

# THE NATIONAL LANDSCAPE OF CREDIT FOR PRIOR LEARNING: EFFECTIVE STATE AND SYSTEM POLICIES FOR SUCCESS AND EQUITY

Maria Claudia Soler, Rebecca Klein-Collins, Erica Swirsky, Kara Seidel, and Rachel Hirsch







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# INTRODUCTION

In 2022, 36.8 million individuals between 18 and 64 years old—about 18 percent of this age group in the U.S.—had some college education but no degree (Berg et al. 2024). To address this gap in educational attainment, many states and postsecondary institutions are developing and implementing strategies to help accelerate credential completion. One such strategy is a policy-driven approach for expanding opportunities for credit for prior learning (CPL). CPL is a term for the various methods of awarding college credit for the skills and knowledge that students may have acquired outside of a formal college setting, including through formal noncollege learning, military training, work experience, informal learning, volunteer work, and life experiences. CPL helps adult learners—especially low-income students, students of color, and immigrants—to complete degrees faster than they would otherwise (Klein-Collins et al. 2020). In addition, CPL saves students time and money, and it helps institutions to attract and retain students (Higher Learning Advocates 2023).

This report presents findings from a state-by-state inventory of CPL policies that was jointly developed by the American Council on Education (ACE) and CAEL (Council for Adult and Experiential Learning). It analyzes key trends across 11 policy themes related to institutional CPL implementation, such as transferability, transcription, assessment methods, affordability, and data collection and reporting. The report also offers a discussion of several important considerations for state or system CPL policy design.

The findings underscore the complexity of designing CPL policies, especially when diverse state and higher education governing structures allow for a range of approaches to structure CPL. The results emphasize the significant role that state legislatures play in creating—or jump-starting—CPL policies, as well as the importance of military training in CPL policies across the country. Key lessons from moving from high-level policy to implementation at the institutional level highlight the importance of data-driven approaches, transparent systems, and state-level coordination to ensure equitable access to CPL opportunities.

# BACKGROUND

CPL refers to a wide range of strategies and methods used to recognize and award college credit for skills and knowledge that students may have acquired outside of a formal college setting, including through formal noncollege learning, military training, work experience, informal learning, volunteer work, and life experiences. Common methods for evaluating this learning through CPL include portfolio assessments, internal and external exams (e.g., the College Level Examination Program [CLEP], DANTES Subject Standardized Tests [DSST], challenge exams), or credit recommendations from third-party evaluators such as ACE and the National College Credit Recommendation Service (NCCRS). Additionally, institutions may develop their own internal processes for reviewing certifications, licenses, apprenticeships, and corporate training programs to award credit.

By encouraging states and systems to recognize and value prior learning that occurs outside formal academic settings, CPL policies provide adult learners with opportunities to accelerate their progress toward a degree or credential (Klein-Collins et al. 2021; Lakin et al. 2015). Research has shown that facilitating the award of CPL can boost degree completion by 17 percent, and it is particularly beneficial to advance college completion among low-income students, students of color, immigrants, and adult learners (Klein-Collins et al. 2020; García and Leibrandt 2020).

CPL also helps students save both time and money by reducing the number of courses required for a degree, thereby accelerating their path to graduation (Higher Learning Advocates 2023; Klein-Collins et al. 2020). As a result, CPL serves as a tool to recruit, reengage, and accelerate degree completion for adult learners, especially those who have some college but no credential. This approach is particularly relevant given the anticipated enrollment cliff, which refers to the expected multiyear decline in traditional-age college students—a concern for many college and university leaders (Basko 2024).

<sup>1</sup> For simplicity, this report uses *states* to refer collectively to all 50 U.S. states and the District of Columbia.

Additionally, CPL is linked to improved postgraduation outcomes, including higher employment rates and increased earnings (Falkenstern 2020); this makes it a key strategy for boosting students' long-term success.

Despite these benefits, students often face challenges in accessing CPL opportunities. One major challenge is the inconsistent availability of CPL across institutions, which—depending on where a student enrolls—results in disparities in accessing these time- and money-saving credits. For example, CPL offerings are sometimes limited to adult-focused degree programs, which excludes students who are pursuing the more mainstream offerings at an institution. Transfer and mobility complicate this further, as CPL credits aren't always accepted in transfer. Additionally, insufficient emphasis on the quality and standardization of CPL evaluation methods often leads to inconsistent assessments and undermines the credibility of the credit granted. Many students remain unaware of the CPL options that are available to them, compounding the problem and further limiting their ability to take advantage of these opportunities.

Institutional resistance presents another challenge, with doubts about the rigor of an approach that validates learning taking place outside the traditional, instructor-led classroom and concerns over lost tuition revenue.<sup>2</sup> Additionally, the financial burden further complicates access, as financial aid often does not cover out-of-pocket expenses such as portfolio assessments or standardized exams that are associated with the CPL process. These combined barriers result in implementation challenges that often translate into low overall rates of earning CPL, with inequitable access particularly affecting low-income and underserved students who are often most in need of accelerated degree pathways.

The purpose of the inventory and this accompanying report is to address the challenges of scaling CPL opportunities beyond individual institutional changes in policy and practice. Although institutions can make progress independently, system- or state-level approaches are crucial for creating sustainable and widespread adoption of CPL. To effectively scale CPL, issues such as normalizing its use, ensuring consistent quality standards, collecting and tracking data, and establishing clear transfer pathways all demand coordination beyond individual institutions. Statewide policies are critical in standardizing and scaling CPL, which institutions may struggle to achieve on their own.

While CPL policies have existed for decades, national interest began to grow considerably starting in the early 2010s. This was largely fueled by a growing focus on improved degree completion rates, support for veterans returning from the overseas deployments, and key insights from the 2010 publication *Fueling the Race to Postsecondary Success: A 48-Institution Study of Prior Learning Assessment and Adult Student Outcomes* (Klein-Collins 2010). These factors elevated CPL as a priority on state and national education agendas.

ACE and CAEL have both been pivotal in advancing CPL initiatives. For over 60 years, ACE has led efforts in evaluating workforce and military training as well as set the standards and best practices that higher education institutions rely on to award CPL. For its 50-year history, CAEL has advanced broader application of CPL methods throughout postsecondary education through technical assistance, professional development, and scalable solutions. Since 2010, CAEL has also worked to advance public policies on CPL through advocacy, special initiatives, and research, including through the first CPL state policy reviews in partnership with HCM Strategists in 2012 and 2016. This momentum continued with the comprehensive, 50-state inventory conducted in 2017 by Education Commission of the States, which included the development of an online database to further promote CPL awareness and adoption (Whinnery 2017). The newer and more comprehensive ACE-CAEL database and report build on such foundational efforts to offer a more detailed analysis of state and system CPL policies that will inform future policy development and expansion.

