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Beyond Transfer

# **Learning Evaluation for the 21st Century:** Recommendations to Transform Policy and Practice to Meet Changing Needs

*Final report of the Learning Evaluation and Recognition for the Next Generation  
(LEARN) Commission*

December 2025

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# Glossary

***Applicability of credit or credit applicability:*** Awarding academic credit for courses previously completed at another institution or for relevant college-level learning obtained outside of higher education, then applying it to the student's graduation requirements.<sup>1</sup> Credit might be applied to general education or program-specific requirements for graduation.

***Articulated course:*** A course taken at one institution deemed equivalent to a course at another. Also called an equivalent course.<sup>2</sup>

***Articulation agreement:*** An agreement between institutions to transfer academic credits earned by a learner from one institution to another by specifying course equivalents. Designed to ensure course credits earned at one institution will transfer to another.<sup>3</sup>

***Credit evaluation or learning evaluation process:*** How institutions evaluate prior learning, including traditional college coursework and college-level learning gained in nontraditional ways, to decide whether to award academic credit and apply it toward a credential.

***Credit mobility or portability:*** How credits move with or are carried by learners as they accumulate learning in a variety of educational, work, and applied settings.<sup>4</sup>

***Learning mobility:*** A learner-centered innovation that designs systems, processes, programs, and initiatives to best meet the needs of learners.<sup>5</sup>

***Recognizing prior learning or credit for prior learning:*** Allows individuals to earn credential-applicable credit for knowledge or skills gained outside traditional classroom settings, such as through work, military experience, or independent study. Learners can demonstrate knowledge through assessments (exams, skills demonstrations, or portfolio evaluations) or by completing a previously-assessed course, credential, or apprenticeship. Also called prior-learning assessment.<sup>6</sup>

***Transferable course:*** A course taken at one institution that can be transferred for academic credit at another.<sup>7</sup> This does not indicate whether or how the course credit can fulfill a graduation requirement at the receiving institution.

# Learning Evaluation for the 21st Century: Recommendations to Transform Policy and Practice to Meet Changing Needs

## Introduction

As learner transfer becomes a new norm in higher education, leaders must closely scrutinize long-standing practices for evaluating, documenting, and applying academic credit for prior coursework and other college-level learning. There have been several national efforts examining learner transfer more broadly.<sup>8</sup> But stakeholders have spent less time examining the underpinnings of the learning evaluation process and how institutions make decisions to award academic credit.

Though it is commonly called the **credit evaluation process**, this report intentionally uses the phrase **learning evaluation process** since today's institutions evaluate more than just prior course credit. Institutions also are increasingly evaluating prior learning obtained outside of higher education, including work experience, military service, on-the-job training, apprenticeships, digital badging, mass open online courses (MOOCs) from non-academic providers, microcredentialing, high school dual enrollment, and more.

In 2024, the American Association of Collegiate Registrars and Admissions Officers (AACRAO) joined Sova and the Beyond Transfer Policy Advisory Board to interrogate the learning evaluation process, noting several compelling reasons:

- ◆ **It involves significant resources:** At present, much staff time is involved in manual processes to review transcripts and other work and learner records, make evaluation decisions, document credit determinations, and communicate back to learners.
- ◆ **It is highly decentralized:** Professionals from a wide range of functional units engage in aspects of the process—from admissions and advising to registrar offices and academic departments. The silos that can form as a

result stymie communication and coordination, confusing learners about *who* is responsible for *what*.

- ◆ **It has a high impact on learners:** The process involves high-stakes decisions that shape learners' trajectories. A decision to not award credit for prior coursework or relevant college-level learning adds time and money to their educational path, impacting whether they decide to continue.

In July 2024, AACRAO and Sova launched the Learning Evaluation and Recognition for the Next Generation (LEARN) Commission to evolve learning evaluation policy and practice for the 21st century, with an eye toward increasing applicability of prior learning in all its forms to the credential sought by the learner. This diverse group of experienced and forward-thinking leaders from two- and four-year institutions, accreditors, researchers, and advocates sought to center the needs and experiences of learners while connecting insights from practitioners, researchers, and policy experts (see full list of members on page ii). Commissioners examined evidence, engaged stakeholder perspectives, and participated in robust dialogue to reach consensus on the recommendations in this report.

