, CPL attempts, and student demographics.

FIGURE 5: Data Collected



CCCS system procedures are specific about the CPL data required to be entered into the student information system so all CCA institutions, along with one of the local district colleges, collect the same information. Roughly half of the universities are collecting the same data as their community college counterparts.

Process Related Questions and Responses
Student Fees

Institutions were asked three questions related to the costs of offering or accepting credit for prior learning. They were first asked to identify what fees are charged to students who apply for CPL. The question was broken down according to the method of assessment with choices being standardized tests, ACE/NCCRS, challenge exams, portfolio review, military transcript, local evaluation of low/no-cost online courses, and local evaluation of industry training.

The CCCS System representative did not provide answers for individual institutions, instead pointing to the CCCS PLA Credit Policy which limits the fees assessed to less than 50% of the cost of tuition for the same course. As of the writing of this report, the CCCS PLA Committee is working on a proposed revised system-wide fee structure. In the meantime, individual colleges determine their charges. A quick review of available information on CCCS college websites indicates that colleges charge fees only for challenge exams and portfolio reviews, although fees vary by institution.

Most institutions reported that they do not charge fees to students for standardized test scores, ACE/NCCRS recommendations, military transcript evaluations, or local online courses, or industry training evaluations. The cost of administering standardized tests is charged by the entity that provides the test and is not considered a CPL fee.

The two assessments that most often incur fees for students are portfolio reviews and challenge exams. This makes sense as they require more direct faculty time and effort than other options. Challenge exams range from free of charge up to the full resident tuition charged for the course. Portfolio review fees are typically charged per portfolio and may depend on the number of credits earned through the review. Fees reported ranged from nothing to \$379 and may require the student to also enroll in a course that guides them through the process of assembling a portfolio (toward which financial aid can generally apply).

It is common practice to assess fees for portfolio review regardless of the outcome of the assessment. This is done to protect the integrity of the process so that payment to portfolio evaluators is not dependent on the outcome of the review.

Process Related Questions and Responses
Institutional Costs

Respondents were next asked to identify positions and departments that provide direct services during a typical CPL process. They were given a list of tasks and asked who might carry them out.

Task	Responses
Intake	Advising, admissions, academic departments, marketing
Advising	Academic advisors, transfer and evaluation coordinator, registrar’s office staff
Test Administration	Academic division or individual departments, campus staff proctors, testing center
Portfolio Evaluation	Content specialist (usually faculty), dean or faculty within departments, department chair
Industry Training Evaluation	Academic division, faculty mentor and department, national evaluations, other faculty
Transcript Evaluation	Transcript evaluators, registrar’s office, academic records coordinator

Then, institutions were asked about the administrative costs associated with CPL. The question of “what are the administrative costs of CPL at your institution?” was broken down into four parts: 1) an estimate of costs related to the people/positions they identified in the previous question; 2) whether they have specific positions dedicated to CPL; 3) if they could identify a per-student cost to the institution for the CPL process, and 4) suggestions for determining a per-student cost. Costs were estimated to vary widely depending on the type of course for which credit was being sought, with upper-division, clinical, and highly technical courses costing much more.

Of the 29 institutions, 8 did not provide an answer to this part of the question. The 13 CCCS colleges were represented with one answer: “*We have a rough figure of what it costs the institution to go through a CPL process however this varies by type (e.g., industry experience vs. challenge exam.*” A few institutions described what would go into a cost calculation, including *the time and expertise required to develop (the) process and determine overall costs*. Costs identified including human resources from academic departments, the provost’s office, and the registrar’s office to manage the evaluation of portfolios and award degree-applicable credit. Institutions also noted faculty stipends for creating exams and assessing portfolios.

The most detailed cost projection specifically referenced CPL assessment of clinical experiences, which would require faculty time to assemble, conduct, evaluate, and disassemble a clinical simulation, as well as significant one-time costs in creating an Objective Structured Clinical Examination, estimated to take 40 hours per course.

Most institutions indicated that their institution had not established an estimate for per-student costs to the institution for CPL. Some provide information on where costs may be incurred and how they might be able to project them.

