



Holding Tight or at Arm's Length:

How Higher Education Regional Accrediting Bodies Address PLA
A research brief by the Council for Adult and Experiential Learning - October 2014

Regional Accrediting Bodies and PLA

Prior learning assessment (PLA) is the term used for the various ways in which higher education institutions and other organizations assess an individual's learning for the purposes of granting college credit, certification, or advanced standing in a postsecondary education program (see sidebar). In recent years, there has been growing interest in PLA from postsecondary institutions, government officials, and the philanthropic community as a way to support higher rates of adult degree completion.

In this research brief, the Council for Adult and Experiential Learning (CAEL) explores the role of regional accrediting organizations in shaping institutional PLA policies and practices. Regional accrediting organizations are private, nongovernmental organizations created for the specific purpose of reviewing higher education institutions and programs for quality.

CAEL examined the policies of the six regional accrediting organizations. They are:

- Middle States Association of Colleges and Schools (MSACS)

- New England Association of Schools and Colleges (NEASC)
- North Central Association of College and Schools (NCA) under which the Higher Learning Commission (HLC) accredits degree-granting colleges and universities
- Northwest Commission on Colleges and Universities (NWCCU)
- Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)
- Western Association of Schools and Colleges (WASC)

CAEL found that all six regional accrediting bodies reference experiential or prior learning assessment in their policies or guidelines. All of the accrediting bodies require that prior experiential learning be comparable to the results of institutionally provided learning experiences, but there are noticeable differences. Some of the policies leave most of the decisions on PLA up to the institution, while others are more prescriptive.

What is PLA?

Prior learning is a term educators use to describe learning that a person acquires outside a traditional academic environment. This learning may have been acquired through work experience, employer training programs, independent study, non-credit courses, volunteer or community service, travel, or non-college courses or seminars.

Prior learning assessment (PLA) is the process by which an individual's experiential learning is assessed and evaluated for purposes of granting college credit, certification, or advanced standing toward further education or training. There are four generally accepted approaches to PLA and, when properly conducted, all

ensure academic quality: (1) national standardized exams in specified disciplines, e.g., Advanced Placement (AP) exams, College Level Examination Program (CLEP) tests, Excelsior College exams, DANTES Subject Standardized Tests (DSST); (2) college faculty-developed challenge exams for local courses; (3) evaluated non-college programs, e.g., National College Credit Recommendation Service (NCCRS) or American Council on Education (ACE) evaluations of corporate training and military training; and (4) individualized assessments, particularly portfolio-based assessments, such as those conducted by CAEL's LearningCounts.org and by some individual colleges.

Middle States Commission on Higher Education (MSCHE)

Regional accrediting body for higher education institutions in the following states: Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, the U.S. Virgin Islands, and other locations overseas

The MSCHE policies, guidelines, and procedures are presented in a web-based format on its website (see <http://www.msche.org/?Nav1=POLICIES&Nav2=INDEX>), with references to standards found in the organization's *Characteristics of Excellence in Higher Education (2011)*. Policies on PLA are located under the third heading on the site, *Institutional Programs and Services, Transfer Credit, Prior Learning, and Articulation*. (<http://www.msche.org/documents/Transfer,-Prior-Learning,-Articulation---1110.pdf>).

The PLA policy's main requirement is that any institutional policy on transfer credit (including PLA) must be publicly disclosed. Beyond that, the policy document allows the individual institution to establish its own policies and practices. The MSCHE policy nevertheless puts forth twelve general principles that "usually characterize effective policies for transfer and experiential learning and their implementation." These recommendations for effective policies provide guidance while allowing very different policies and practices at the institutional level. The 12 principles include the following:

- Transfer and experiential learning decisions are student-centered and guided by the institution's mission and goals
- Previous learning is judged on the student's learning outcomes, using valid evaluation measures including third-party review by organizations such as ACE or CAEL
- Credit is awarded based on course equivalencies of the receiving institution
- Policies are clearly communicated, including whether degree requirements may be met by prior or experiential learning

- Credit is awarded for learning, not experience
- Faculty participate in the creation, review, and implementation of transfer and experiential learning policies/procedures
- Outcome data on the success of transfer students or students receiving credit for experiential learning is used to assess the overall student experience at the receiving institution

MSCHE is the only regional accreditor to emphasize this last recommendation—using student outcome data on PLA students to evaluate the overall student experience at the institution.

New England Association of Schools and Colleges (NEASC)

Regional accrediting body for higher education institutions in the following states: Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont

The NEASC Commission on Institutions of Higher Education (CIHE) publishes its 2011 criteria for accreditation as "Standards for Accreditation," which can be accessed through its website (http://cihe.neasc.org/downloads/Standards/Standards_for_Accreditation_FINAL_2011.pdf). Reference to PLA appears three times under *Standard Four: The Academic Program*, under the heading *Integrity in the Award of Academic Credit*.