### *Why a focus on the learning evaluation process?*

To compete in a global economy, Americans are increasingly completing learning beyond high school. This includes enrolling in traditional higher education institutions or seeking career-relevant and high-quality training in less traditional ways, such as through high school dual enrollment, military and work experience, online education and massive open online courses (MOOCs), industry certification and digital badges, and more.

Several trends are shaping learning evaluation, including:

- ◆ **High prevalence of learner transfer across postsecondary institutions.** Nationally, more than one-third of all undergraduate learners transfer across postsecondary institutions. Of those who do, 45 percent transfer more than once<sup>9</sup> and about one-fourth transfer across state lines.<sup>10</sup>
- ◆ **Increases in learner transfer since COVID-19 continue.**

Learner transfer has grown since the COVID-19 pandemic, which disrupted the postsecondary trajectories of many learners and expanded the modes for postsecondary training (e.g., online education). Enrollment among transfer students increased nationally by 11.9 percent between fall 2020 and fall 2024. This includes increases in vertical transfer from community college to a baccalaureate institution, lateral transfer across institutions of the same type, and reverse transfer from a baccalaureate institution to community college.<sup>11</sup> Understanding the nuances behind this data is essential to support successful learner trajectories.

◆ **The number of U.S. adults with some college and no credential (SCNC) is growing as the number of high school graduates is declining.**

Institutions soon will see fewer first-time learners enrolling directly from high school due to projected declines in the number of high school graduates across most states. The Western Interstate Commission for Higher Education projects the population of high school graduates will peak in 2025, then steadily decline through 2041.<sup>12</sup> By contrast, the number of adults with SCNC has consistently grown across all 50 states and the District of Columbia in the past three years.<sup>13</sup> Adults with SCNC are likely to return to higher education as transfer students: 56 percent of returning adults enrolled in fall 2024 chose to transfer their prior learning to a new institution.<sup>14</sup>

◆ **High school graduates increasingly bring previously earned college credit.**

Over the past decade, states have invested heavily in expanding high school dual enrollment courses, also known as dual credit, concurrent enrollment, or early college courses. These courses are locally designed and administered by K-12 districts and postsecondary institutions. As a result, 34 percent of high school learners take dual enrollment courses, and most high schools nationwide (88 percent) offer them.<sup>15</sup>

◆ **Nationally, outcomes among vertical transfer students remain dismal.**

Despite decades of reform, attainment rates remain persistently low for community college learners seeking baccalaureate degrees. While 80 percent of learners who begin in community college aspire to earn a bachelor's degree, just 16 percent do so within six years.<sup>16</sup> Moreover, sizable inequities by race and ethnicity, income, and age point to the need for drastic change.

- ◆ **The stakes for completing a postsecondary credential are high, as an increasing share of jobs in the U.S. that pay family-sustaining wages require a postsecondary education.**

Analysis by the Georgetown University Center on Education and the Workforce projects that by 2031, 72 percent of all jobs in the U.S. will require at least some postsecondary education for entry.<sup>17</sup> Further, 85 percent of jobs paying a family-sustaining wage will require some level of postsecondary education. Adults who lack a postsecondary credential will be at a real disadvantage in this job market.

These trends underscore the critical importance of the learning evaluation process, which can either bring more learners into higher education and accelerate their progress to a credential, or create undue roadblocks that push them out of higher education altogether. **One thing is abundantly clear about the learning evaluation process: It was never set up to handle the volume or complexity of learner mobility trends and learning evaluation needs that higher education is now facing.**

## About the LEARN Commission

As critical as the learning evaluation process is, previous discussions about transfer policies seldom examined how the process worked or identified ways to evolve policy and practice to meet the changing needs of learners and institutions. The Learning Evaluation and Recognition for the Next Generation (LEARN) Commission sought to fill this gap by taking stock of current approaches, responding to new patterns in learning acquisition and mobility, and considering how emerging technologies can support more equitable pathways for learners. The commission is

### *Spotlight on Community College Transfer Student Outcomes*

*Nationally, just 16 percent of learners who begin in community college and aspire to earn a bachelor's degree finish within six years. According to the 2024 Tracking Transfer report, the percentages are significantly lower among historically-marginalized learners:*

- ◆ *11 percent for low-income learners*
- ◆ *13 percent for Latine/o/a learners*
- ◆ *9 percent for Black learners*
- ◆ *6 percent for older adults*

composed of 15 institutional leaders, accreditors, researchers, and policy advocates from across the country.