Key Cost Variables

- Many institutions have operationalized the costs of offering CPL on their campuses through a student fee structure that compensates faculty assessor time for portfolios and challenge exams. However, this revenue doesn’t always pay for the non-assessment support costs associated with CPL. Most of the administrative tasks of CPL are those which are normally included within regular college operations: advising, admissions, and transcript evaluation, for example. The process of expanding these services would result in increased costs across the institution, not just in the cost of training and compensating evaluators.
- Costs will vary substantially depending on the course that is challenged and whether the course had been challenged previously. Laboratory, clinical, and highly technical courses will require greater resources to develop challenge exams or other specialized assessments. The cost of developing a new assessment—or creating a process for a course that is being challenged for the first time—will be much higher than the costs for each subsequent student. Some assessments require more direct involvement of faculty or professional staff. Other variables like existing articulation agreements, the number of credits involved, the number of institutions and sources of learning to be processed, and the depth of advising required also influence the institutional costs.

- The costs for each step of the process will need to be evaluated before a per-student cost is established. This will vary from institution to institution depending on local practices. Institutions could conduct a time and effort evaluation of all staff involved in the CPL process and apply that dollar value against historical student usage to get a projection of utilization for a per-student cost.
- Demand for new services will influence institutional costs and will require program startup funds followed by sustaining resources. Institutions reported needing at least one new full-time person to administer a portfolio review process, on top of the costs required to create a process and the infrastructure required.
- A reasonable estimate of costs across assessment methods is approximately one hour of faculty or assessor time for each credit awarded for prior learning. Using figures that extrapolate from national studies, 82,500 credits could be awarded across public institutions in Colorado to the current cohort of adult students if CPL was fully implemented. Given an hourly rate of \$50 (based on average faculty salaries), this translates into a total institutional faculty cost of \$4,125,000 million, or approximately \$1 million annually assuming an average time-to-degree of four years.
- Best practices in developing and sustaining CPL programs suggest that colleges work to include CPL in business plans and operating budgets. Assuming 1.0 FTE per institution devoted to central coordination and administration of CPL processes and 1.0 total FTE for additional support functions across administrative roles, the total administrative costs across 31 institutions would be approximately \$6,200,000 million annually (assuming \$100,000 in annual costs per FTE).
- If a 25% cost recovery fee were assessed of students (based on estimated student cohort savings of \$20 million) total annual costs incurred by institutions would be approximately \$6 million.

Interviews

Individual interviews were conducted with the designated contact persons for each institution as a follow-up to the survey. Participants were asked five questions:

1. Do you have any local data related to student success and CPL?
2. Do you have rules relating to non-GT credit earned via CPL in articulations?
3. What thoughts do you have on the opportunities and barriers to developing a process articulated in HB20-1002, namely one *by which a student can receive academic credit for any course in the undergraduate curriculum, free of tuition, through successful completion of a portfolio assessment, individual assessment, examination, or any combination thereof that is appropriate to the learning outcomes of the course?*
4. What are your thoughts on the costs to institutions for developing and maintaining a CPL process?
5. What additional information would you like to provide on potential CPL expansion?

Interview Responses

1. Do you have any local data related to student success and CPL?

As noted earlier in the survey, most colleges and universities are collecting some of the data associated with CPL, although in a manner that differs from institution to institution. This question asked respondents if the data was being used to create reports on the relationship between CPL and student success.

None of the respondents were aware of any routine institutional studies being done on the CPL data they collect. One institution identified two internal studies of AP student progress in calculus and rhetoric, which were conducted to gauge student readiness for subsequent coursework. The data was not made public.

