

## Thinking About the State of PLA Policymaking in the United States: A Conversation with Becky Klein-Collins and Amy Sherman

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*Over many years, CAEL, the Council for Adult and Experiential Learning, has provided academia, the work world, accrediting agencies, and education systems with principles of prior learning assessment (PLA) and with guidance in developing assessment policies. In this conversation, Becky Klein-Collins, associate vice president, research and policy development, and Amy Sherman, associate vice president of innovation and policy, describe some of their recent experiences and challenges as they work in the United States with individual states and state systems to develop policies and practices on the assessment of prior learning.*

*What follows is an edited version of a conversation that took place on November 17, 2016.*

**Alan Mandell (A.M.):** It seems as if there are differences in the approaches that particular states in the U.S. are taking in regard to PLA and policies relevant to it. Do these states have different interests? Are they looking at PLA issues from different angles?

**Becky Klein-Collins (B.K.-C.):** I think it is more a matter of how much influence the state office actually has on the individual institutions, in terms of the governance relationship. In most cases, there is a coordinating board rather than a governing board, so the state board of higher education can't really dictate policies and practices. But there are some states where there is a strong culture of individual institutions coordinating with each other and working as a system, with the state board playing a role in facilitating that kind of coordination. That is how we end up seeing progress on systemwide policies in states like Ohio, Tennessee, Oregon and Washington. In many instances, there is something closer to a culture of voluntarily adopting a consistent practice or a set of standards.

**Amy Sherman (A.S.):** My impression is that even when there is legislation at the state level (in regard to a state system, for example), policymakers tend to leave quite a bit of room for each institution to develop its own policies.

**B.K.-C.:** The question of the transfer of credit is partly the key driver in wanting to do something statewide on PLA. There is a recognition that if a student is earning credit through PLA and then hits a roadblock when trying to transfer from one institution to another, a statewide agency will see value in institutions adopting similar policies and practices. Consistent PLA policies can lead to more of a systemwide offering that makes sense for students.

**A.S.:** And that is facilitated in states that have common course numbering systems and common course descriptions. All of this leads to creating the right conditions for greater consistency and fairness.

**Nan Travers (N.T.):** In your work with different state systems and different institutions within those states, are you seeing the adoption of similar policies, or is there a great deal of variation from state to state and institution to institution?

**B.K.-C.:** They do seem very similar. One of the things we have tried to do when we've worked with these various state systems is to make sure they had in front of them examples of what kinds of policy guidelines other states have developed. There is a good deal of borrowing of language and structure from leading states like Ohio and Tennessee, for example. One resource we developed in collaboration with HCM Strategists is an inventory of state policies and practices (Sherman & Klein-Collins, 2015). This latest version describes the various types of state policy approaches to PLA, while also providing some case studies, a road map and sample policy language. We included something like a template of what a state policy and its different components might look like. It's not at all our expectation that states would take and use the template verbatim, but that they would use it as a guide, a starting point, for the kinds of things they want to include in their policies. In addition to this guide, there is a more recent inventory of state PLA policies that was just released by Education Commission of the States (Whinnery, 2017).

**A.S.:** In terms of institutional variation, we sometimes see variations in these kinds of policies in the types of assessment methods accepted. There are also differences in the percentage of PLA credit accepted in a degree, but that is usually dictated more by regional accreditation standards than by anything else. There are some differences in how PLA is displayed on a student's official transcript. When we work with systems where institutions are interested in harmonizing these policies, one of the lessons we learned very early on is the importance of engaging not only faculty, but also registrars, who are key players when it comes to implementing the policies, tracking data and presenting PLA data on the student transcript. It's crucial to make sure that you are thinking from soup to nuts, because we are not only dealing with the policy level, but with what happens on the ground – in the details of the PLA process itself. I think the states have gotten smarter and have done a better job of engaging all of the key stakeholders.

**A.M.:** When you consult and guide these policymaking efforts, do you have a set of principles or ideals that animate your hope for the outcomes?

**A.S.:** First of all, we encourage systems to adopt quality principles that are aligned with CAEL's (n.d.) Ten Standards for Assessing Learning. As a starting point, that is important.