<sup>2</sup> Research has debunked these tuition revenue concerns and shows that institutions gained approximately a full-time semester's worth of additional tuition revenue from adult students with CPL, on average, compared with institutions that do not accept CPL (Klein-Collins et al. 2020).

# STATE-BY-STATE INVENTORY

# Methodology

ACE and CAEL researchers employed a multiphase approach to gather and analyze state CPL policies across all 50 U.S. states as well as the District of Columbia. The research team also examined Puerto Rico to determine whether it had CPL policies, but none were identified during the review process.<sup>3</sup>

The data collection process began with a comprehensive legislative search using LexisNexis and Westlaw to identify relevant CPL-related policies between 2010 and 2023.<sup>4</sup> In addition to the legislative search, the teams explored whether CPL-related policies had been established by state governing and coordinating boards as well as postsecondary systems. This involved a thorough review of state board and higher education system websites that used the CPL-related terms to uncover relevant policies. When initial policies were not initially found, secondary search terms were employed to ensure all possible references to CPL were identified. A general Google search was also used to capture any remaining public policies—particularly those set by state agencies or governors' offices that might not have appeared in the earlier searches.

The team then coded the identified policies according to 11 themes that were selected and defined based on previous CPL policy analyses and CAEL's experience working with states and systems on CPL policy design.<sup>5</sup> Table 1 lists the 11 policy themes and their definitions.

Puerto Rico is included in this report due to its strong higher education infrastructure compared with that of other U.S. territories and freely associated states (i.e., American Samoa, the Federated States of Micronesia, Guam, the Republic of the Marshall Islands, the Commonwealth of the Northern Mariana Islands, Republic of Palau, and the U.S. Virgin Islands). As a jurisdiction of the U.S., Puerto Rico stands out for having more higher education institutions than most states (*Excelencia* in Education 2019). As of 2021–22, Puerto Rico had 82 of the 91 total postsecondary institutions among all U.S. jurisdictions (NCES 2023). Moreover, Puerto Rico ranked among the top 15 of U.S. states and territories in its number of colleges and universities (*Excelencia* in Education 2019).

<sup>4</sup> The list of CPL-related terms used for the search included credit for prior learning, prior learning, prior learning assessment, recognition of prior learning, assessment of prior learning, workforce credit, experiential learning, competency-based credit, credit crosswalk, crosswalk, credit for competency, CLEP, DSST, Thomas Edison credit, non-college learning, StraighterLine, Sophia Learning, Coursera credit, EdX credit, MOOC (massive open online course), MOOC credit, portfolio assessment, military credit, ACE credit, American Council on Education credit, NCCRS, National College Credit Recommendation Service, Excelsior exams, UExcel, CAEL, and Council for Adult and Experiential Learning.

<sup>5</sup> Although we conducted extensive searches of CPL policies, we did not include every individual policy related to licensure or apprenticeships. Certain states—for example, Colorado—have a particularly high volume of such policies, and the team chose to include only a sample of these in the final inventory.

**TABLE 1. CPL POLICY THEMES** 

Policy Theme	Definition
Require a Policy	Policies that provide a mandate for all state or system institutions to establish a policy on CPL
Focus on Transparency	Policies that require CPL-related information to be made public, such as published on a website or made accessible to students
Military Training	Policies that concern the awarding of credit to service members or veterans for their military training or experience, such as boot camp credits, advanced standing for military medics, or ACE-recognized military credits
Credit Caps and Limits	Policies that set limits on how much CPL can be applied toward a degree (e.g., CPL cannot exceed 25 percent of degree requirements) or require a minimum number of credits to be completed at the institution
Cost/Affordability	Policies that address the costs of CPL, including the setting of fees or fee limits and offering scholarships or waivers for certain student populations
Transfer Policy	Policies that specifically address the transfer of CPL credits between institutions; this includes guidelines for accepting CPL credits awarded by other institutions
Transcription Policy	Policies that provide guidance on how CPL credits should be recorded on student transcripts; this may include recommendations for institutions to merely establish a formal policy on the treatment of CPL credits
Methods of Assessment	Policies that outline policies and procedures related to specific methods for assessing CPL, such as CLEP exam credits, portfolio assessments, ACE credit recommendations, or the conversion of noncredit learning into college credits
Data Tracking	Policies that require the collection and reporting of data related to CPL, such as tracking the number of students using CPL, the number of CPL credits awarded, or related metrics
Evaluation of Effectiveness	Policies that call for a formal evaluation of CPL program effectiveness, including the analysis of key metrics or outcomes to assess the impact of CPL on students and institutions
CPL for Professional License Requirements or Apprenticeship	Policies that address how prior learning can be applied toward occupational license requirements or apprenticeships, such as recognizing work experience or CPL credits to fulfill specific professional or licensing criteria; policies that referenced the review of licenses and apprenticeship for awarding college credit toward degrees were categorized under Methods of Assessment

# Trends in State and System CPL Policies

The inventory contains 362 CPL policies and regulations across all 50 U.S. states as well as the District of Columbia (DC) around credit for prior learning and the award of credit for military experience.<sup>6</sup>

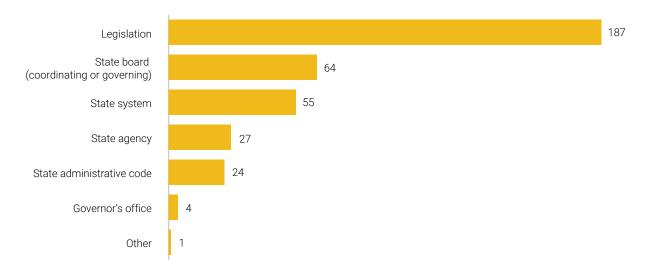
To better understand the different approaches and governance structures behind the development and implementation of CPL policies, the research team analyzed the distribution of policies by source and policy theme. The following sections summarize a few noteworthy trends.<sup>7</sup>

### Distribution of CPL Policies, by Source

Credit for prior learning policies stem from a diverse range of sources across the 50 states and the District of Columbia. For the purposes of this inventory, sources were coded into seven different types: legislatures, state boards (both coordinating and governing), state systems, state agencies, state administrative codes, governors' offices, and other.

