

March 12, 2021

MEMORANDUM

To: SUNY Campus Presidents and Chief Academic Officers

From: Shadi Sandvik, Provost-in-Charge

Subject: Call for Comments: Revised SUNY Policy on the Award of Academic Credit by Evaluation

I am pleased to open a comment period on the attached update to SUNY's Policy on the *Award of Academic Credit by Evaluation* (also known as 'prior learning assessment,' 'credit for prior learning,' or 'learning recognition'). **Comments will be accepted via email to: provost@suny.edu through Wednesday, April 7, 2021.** Feedback will be incorporated as appropriate with the goal of bringing the revised policy to the SUNY Trustees for consideration of adoption in May.

SUNY's current policy, which dates to 1976, positioned SUNY as a front-runner nationally in recognizing the value of awarding academic credit for learning that takes place outside of the traditional classroom; a practice proven to increase students' confidence in their ability to succeed, decrease time to completion, and, result in cost savings. Opportunities for this learning have grown to include K-12 settings; work experience; military education and service; completing professional certifications and licenses; micro-credentials; non-credit and continuing education study; experiential learning, including community service and volunteer activities; and independent study through open educational resources and online offerings.

The purpose of this revision is to align SUNY's approach for the award of credit by evaluation with recent advancements in the practice nationally; and, also to ensure that SUNY's approach addresses challenges made clear by the latest national research, which in short, tell us that when students know about these programs, they work. For example, a recent CAEL/WICHE study found that, "PLA boosts credential completion rates for adult students, and has the potential to close unfair, persistent equity gaps in degree and credential attainment. The boost for adult student completion is 17% for all PLA methods. This includes a boost of 14% for Black adults, 24% for Hispanic adults, 19% for Pell Grant recipients, and 25% for adult students at community colleges." The challenge, however, is that program participation is low, "While eight out of 10 U.S. institutions offer PLA options, barriers prevent students from understanding and using the process. Only about 11% of the students in the above referenced study received PLA credits." According to the authors, "PLA use was lowest among Black, female, and low-income students."

In response to this data and other research, the draft revised policy specifically addresses effective and transparent communication on the award of credit by evaluation – during recruitment, at the time of matriculation, and, in sufficient time prior to graduation to identify opportunities to advance time to completion -- as a tool in advancing equitable access to higher education. Policy adoption through the SUNY Trustees would be followed by system-wide training opportunities and access to a related library of resources.

Recommendations to update the policy have come from the SUNY TAACCCT Grant PLA Advisory Board, the SUNY Micro-Credential Task Force Implementation Team, and the team writing the DEI Action Plan. Given SUNY's diversity, equity and inclusion priorities, and the focus of SUNY for All, this proposed update is relevant and time-sensitive. This revision would also address DEI Action Plan Recommendation A3: Develop a Robust Policy to Expand College Credit for Life and Work Experience.

Questions should be sent to provost@suny.edu. I look forward to receiving your feedback.

Copy: President, University Faculty Senate
President, Faculty Council of Community Colleges
President, SUNY Student Assembly
SUNY Chief Diversity Officers
SUNY Military Coordinators
Vice Presidents for Student Affairs
SUNY Vice Presidents for Enrollment
SUNY Directors of Admission
SUNY Registrars
SUNY Business Officers
SUNY Directors of Continuing Education
SUNY Transfer /PLA Coordinators
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Discussion DRAFT

Policy Title: *Award of Academic Credit by Evaluation*¹

Summary

The policy broadly regulates within the State University of New York (SUNY) the award of academic credit by the evaluation and assessment of learning that often takes place outside of “traditional” higher education settings and oversight, but can also include evaluation of on-campus non-credit and continuing education activity. As of this writing, this work is also referred to as ‘prior learning assessment,’ ‘credit for prior learning,’ or ‘learning recognition.’

Background and History

SUNY initially issued the *Award of Academic Credit by Evaluation* Memorandum to Presidents in 1976, emerging as a leader at that time in recognizing that college-level learning can occur outside of traditional classrooms, and that this learning may be equivalent to knowledge gained from more standard higher education experiences. We know that today, increasingly, verifiable college-level learning takes place in K-12 settings; through work experience; military education and service; completing professional certifications and licenses; micro-credentials; non-credit and continuing education study; experiential learning, including community service and volunteer activities; and independent study through open educational resources and online offerings. Research demonstrates that the academic credit awarded for these experiences can give students’ increased confidence about their ability to succeed, decrease time to completion, and, result in cost savings.

The purpose of this policy update is to align SUNY’s approach for the award of credit by evaluation with recent advancements in the practice nationally, and to address research findings that too many students, particularly those who self-identify as low income or under-represented minority, are not aware of opportunities to have their prior learning assessed or of the related benefits such a review can provide. This update will address effective and transparent communication on the award of credit by evaluation as a tool in advancing equitable access to higher education.