The first reference to PLA is in paragraph 4.32, and relates to the awarding of academic credit. The policy states: "The institution demonstrates its clear and ongoing authority and administrative oversight for the academic elements of all courses for which it awards institutional credit or credentials. These responsibilities include course content and the delivery of the instructional program; selection, approval, professional development, and evaluation of faculty; admission, registration, and retention of students; evaluation of prior learning; and evaluation of student progress, including the awarding and recording of credit."

The main reference to PLA in the CIHE Standards comprises three sentences that restrict PLA to the undergraduate level only, require oversight by faculty and academic administration, and state that the PLA policies and procedures should be “clearly stated and communicated” to the students. The NEASC PLA policy further notes that when awarding credit for prior experiential learning, the learning should be “demonstrated to be at least comparable in breadth, depth, and quality to the results of institutionally provided learning experiences” (4.35).

A subsequent paragraph (4.46) relates to credit restrictions/residency requirements in general, which could be interpreted to limit some forms of PLA credit to no more than 75% of a degree. The policy states: “Students complete at least one fourth of their undergraduate program, including advanced work in the major or concentration, at the institution awarding the degree. In accepting transfer credit, the institution exercises the responsibility to ensure that students have met its stated learning outcomes of programs at all degree levels.”

North Central Association of Colleges and Schools – The Higher Learning Commission (HLC)

Regional accrediting body for higher education institutions in the following states: Arkansas, Arizona, Colorado, Iowa, Illinois, Indiana, Kansas, Michigan, Minnesota, Missouri, North Dakota, Nebraska, Ohio, Oklahoma, New Mexico, South Dakota, Wisconsin, West Virginia and Wyoming

The HLC publishes its 2014 policy document as the “Higher Learning Commission Policy Book” (<http://policy.ncahlc.org/>). References to PLA are found throughout the document.

Under “Criteria for Accreditation,” various criteria address the oversight of PLA credit at institutions: “The institution evaluates all

the credit that it transcripts, including what it awards for experiential learning or other forms of prior learning” (4.A.2, p.14). Criterion three notes that faculty has “oversight of the curriculum and expectations for student performance [and...] involvement in assessment of student learning” (3.C.1, p. 13). Communication with an HLC representative clarified that institutions have the authorization to use third party evaluators.

In the section on “Assumed Practices,” under *Part A Integrity: Ethical and Responsible Conduct*, HLC policy requires institutions to make readily available to students all information about policies on the acceptance of transfer credit, while noting that no promises should be made to prospective students “regarding the acceptance of credit awarded by examination, credit for prior learning, or credit for transfer until an evaluation has been conducted” (p. 17).

Also in the section on “Assumed Practices,” under *Part B: Teaching and Learning: Quality, Resources and Support*, the policy suggests that residency requirements (such that would limit PLA credit) help to ensure program quality: “Typically institutions will require that at minimum 30 of the 120 credits earned for the bachelor’s degree and 15 of the 60 credits for the associate’s degree be credits earned at the institution itself” (p. 18). The institution must have clear policies on the maximum number of credits allowed through PLA “as a reasonable proportion of the credits required to complete the student’s program” (p. 18). Correspondence with HLC clarifies that this means PLA should be a smaller proportion of the non-residency credits permitted (for example, if 75% of a degree can be earned through a combination of PLA and transfer credits, a reasonable proportion for PLA might be one-third of the non-residency credits, or 25% of the degree).

The HLC PLA policy leaves most of the other details of PLA policy and practice to the institution.

Northwest Commission on Colleges and Universities (NWCCU)

Regional accrediting body for higher education institutions in the following seven-state Northwest region: Alaska, Idaho, Montana, Nevada, Oregon, Utah and Washington

The NWCCU publishes its 2010 policies as “Standards for Accreditation,” a document that can be accessed through the NWCCU website (<http://www.nwccu.org/Pubs%20Forms%20and%20Updates/Publications/Standards%20for%20Accreditation.pdf>). The NWCCU PLA policy appears under *Standard Two – Resources and Capacity*.

The NWCCU PLA policy is brief but specific. Substandard 2.C.7 notes that credit for prior experiential learning should be guided by clear policies, limited to the undergraduate level only, limited to a maximum of 25% of the credits needed for a degree, allowed only for credits that directly apply to course work a student would earn at the institution, and granted only upon the recommendation of “appropriately qualified teaching faculty” (p. 7).

