



INDIANA COMMISSION *for*
HIGHER EDUCATION

Indiana Model Credit for Prior Learning Policy Guidance

March 2024

Developed with the support of the Council for Adult and Experiential Learning (CAEL)



Recognizing that adult learners are the backbone of the U.S. economy, CAEL helps forge a clear, viable connection between education and career success, providing solutions that promote sustainable and equitable economic growth. CAEL opens doors to opportunity in collaboration with workforce and economic developers; postsecondary educators; employers and industry groups; and foundations and other mission-aligned organizations. By engaging with these stakeholders, CAEL fosters a culture of innovative, lifelong learning that helps individuals and their communities thrive. A national membership organization

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Program and Service Design

Awarding Credit

- The Indiana Commission for Higher Education (CHE) adopts the Higher Learning Commission's (HLC) policies relating to the establishment of college and university policies regarding the award of credits for prior learning¹.
 - "The institution evaluates all the credit that it transcripts, including what it awards for experiential learning or other forms of credit for prior learning, or relies on the evaluation of responsible third parties."
- Each institution shall adopt a clear policy statement regarding the maximum number of credits that will be awarded for CPL.
 - Transfer and CPL credit cannot exceed 75% of an individual's degree completion.²
 - CPL must be documented, evaluated, and appropriate for the level of degree awarded.³
- CPL may be awarded by an institution at any time after matriculation to that institution, but estimates may be provided prior to matriculation. The Indiana CPL program is available for all students at any time during their academic journey after matriculation.

Research and Goal Setting

- Each institution shall set goals for increasing the number of certifications and other non-collegiate credentials which may be automatically applied for credit through pre-evaluated crosswalks.
- The intent of CHE is for all academic programs to include CPL opportunities. For those institutions that do not offer CPL for every academic field, they need to begin the process of evaluating how they will recognize CPL within all their fields of study. Each campus may prioritize degree programs that would be most likely to attract students with college-level prior learning.
- Each campus shall develop a plan to increase its CPL offerings as appropriate in the above noted, prioritized high CPL usage programs.

Tuition & Fee Structure

- Each institution shall develop and consistently apply a fee structure for CPL that is transparent and accessible to all students, faculty, staff, and stakeholders.

¹ Higher Learning Commission. 2023. "Section 1: Criteria and Requirements: Chapter B: Criteria for Accreditation, Criterion 4. Teaching and Learning: Evaluation and Improvement, Core Component 4.A." In *Policy Book*, June 2023, 14–15. https://download.hlcommission.org/policy/HLCPolicyBook_POL.pdf.

² Higher Learning Commission. (n.d.). Assumed practices (crrt.c.10.010, B(b)): Policies. <https://www.hlcommission.org/Policies/assumed-practices.html>

³ Higher Learning Commission. (n.d.). Assumed practices (crrt.c.10.010, B(g)): Policies. <https://www.hlcommission.org/Policies/assumed-practices.html>

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- The fee structure shall be posted online to ensure transparency for students.
- The school must offer guidance on costs to the student for CPL versus the cost if the student took the matching course.
- Institutions shall endeavor to charge fees for CPL assessments that are based on the services performed in the assessment process rather than the credit awarded if charged at all.⁴ Regardless, CPL fees should not be greater than 25% of in-state tuition costs for the course. Institutions may want to consider having differing fees depending on the amount of labor involved with each assessment method.
- When transferring CPL credit, the receiving institution cannot charge the student for transcription of CPL credit, including portfolio reviews, previously awarded by the sending institution.
- Institutions shall embrace the goal of having all students able to access CPL irrespective of financial need.⁵

Program Design

- CPL shall be treated in the same manner of its application and use, including satisfying prerequisite requirements, as their course equivalencies do at that institution. Institutions shall make an effort on behalf of faculty and staff to determine how credit will apply to a given academic program.
- For any assessment method offered, the institution shall provide students with a reasonable explanation about why prior learning is or is not comparable with curricula and standards to meet degree requirements.
- Institutions shall strive to provide adequate and appropriate allocation of resources, including proper training and continuing professional development for the functions they perform.⁶
- CHE and institutions shall work together to develop roles and responsibilities for ongoing quality program administration and consistent professional development at the institutions.