Policy

I. Core Tenants

- A. The awarding of credits through evaluation and assessment of learning is based on the same criteria used to evaluate credit awarded in formal academic settings:
 1. **Shared Governance:** Campus-level policies and procedures must meet all applicable campus administrative and shared governance procedures for consultation, and must undergo a campus governance process equivalent to that for any local academic policy.

¹ This policy is informed by the recommendation report prepared by the SUNY TAACCCT Grant PLA Advisory Board as well as the 2018-2020 studies and reports funded by the Lumina Foundation and the Strada Network and prepared by The Western Interstate Commission for Higher Education (WICHE) and the Council for Adult and Experiential Learning (CAEL).

2. **Faculty Oversight:** The evaluation of student learning for the award of academic credit must be conducted by the faculty, or equivalent subject-matter experts whose credentials have been reviewed by procedures parallel to those employed by the campus for adjunct faculty.
 3. **Transparency and Communication:** policies and procedures for the award of academic credit by evaluation must be clearly delineated and disseminated, and readily accessible at multiple points: recruitment (prospective students, business/industry partners), at the time of matriculation, and again prior to graduation.
 4. **Enrollment Marketing:** The availability of prior learning assessment will be highlighted in marketing materials to prospective students across the institution, and business and industry partners as part of workforce development and continuing education programs.
 5. **Accountability:** all policies and procedures related to the award of academic credit fall under the purview of the President, Chief Academic Officer, or their designee.
- B. **Campuses can identify and assess non-traditional learning through a variety of methods to determine if academic credit should be awarded, leading to credentials.**

Common methods include, but are not limited to:

- standardized examinations;
 - military training (courses) and experiences (occupations) evaluated by the American Council on Education (ACE);
 - corporate, government and non-profit organization credit recommendations evaluated by ACE, the National College Credit Recommendation Service (NCCRS), and institutional accrediting bodies;
 - faculty-developed challenge exams;
 - national certifications and apprenticeships developed to meet industry or professional standards evaluated by ACE; and
 - individualized assessments of prior learning through a portfolio review by campus faculty or other nationally recognized body.
- C. **For purposes of providing minimum university-wide guarantees to all SUNY students, campuses must provide students with opportunity to apply *at least* 30 credit hours earned by evaluation and assessment of learning prior to their matriculation, including those offered as transfer credit, toward fulfillment of degree requirements at any SUNY campus where they are matriculated.**

A given campus may allow additional credit hours up to the limit specified by the residency requirement described later in this document.

Credit by evaluation is covered by SUNY's seamless transfer policy as described in Sections II and III below.

After matriculation, a student desiring credit by evaluation should seek prior approval before engaging in the activity.

Campuses will not be expected to count credit hours toward fulfillment of degree requirements in areas that would normally not receive credit during an evaluation of transfer credits.

II. Credit by Evaluation in Practice

All personnel involved in the assessment of prior learning must be adequately trained in assessment procedures and pursue continuing professional development for the functions they perform.

A. Published Examinations

Subject to the conditions of this policy, the guarantee of credit for published examination applies to the following published examinations. Acceptable scores need to be equivalent to a grade of C or better in a formal course:

1. College-Level Examination Program (CLEP) Subject Examinations;
2. Advanced Placement (AP);
3. International Baccalaureate (IB);
4. UExcel Examination; and
5. DANTES (Defense Activity for Non-Traditional Education Support) Subjects Standardized Tests (DSST).

Individual campuses may set lower cutoff scores for which local credit may be awarded through published examinations; however, other SUNY campuses are not required to award transfer credit for scores lower than the equivalent to a grade of C when published examinations are reported.

Further, a campus may award credit for other examinations, including campus-developed challenge exams.

B. Military Credits

Credit by evaluation may be awarded for military credits as recommended by the American Council on Education (ACE). These military credits should be accepted and applied accordingly when they satisfy local program degree requirements, in the same ways as other transfer credits. Other military experience may be eligible for portfolio review and/or faculty developed assessment.

C. Other Forms of Learning

For credits earned through other experiences, such as industry or corporate certifications, employment, internships, or service learning, the methods of evaluation shall fall under the oversight of the faculty and/or professional staff responsible for awarding credit. This would include challenge exams and portfolio reviews developed by faculty or by a nationally recognized external body such as ACE.

III. Transfer Policies

All SUNY campuses must apply the same SUNY policies to credit awarded via evaluation and assessment as those used to evaluate transferability of credit earned through standard instructional methods.

- A. These credits shall be appropriate to the programmatic context in which they are awarded and accepted;
- B. No campus shall be required to give credit in subject matter that could not normally be accepted for transfer from other institutions;
- C. Credit shall not be excluded from transfer solely because it was obtained through evaluation and assessment of learning;
- D. Transcript entries for such awarded credit shall clearly describe what learning is being recognized and identify that it is credit by evaluation and assessment of learning; and
- E. Verification procedures shall be documented at the campus level.