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

Regional accrediting body for higher education institutions in the following states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas and Virginia; and in Latin America for those institutions of higher education that award associate, baccalaureate, master’s, or doctoral degrees

The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) publishes policies related to PLA in *The Principles of Accreditations: Foundations for Quality Enhancement* (revised 2011) (<http://www.sacscoc.org/pdf/2012PrinciplesOfAcreditation>).

pdf, as well as a resource manual to help institutions interpret the standards (<http://sacscoc.org/pdf/Resource%20Manual.pdf>).

The first standard is regarding the acceptance of academic credit, which states:

The institution publishes policies that include criteria for evaluating, awarding, and accepting credit for transfer, experiential learning, credit by examination, Advanced Placement, and professional certificates that is consistent with its mission and ensures that course work and learning outcomes are at the collegiate level and comparable to the institution’s own degree programs. The institution assumes responsibility for the academic quality of any course work or credit recorded on the institution’s transcript (Principles of Accreditation, 3.4.4, p. 28).

The resource manual explains that policies for experiential learning are to be “published in catalogs and other documents that are made available to prospective students” (*Resource Manual*, p. 57). Good practices include “awarding credit for experiential learning and professional certifications based on well-documented activities and experience at the appropriate educational level and evaluated based on clearly developed outcomes for the courses or program for which credit is awarded”; in addition, qualified faculty are involved in the evaluation of credit (*Resource Manual*, p. 57).

The resource manual also notes that when SACSCOC reviews this standard at an institution, evaluators will examine the criteria used by the institution for determining the awarding or acceptance of credit. A list of “relevant questions for consideration” suggests that SACSCOC values institutional policies that are consistent with the mission and with good practices: involve faculty in the review and award of credit, make the policies transparent to students, ensure academic quality, and assure that the coursework and learning outcomes are at the collegiate level (*Resource Manual*, p. 57).

Another standard addresses awarding credit for noncredit instruction:

The institution awards academic credit for course work taken on a noncredit basis only when there is documentation that the noncredit course work is equivalent to a designated credit experience (Principles of Accreditation, 3.4.8, p. 28).

The resource manual explains that institutions awarding credit for noncredit coursework must have “a process for evaluating and determining that noncredit course work is equivalent to a designated experience” and that these processes are systematically reviewed (*Resource Manual*, p. 61).

While the SACSCOC PLA policy itself does not mention a restriction on the number of credits students may earn under PLA, limits could be applied if the PLA credit is viewed as non-residency credits. The residency requirement of undergraduate degrees is at least 25% of the credit hours required for the degree (*Principles of Accreditation*, 3.5.2, p. 29). The residency requirement for graduate or post-baccalaureate professional degrees is one-third of required credit hours (*Principles of Accreditation*, 3.6.3, p. 30). SACSCOC leadership has noted in a public meeting that PLA credit may apply towards the residency requirements if the experiential learning was evaluated at the institution (Wheelan, 2013).

Western Association of Schools and Colleges (WASC)

Regional accrediting body for higher education institutions in California and Hawaii, and the territories of Guam, American Samoa, Federated States of Micronesia, Republic of Palau, Commonwealth of the Northern Mariana Islands, the Pacific Basin and East Asia, and areas of the Pacific and East Asia where American/International schools or colleges may apply to it for service

There are two separate and independent WASC organizations: Accrediting Commission for Community and Junior Colleges (ACCJC) and WASC Senior College and University Commission (WSCUC). Each has its own set of policy documents. Both policies begin with the notable statement, “It is the position of the Commission that the institution has a significant role beyond that of certifying what a student has learned elsewhere. It is within the institution that a student earns academic degrees” (p. 50).

• Accrediting Commission for Community and Junior Colleges (ACCJC)

The policy document for the community and junior colleges is published as “The Accreditation Reference Handbook” (http://www.accjc.org/wp-content/uploads/2013/07/Accreditation_Reference_Handbook.pdf). The Policy on Credit for Prior Experiential Learning in Undergraduate Programs appears on page 50.

The PLA policy is that institutions are required to “follow the principles of good practice in assessing experiential learning represented by the Council for [Adult and] Experiential Learning (CAEL) and the American Council on Education” and then lists 9 of 10 CAEL Standards for Assessing Learning (see sidebar)—standard #8 regarding the determination of fees is omitted in the WASC policy. According to a representative of AACJC, this is likely because public community colleges in California use a “credit by examination” process, for which the student is charged a fee that is equal to the units of credit awarded.

The ACCJC policy does not, however, apply to CLEP, advanced placement, or ACE evaluated military credit. There is no mention of any other policies or restrictions, such as undergraduate only or maximum credit allowances.

• WASC Senior College and University Commission (WSCUC)

The WSCUC policies for senior universities are found at <http://wascsenior.org/document-list>.

PLA is referenced twice. It is first referenced as “Credit for Experiential Learning Policy” at (http://www.wascsenior.org/files/Credit_for_Experiential_Learning_Policy.pdf). The policy contains ten standards that are similar to many of CAEL’s Standards for Assessing Student Learning, but includes additional restrictions.

