



Comptroller General  
of the United States  
Washington, D.C. 20548

## Decision

Matter of: Payment of Fees for College Level Examination Program

File: B-972280

Date: May 29, 1997

---

### DIGEST

Department of Defense On-Site Inspection Agency may properly pay examination fees for College Level Examination Program (CLEP) examinations as part of academic degree training that the agency has determined, under 5 U.S.C. § 4107(b) and implementing regulations, is necessary for recruitment or retention of employees. CLEP may properly be viewed as an integral part of the overall academic degree training since the examination allows the examinee to obtain college credit in substitution for a portion of the program leading to an academic degree. 55 Comp. Gen. 759 (1976) and B-187525, Oct. 15, 1976, regarding an examination to qualify for a professional license or certification, are distinguished.

---

### DECISION

The Department of Defense On-Site Inspection Agency (OSIA) has requested our opinion as to whether it may use appropriated funds to pay for examination fees for the College Level Examination Program (CLEP) for employees enrolled in the agency's academic degree training, authorized under the Government Employees' Training Act, 5 U.S.C. §§ 4101 *et seq.*<sup>1</sup> As explained below, OSIA may use appropriated funds for this purpose.

---

<sup>1</sup>Section 4107(b) of title 5, U.S. Code, permits the payment of costs of an academic degree where an agency determines such training is "necessary to assist in the recruitment or retention of employees in occupations in which the Government has or anticipates a shortage of qualified personnel." See also 5 C.F.R. § 410.309. OSIA has made the determination required that academic degree training is necessary to relieve its recruitment and retention problems.

Section 4101 defines training as:

"The process of providing for and making available to an employee, and placing or enrolling the employee in, a planned, prepared, and coordinated program, course, curriculum, subject, system, or routine of instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal, administrative, or other fields which will improve individual and organizational performance and assist in achieving the agency's mission and performance goals."

CLEP examinations are offered by colleges and universities to allow students to earn college credits in certain subjects based on the student's existing knowledge. Successfully passing a CLEP examination earns a student college credit counting toward a degree without the necessity of the more time consuming and expensive process of attending classes and completing course work. A fee is required for the examinations. OSIA questions whether receiving college credit under CLEP might meet the section 4101 definition of training as part of a "planned, prepared and coordinated program" or "routine of instruction or education."

The agency's question arises in light of two decisions in which we held that the costs of examinations that are not part of a training course or program may not be paid from appropriated funds. In one case, we held that the definition of "training" in section 4101 does not include an examination given by a professional organization to certify an employee as an accredited rural appraiser where the examination merely tested the skills the employee had acquired in a previous training course. 55 Comp. Gen. 759 (1976). Similarly, in the other case, we held that an agency may not pay for a professional examination that is part of an employee's personal qualification process, such as the bar examination required of lawyers. B-187525, Oct. 15, 1976.

Unlike the examinations that were the subject of the two decisions discussed above, the CLEP is not a professional certification or licensing examination, it is a substitute for taking a particular college course. We believe a clear line exists between the usual professional qualification types of examinations and examinations which may be used as a substitute for a portion of an academic program. Thus, the CLEP in this case properly may be viewed as an integral part of the overall "process . . . of placing or enrolling the employee in, a planned, prepared, and coordinated program," as required by section 4101. Accordingly, the same authority the Training Act provides to pay the cost of a college course under OSIA's academic degree program provides authority to pay the lesser cost of the CLEP which substitutes for such a course.

The agency also has asked whether it would be appropriate to pay the cost of the CLEP in other training situations. We are unable to provide a conclusive answer without knowing the details of the other situations. However, it may be appropriate in other situations where the course for which the CLEP substitutes is a part of an approved training program for which the agency would otherwise pay, such as where the course is a prerequisite to taking another course under the program.

/s/Robert P. Murphy  
for Comptroller General  
of the United States