

Policy Implications of the Intersection Between Prior Learning Assessment and Competency-Based Education

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Competency-based education (CBE) and prior learning assessment (PLA) are both well-known credit-earning modalities, which seemingly overlap a great deal. In the broadest sense, with both modalities, student learning outcomes are constant while the time frame in which the learning occurs is irrelevant. Further, both modalities require students to demonstrate or perform at a certain level in order to receive a credential, and give students the opportunity to use different forms of assessment to attest to their learning. However, despite their conceptual and practical linkages, educators and lawmakers treat these methods very differently. This essay begins to examine the relationship between CBE and PLA, and discusses policy considerations and implications that educators need to consider in order to preserve and nurture their innovative potential.

Outside of a handful of progressive institutions, U.S. higher education has historically been reluctant to recognize, assess or credential college-level learning that has occurred outside of the classroom. If, for instance, an adult student had spent years working in an industry, earned certifications and developed skills that reflect college-level learning, most colleges offered no recourse to translate that informal education into a formal credential. Many in the higher education field maintained the perception that knowledge acquired in the workforce or the community, or through independent study, does not equate to the rich and vibrant experience that supposedly occurs within traditional college lecture halls (Fain, 2012a). Nearly five decades ago, however, this dynamic was challenged with the emergence of prior learning assessment as a legitimate institutional practice. Through a variety of methods, educators began examining the informal learning experiences that adult learners possessed. In this way, the focus moved from what students were taught, to what they had learned and could demonstrate. As readers of this publication will know, PLA in the U.S. has continued to grow.

Despite criticism that learning acquired outside the classroom is somehow less substantial than learning acquired in the conventional classroom model, the shift from rewarding inputs to recognizing outputs allows PLA advocates to reliably determine what skills and abilities students possess. Over the past 40 years, institutions across the globe have devised a variety of credit-earning methods that incorporate PLA. In the United States, the assessments are commonly conducted through either: 1) a portfolio assessment, 2) a challenge exam or 3) an institutional or external review and certification of workforce or military training programs. With the first two methods, students identify areas of knowledge, skills or courses to which they believe their experience or abilities speak, and complete a performative or demonstrative assessment process. The third method involves the institution or third-party organization conducting a comprehensive examination of training or certification programs for college credit. Any student with an approved, official credential can earn credits as a result of that training review upon matriculation.

By evaluating and credentialing a student's knowledge and skills, PLA not only validates student experiences

and increases self-confidence, but also provides students with a more affordable and effective path toward a degree. Furthermore, the focus on outcomes mirrors what is increasingly the mindset of the chief consumers of higher education and its credentials. Students want skills that lead to increased employability, and care less about customary measurements, such as seat time, faculty interaction or student participation. Employers want clear and transparent credentials that they can use to identify students who can perform effectively, as well as opportunities to efficiently skill-up current employees (Blumenstyk, 2016). PLA helps bridge the gap between higher education and workforce needs by placing *all* education on an equal playing field, credentialing experiential learning in the same way classroom learning is recognized.

As nationwide college enrollment continues to decline, the potential benefits of PLA have not gone unnoticed (National Student Clearinghouse Research Center, 2016; Klein-Collins, 2010). Many institutions have been taking another look at prior learning assessment as a core strategy. Some states in the U.S. have even gone as far as developing PLA policies in order to drive college completion and revive their economies (Fain, 2012b). However, a key barrier to an even wider adoption of PLA has been the restriction against using federal student aid. According to the United States Department of Education (ED), 86 percent of full-time undergraduate students at four-year degree-granting institutions are receiving some form of financial aid (ICES NCES, n.d.). Unfortunately, undergraduate students are not eligible to receive financial aid for the assessment of their prior learning. Students must pay out-of-pocket fees for credits earned through prior learning assessment, which, if taken as a traditional course, would be federal financial aid-eligible. The attitude among lawmakers and regulators seems to be that taxpayers should be paying for *instruction*, not *assessment*.