These additional restrictions include limiting PLA only to undergraduates, limiting the number of portfolio-based credits allowed to no more than 30 semester units, and limiting PLA awards only to “areas which fall within the regular curricular offerings of the

institution and are part of the instructional program the student completes.”

The second reference to PLA is under the “Transfer of Credit Policy” (http://wascsenior.org/files/Transfer_of_Credit_Policy.pdf). This policy outlines eight criteria for transfer decisions. The eighth criterion is the “Validation of Extra-Institutional and Experiential Learning.” The policy clearly supports offering PLA as an option for students by saying, “Transfer of credit policies should encompass educational accomplishment attained in extra-institutional settings as well as at accredited postsecondary institutions.” The policy refers institutions to the American Council on Education’s credit recommendation service and to CAEL for guidance in setting procedures and processes.

CAEL’s Ten Standards for Assessing Learning

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

Taken from *Assessing Learning: Standards Principles, and Procedures* (Second Edition)
By Morry Fiddler, Catherine Marienau, and Urban Whitaker, 2006. Chicago, Kendall Hunt Publishing Company.

Summary

Although all six regional accrediting agencies have policies on the offering of PLA, there are important differences, summarized in the table below. In some cases, there was little or no mention of specific restrictions, such as limiting the number of PLA credits or limiting PLA to undergraduate courses only. In other cases, there are clear restrictions, and the specifics of the restrictions vary by region.

It should be noted that the guidelines of the accrediting agencies leave a lot open to

interpretation by individual institutions or systems. In CAEL’s experience working with institutions on their PLA programs, we have learned that some institutions have applied the accreditors’ PLA guidelines to certain types of PLA and not others. For example, some institutions view credit from methods such as portfolio assessment and challenge exams as “residential credit” since their faculty members are the ones who evaluate the students’ learning for credit. This credit, therefore, is not counted with other PLA credit (such as CLEP exam credit or credit from

POLICY CATEGORY	MSCHE	NEASC	HLC	NWCCU	SACSCOC	WASC ACCJC	WSCUC
Restrictions on the number of PLA credits that can apply to a degree	No mention	Students complete at least 25% of the undergraduate program at the institution awarding the degree.	PLA limited to a reasonable proportion of the credits required to complete the student’s program (e.g., a fraction of the 75% of credits that can be earned outside of the institution)	Credit for prior experiential learning is limited to a maximum of 25% of credits needed for a degree	At least 25% of the credit hours required for the degree are earned through instruction offered by the institution awarding the degree. Experiential credit may count toward the residency requirement if evaluated at the institution.	No mention	Credit for prior experiential learning is awarded for no more than 30 semester units, or the equivalent, toward the degree
PLA for undergraduate only	No mention	Yes	No mention	Yes	No mention	Yes	Yes
PLA credit award specifically limited to curricular offerings of the institution	No mention	No mention	No mention	Yes	Credit awarded for experiential learning comparable to the institution’s own degree programs	Yes	Yes
Reference to standards of good practice	12 principles defined by MSCHE	No mention	No mention	No mention	Examples of good practices provided in Resource Manual	CAEL Standards 1-7 and 9-10	WASC-defined (based on CAEL Standards)
Transparency—requirement to clearly communicate policies to students	Yes	Yes	Yes	Yes	Yes	No mention	Yes
Faculty review required	Yes	Yes	Yes	Yes	Yes	Yes	Yes

evaluation of non-college programs) in PLA credit limits. Other institutions treat credit from evaluation of non-college programs (e.g. credit recommendations from ACECREDIT or NCCRS) as part of a student’s “transfer credits,” with portfolio assessment being counted as PLA. These different interpretations of the guidelines allow for greater flexibility in PLA credit earning.

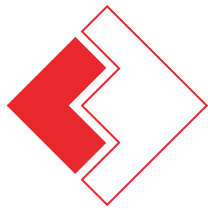
In CAEL’s view, these various interpretations of accreditors’ policies and guidelines speak to the need for accreditors to clearly differentiate between the various methods of assessing prior learning in their policies on credit limits. We suggest that those methods that involve faculty evaluation of individual student learning

or that specifically compare student learning to the institution’s own course outcomes should be treated as residential credit. Further, those methods that involve standardized tests or evaluation of non-college training should be treated in the same way as other transfer credit that is evaluated using criteria defined outside of the institution.

While additional clarity may be needed, this review of accreditors PLA policies shows a broad level of acceptance for PLA. PLA is no longer a new concept, and is gaining momentum quickly. Colleges and universities across the nation can look to these PLA policies for guidance to develop their own policies, which will help adult learners accelerate progress toward their goals.

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