**B.K.-C.:** We often find ourselves having to talk about whether institutions are offering a wide enough range of PLA methods to serve every learner's needs; and if an institution is not offering a portfolio opportunity, what we can do to help that institution include that option. Another piece we always want to get to is consistency across programs. For example, we help them begin the conversation about CLEP [College-Level Examination Program] tests – making sure we reach agreement so that there is consistency across institutions about what kind of credit a student receives for specific test scores. We also pay close attention to whether PLA is offered throughout the institution, or whether it is only offered for one or two programs that may be targeted specifically to the adult learner. If it is really limited to a very narrow set of program offerings, we ask whether an individual institution or a system can do more to communicate with the entire faculty across departments and schools within the university about making these options more available. This is important because, more and more, adults are not confining themselves to adult learning divisions. Offering greater availability within an institution can be more responsive to more students.

**A.S.:** Another topic we consistently touch on is how these policies and opportunities are being

communicated to the adult learners, and here I don't only mean after they enroll in the school, but *before* they decide on the school during outreach. I can't tell you how many times I have tried to find a particular institution's policies on their website – or even whether they offer PLA at all – and, after a while, just feel like banging my head against the wall! In so many instances, they are just not there. Making sure that PLA policies and opportunities are easy for students to find is important.

**B.K.-C.:** One of the things that we did as part of a Lumina Foundation-funded project on which we were working with state systems was to provide some training in marketing and outreach of PLA programs to their students. That kind of investment can be a significant part of the institutional improvement efforts on PLA.

**A.S.:** As a starting point, we offer to conduct scans in order to really understand what policies and practices are taking place within either the system or the state. We have done this with several state systems and institutional consortia; it's a very important launching pad for them talking about policy because you get a sense of what the policy and practice variations are across the different institutions. Sometimes people are surprised that there is so much variance, and start to identify and pinpoint areas for focus. We have found these scans to be very useful tools.

**N.T.:** Another piece of practice that I have seen faculty really struggle with concerns the issue of PLA credits that can be used (or not used!) in a student's curriculum. If those credits cannot be used, then the goal of making PLA part of the institution or system just falls apart. What have you found in regard to this PLA-curriculum integration?

**B.K.-C.:** This topic tends to come up very often in our work with community colleges [two-year college institutions] because the associate degree has a lot less room for PLA-earned credit, particularly since some policies limit the use of PLA credit to electives. We have also talked a lot with the colleges and systems that we work with about the fact that PLA shouldn't just be limited to electives, and that a good and robust PLA policy will allow for PLA to be used for general education credits, as well as for requirements in the student's major. This is part of the discussion you need to have when you are moving toward spreading PLA out from the adult learning division into other divisions and schools.

**A.S.:** I would add that another issue is what is considered "partial credit," a situation in which, as a result of the assessment, there is evidence of some student learning but it doesn't get you to the finish line in terms of the outcomes of a full class, or even a full course of study. We are seeing more attention to this kind of situation in "bridge" or "gap" programs, and in efforts to think about learning in terms of modules, particularly for the military-connected students. This kind of work requires flexibility and open thinking, and I would say some states are farther along than are others, such as North Carolina and Texas.

**A.M.:** I wonder about some of the contested areas that you face in your efforts. For example, what are the tensions that the two of you and others who are doing this kind of work have to confront?

**A.S.:** There is often faculty concern around quality and the integrity of the educational process. There are questions around the role of faculty itself and about the relationship between assessing and teaching. Another area of concern is faculty compensation, which I think is a legitimate question for which we need to have an answer whenever we develop and implement PLA policies. And there is always the question of the kind of intensive faculty training that CAEL is trying to promote. We have found that a good training program can also address skepticism that may exist around PLA. Once faculty learn more about what PLA is – and what it is not – there is often a big shift, and you start to have people connecting the dots. I can tell you of experiences

I had where I worked with states in which the biggest critic became the biggest champion, but it wasn't overnight. These critics were often passionate: they cared. You need to take the time to work through their concerns. One thing I have learned in this work is that you don't develop the policy and then go to the faculty; you go to the faculty and to everyone else who is involved in this process and work together. This seems so obvious, but it is a really important lesson for those who are doing this work.