Across the inventory, legislative policies were the most prevalent with 187 policies included in the inventory.<sup>8</sup> State board policies were the second most common (64 policies), followed by state system policies (55 policies). Governors' offices and a source coded as other were the least represented (four policies and one policy, respectively) (see figure 1).<sup>9</sup>





<sup>6</sup> This tally somewhat underrepresents the total number of CPL policies for the target time period, as three states had many different versions of policies related to the 11th theme (CPL for Professional License Requirements or Apprenticeship); for these three states, the inventory lists only a sample of such policies rather than the many dozens that only vary in terms of the specific profession or occupation addressed.

<sup>7</sup> Note that the numbers reported throughout this section reflect the inventory at a specific point in time, and they are likely to be somewhat dynamic as new policies are added and coding methods are revised.

<sup>8</sup> As explained previously, this number somewhat undercounts the number of policies for CPL that were established through legislation, since the inventory includes a few samples of the many dozens of laws outlining the use of CPL for meeting occupational licensing requirements (notably in Colorado, Oregon, and Virginia).

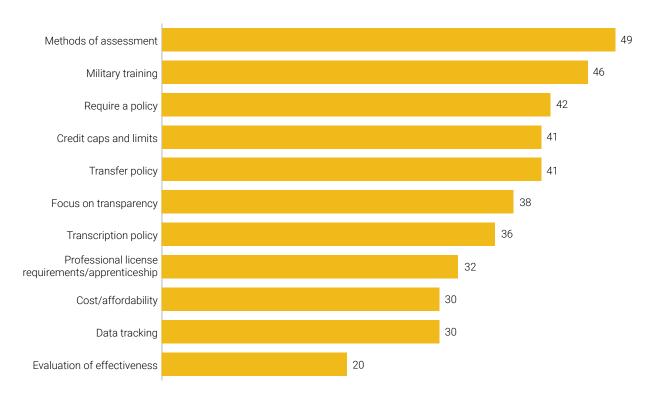
<sup>9</sup> This source corresponds to the handbook of the Washington Council for High School-College Relations' Intercollege Relations Commission.

### **Themes Across States and Policies**

The team also analyzed the CPL policies to determine how many states had policies related to each of the themes, even if those policies applied only to an individual postsecondary system. To achieve this, the team identified how many states referenced each of the 10 policy themes at least once.

State or system policies that outline specific methods for assessing prior learning (such as the use of CLEP exam credits, portfolio assessments, ACE credit recommendations, or the conversion of noncredit learning into college credits) appeared in 49 states. Credit awarded for military training and experience was the next most common theme (46 states), followed by policies that require state institutions to establish a CPL policy (42), transfer policies (41) credit caps and limits (41) and policies for awarding CPL toward the requirements for professional licenses or apprenticeships (32 states). The less common policies were those related to data tracking (30 states), costs and affordability (30), and evaluation of CPL program effectiveness (20) (see figure 2).

FIGURE 2. STATES WITH STATE OR SYSTEM POLICIES RELATED TO THE 10 POLICY THEMES



Looking only at the frequency of various policy themes reflected in the inventory's policies offers further insight into state and system policy priorities with respect to CPL. The most common policy themes focused on credit for military experience (195 policies) and/or methods for assessing prior learning (181 policies). Over a third of the inventory's policies required institutions to have a CPL policy (124). The least common themes were data tracking (60 policies), cost and affordability (58 policies), and evaluation of effectiveness (see figure 3). This analysis deliberately omitted the 11th policy theme—CPL for Professional License Requirements or Apprenticeship—since the inventory included only sample legislation in the case of three of the states (see shaded box).

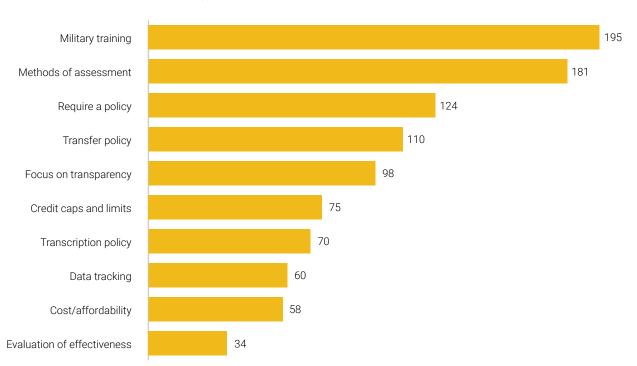


FIGURE 3. POLICY THEME FREQUENCIES IN THE INVENTORY

The variety of sources and policy categories illustrates the complexity of designing CPL policies. Adoption of CPL policies varies across the country, and diverse state and higher education governing structures allow for a range of approaches to structuring CPL. Yet the results highlight the significant role that state legislatures play in shaping CPL frameworks, as well as the importance of CPL policies that address military training to expand CPL opportunities for learners.

### **CPL for Professional License or Apprenticeship**

This 11th CPL state or system policy theme is presented separately from the main analysis because it is a slightly different category of CPL policy. The other 10 themes primarily focus on CPL for use within postsecondary education institutions for the purpose of recognizing learning for credit toward postsecondary degrees and credentials. This 11th theme is different: It focuses on applying the underlying principles of CPL to recognize work experience and alternative learning experiences to meet the requirements of professional licenses or apprenticeships. In Colorado, Virginia, and Oregon, there are multiple policies that fit this theme, with each policy addressing the requirements of a different professional license (there were several dozen examples solely in Colorado). Because there are so many of these policies—and they are mostly duplicative in their nature, language, and intent—the inventory includes only a sample rather than each and every policy that exists. Any tally of the policies in this category would undercount the actual number. For this reason, we did not include this theme in figure 3.

## **CPL Policy Themes Across Sources**

The analysis of CPL policies also revealed that the proportion of policies that referenced specific themes varied somewhat across different policy sources. Military training emerged as one of the top themes across all the sources. In CPL policies created through legislation, military training was the most frequently referenced theme; it appeared in 51 percent of policies, followed by policies that required a CPL policy (41 percent) and methods of assessment (41 percent). In contrast, CPL policies created by either state boards or state systems placed a stronger emphasis on methods of assessment (70.3 percent), followed by transfer policy (58 percent), and military training (53 percent). Additionally, state boards frequently referenced credit caps and limits (44 percent), whereas state systems placed a higher emphasis on transcription policy (49 percent). Among CPL policies from state agencies, the most prevalent theme was CPL for military training (52 percent) (see table 2).

