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Capitol Hill Day – June 13, 2019 PLA, CBE, and Privatization

The AAUP is greatly concerned about the growth of two strategies of doubtful value that are being promoted primarily as pathways to generate more affordable degrees for more students at institutions of higher education across the country: Prior Learning Assessment (PLA) and Competency-based Education (CBE). We are concerned that these strategies not only promote degrees of lower quality, but also facilitate the continued defunding and consequent privatization of higher education.

Prior Learning Assessment is designed to grant credit for college courses to students for information or skills they already possess. It can take a wide variety of approaches, such as the College Level Examination Program (CLEP) tests or the Defense Activity for Non-Traditional Educational Support (DANTE) exams but the goal remains the same: to have a standardized exam replace faculty and course work. Competency-based Education (CBE) takes this idea and proposes it more broadly, designing whole programs divorced from the classroom and faculty. It promotes itself as a way to allow students to learn on their own and prove what they know through tests rather than through coursework.

We do not object to the use of exams to determine competency. The problem is the drive to replace actual coursework with commodified assessment products. These tools are very often produced and sold by for-profit corporations, organizations that clearly have interests that are not informed by the common good.

At one level, there is the simple matter of equity. Clearly, the person who takes a course in a classroom with a teacher in the company of other students would most likely gain a much more sophisticated understanding of a subject than the person who spends a couple of hours taking an exam. Conflating these two experiences as equally representative of competence reduces education to mere performance on a behavioral assessment tool. In addition to being pedagogically unsound, this also creates a two-tiered educational system (one filled with less expensive tests and less opportunity to learn for low income students while wealthy students can afford better). At another level, in terms of the mission of publicly funded education, conflating these experiences is sociologically dangerous in that it blurs the line between education as a public trust, and a collection of commodified assessment products.

Much of this drive for PLA and CBE is being driven by the organization, Complete College America, funded primarily by the private Gates Foundation and Lumina Foundation. Corporations, like Pearson, who are supporting this drive see it as a way to turn public higher education into a profit center for their own gain. Advocates believe this approach could get more people more credentials, especially those who have started but not completed college. This is a fundamental misreading of the situation, at best naive and at worst disingenuous. Most students who don't complete their degrees fail to do so because of financial problems. Members of Congress should advocate for the restoration of the financial support that has been taken away from our colleges and universities. They should advocate, at both federal and state levels, for grants to low-income students and a lower-cost loan program. They should push higher ed

administrations to devote more of their financial resources to their instructional missions to produce lower tuition and more full-time faculty. Nationwide, on average, only about 24 percent of our four-year public university budgets pay for instruction, according to the national Integrated Postsecondary Data System (IPEDS) reports. If support of PLA and CBE is indeed driven by a concern for populations that struggle to get into and stay in college, then the primary objective should be to improve the public's access to college, not waive its requirements, or dilute its content by turning to the private sector for solutions.

Nevertheless, the Department of Education has embraced these models, especially CBE. In July 2014, the House passed H.R. 3136, sponsored by Rep. Matt Salmon, R-Arizona, and Rep. Jared Polis, D-Colorado, which aimed to waive rules and regulations to allow the Department of Education to fund experiments with CBE. In the same month, the DOE announced that it was doing just that, changing regulations to waive certain rules to allow institutions to use federal funding to experiment with CBE. H.R. 2859, the Advancing Competency-Based Education Act of 2017, introduced to the 115th Congress in June 2017 by Rep. Polis (D-CO), would further fund demonstration projects for CBE. Eligible institutions would receive waivers, or other "flexibility" regarding documenting attendance, minimum weeks of instruction time, requirements for substantive interaction with faculty, and definitions of key terms like "full-time student," "satisfactory academic progress" and "educational activity."

It does not strain the imagination to see this government funded effort as facilitating the increased utilization of other for-profit products like online program management systems, or OPMs. The same companies that produce and advocate for these testing products also produce OPMs, and their mercurial rise at colleges and universities across the country is very often justified by the same disingenuous rhetoric about reducing costs for low income populations. However, in a recent report, the Century Foundation found that "the growing use of for-profit intermediaries to provide online programming at public institutions raises important questions concerning whether these agreements appropriately shield students from the profit-seeking motives of these companies, inform students about exactly who is responsible for the education they are receiving, and provide a quality education that is up to the standards of institutions backed by the full faith and credit of states."

These changes are being driven by organizations that do not operate on the public trust. We at the AAUP know what the problems are in higher education that are driving up costs: administrative bloat and decreased state spending. The cost of higher education is the biggest barrier to degree completion. The AAUP has for over a century worked to improve higher education and maintain standards of excellence, including shared governance and academic freedom. We advocate for a sharper focus on the enormous sums misspent by administrations nationwide on areas that are peripheral to their academic missions, as well as on the state and federal responsibility to maintain the distinction between private profit and the general welfare.

Please help us monitor this situation. We would like to have you work to create a committee to examine this new direction taken by the DOE that includes AAUP members and report on the effect this is having on institutions of higher education and student success. We would also like incentives proposed to encourage colleges and universities to redirect funds toward their public academic missions, and to encourage states to increase funding to higher education for the common good.