**N.T.:** And how about issues that emerge from others involved in this policymaking work?

**A.S.:** The registrars are often concerned about compliance across their institutions. They are also thinking about transaction costs and about the technology platforms that they use. There are many implementation concerns. As with the faculty, I find that you see a big shift if you invite the registrars to be part of the solution, as opposed to only raising the issues and problems.

**B.K.-C.:** With registrars, the questions are: How do we record this PLA work in our systems, and what additional listing does that require? Recording PLA does require some additional steps that need to be taken in terms of data entry, particularly if you have to prepare special codes for this kind of credit. This also takes training of your staff; and also, once you have it, what do you do with it? For example, I don't think many institutions are doing that much in terms of taking a look at PLA usage. In my experience, even when institutions are doing a lot with PLA, they may not have good systems in place for tracking PLA usage and credit-earning. Then, when they are interested in being part of one of CAEL's research projects on PLA, we learn that they can't provide all of the data that we are asking for.

**A.S.:** One additional point of concern that we hear about is the perception by some that you will lose revenue if you do PLA, even though our research has shown that because students who get credit for PLA are more likely to persist, they actually take *more* credits.

**A.M.:** That is my absolute favorite outcome of your research. It's important to point to because it's somewhat counterintuitive. It's a powerful case for PLA.

**B.K.-C.:** There is one sort of twist to that, which was a finding from CAEL and Empire State's joint research on the PLA business model (Klein-Collins et al., 2015). If you have a situation where revenues are being tracked back to the individual department, and department sustainability is being evaluated based on how much revenue that department is bringing in (i.e., tuition dollars tied to course enrollments), then there's a real disincentive for individual departments to encourage their students to use PLA. For example, at some institutions, students earn a lot of credit in areas like business administration and foreign language. If those departments will be penalized financially by this pattern of credit-earning, then those are rational concerns that they are voicing.

**N.T.:** As we've discussed, the business model touches every aspect of the institution's PLA practices. Yes, it affects how a program is reviewed and how faculty are evaluated and whether the entire institution supports PLA. These things are all interrelated. So both of you have mentioned the faculty; you mentioned the registrar's office; you also touched on operating systems and technologies. But how would you respond if a single institution, or a system, or a consortium came to you and asked: "Who do we need to bring to the room to initiate this PLA policy conversation? Who would you encourage us to invite in, and what other policies would you bring with you?"

**A.S.:** If we were talking about an academic institution, we would want a leader in the provost's office,

some department chairs and representatives from the faculty senate, student services, advising and, of course, the registrar's office. If we were working at the state level, I would want someone from the state department of higher education and from the state board of regents. I would want someone connected to workforce development programs and economic development, too. It would be helpful to include a representative from the governor's office, as well as the state person dealing with veteran policy.

**B.K.-C.:** Obviously, if there is some PLA staff or PLA leadership at the institution or in the system, especially center staff, they should be there too.

**A.S.:** When you are thinking about state policy, you would want different representatives from throughout the system. Sometimes, people are really scared of state legislators, but I think it is helpful when you have a legislator who, for any number of reasons, maybe an adult learning champion, involved in the conversation. It is great when you have people in the room who have experienced and benefitted from PLA, who can tell their own story or know of the stories of others. This moves the discussion from something that is rather theoretical to something that is very concrete. Still, if you load the room with all champions, you probably are not going to make change. You need to have different peoples' viewpoints and to flesh out their concerns. To promote a new approach, you have to listen to and respond to the inevitable questions and tensions. It's part of the process. "Let's talk!" That is the attitude you need to have; otherwise, people will check out or not show up. I would much rather have the critical person in the room.

**A.M.:** I'd think that when you move from the individual institution to the level of the university system of a state, the criticisms, or the buy-in, of a more powerful institution could make a major difference in the outcome of the PLA discussion. Such an institution could just say something like: "We just don't want this. This has nothing to do with academic quality. This is not what our goal is and we are not going to let the state impose it on us!"