**TABLE 2: PREDOMINANCE OF POLICY THEMES, BY POLICY SOURCE** 

Legislation	State Board	State System	State Agency
<ul> <li>Military training (51%)</li> <li>Methods of assessment (42%)</li> <li>Require a policy (41%)</li> <li>Focus on transparency (21%)</li> </ul>	<ul> <li>Military training (53%)</li> <li>Methods of assessment (70%)</li> <li>Transfer policy (58%)</li> <li>Credit caps and limits (44%)</li> </ul>	<ul> <li>Military training (71%)</li> <li>Methods of assessment (82%)</li> <li>Transfer policy (57%)</li> <li>Transcription policy (49%)</li> </ul>	<ul> <li>Military training (52%)</li> <li>Methods of assessment (33%)</li> <li>Transfer policy (22%)</li> <li>Require a policy (19%)</li> <li>Focus on transparency (22%)</li> </ul>

Note: The percentages included in the table were derived from table A1 (see the appendix). There may be some differences due to rounding.

# **CPL Policy Themes: State and System Examples**

Coding the various CPL policies by the themes outlined herein can be a helpful way to consider the problems that each state or system policy is trying to solve. Within each theme, however, there are also different ways to go about writing policy or providing guidance for system-wide implementation.

This section provides sample language to further clarify the intent and scope of each CPL policy theme.

### **REQUIRE A POLICY**

A relatively common approach is to require that all publicly funded institutions have some kind of established CPL policy. It can either be part of a broader, more comprehensive approach, or it can be a state policy with smaller scope as an initial way for states or systems to direct institutional attention to CPL.

### Michigan

Policy Source: Legislation

Policy: Michigan Senate Bill 845, Sections 227 and 265f

This Michigan Senate Bill from 2022 requires that publicly funded community colleges and universities "shall demonstrate the acceptance of nationally recognized college level equivalent credit examination opportunities by developing and implementing policies and procedures for the awarding of academic credit through college level equivalent credit examinations." Further language stipulates that no policies can be created that prevent enrolled students from earning such credits. In addition, in an effort toward transparency, CPL policies and opportunities are to be made publicly available on the institution's website (see Focus on Transparency).

### **FOCUS ON TRANSPARENCY**

State or system policies focused on transparency typically require that CPL policies be publicized in some way, such as on the institution's website.

### Louisiana

Policy Source: State Board

Policy: Louisiana Board of Regents Academic Affairs Policy 2.23: Prior Learning Assessment

This Louisiana Board of Regents policy is designed to provide guidelines for public postsecondary institutions for awarding CPL credit, referred to in Louisiana as prior learning assessment (PLA). The guidance requires each institution to maintain clear policies; provides details on acceptable CPL methods; and includes information on credit transcription, credit transfer, fees, and data reporting. Regarding transparency, the Louisiana Board of Regents (2022) states:

It is incumbent upon institutions to ensure that this policy and all institutional policies governing the awarding of credit for PLA are clearly stated and publicized. Each institution must provide ease of access to and transparency of PLA policy and procedures for prospective and current students.

<sup>10</sup> State of Michigan 101st Leg., Public Act No. 144, S.B. 845 § 227 and 265f (2022).

In the name of transparency and ease of access, the Board of Regents further requires institutions to:

- Guarantee timely and efficient evaluation of all student requests for PLA.
- Ensure that PLA policies and procedures are incorporated into admissions and other advising practices.
- Ensure that faculty who conduct prior learning assessments are appropriately credentialed and have adequate resources and training to conduct those assessments.
- Include a procedure for removal of excessive credits from a student's transcript that will negatively affect financial aid eligibility.
- When awarding credit to students who are veterans or military service
  members, the institution will reference the Joint Services Transcript
  (JST), DD-214 and/or transcripts from the Army/American Council on
  Education Registry Transcript System (AARTS), Community College of
  Air Force (CCAF), and Coast Guard Institute (CGI). (Louisiana Board
  of Regents 2022)

### **MILITARY TRAINING**

State and system policies regarding the awarding of credit for military training include a range of approaches, such as requiring a policy, stipulating methods for awarding credit for military training, and even recognizing the credentials of military spouses that were earned in other states. Many legislatures created these policies in the early- to mid-2010s as many veterans of the Iraq and Afghanistan wars transitioned from military service to civilian life and entered into the educational opportunities provided through the Post-9/11 GI Bill.

### Illinois

Policy Source: Legislation

Policy: (110 ILCS 32/) Educational Credit for Military Experience Act

Illinois law established the following requirements:

Each institution of higher education shall adopt a policy regarding its awarding of academic credit for military training considered applicable to the requirements of the student's certificate or degree program. The policy shall apply to any individual who is enrolled in the institution of higher education and who has successfully completed a military training course or program as part of his or her military service that is:

- (1) recommended for credit by a national higher education association that provides credit recommendations for military training courses and programs;
- (2) included in the individual's military transcript issued by any branch of the armed services; or

- (3) otherwise documented as military training or experience.
  - (b) Each institution of higher education shall develop a procedure for receiving the necessary documentation to identify and verify the military training course or program that an individual is claiming for academic credit.
  - (c) Each institution of higher education shall provide a copy of its policy for awarding academic credit for military training to any applicant who listed prior or present military service in his or her application.
  - (d) Each institution of higher education shall develop and maintain a list of military training courses and programs that have qualified for academic credit.<sup>11</sup>

### Louisiana

Policy Source: Legislation

Policy: RS § 17: 3165.2. College Credit for Military Service; Spouses of Veterans

Notable is Louisiana's version of this type of policy that extends opportunities to spouses:

Each public postsecondary education institution shall assist veterans of the United States Armed Forces and their spouses in pursuing their educational goals by providing expedited transcript analysis, prior learning assessment, portfolio analysis, advising, and testing. Upon the disclosure of military status on the application for enrollment or at the request of an entering student who is a veteran or the spouse of a veteran, each public postsecondary education institution shall evaluate any transcript of prior earned postsecondary academic or workforce credit and accept the transfer of any credit earned from a regionally accredited postsecondary education institution, or military education, training, or experience provided that the credit aligns with the course and program requirements of the receiving institution. <sup>12</sup>

<sup>11</sup> Educational Credit for Military Experiences Act, 110 §32 (2018).

<sup>12</sup> College Credit for Military Service; Spouses of Veterans, RS 17 § 31652.2 (LA 2015).

### **CREDIT CAPS AND LIMITS**

When state and system policies reference credit limits on CPL, it is typically in relation to established residency requirements and CPL is viewed as not fulfilling such requirements.