### *Areas of Work and Commission Process*

With an eye toward expanding learning mobility more broadly, the commission examined four dimensions of credit evaluation:

1. Traditional institution-to-institution credit transfer;
2. High school dual enrollment course credit;
3. Credit for prior learning; and
4. Applications of technology and artificial intelligence (AI) to credit evaluation and credential applicability.

While the commission arranged its meetings and deliberations around these four dimensions, its findings and recommendations are not presented in this same structure. The commission believes these learning experiences should be treated the same in the evaluation process. In this way, the commission re-elevates a core recommendation previously issued by AACRAO, the American Council of Education (ACE) and the Council for Higher Education Accreditation (CHEA) in their 2021 [Joint Statement on the Transfer and Award of Credit](#).

First, the standards for evaluating and awarding credit for prior learning **should be the same, regardless of where the prior learning took place** [emphasis added]. This is true whether the learning was acquired at another institution, as part of a high school dual-enrollment program, during on-the-job training at an employer or in the military, or through experiential learning. The award of credit also needs to be independent of the learning modality by which it was acquired.<sup>18</sup>

The commission convened virtually between July 2024 and October 2025, dedicating two meetings to each dimension of credit evaluation. Commissioners received research briefings from subject area experts and reviewed evidence on existing practices, key challenges, and potential areas for improvement. Commissioners contributed their own insights and experiences to further enhance group learning and decision making.

Of note, AACRAO leveraged its robust research assets, including its membership surveys, to develop four publicly available green papers to inform commission proceedings.

### *What did we uncover in this process?*

This report synthesizes key insights and takeaways revealed through the commission’s research, discussions, and deliberations. These insights provide necessary context for understanding the commission’s recommendations. For a deep discussion of trends in learning evaluation approaches, we recommend the green papers developed to guide the commission’s work (see page 9).

<b>The Current State of Learning Evaluation: Insights and Takeaways</b>	
<b>HIGH VARIABILITY</b>	Learning evaluation processes are highly variable across higher education and within institutions, creating a complex landscape for learners to navigate.
<b>MANUAL PROCESS</b>	The steps in the learning evaluation process—including transcript processing and evaluation, course and syllabi review, prior learning assessment, credit determination, and transcript recording—frequently are manual processes involving many campus professionals: registrars and transcript evaluators, deans and faculty, and admissions counselors and academic advisors.
<b>DIFFUSED DECISION MAKING</b>	Within this process, decision making often is distributed across campus units that lack coordination. It can be difficult for learners and campus professionals to know <i>who</i> is responsible for <i>what</i> , as well as <i>when</i> to expect a decision.

<b>UNCLEAR FACULTY ROLE</b>	<p>There are differing perspectives in the field about how much ownership faculty have over the learning evaluation process in practice. While learning evaluation looks different across institutions, administrators make most decisions and seek faculty input on new or unique cases. Clarity and transparency about who makes the decisions is important, as faculty autonomy is often perceived as a barrier to changing the learning evaluation process. However, administrators may have more authority to make changes than they believe.</p>
<b>FEW NATIONAL STANDARDS</b>	<p>Because there are few nationally agreed upon standards, principles or rubrics for developing learning evaluation processes, learners and campus professionals can view them as opaque. Institutions often provide limited information about the criteria or data they use to make those decisions.</p>
<b>LACK OF TRANSPARENCY</b>	<p>A lack of transparency can result in inconsistent evaluation decisions and inefficiencies in the process, forcing institutions to reevaluate the same course or learning experience with each new learner or prompting campus professionals to evaluate the same learning experience differently.</p>
<b>UNDERDEVELOPED DATA AND TECHNOLOGY INFRASTRUCTURE</b>	<p>There have been substantial efforts by faculty across institutions to identify course-to-course equivalencies, develop articulation agreements between institutions, and create frameworks for credit for prior learning to make learning evaluation more transparent and consistent. Yet the data and technology infrastructure to support this work remain woefully underdeveloped.</p>