Interview Responses

2. Do you have rules relating to non-GT credit earned via CPL in articulation agreements?

None of the institutions interviewed have any explicit language in their local articulations that would preclude the use of CPL in transfer. All reported a long-standing process of accepting the designated courses into the appropriate department based on the specifics of the articulation agreement without further evaluation at the receiving institution. All were asked to provide a list of current local articulations. (*See the compiled list of submissions in Appendix.*)

Interview Responses

3. Participants were read the following quote from HB 20-1002:

The department shall study *“the process by which a student can receive academic credit for any course in the undergraduate curriculum, free of tuition, through successful completion of a portfolio assessment, individual assessment, examination, or any combination thereof that is appropriate to the learning outcomes of the course.”* They were then asked to respond with their thoughts on the opportunities and barriers that might be presented by this process as described.

Opportunities Described:

Most respondents led with the benefits of expanded PLA opportunities to students, including a combination of lower cost and less time-to-degree. There was also mention of the special support and expanded process that could offer adult students coming from the workforce. The ease of entry afforded by a process was seen as a way for these students to better connect to education and workforce pathways in the state. The potential improvement in student communication was also seen as a plus. Finally, more than a few respondents called out the opportunity to support equity efforts through CPL.

- Meeting students where they are and advancing their success. Enhances student success, creates opportunities to advance in a system that values them. Work will impact BIPOC and military members. Can be used as a way of advancing equity goals. Leverage skills, strengthen transfer pathways.
- Allows students to smoothly streamline CPL into the institution. Will get more students in the pathway via recruitment.

Barriers Described:

Concerns about expanding the CPL process centered around a few primary themes:

Faculty and staff compensation and capacity.

Respondents had strong concerns about faculty workload and compensation. The perceived work that would be involved in expanding the types of assessments offered and increasing the scope to include all courses in the undergraduate curriculum was seen as prohibitive. While all saw the activity as a plus for students, some saw it as an additional burden for already stretched staff (after nearly 18 months of stress related to the COVID-19 pandemic).

Some expressed a fear of lowering course quality and rigor, and that the endorsement of skills not learned at the college would create a disadvantage for students as they move forward in their program of study and struggle with subsequent courses in the curriculum.

- **Lack of sufficient resources.**

Across most institutions, there was a concern that the lack of designated CPL funding would undermine the process. Many have expectations of investing significant resources in creating CPL processes with minimal uptake of the opportunity by students.

The additional cost and required capacity to assess laboratory and clinical work for students with work-related learning were voiced by many, especially those institutions with health care programs and large STEM majors.

- **The decentralized nature of the current practice.**

While a few institutions have positions or offices that manage the CPL process for an entire campus (and CCCS has a common policy and procedures for all colleges), many institutions have decentralized practices that give the responsibility of assessing prior learning to individual academic departments. While this ensures the input of faculty with expertise closest to the course and the learning being assessed, it also creates a lack of consistency across the institution that can negatively impact students.

- **Concern about the breadth of an expanded process.**

Respondents from some universities noted that the courses that would most likely be equivalent to the learning represented in portfolios (such as industry credentials) are not part of academic programs they offer and therefore would not be relevant to a student's program of study.

Establishing too broad of an opportunity for CPL was seen as potentially a negative for students if they end up paying money for evaluation and not receiving any credits that apply toward a degree program. The current practice of some institutions of transcribing CPL courses only as free electives could also lead to credit overloads that have negative consequences for financial aid eligibility.

Interview Responses

4. What are your thoughts on the costs to institutions for developing and maintaining a CPL process?

None of the colleges reported having a business plan that explicitly provides for CPL staff and faculty support or identifies a specific cost or revenue stream. Those with defined CPL job tasks in place routinely view these as part of the rest of the responsibilities of existing staff (e.g., registrars, transcript evaluators, advisors).

Uptake/Demand:

More than one respondent voiced concern over the potential increase in demand for assessments while others believed there was already minimal uptake and that the potential demand would not be worth the extra effort and funding. There is a lack of data to test either of these suppositions.

Funding/Compensation:

Respondents shared that funding is key to developing and sustaining CPL opportunities. Most saw this as the need for increased faculty compensation for assessment activities. Projected cost increases included adding staff positions or expanding existing job descriptions and compensation. Comments included the need to identify where increased workload issues might arise for staff and be prepared to expand capacity to meet demand.