### Mississippi

Policy Source: State Board

**Policy:** Mississippi Board of Trustees of State Institutions of Higher Learning 518.A.9a: Prior Learning Assessment and Competency-Based Education

The Mississippi Board of Trustees' policies and bylaws outline the requirements for adult degree completion programs, noting that these programs may integrate prior learning assessment (PLA) and competency-based education (CBE):

PLA credit may include individualized student portfolios, evaluation of corporate and military training, program evaluations, challenge exams, and standardized exams. Credit earned through PLA may count as lower-division or upper-division credit. Credit earned through PLA shall not count toward the 25 percent residency requirement for the degree-awarding institution. The types of PLA accepted may be determined by the IHL institution. (Mississippi Board of Trustees of State Institutions of Higher Learning 2024)

### **COST/AFFORDABILITY**

Many state or system policies provide some guidance on how CPL fees may be set, but few address affordability issues around CPL. Generally speaking, CPL is not an eligible expense under most federal financial aid programs, so state attention to keeping CPL fees low or providing other support can be an important policy approach.

### **Arizona**

**Policy Source:** System

Policy: 2.2.4: Transfer Credit and Prior Learning Assessment

In Arizona, the Maricopa Community College District policy provides a fee schedule for CPL methods: "\$40 administrative fee per departmental challenge exam request, \$150 administrative fee per portfolio assessment request, and \$500 administrative fee for journeymen card evaluation" (Office of Public Stewardship 2019).

### Indiana

Policy Source: Legislation

Policy: IC 21-12-17 Prior Learning Assessments: Chapter 17

Indiana has been a pioneer in addressing CPL affordability by allowing state grants and scholarships to be used for CPL at Ivy Tech Community College:

A recipient of a grant, scholarship, or remission of fees listed under IC 21-12-13-1 or IC 21-12-13-2 may use the funds from the grant, scholarship, or remission of fees to pay for costs associated with a prior learning assessment that the student attempts to earn during the academic year in which the student receives the grant, scholarship, or remission of fees if the prior learning

assessment: (1) has been approved by the commission; and (2) costs not more than fifty percent (50%) of the full tuition and fees for an equivalent number of credits at Ivy Tech Community College of Indiana.<sup>13</sup>

### **New York**

Policy Source: Legislation

Policy: Section 667-C: Part-Time Tuition Assistance Program Awards

While not focused on CPL fees, a recent New York law ties CPL opportunities to a college affordability program. It provides tuition assistance for part-time students enrolled in a nondegree workforce credential program directly leading to employment in a "significant industry"; the law further stipulates that the student will receive credit for the nondegree credential from public institutions in The State University of New York or The City University of New York system:

A student who successfully completes a non-degree workforce credential program and receives part-time tuition assistance program awards pursuant to this paragraph shall be awarded academic credit by the state university of New York or city university of New York upon matriculation into a degree program at such institution, provided that such credit shall be equal to the corresponding credit hours earned in the non-degree workforce credential program.<sup>14</sup>

### TRANSFER POLICY

CPL earned at one institution is often not recognized if a student transfers to another institution. States and systems focused on strengthening transfer pathways should consider including policies on accepting CPL credit in transfer.

### Utah

Policy Source: Legislation

Policy: 53B-16-107 Credit for Military Service and Training—Notification—Transferability—Reporting

Utah legislation stipulates that students transferring within the system with transcripted CPL credit will be *evaluated* by the receiving institution:

Upon transfer within the state system of higher education, a student may present a transcript to the receiving institution of higher education for evaluation and to determine the applicability of credit to the student's program of study, and the receiving institution of higher education shall evaluate the credit to be transferred in accordance with Subsection (2) and the policies described in Section 53B-16-110.<sup>15</sup>

<sup>13</sup> In. Code § 21-12-17 (2023).

<sup>14</sup> Part-Time Tuition Assistance Program Awards, 16 § 1.14.2.2 (NY 2024).

<sup>15</sup> Ut. Code § 53B-16-107 (2020).

### **Rhode Island**

Policy Source: State Board

**Policy:** Rhode Island Council on Postsecondary Education Policy for Articulation and Transfer Between Public Institutions of Higher Education in Rhode Island (S-6)

Rhode Island's Council on Postsecondary Education (2024) goes a bit further by requiring that transcripted CPL credit be honored in transfer:

Credit awarded through examination or other forms of assessment shall be identified as such on the transcript. These transcripted credits will be honored by the receiving institution; credits accepted at a state institution of higher education through any form of prior learning assessment will be accepted by the receiving institution and to the extent appropriate shall be applied toward meeting degree requirements.

### TRANSCRIPTION POLICY

To facilitate transfer policies for CPL, it is important to have clear guidelines on how CPL is depicted on the transcript.

### **Alabama**

Policy Source: State System

Policy: Chancellor's Procedure for Policy 706.01: Credit Awarded Through Non-Traditional Means: General

The Alabama Community College System simply notes that "course credit earned from prior learning shall be noted on the student's transcript as having been awarded through PLA" (Alabama Community College System 2017).

### Maine

Policy Source: State System

Policy: University of Maine System Prior Learning Assessment Standards

The University of Maine System provides additional guidance about what details should be included:

- UMS institutions will record PLA credit using the appropriate labels and mechanisms in the database to differentiate test credit, military credit, portfolio, and credential credit.
- The credit will display as transfer credit on the transcript and clearly indicate the source of the credit (i.e. test, military, portfolio or credential).
- The subject and course number of the course for which credit is being
  given will be posted on the transcript. The course title will, except for test
  credit, reflect additional information about the student's prior experience
  and/or training.
- Credits awarded through the PLA process are considered to have been passed with a C- or better, like any other transfer course.
- Credits awarded through the PLA process do not carry quality points and are not calculated in the grade point average. (University of Maine System 2018)

### **METHODS OF ASSESSMENT**

State or system policies often define CPL by providing a list of the types of methods that institutions may include in their policies. These methods can be provided in a simple list or accompanied by additional details and guidance for administering the methods.

### Idaho

Policy Source: State Board

**Policy:** Idaho State Board of Education Governing Policies and Procedures Section: III. Postsecondary Affairs, Subsection: L. Prior Learning

The Idaho State Board of Education includes some CPL methods in its definitions:

- 1. National standardized exams in specific disciplines, including but not limited to
  - a) College Level Examination Program (CLEP)
  - b) DANTES Subject Standardized Test
  - c) Excelsior College Exams (UExcel)
  - d) Advanced Placement (AP)
  - e) International Baccalaureate (IB)
- 2. Challenge exams for local courses at the student's college or university
- 3. Individualized assessments or experiential learning, particularly portfolio-based assessments whereby students demonstrate learning acquired through experiences . . .
- 4. Evaluated non-college or non-credit courses and programs, such as
  - a) The National College Credit Recommendation Service (NCCRS)
  - b) the American Council on Education's ACECREDIT service and evaluations of corporate and military training
  - c) microcredentials pursuant to Board Policy III.E. (Idaho State Board of Education 2024)

### **DATA TRACKING**

States and systems can establish requirements for collecting, tracking, and reporting data related to CPL that can help in the evaluation of program effectiveness, access, and equity.