This belief can be seen in the ED's treatment of another higher education model that has risen to prominence alongside PLA: competency-based education. The CBE model offers students an opportunity to earn a degree at their own pace, while – similar to PLA – effectively leveraging and demonstrating what they have learned in and out of the classroom. According to a definition from a leading CBE organization, the Competency-Based Education Network (n.d.),

[c]ompetency-based education combines an intentional and transparent approach to curricular design with an academic model in which the time it takes to demonstrate competencies varies and the expectations about learning are held constant. Students acquire and demonstrate their knowledge and skills by engaging in learning exercises, activities and experiences that align with clearly defined programmatic outcomes. Students receive proactive guidance and support from faculty and staff. Learners earn credentials by demonstrating mastery through multiple forms of assessment, often at a personalized pace. (para. 1)

Yet, and this is the key, despite their similarity to PLA, CBE programs *are* eligible for financial aid. Direct assessment programs – where students progress through the demonstration of a requisite number of competencies, rather than through the accumulation of credit hours – have been financial aid-eligible since 2005, when Congress passed Section 8020 of the Higher Education Reconciliation Act (Pub. L. 109-171) to allow Western Governors University (based in Salt Lake City, Utah) the freedom to explore CBE models. More recently, the ED has, through its Experimental Sites Initiative, allowed institutions to investigate the effectiveness of course-based and partial or limited direct assessment models, while maintaining their financial aid eligibility (Laitinen & Tepe, 2014).

At first glance, it may seem like CBE is the conceptual successor of the PLA model. CBE maintains the focus on outputs over inputs and continues to provide students a variety of options when it comes to demonstrating mastery of a concept. Furthermore, CBE (at least direct assessment CBE) exceeds what is possible with many PLA models (e.g., course-match assessment methods) by giving students the opportunity to earn credentials

for more individualized and discrete abilities, rather than forcing them to squeeze their experience into 3 credit units. PLA and CBE diverge, however, when it comes to instruction. Customarily, students are offered guidance in preparing PLA requests and given feedback through the assessment process; however, they receive no instruction. Meanwhile, in a CBE program (at least those for which students can receive federal financial aid), faculty are required to initiate substantive interactions with students on a regular basis.

Essentially, the U.S. Department of Education has specifically chosen to draw a line between informal, “instructionless” learning and instruction, the latter of which it is willing fund. The guidance documents that the ED has published in relation to CBE are littered with phrases that imply that Title IV aid (all federal financial aid funds) cannot be used for the assessment of learning that was not based on instruction provided during a particular payment period (National Archives and Records Administration, 2006; 2014). The fact is that federal financial aid is tied to instruction, rather than outcomes.

Given these restrictions and the practical difficulty in splitting *prior* learning from *emergent* learning, institutions are left with two options. First, they can separate the PLA process from the rest of the competency-based program – providing students with opportunities to document their college-level learning; however, this would require students to pay for the prior learning component on their own. Alternatively, institutions can choose not to assess prior learning on its own, but capture it during the competency program. In other words, if students have prior knowledge in specific areas, that knowledge would not be recognized as prior learning, but treated as emergent learning and captured during the CBE program process.

Neither of these options is particularly advantageous to students, nor are they ideal for educators and academic institutions aiming to provide efficient and affordable pathways toward a degree. The first option puts the burden of cost on the student, which can dissuade students from pursuing PLA. In addition, it is problematic for the institution because the financial demands and resulting business model involved in maintaining an effective PLA administrative infrastructure may not be sustainable. The second option could be beneficial to both the student and the institution at one level, because prior learning gets integrated into the fulfillment of competencies, and it can be paid for through the CBE funding process. Yet, the integrated PLA/CBE option delays the credentialing of the learning that students bring with them, which ultimately slows down the process for students eager to reach their goals. In addition, this second option is not much different from students demonstrating their prior knowledge within traditional courses (having a running start; or being able to pull in and use relevant knowledge based on their experiences) and not having a PLA option.