Student Support Services

- Appropriate academic advising shall be provided by well-informed faculty and academic advisors, as outlined below. Academic advisors shall proactively and directly share CPL information with students.
- As part of the advisement process, institutions shall commit to providing and connecting students with holistic support services as appropriate to ensure CPL candidates can be

⁴ Council for Adult and Experiential Learning (CAEL). Standard 8. "Ten Standards for Assessing Learning." 2017. Accessed September 22, 2023. <https://www.cael.org/ten-standards-for-assessing-learning>.

⁵ Indiana Commission on Higher Education. "State Financial Aid for Prior Learning Assessments." November 29, 2017. https://www.in.gov/che/files/PLA_FinAid_Guidance_2017.pdf

⁶ CAEL. Standard 9.

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successful. This shall include referrals to those who can counsel on any impacts on financial aid eligibility.

- Academic advisors or relevant institutional faculty and staff shall ensure that students have realistic expectations about the process and the necessary skills to successfully complete the process, including establishing reasonable expectations and limitations of CPL.
- Institutions shall consider having a CPL coordinator on each campus or for each district. All counselors and advisors (e.g., veterans resource center, career center, adult re-entry center, student orientation, etc.) need to be versed in CPL policies and practices.
- Institutions shall provide necessary training and static resources to faculty and staff to ensure they are sufficiently informed to advise students as noted above.

Awareness & Transparency

- Indiana's CPL Clearinghouse serves as a central repository for all institutional policies and practices. The Clearinghouse also serves as a resource and outreach of program tools to aid stakeholders and potential and current students in their academic endeavors.
- Institutional CPL policies, expectations, and related materials shall be clearly published and communicated to current and prospective students, faculty, staff, and industry and community stakeholders in a variety of places, such as the course catalog and the institution's website, and this information must be regularly evaluated for accuracy. The following information shall be included:
 - Institutional CPL contacts
 - Available CPL opportunities and preparation requirements
 - Fee structure(s) and information about financial aid, including fee waivers
 - Risks to students and the financial consequences of assessment where credit may not be awarded
 - Information regarding the applicability of CPL towards certificate or degree programs including the number of CPL that can be used for a certificate or degree and the number of required residency credits
 - Passing scores
 - Transparency of how award or denial for CPL decisions are made
 - An appeal process

Transcription, Transferability, and Data

Data Collection and Reporting

- CHE shall require institutions to submit data as part of the institution's CPL operations on a regular basis. Institutions shall collect and report data in CHEDSS on the types of CPL awarded based on data points collaboratively developed, defined and agreed upon by the state and the institutions, to be detailed in a separate data collection policy.
- Additionally, institutions should internally monitor their own data for quality assurance purposes.

Transcription

- Transcription shall be informed by the American Association of Collegiate Registrars and Admissions Officers (AACRAO)-recognized best practices.⁷
- CPL shall be awarded for a specific course and when possible build upon existing state frameworks and practices for promoting transfer credit, such as the Core Transfer Library. Credit awarded shall not be limited to these existing frameworks.
- Optimally, the type of CPL awarded should be indicated as well as the number of units (credit awarded).
- Institutions may assign letter grades for CPL; however, if no grade is assigned beyond a pass or equivalent, the institution shall endeavor through published policies or on the transcript to indicate the minimum grade equivalent for a pass, and when receiving a transcript shall endeavor to verify whether the transmitting institution's policy for pass/fail meets its requirements. The institution shall maintain all documentation used as a basis for CPL awarded consistent with institutional policies on record retention.
- Institutions shall provide clearly articulated, consistent, and transparent statements to students about their transfer policies for CPL, including how CPL will be recorded on transcripts.
- The Indiana e-Transcript Program working group should reach consensus on how the Indiana College e-Transcript XML Schema should be modified to transcript CPL, consistent with AACRAO

⁷ American Association of Collegiate Registrars and Admissions Officers (AACRAO). 2017. "A Guide to Best Practices: Awarding Transfer and Prior Learning Credit." 2017. Accessed September 22, 2023.

https://www.aacrao.org/docs/default-source/signature-initiative-docs/trending-topic-docs/transfer/guide-to-best-practices.pdf?sfvrsn=4820bb55_6.