**B.K.-C.:** Right. But you know, it doesn't necessarily have to be the powerhouse institution, the flagship university that is leading the way and providing leadership on PLA. That's not our experience. What we have had are examples where a single institution, not the flagship but one of the other four-year public institutions, will really latch onto PLA and see very clearly how it's important for students in a particular degree program that they are offering. They then become the champion for the other institutions in the system, and they'll be the ones who are on fire in all the group discussions about PLA. They will be called by those other institutions to come talk to them about what they are doing and why they are doing it and what tools they are using. In some cases, CAEL can get the conversation started with these systems and processes, but we can't push it through all the way to all the institutions. If we can get one or two institutions to become the internal champions, then we can help them spread the word to others.

**A.S.:** I agree that having a peer institution take the lead in advocacy with other institutions can be really effective. I often want to bring another school from another area or within the state to any gathering we're a part of. I want these institutions to be talking and learning from each other. The less I talk the better! I work more as a technical support person who is really trying to help them get through that initial period. I also think that an important feature of our experience is that the schools that turn to us for help have connected the dots in recognizing their need for adults; they may be dealing with declining enrollments because of demographics and they're realizing they have an untapped market and need to get smart about PLA. I think that is a real opener. We don't tie it to the idea that by doing this work we're generating a whole new face for higher education population. Instead, I think we often talk about PLA as a good thing and the right thing to do: that's crucial. But we shouldn't forget that it also makes business sense – PLA can be a way to bring new

adult students in the door.

**N.T.:** In the world of higher education today, there is a real emphasis on jobs and job training and getting people prepared for the workforce. I think this is a significant shift in the way we talk about higher education. In some of the conversations you have had, and just looking at the way educational policy in general is moving in terms of its need to be directly addressing the needs of the economy, has PLA policy been part of that shift, and thus directly involved in the continuum from job training to higher education?

**B.K.-C.:** PLA has not been an official part of workforce training programs up until a few years ago, which is not to say it wasn't being used. It may not have had the term "PLA" connected to it. It might have just been done more informally, as in situations in which people coming in with a lot of work experience were awarded credit, or could demonstrate skills and someone could get some kind of "advanced standing" in some way. But we are starting to see a lot of movement on that. This is in no small part because of the TAACCCT [the U.S. Department of Labor's Trade Adjustment Assistance Community College and Career Training program] grants that were started several years ago, and especially the ones in the latest rounds where there was specific language about including prior learning assessment in workforce programs. These grants resulted in the growth of PLA at many community and technical colleges in their career and technical education areas.

**A.S.:** I also think that the bachelor's degree in applied science is a very interesting development that we need to be thoughtful about. At its best, it is drawing from a population that would never have gone after an undergraduate college degree, so it is creating a new opportunity. I'm seeing a lot more openness toward PLA and about how to use PLA in those programs. We just need to make sure people know that there is a pathway and there is an opportunity to go further in their education where they do not lose recognition of what they've learned and what they have proven that they know. I really think that PLA has to be part of that conversation. How do we make sure that PLA credits are going to count at every stopping point? This is an important question.

**A.M.:** We have been talking about possible and important policy initiatives and changes involving PLA. Isn't quality assurance really at the core here? How should quality get monitored and evaluated in a systematic and ongoing way? How have these quality questions emerged in the work you have been doing?

**B.K.-C.:** Quality is key when you are trying to change hearts and minds at the system level, or from the system to the institutional level. The quality question is pivotal to communicating that PLA is not reduced to: "Oh, I am going to have a quick look at someone's resume and say that this is worth 6 credits of whatever." Everyone involved needs to know that there are some real procedures involved and standards that are used to award credit. That quality question has to be communicated and responded to so that faculty start to see that this is something different that it is not about "giving away" credit, but rather about recognizing learning that is relevant to the student's degree plan. PLA is something legitimate, and it involves a trained faculty member making a professional judgment about somebody's learning skills, knowledge, capabilities and competencies in a way that is just the same as when faculty make such judgments, every day, in a classroom setting.

**A.S.:** Exactly. And I'll tell you that when those issues are raised, I respect that. I think that is what faculty should be doing, and I think that faculty need to work with all of us in the field on how we make sure that is happening, not only with PLA, but in the classroom, or in any online program. This is one of the first issues that has to be addressed because you are not doing adult learners a favor otherwise with PLA. We don't want to shortchange our adult students. This is about their learning, and I think if we remember that, we can then

work out all the policy details. I really believe that.

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