Regardless of the particular option that an institution might chose, tying federal financial aid to instruction, rather than outcomes, reflects an outmoded understanding of the practical realities in higher education, the postsecondary credential ecosystem, and the job market today. The U.S. Department of Education has continued to make it clear that any direct assessment of learning that is not coupled with ongoing substantive interactions with faculty is not aid-fundable. Yet, industry has made it obvious that, from the start, it needs to know more about what a student knows and can do for employment purposes. The world has shifted to a competency-based approach, but what is fundable is still based on a traditional educational, instruction-focused model.

For example, many students who possess deep industry knowledge and relevant skills are in desperate need of a meaningful credential to advance their careers. Every moment we delay these students’ educational progress adds hardship for themselves and their families. And, too, these delays also impact the economic realities of industries in need of highly skilled and credentialed individuals. Schools need to be able to provide their students with the most effective route to a degree that recognizes the skills and abilities students bring

with them from a life of rich experiences. What matters is what a student knows and can do – the outcomes, rather than the process and the instruction along the way. Moreover, the current financial aid model is an ineffective deployment of federal resources. Congress and the Department of Education would sooner pay on average \$594 per credit for students to sit in a classroom, than provide them with the means to demonstrate their college-level abilities for potentially one-fifteenth of the cost (Kirkham, 2018).

Despite the importance of this issue, it is unlikely that either Congress or the Department of Education will prioritize the necessary changes. Their intransigence notwithstanding, the trend in higher education is moving toward acknowledging outputs over inputs. While educators and administrators who wish to implement a PLA or CBE program will need to navigate the current byzantine restrictions by pushing a shift now, they will be able to gird themselves against the inevitable upheaval. Even institutions that have no interest in utilizing PLA or CBE must grapple with how the growing popularity of these models will affect their school's institutional strategy, especially amid a nationwide enrollment decline. Even the most traditionally-minded institutions are being driven to seek out new audiences and profit centers. Among those new targets are adult students, for whom the capabilities of PLA and CBE are most beneficial.

For those institutions that lack a formal pathway for credentialing informal learning, the current situation presents a unique opportunity to modernize their offerings ahead of potential seismic changes to the industry. By establishing policies around credit for prior learning now, institutional leaders can begin to confront internal critics and start conversations around implementing best practices before they are forced to do so by external forces (statewide policies, market pressures, etc.) (Sherman & Klein-Collins, 2015). Additionally, there are more immediate benefits to introducing a PLA program. Studies have shown that students who earn some credits through PLA take more courses than those who do not, and graduate at much higher rates (Klein-Collins, 2010). Therefore, regardless of the timeline of systemic change, institutions can take concrete steps toward increasing student success.

Meanwhile, institutions that are already steeped in PLA have more complex considerations to contemplate before transitioning to a CBE model. Their PLA programs certainly offer a route for students to earn credit for their informal education, and the transition to CBE can be expensive and time-consuming. Institutions like these may consider developing a hybrid program to acclimate their faculty and staff to this new modality, and to begin conversations around assessment and modularization on campus. Depending on the degree to which any institution wants to embrace CBE, policy considerations, extensive back-end processes and technology developments are required.

While regulatory and statutory obstacles continue to slow the pace of innovation, market forces are driving more and more institutions to at least consider – if not adopt – PLA and CBE in order to stay competitive. Institutional leaders who are resistant to creating formalized pathways for informal learning should reflect on how personal biases may conflict with authentic student success metrics. Further, they should consider how their failure to value and validate students' informal learning perpetuates the notion that academia is out of touch with the rest of the credential ecosystem. Meanwhile, lawmakers must recognize their role in limiting what is, in effect, the modernization of higher education, and pursue sensible policies that encourage the growth of outcomes-based models.

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