<b>LACK OF FOCUS ON THE END GOAL</b>	As a result, there are limited systematic approaches to using data to determine whether learning evaluation decisions set up learners for success, such as tracking the rates of courses evaluated, accepted, and applied to graduation requirements and the associated impact on time and credits to completion.
<b>IMPACT ON LEARNER EXPERIENCE</b>	How learners experience this process is also highly variable, given differences in how long this process takes, when and how institutions notify learners about evaluation decisions, and how institutions support learners to advocate for themselves.

**Together, these findings paint a picture of our higher education ecosystem straining under the weight of learning mobility.** Without reform, higher education will continue to lose learners in transition, communities will struggle to meet local workforce needs, and our nation will fail to deliver viable pathways to economic mobility for all. The following recommendations are designed to address these root problems. While policy and practice are essential, transformative change ultimately requires that institutions adopt an ethos that values learners’ diverse strengths and assets, honors their prior learning by awarding academic credit, and supports them as they reach their educational goals.

***Explore these insights in depth through the commission’s green paper series:***

- ◆ [\*Transforming Traditional-Credit Evaluation: Developing a Learner-Centric Approach\*](#) by Dr. Wendy Kilgore
- ◆ [\*Embracing Credit for Prior Learning: Advancing Educational Equity and Mobility through a Learner-Centric Approach\*](#) by Dr. Wendy Kilgore
- ◆ [\*High School Dual Enrollment Credit: An Expanding Sector of Traditional Credit Transfer\*](#) by Dr. Wendy Kilgore and John Fink
- ◆ [\*AI-Supported Credit Mobility Opportunities and Challenges in Higher-Education Transfer Systems\*](#) by Dr. Wendy Kilgore and Dr. Jesse Boeding

## Recommendations to Transform Learning Evaluation for the Next Generation

Institutions have the power to immediately transform learning evaluation. Indeed, local institutional policy and practice already shape many aspects of this process. Yet because of the real constraints institutions often face with personnel, data, and technological capacity, the commission will also address the role that state and system policymakers, federal regulators, and accreditors can play in this transformation.

Moreover, changing these systems requires a collective willingness to confront the underlying norms that regularly devalue certain types of learning, including what community college students and adult learners bring to the table. Focusing on structural change (i.e., changing policies and resource flows) without considering relational and transformational change (i.e., changes in human relationships, power dynamics, and mental modes) will not shift the conditions that hold the status quo in place.<sup>19</sup>

For that reason, the commission's recommendations are organized in two parts. In this section, we discuss immediate foundational actions within and across institutions, acknowledging the incredible power and decision-making authority that institutional, state and system leaders already hold. Here, the term "leaders" may refer to administrators, faculty and/or staff working within a single institution, as well as professionals working within a system office and/or state agency. Throughout this section, we include real-world examples of how these ideas are being advanced across institutions, systems, states and regions.

The next section "Aligning the Levers for Systems Transformation" discusses the long-game strategies needed to bring these efforts to scale across institutions, regions, and states with support from accreditors, policymakers, national technical assistance providers, private philanthropy, and other stakeholders in the field.

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## RECOMMENDATIONS TO TRANSFORM LEARNING EVALUATION FOR THE NEXT GENERATION

*The LEARN Commission is calling for a shift in mindset. Institutions and systems—and all involved constituents—should seek to maximize credential applicability and embrace the assumption that a learner is prepared for additional education, unless proven otherwise. The following recommendations operate with this perspective.*

- 1.** Decisions to award and apply credit should be based on whether course- and/or program-level learning outcomes overlap by at least 70% of the predetermined learning outcomes; invoking additional criteria does little to preserve academic quality and could introduce bias.
- 2.** When learning outcomes do not overlap by at least 70%, institutions should maintain focus on whether evidence suggests that the learner is prepared enough to be successful in subsequent education, with institutions providing appropriate support to promote student success, as needed.
- 3.** Institutions and systems should collect and use student outcome data to make ongoing improvements to the learning evaluation process, learning outcome goals, curricular pathways, classroom pedagogy, and student support services.
- 4.** Once an institution decides to award and apply credit for a transferred course or other prior learning experience, that decision should become a precedent for all future learners.
- 5.** Institutions and systems should document as a matter of policy essential information about the learning evaluation process (e.g., decision-making authority and workflow, timelines, appeal processes, staff training, and rubrics used to evaluate learning) and make that policy available to the public.