### Kentucky

Policy Source: Legislation

**Policy:** KRS § 164.2951: Development and Implementation of Credit Hour Degree Programs, Course Classifications, Credit Transfer Agreements, and a Statewide Standardized Articulation Agreement—Changes to Learning Outcomes

Kentucky policy directs its Council on the Future of Postsecondary Education to create such a system, stating that it must "develop uniform data collection and reporting methods to facilitate and ensure statewide and institutional compliance with course transfer and credit requirements."

### **Delaware**

Policy Source: State Agency

Policy: Delaware Credit for Prior Learning Policy Framework: 2022

Delaware's state higher education agency presents a vision for how a system should be implemented through institutional collaboration and provides suggestion for the specific metrics that might be tracked: "Delaware institutions should collaborate in common measures for CPL programs, such as numbers of students earning CPL, number of credits awarded, credits awarded by CPL source, etc." (Delaware Department of Education 2023).

### **EVALUATION OF EFFECTIVENESS**

As noted, a state or system focus on data collection can support evaluation activities to determine the effectiveness of a CPL program (or a program that includes CPL as a component). Such an evaluation provides evidence and insights for making improvements and recognizing any equity gaps.

### **North Carolina**

Policy Source: State System

Policy: The UNC Policy Manual, 700.10.1[R]: Regulation on Awarding Undergraduate Credit for Prior Learning

The University of North Carolina (UNC) System includes language outlining the intent of the UNC System office to evaluate the effectiveness of the policy and regulations, as well as the specific reporting requirements for each institution:

The effects of the policy and this regulation as they relate to awarding credit for advanced course examination scores, at the level of the UNC System and across its constituent institutions, shall be assessed by the UNC System Office within three years of implementation, and then on a period basis. Recommendations for altering the policy and this regulation shall be made accordingly to the president (for this regulation) or Board of Governors (for the policy), on the basis of appropriate evidence . . . .

Constituent institutions shall annually report to the President each form of prior learning assessment through which they provide credit, the total amount of CPL credit the institution awarded students, the number of students who have been awarded credit for prior learning, and updates to institutional policies and procedures. (University of North Carolina System 2024)

### Massachusetts

Policy Source: Legislation

**Policy:** The 193rd General Court of the Commonwealth of Massachusetts, Chapter 15D: Department of Early Education and Care, Section 5: Workforce Development System; Implementation Plan

Massachusetts law outlines directives for a workforce development system to support the education, training, and compensation of the early education and care workforce, which includes consideration for "credit for prior learning experiences, development of equivalencies to 2 and 4 year degrees, and the inclusion of strategies for multiple pathways for entry into the field of early education and care." <sup>16</sup>

<sup>16</sup> General Court of the Commonwealth of Massachusetts, General Laws, Part 1, Title II, Chapter 15D, Section 5: Workforce Development System; Implementation Plan. https://malegislature.gov/Laws/GeneralLaws/PartI/TitleII/Chapter15D/ Section5.

Part of the law requires evaluating the effectiveness of the entire program by creating "a data collection and evaluation system to determine whether the workforce and professional development activities established pursuant to this chapter are achieving recruitment, retention and quality of the workforce goals."

# CPL FOR PROFESSIONAL LICENSE REQUIREMENTS OR APPRENTICESHIP

Many state or system CPL policies are focused on ways to evaluate work experience or licensure for the purposes of awarding credit toward a formal associate or bachelor's degree program. In addition, many states have adopted the language and underlying intent of CPL to recognize alternative forms of learning for the purpose of awarding professional licenses or satisfying licensing requirements.

### Colorado

Policy Source: State Agency

**Policy:** Department of Regulatory Agencies' State Physical Therapy Board, Physical Therapist Licensure & Physical Therapist Assistant Certification: 4 CCR 732-1

Colorado has established dozens of individual regulations, each of which addresses the licensing, certification, or other requirements for specific fields. Only a sample were included in the inventory, as many of these instances were duplicative in nature. Examples include respiratory therapy, audiology, speech language pathology, massage therapy, nursing home administration, and real estate appraisal.

The following sample language describes how military training and experience can be evaluated as to the requirements for physical therapist and physical therapist assistant certifications:

Education, training, or service gained in military services outlined in § 24-34-102(8.5), C.R.S. that is to be accepted and applied towards receiving either a physical therapist license or a physical therapist assistant certification must be substantially equivalent, as determined by the Board, to the qualifications otherwise applicable at the time of the receipt of the application. It is the applicant's responsibility to provide timely and complete evidence of the education, training and/or service gained in the military for review and consideration. Satisfactory evidence of such education, training or service will be assessed on a case by case basis.<sup>18</sup>

**Policy:** Department of Regulatory Agencies' State Electrical Board, State Electrical Board Rules and Regulations 3 CCR 710-1

For electrician licensing, similar language is used to recognize learning from military training and experiences as well as for other alternative learning and training experiences:

Applicants for licensure with electrical apprenticeship training, other electrical training, non-accredited electrical education, or other electrical education not addressed in statute or Board Rules may be granted a maximum of one year of experience credit provided the applicant meets and provides [specified] documentation.<sup>19</sup>

<sup>17</sup> General Court of the Commonwealth of Massachusetts, General Laws, Part 1, Title II, Chapter 15D, Section 5: Workforce Development System; Implementation Plan. https://malegislature.gov/Laws/GeneralLaws/PartI/TitleII/Chapter15D/Section5.

<sup>18</sup> Col. Code 4 732-1 (2015).

<sup>19</sup> Col. Code 3 710-1 (2023).

# Comprehensive CPL Approaches

Some states and statewide systems have adopted particularly comprehensive approaches to their CPL policies. These examples often include eight or more of the tracked policy themes identified in this report. Instituting a comprehensive policy rather than a fragmented approach can help make CPL an integral part of system-wide processes. By tackling multiple areas at once, this process simultaneously addresses the continuum of CPL policy approaches, and it also in many cases sets forth some kind of continuous improvement feedback loop through data tracking and reporting. Several states—including Delaware, Kansas, and Oregon—have implemented comprehensive approaches to CPL. This section highlights such approaches to offer deeper insights into the development of robust CPL frameworks.