Some expressed concern for the negative effect on the college's business bottom line. To some, the return on investment for the institution was seen as uncertain and concerning—that insufficient data is available to ensure that the institution won't lose

student enrollment revenue, including tuition and on-campus housing fees, for example, without gaining back revenue in some way. Again, local data is not available to test these suppositions.

Staffing and Sustainability:

More than one respondent identified the need for a funded CPL Coordinator position (1FTE) at each institution. They saw this as a vital requirement to standardize the practice and communicate more broadly. Feedback indicated that the current practice of using student assessment fees to pay for CPL activities is not sustainable at scale; the cost to students would be too high and would negate the cost-saving benefits of CPL for students.

Some reported that there are few resources available for portfolio development and assessment since requests historically have been sporadic. Many respondents expressed concern that there is no way to predict demand, including how many and which kinds of assessments might be requested.

Interview Responses

5. What additional information would you like to provide on potential CPL expansion?

One respondent said it was important to note that, at least for faculty at research institutions, the process of developing and administering assessments would take time away from research and other activities that are key to tenure and promotion.

Some urged the department to not lose sight of the opportunity for students and to make sure that CPL is accessible to all. One participant said, *"it is the noble thing to do and can aid Colorado in raising postsecondary attainment."*

Again, participants indicated that it was *"hard to predict potential impact if there is an influx of requests"* and expressed concerns about the process becoming *"like micro-credentials where too many offered over time will weaken rigor."* CPL then becomes *"competitive based on credit shopping."* To avoid this there needs to be oversight, guidance, and direction from the commission.

One participant expressed concern about time and money devoted to assessing prior learning for individuals who haven't been admitted, let alone matriculated, into the institution, suggesting that the institution should be compensated such that there is no revenue lost from "shoppers" who may not enroll.

Summary

Colorado colleges and universities have a solid foundation in place for engaging in expanded PLA efforts identified for study in HB20-1002. Expanding PLA opportunities to every course in the undergraduate curriculum will require expanded infrastructure, with both up-front/start-up costs and continuing/maintenance costs. External funding may be required to ensure that institutions can offer CPL opportunities for all courses in the undergraduate curriculum and also offer students multiple ways to demonstrate their learning and have it assessed. Costs include both faculty time but also administrative support to receive and triage CPL requests and to manage the overall process on campuses. At a minimum, each institution should have at least one position dedicated to coordinating CPL operations among academic departments and divisions. These coordinators could help to centralize operations, track student metrics, improve transparency and communication, and better engage with industry partners.

The benefit-cost analysis suggests that adult students in Colorado could save \$5 million annually from expanded PLA processes that enable testing or assessing out of any course in the undergraduate curriculum. Institutions would incur annual costs of approximately \$7 million compared to projected revenue gains of \$6.2 million. Charging a 25% administrative fee to students would generate approximately \$1.25 million annually, potentially making expanded CPL processes revenue neutral.

Colorado could save \$5 million annually from expanded PLA processes that enable testing or assessing out of any course in the undergraduate curriculum.

In addition to annual costs, institutions would incur start-up costs related to creating the necessary infrastructure and providing training and professional development for faculty evaluators and others supporting prior learning assessment. Support for the Department of Higher Education could aid in providing faculty professional development to engage in CPL assessment, maintaining a statewide repository of assessments and credit crosswalks, and supporting statewide discipline groups in conducting credential evaluations.

Resources

Colorado Commission on Higher Education Policy Section 1, Part X: Prior Learning Assessment. <https://higher.ed.colorado.gov/sites/highered/files/2020-03/i-partx.pdf>.

Colorado Community College System Prior Learning Assessment Credit policy and manual. <https://internal.cccs.edu/academic-affairs/academic-initiatives/prior-learning-assessment/>.

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SUNY Empire State College (2021). *The global learning qualifications framework*. <https://www.esc.edu/global-learning-qualifications-framework/>.



For More Information:

Colorado Department of Higher Education

<https://highered.colorado.gov/>

Colorado Rises: Advancing Education and Talent Development

<http://masterplan.highered.colorado.gov>