American Association of Collegiate Registrars and Admissions Officers (AACRAO), American Council on Education (ACE), and Council for Higher Education Accreditation (CHEA). (2021, December 15). Joint statement on the transfer and award of Credit. <https://www.acenet.edu/Documents/2021-Joint-Statement-Award-of-Credit.pdf>

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transcript standards, PESC College e-Transcript XML Standards, and how CPL data are collected in the Commission for Higher Education Data Submission System (CHEDSS).

Transferability

- Credit awarded by a sending institution through CPL should be considered eligible for credit evaluation at the receiving institution as elective or other credit, or credit for courses that are part of Indiana's transfer initiatives such as the Core Transfer Library and Transfer Single Articulation Pathways.
- Credit awarded by one institution, based on scores earned through College Board's AP and CLEP programs, International Baccalaureate (IB), and Cambridge International will be awarded by the receiving institution upon receipt of official documentation of the score and consistent with the TransferIN website databases.
- In cases where the sending institution makes available to the student an opportunity for CPL that does not exist at the receiving institution (e.g., credit for a professional certification), the receiving institution should consider the CPL eligible for evaluation based on an equivalency review of the awarded CPL credits on the official college transcript.
- In cases where the CPL originates from an assessment completed at the institution, including through a prior learning assessment portfolio or test-out option, the receiving institution should consider the CPL eligible for evaluation based on an equivalency review of the awarded CPL credits on the official college transcript.
- In cases where the CPL originates from an assessment completed outside of the sending institution, including third-party services such as the American Council on Education (ACE) or the National College Credit Recommendation Service (NCCRS), the institution should consider the CPL eligible for evaluation based on an equivalency review of the awarded CPL credits on the official college transcript.
- When possible, efforts should be made to reduce the resubmission of official documentation by students. The lack of information about the CPL source (e.g., the ACE transcript) may require the submission of original official documentation to ensure students receive a complete and comprehensive evaluation at the receiving institution.
- In addition to ongoing institutional efforts, each year a statewide CPL working group may review additional third-party assessments and assessment organizations that may be considered for the awarding of credit based on prior learning.

Standards for Assessing CPL and Quality Assurance (Curriculum)

Overall Policy Language

- Institutional policy language shall remain flexible and provide expectations for evaluations (e.g., a review timeline, stated goals, scores, fees, student qualifications, and factors to be assessed).
- “The institution makes no promises to prospective students regarding the acceptance of credit awarded by examination, credit for prior learning, or credit for transfer until the institution has conducted an evaluation of such students’ credits in accordance with its transfer policies.”⁸ However, as noted above, this does not prohibit estimates from being given.
- CPL decisions are student-centered, striving for appropriate balance among fairness, consistency, flexibility, good educational practice, and academic program integrity. They address the needs of a student who has changed institutions or objectives or has learned in non-traditional formats.

Policy Review

- An institution’s periodic review of its CPL policies shall
 - include qualitative data from students and content experts.
 - be reviewed periodically as part of locally established review cycles (e.g., program reviews).
 - be inclusive of review of administrative processes and fee levels to ensure they are effective and fair.
 - engage faculty and key stakeholders (e.g., Academic Senate, the Associated Student Governments).
 - allow for local flexibility.
 - be reviewed frequently to adapt to changes in local contexts (e.g., local employer training programs) and innovation in higher education credentialing (e.g., digital badging, competency-based transcripts, new assessment types, etc.).
 - allow compliance with state-level requirements as defined in Indiana law.⁹

Elements of Institutional Policies

- All CPL assessments shall be evaluated
 - by faculty serving as content or subject matter experts in their chosen field.