Where credit is awarded originally by the sending campus in content areas not offered by the receiving campus, the articulation must be reviewed and approved by an appropriate academic committee or designee assigned by the receiving campus, consistent with campus governance processes.

Content Restrictions

Academic credits awarded by evaluation and assessment may apply to multiple established policies, including SUNY General Education requirements, Transfer Path degree requirements, approved applied learning experiences, and micro-credentials developed in accordance with SUNY Trustee policy. All disciplines may accept academic credit awarded through evaluation. Any restrictions otherwise compliant with SUNY policies will be determined at the campus level.

Residency Requirement

Individual campuses may allow as many credits awarded to apply toward degree requirements as deemed appropriate and consistent with their local residency requirements.

Student Participation

All matriculated students will be allowed to use credits earned by evaluation and assessment. Individual campuses will also be allowed to extend such opportunities to non-matriculated students.

Although an individual may request evaluation of their verifiable, college-level learning at any time, the awarding of academic credit should be considered early enough to ensure maximizing its benefits toward a desired degree.

Campus Coordination

The President, Chief Academic Officer (or, for some areas, a designee) oversees the academic program of the institution, including the awarding of credit by evaluation and assessment. This individual or designee shall:

- A. Communicate clearly and accurately the university-wide campus practices concerning options, policies and procedures to students, faculty, and staff;
- B. Ensure evaluation activities are expeditious and conducted with integrity;
- C. Provide professional development for faculty and professional staff who would perform the evaluation and other campus groups concerned with related policies and procedures (admissions, enrollment management, communications, continuing education, registrar, business office, etc.);
- D. Serve as an information channel between the campus and other units and agencies (System Administration, ACE, etc.); and
- E. Maintain accurate records of credit evaluation activities, including documentation on the student transcript.

Campuses need to monitor, review, evaluate, and revise as needed their awarding of academic credit by evaluation policies and procedures regularly.

Communication

Repeated national studies of the award of credit by evaluation reveal a lack of awareness of available programs; particularly by those from low-income families or who identify as under-represented minority. As this process can boost student confidence and reduce time to degree completion and program cost, it is critical that related communication is elevated as part of each campus's commitment to an equitable access to education for all.

Policies, procedures and criteria applied to the evaluation and assessment of learning, including fee structure, financial aid practices and appeal procedures, should be fully disclosed and prominently available to prospective and enrolled students, as well as faculty and staff.

The award of academic credit as described herein should be regarded as an essential tool for promoting and supporting access to higher education, especially for adult learners in low income families, first-generation students, and students who identify as under-represented minority.

Relevant information should be provided in all:

- Campus catalogs;
- Webpages (transfer students, prospective students, admissions, workforce development, continuing education, etc.);
- Enrollment marketing campaigns aimed at adult learners/non-traditional students;
- Brochures and publications (printed or online);
- Presentations and meetings with prospective students; etc.

Further, recognizing that learning outside of traditional higher education can continue throughout a students' study, existing students should have the opportunity to have learning evaluated as they progress toward graduation. Key communication points are during recruitment, at the time of matriculation, and, in sufficient time prior to graduation to identify opportunities to advance time to completion.

In addition, if the application of credits earned through evaluation and assessment of learning to a specific degree program is restricted in any way, communication methods must also include a statement regarding those credits that are:

- A. not accepted for degree credit;
- B. not appropriate for specialized requirements; or
- C. not appropriate for prerequisites for advanced level courses.

Fiscal Procedures

The evaluation and assessment of learning that takes place outside traditional higher education settings still incurs an operational cost for the institution. Support for these costs – in the form of student fees² - should reflect, as closely as possible, the costs incurred.

- A. Assessment Fees charged for evaluation shall be based on the services performed in the process and not determined by the amount of credit awarded;
- B. In regard to charges for this evaluation and assessment, only the Assessment Fee will be charged to the student;
- C. Campuses will determine an appropriate proposed Assessment Fee based on the direct and indirect costs) necessary to provide credit-by-evaluation services. Such costs would include, but not be limited to, supervision of the evaluation activities, assessment preparation or purchase, administration of the assessments, including correction, evaluation, recording, notification of participants, and associated employee benefits / pooled offset contribution / other costs incurred in providing support services;
- D. Assessment Fees may vary based on type of evaluation and its related costs, but may not vary between participants taking the same test during any semester. Assessment Fee levels should be re-examined each academic year;
- E. Based on the financial circumstances of the participant, waiver of Assessment Fees may be authorized by the campus president or designee.
- F. Overall Assessment Fee levels should be established in such a way as to accommodate any loss in revenue as a result of waivers, operating within the principle that, overall, the evaluation program must reflect, as closely as possible, the costs incurred by the institution; and
- G. Proposed Assessment Fees for evaluation and assessment activities will be developed by each campus and forwarded to the SUNY System Administration Office of the SUNY Chief Financial Officer for approval.

Reporting

System Administration may request information from campuses concerning the awarding of credit by evaluation and assessment, as needed and appropriate.

² Hereafter "Assessment Fee(s)"