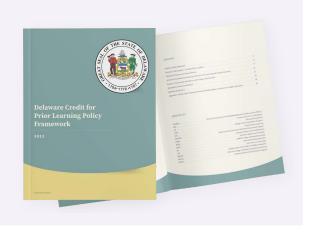
### **Delaware**

In 2023, the Delaware Department of Education (DDOE) released *Delaware Credit for Prior Learning Policy Framework*. This document establishes a shared vision, language, and guiding principles for the implementation of CPL at institutions across Delaware. The framework is the product of intensive engagement with key stakeholders that was facilitated by CAEL. Stakeholders that weighed in on the framework included Delaware's colleges and universities (Delaware State University, Delaware Technical Community College, Goldey-Beacom College, the University of Delaware, and Wilmington University) as well as the adult education divisions of the New Castle County Vocational Technical School District, POLYTECH School District, and Sussex County Vocational Technical School District; the Delaware Department of Labor; and DDOE's Adult Education, Prison Education, Higher Education, and Career and Technical Education programs. By engaging entities across the postsecondary education continuum, the state created early buy-in from a wide range of stakeholders. The framework outlines recommendations related to a variety of policy themes, including transcription, transfer, data collection, methods of assessment, and military training. After its release, DDOE decided to dive further into data collection and analysis around CPL and convened a working group facilitated by CAEL to develop recommendations on that topic.

### **Lessons Learned from Delaware's Efforts**

CAEL's work with Delaware allowed for a close view into the success of the framework and ensuing efforts. Other states that are interested in pursuing similar efforts may benefit from the following lessons learned:

- · Engage a wide array of stakeholders early for buy-in.
- Use the flagship university (in this case, the University of Delaware) to encourage others to participate.
- Task each representative with engaging their own institution for feedback.



### **Kansas**

In 2022, the Kansas Board of Regents released *Kansas Credit for Prior Learning Guidelines: A Best Practices Guide for Assessing Prior Learning at Public Postsecondary Institutions*, which was informed by the Kansas Credit for Prior Learning Task Force. The task force consisted of representatives from each university as well as from the community college and technical college sectors. The comprehensive guide is intended to encourage all public institutions of higher education to implement best practices around quality, transferability, fees, transparency, military service, and more. Additionally, the Kansas Board of Regents publishes online a yearly report with CPL data from the state universities, municipal university, community colleges, and technical colleges. This includes credit hours awarded by institution and by type of credit, as well as year-over-year comparisons.

### **Oregon**

Oregon Revised Statute 350.110 states that the Higher Education Coordinating Commission (HECC) must collaborate with public universities, community college districts, and independent for-profit and nonprofit higher education institutions to achieve a series of objectives related to CPL. These objectives include increasing the number of students who gain credit through CPL, the number of credits awarded through CPL, and the range of CPL options that are available. Creating articulation agreements and outcome measures for goal progress were also key objectives. Moreover, HECC must submit an annual report to the legislature on progress to goals each year, which they have been doing since 2012. In 2014, HECC also created standards for CPL that each institution is encouraged to follow. The standards have been updated regularly, with the latest update in 2024. Notably, in 2022 as part of the \$200 million Future Ready Oregon initiative to increase opportunities for a diverse workforce, the state invested \$10 million to increase opportunities for students from priority populations to receive CPL.

### **New York**

At the statewide system level, The State University System of New York (SUNY) has instituted a comprehensive approach that ensures consistency across multiple campuses. SUNY was a pioneer in formalizing academic credit by evaluation and introduced its Award of Academic Credit by Evaluation policy in 1976. A comprehensive revision was issued in 2023 that expanded the types of prior learning that could count for credit. The policy also states that credit earned through CPL at one SUNY university is guaranteed to transfer to any other SUNY campus. Adult students may be more prone to start and stop their education, which potentially includes switching campuses. When CPL processes are the same system-wide and credit gained through prior learning is transferable, students receive a better experience overall and do not need to worry about these credits transferring if they choose to resume their postsecondary journey at a different institution. The policy outlines methods of evaluating CPL effectiveness and communicating the policy information to students. Even more recently, a memorandum on implementation of the 2023 policy revision was issued that explains campus expectations in even more detail. With SUNY's undergraduate enrollment of over 320,000 students, this policy has widespread influence.

# **Database of CPL State Policies**

Credit for Prior Learning Policies: A Database of Findings from the ACE-CAEL 50-State Analysis is housed on ACE's website and accessible to the public. The inventory provides access to more than 360 examples of state and system CPL policies and serves as a valuable resource for CPL policymakers, institutional leaders, accrediting bodies, military and veterans affairs specialists, and others.

The database is designed to support such stakeholders in crafting, implementing, and scaling effective CPL initiatives. For policymakers, the inventory offers a centralized resource to research CPL policies across different states and develop new or revised legislation based on existing models. Drawing from policies across the country, policymakers can also craft policies that better address the needs of both adult learners and the workforce. States and systems can use the database to compare their own policies against peer states to identify opportunities for enhancing their approaches. Accrediting agencies can also use the database to make cross-state comparisons and follow trends to inform recommended practices and quality standards. Others may find the database useful to raise awareness and transparency around CPL policies.

# Considerations for CPL Policy Design and Implementation

The results of the state- and system-level database of CPL policies show that some themes have been more prevalent than others over the past 15 years of CPL policymaking. Yet it is also clear that a handful of states have taken significant action toward building comprehensive approaches to CPL for their public colleges and universities.

There is still much to learn about the value of the individual policy themes and the effectiveness of states' ability to move from policy to implementation at the institutional level. In the meantime, ACE and CAEL offer a few reflections on how states might choose to engage with CPL at the policy level.

- The 11 CPL policy themes offer a possible framework for state or system action. The 11 themes identified in the CPL policy inventory provide valuable starting points for states and systems that are aiming to build or expand their approaches to statewide or system-wide CPL. Each theme addresses an important aspect related to creating a robust CPL system. By using these themes as a framework for action, states and systems can effect a more tailored approach to addressing common barriers in CPL implementation for their particular jurisdiction—such as inconsistent implementation of CPL methods or limited access to alternative credit opportunities—and can thereby support equitable outcomes for all learners.
- Focusing on standards for data collection and reporting should be a state or system priority. An essential focus for CPL policy development is robust CPL data management—an area that currently faces considerable challenges, including inconsistencies in data collection methods across institutions, if such data are collected at all. Currently, 30 states currently have policies that mention the collection and reporting of CPL-related data; even among these policies, however, specific guidelines are often lacking. There is a great need for more structured, supported, and enforced data management practices. States and systems could start by assessing the availability of CPL-related data, especially that which reflects CPL use and outcomes for specific student subgroups. Reviewing current practices in this way will provide an understanding of what kind of capacity-building will be needed to provide reliable CPL data. Better system-wide data on CPL usage and outcomes are important for determining and evaluating who benefits from CPL, the ways in which they may benefit (e.g., credential completion, cost savings, or time savings), needed program improvements, and overall program effectiveness.
- Better CPL data can also help with other state or system priorities, such as equity and workforce strategies. States, systems, and institutions that collect CPL data will be better equipped to understand where there might be equity gaps and how to address them, particularly for low-income students, veterans, military personnel, and populations that are traditionally underrepresented in or underserved by postsecondary

education. Understanding who benefits from CPL—and who does not—can help systems and states to focus on solutions that close those gaps (see, for example, strategies for closing CPL equity gaps in CAEL's Equity Paradoxes in the PLA Boost (Klein-Collins, Bransberger, and Lane 2021) and Closing Equity Gaps in Credit for Prior Learning: Tools and Strategies to Recognize All Learning (Klein-Collins, Sedney, and Lane 2024)). In addition, understanding the role of CPL in supporting career changes for key industries can help to inform strategies that are focused on the needs of local labor markets and industries, which can further strengthen the case for CPL investment.