⁸ Higher Learning Commission. (n.d.). Assumed practices (crrt.c.10.010, A, 5(d)): Policies. <https://www.hlcommission.org/Policies/assumed-practices.html>

⁹ Title 21. Higher Education. Indiana Code. (2021, June 8). <https://codes.findlaw.com/in/title-21-higher-education/>

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- by faculty who have taught at least one course in the discipline area and are current in their field. However, a CPL review team or non-expert assessors can still evaluate specific parts of a CPL submission, such as composition or technical requirements.
 - based on transparent standards and criteria for the level of acceptable learning. The institution shall consult its appropriate stakeholders in determining such standards and criteria.
 - as needed through agreed upon external entities to judge learning outcomes and validity of evaluation measures. Such entities may include third-party review by appropriately qualified reviewers and organizations such as ACE, CAEL, NCCRS.
 - to determined level of “Equivalency”/“level of acceptable learning” which is defined as approximately 70% of course learning outcomes match between CPL source and college-level course or its equivalent.
- Credit is not awarded for experience, but rather for college-level learning.¹⁰ This may entail knowledge, skills, and competencies that students have obtained because of their prior learning. CPL is rooted in the notion that legitimate, college-level learning can be achieved outside the traditional classroom setting, such that the learning is equivalent to college-level courses.
- Institutions shall make clear what degree requirements may be awarded through CPL. Clarity may be around possibilities of earning credit for specific general education or core course requirements, under HLC guidelines.
- Opportunities shall be given to students to have their extra-collegiate learning continually evaluated or reevaluated.
- No limitations for CPL shall be placed on student eligibility, including age, work experience, or discrimination based on race, religion, gender, disability, marital status, or sexual orientation.
- Equivalency decisions may be recorded for automatic use by credentialing experts.
- All CPL must be based on sufficient evidence provided compiled or gathered by the student, the institution, and/or sanctioned institutional outside assessors such as College Board, ACE, etc. Evidence required by the institution shall be based on academically sound CPL assessment methods and relevant disciplinary knowledge, including, but not limited to, institutionally developed tests, final examinations, performance-based assessments, demonstrations, presentations, portfolios, or industry certifications.

¹⁰ CAEL. Standard 1.

Community, Workforce, and Employer Partnerships

- Institutions may evaluate non-collegiate training programs that result in industry certifications, military recognition, professional licensure, apprenticeship completion, and other workplace skills development.
- CHE would be an ideal partner to provide support in coordinating these connections with the business community, the workforce system, establishing a clearinghouse of CPL partnerships, etc.
- Optimally, institutions should develop a partnership policy to connect their CPL programs with community, workforce, and employer partners.
- This institutional policy should include a clear statement advocating the value such partnerships provide to the institutions, the external partners, and the students. This statement should be written with the expectation that it will be shared with external partners.
- The policy should also include guidance to internal stakeholders on how to develop and maintain such partnerships.

Example elements of partnership policies:

- Benefits of Partnerships: The partner (business, military, regional intermediaries focused on talent, etc.), employee (servicemember, etc.), and institutions all benefit from this kind of evaluation.
- Partners can use CPL crosswalk opportunities to leverage limited education funds. They may also be able to use this crosswalk to attract those looking for support in furthering their education.
- Employees benefit in realizing that their work and training in the “real world” is worth college credit which could induce more people to return to school than might have otherwise.
- The institution could gain increased enrollments and contract support for specialized training.
 - An additional benefit to institutions is gap analysis; they can observe outcome applications in the “real world” and update or create curriculum in response.
- The inclusion of these evaluations will then allow employees to have more ease and flexibility in choosing a program that fits their college and career plans.
- The method of evaluating partner training will vary between colleges, industries, and training design. It is suggested that the institution take the time to engage faculty and staff in the creation of local evaluation standards and practices that are equitable for all participants.

Best practices for developing and maintaining partnerships:

The following are suggestions for developing these standards and practices to ensure a strong partnership with the employer, community, or workforce partner while maintaining the academic integrity of an institution's programs:

- Before deciding to conduct a full evaluation, take steps to make sure the training is of a caliber that will meet college-level curriculum requirements and standards. Appropriate curricular documentation (e.g., training plan, syllabus) is required to confirm this standard fulfillment.
- Use the following checklist to make a determination:
 - Does the training subject align with an academic offering? How long has the partner been offering the training?
 - Is the training accredited/credentialed? This is not a requirement but beneficial information.
 - Does the partner have a training department or liaison? As best practices, the training should be reviewed on a regular basis and the employer should be providing the institution with updates when the training is substantially revised.
 - Did the partner create the materials for the training or were they purchased from a vendor? Be aware that partner-specific material may be synthesized into content originating from a vendor. In such a case, consider whether an evaluation of the original content is practical and/or efficient.
 - Who teaches/trains the employees and what are their credentials? How are training records maintained?
 - How does the partner assess the training? Is there a pre-and post-test? Does the employee have to "pass" the training as opposed to just attending it? Are there grades?
 - How long is the training program (contact hours, days, weeks, months)?
 - Are there hands-on demonstrations or simulations? Are these assessed? How?
- Once it has been determined that there is comparability between the training and an academic course or competencies, then it may be a good idea, but by no means required, to conduct a site visit.
- If faculty determine that the partner's training program is established and ready for an evaluation, then the various documents from the checklist above can be collected and reviewed. The overarching objective is to see if there is a comparability between the training and an academic offering.
- Faculty will look for alignment with competencies and/or outcomes for a course or courses. The extent to which there is alignment will determine if credit can be awarded. Documentation should be reviewed by the faculty department and or director/dean before approving credit for the training.

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- In instances where partial credit for a course is considered, colleges should be prepared to offer students an academic plan that allows the credit to be used or expanded to full course credit through supplemental coursework or modular/competency-based learning.
- An agreement/memorandum of understanding/contract should be drafted for both the college and the partner. It should cover the following:
 - Duration of the agreement.
 - The training documentation required by employees that will be recognized by the institution for credit.
 - Any exceptions to credit recognition.
 - The offices or titles of the persons that should be notified in writing should the agreement need to be terminated or revised.
 - The institution should have a designated office where the agreement is kept (registrar's office) and where it will be maintained.

Glossary of Terms

AACRAO: American Association of Collegiate Registrars and Admissions Officers

ACE: American Council on Education- an organization that supports academic institutions in awarding college credit to military-connected and post-traditional learners based on military training and occupations, workplace learning, certifications, apprenticeships, and online coursework evaluated by faculty and published in the ACE National Guide.

Challenge Exams: CPL assessment that involves discipline faculty administering locally developed exams to determine whether a student can illustrate the learning outcomes of that class, often referred to by different terms, such as institutional exams, credit by exam, departmental exams, or proficiency exams. This assessment process provides academic departments the flexibility to tailor exams to fit specific course curricula, give program faculty confidence that the exams reflect an appropriate level of academic rigor, and provides faculty direct control of the assessment process

Clearinghouse: a central repository for all institutional policies and practices.

Credit for prior learning (CPL): Credit awarded for the demonstration of validated college-level skills and knowledge gained outside of a college classroom and is a potential tool for current and prospective students, especially returning students with non-traditional backgrounds. Also known as Prior Learning Assessment (PLA), Recognition of Prior Learning (RPL), as well as more informal terms such as lifelong learning credit or experiential learning. CPL assessments can include examinations, crosswalks, military recommendations, and portfolio assessments, among others.

Crosswalks: Direct evaluation of registered apprenticeship programs, industry-recognized credentials and assessments, and non-military training. This CPL assessment process involves subject matter experts examining the training directly (often in advance for commonly used training and credentials) and determining whether the outcomes of the training itself match the outcomes of a course (creating a “crosswalk” or “mapping”). Students who submit the proper documentation for the recognized training do not need to complete additional assessments in order to receive credit, otherwise, if insufficient documentation is provided, students may be recommended to complete other forms of CPL assessment.

Equivalency: When 70% of course learning outcomes match between CPL source and college-level course.

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HLC: Higher Learning Commission

Portfolio Assessment: Typically, a written narrative that allows the student to demonstrate their proficiency in the challenged subject's learning outcomes and should be supported by collected evidence (certificates of training, work samples, awards, job descriptions, resumes, or other forms of applicable documentation). The assessment process should include opportunities for feedback from the assessor to the student and should document the achievement of commonly recognized student learning outcomes for that course(s).

Third-Party Assessment: Those created, administered, and maintained by third-party entities beyond the institution (e.g. College Board, AP, IB, JST/ACE, ACE National Guide, Cambridge, NCCRS, DSST), also referred to as externally conducted assessments. Institutions still need to evaluate these assessments or credit recommendations for applicability to their specific program offerings (e.g., ACE, CAEL).

Transparent: Documentation that is clearly articulated, consistent, and accessible.