• A comprehensive approach that integrates key policy themes may lead to even greater impact for student transfer and mobility. A comprehensive approach to CPL that advances a combination of themes implemented together could play an important role in supporting students. Consider, for example, the issue of student transfer. Currently, students with CPL credit who want to transfer to another institution may find that those CPL credits are not accepted by the receiving institution. This may be due to the lack of clarity in how prior learning is assessed and how CPL credits are awarded at the originating institution. A CPL policy approach can take steps to solve that problem by simultaneously addressing quality standards in CPL assessment methods, transparency in how CPL credits are awarded, CPL transfer policies within systems, and standards in how CPL appear on the transcript (including embedded data on specific learning outcomes and/or sources of learning). In combination, these four CPL themes could help to foster cross-institutional trust—which then further supports student transfer and mobility (see figure 4). States and systems should consider what their overarching CPL policy goals are and focus on the CPL policy themes that help to advance those goals.

FIGURE 4. INTERCONNECTEDNESS OF CPL POLICY THEMES FOR GREATER IMPACT



• A need to address CPL affordability. There are a number of CPL policies in this inventory that mention CPL fees, even if only at very high levels. But it is striking how few of these policies provide solutions to the fees that may be charged for CPL-related services—which is one of the key barriers to CPL for many students. In particular, this creates a significant barrier for students who are dependent on Pell Grants or federal student loans, which are not currently structured in ways that cover those costs. Only one state—Indiana—was identified as providing direct financial support for CPL through its state grant system. A goal for state and system policymakers should be to find solutions that will reduce CPL fees or provide financial assistance for students who otherwise could not afford to pursue CPL. The time-saving and credential completion benefits of CPL should not be only available to students who can afford it.

In sum, by adopting a comprehensive approach to CPL that prioritizes equity, quality standards, transparency, affordability, and cross-institutional trust, policies not only facilitate the seamless transfer of CPL credits but also enhance CPL as a powerful tool for advancing postsecondary success. This approach offers a promising path for states and systems to unlock the full potential of CPL for adult learners, drive educational achievement, and meet the evolving needs of the workforce.

# **Future Directions**

The variation in CPL policy enactment across states highlights the need for further research to determine which approaches are most effective in promoting postsecondary success. Future studies could focus on comparing CPL implementation across states to identify the specific elements of state and system policies and practices that have the greatest impact on institutional implementation. Engaging a diverse range of stakeholders in the research design would be especially valuable to identify challenges in the implementation process and determine how specific policy components are most effective for supporting adult learners, institutions, and systems.

Another promising area for future research is to explore the long-term effects of CPL policy implementation in terms of student usage and the ultimate impact on cost savings, time savings, credential completion, and employment outcomes. Additionally, research could assess the effectiveness of institutional support mechanisms in helping students navigate CPL opportunities, particularly as these supports may improve access for different student subgroups that may be important for reaching system-wide equity goals. Understanding the barriers that institutions face in implementing CPL policies to serve a diverse group of learners—and how those challenges affect scalability—will also be crucial for improving the reach and effectiveness of CPL programs.

# **APPENDIX**

The following table displays the distribution of themes within each source, which is based on the total number of policies for each source and the number of policies referencing any given theme.

TABLE A1. PREDOMINANCE OF POLICY THEMES, BY SOURCE OF POLICY

Source		Military Training	Methods of Assessment	Transfer Policy	Require a Policy	Transcription Policy	Credit Caps and Limits	Cost/Affordability	Focus on Transparency	Data Tracking	Evaluation of Effectiveness	Number of Policies Within a Source That Reference a Theme
Legislation	Freq.	95	77	31	77	12	17	16	40	28	15	187
	%	50.8%	41.2%	16.6%	41.2%	6.4%	9.1%	8.6%	21.4%	15.0%	8.0%	100.0%
State Board (Coordinating or Governing)	Freq.	34	45	37	22	24	28	18	27	21	10	64
	%	53.1%	70.3%	57.8%	34.4%	37.5%	43.8%	28.1%	42.2%	32.8%	15.6%	100.0%
State System	Freq.	39	45	31	16	27	21	18	19	9	7	55
	%	70.9%	81.8%	56.4%	29.1%	49.1%	38.2%	32.7%	34.5%	16.4%	12.7%	100.0%
State Agency	Freq.	14	9	6	5	2	4	3	6	1	1	27
	%	51.9%	33.3%	22.2%	18.5%	7.4%	14.8%	11.1%	22.2%	3.7%	3.7%	100.0%
State Administrative Code	Freq.	10	3	2	3	2	3	2	4	0	0	24
	%	41.7%	12.5%	8.3%	12.5%	8.3%	12.5%	8.3%	16.7%	0.0%	0.0%	100.0%
Governor's Office	Freq.	3	2	2	1	3	1	1	2	1	1	4
	%	75.0%	50.0%	50.0%	25.0%	75.0%	25.0%	25.0%	50.0%	25.0%	25.0%	100.0%
Other	Freq.	0	0	1	0	0	1	0	0	0	0	1
	%	0.0%	0.0%	100.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	100.0%
All Sources	Freq.	195	181	110	124	70	75	58	98	60	34	340
	%	57.4%	53.2%	32.4%	36.5%	20.6%	22.1%	17.1%	28.8%	17.6%	10.0%	100.0%

Notes: This table reflects 340 of the 362 total CPL policies; omitted from the table's calculations are CPL policies that are exclusively about the 11th policy theme, which focuses on CPL for licenses and apprenticeship. | The table displays the distribution of themes within each source, based on the total number of policies for each source and the number of policies referencing any given theme. For example, out of the 187 legislative policies in the inventory, 95 mention military experience or training. Therefore, 50.8 percent of legislation policies include this theme.

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