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**6.** Institutions and systems should provide transparent, public data on credential applicability.

**7.** Institutions and systems should make course equivalencies publicly available in searchable databases.

**8.** Institutions and systems should use technology that automatically applies existing course equivalencies to speed the learning evaluation timeline and free staff for other critical functions (e.g., developing new transfer partnerships, advising learners, and curricular and student support innovations).

**9.** Institutions and systems should communicate preliminary credit determinations in time for learners to make informed decisions about admissions offers and meet enrollment deadlines (e.g., course registration, financial aid verification, student housing), and honor any decisions communicated to students even if the preliminary decision does not hold.

**10.** Institutions and systems should communicate final determinations to the learner in writing and include a rationale for any credit deemed inapplicable to degree requirements.

**11.** Institutions must provide clear processes for appealing credit determinations and review appeals within 10 business days.

**12.** Institutions should transcript learning determined to have an institutional equivalent as a course.

**13.** Institutions should send machine-readable transcript data to other institutions.

**14.** Institutions should ensure there is adequate staffing of the learning evaluation process and coordinate across responsible units.

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## *Discussion of Recommendations*

At this time, policies and approaches to learning evaluation typically begin with the assumption that credential applicability of credit should be closely controlled, and learning experiences should be interrogated and proven to be of sufficient quality. The LEARN Commission is calling for a shift in the mindset that undergirds the current policies and approaches. Institutions and systems—and all involved constituents—should seek to maximize credential applicability and embrace the assumption that a learner is prepared for additional education, unless proven otherwise. The following recommendations operate within this perspective.

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- 1. Decisions to award and apply credit should be based on whether course- and/or program-level learning outcomes overlap by at least 70% of the predetermined learning outcomes; invoking additional criteria does little to preserve academic quality and could introduce bias.**
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At its heart, the learning evaluation process validates prior learning obtained elsewhere to preserve the academic integrity and quality of the credentials awarded by the receiving institution. Learning evaluation should thus seek to determine if relevant learning outcomes are well enough aligned such that learners can be reasonably expected to progress to subsequent coursework.

AACRAO has previously defined “well enough” as 70 percent or more alignment with course content and learning outcomes.<sup>20</sup> This threshold should also be applied when crosswalking nontraditional learning experiences—such as military transcripts, non-credit credentials, and other learning—to courses.

To support evaluation based on learning outcomes, institutions should specify program-level and course-level learning outcomes as well as work-ready skills or competencies within their academic catalogs and course syllabi. Prior learning assessment instruments—including locally-developed examinations, portfolio assessments, skill demonstrations, and interviews—also should clearly state the learning outcomes they are assessing.

Interrogating all aspects of a course, including extraneous factors that have no bearing on whether learning outcomes have been met, results in a misplaced focus on finding an exact course match. Even within an institution, faculty may teach the same course with different approaches—for example, using different textbooks or course modalities. Yet it is generally accepted that these differences will yield the same course-level learning outcomes. Moreover, most degree programs provide some flexibility for the learner to select among a variety of similar-enough courses (upper division course electives, for instance) believing that the learner will arrive at the same program-level learning outcomes.

Professionals should not introduce additional criteria in the evaluation process, including but not limited to:

- ◆ the type of institution where the credit was earned;
- ◆ the accreditation status of the institution where the credit was earned;
- ◆ the modality of the course;
- ◆ the recency of the course; or
- ◆ the grading basis used in the course.

Applying extraneous criteria of this nature introduces bias and, without evidence that these criteria actually affect learning outcomes, does little to ensure academic quality.

Further, receiving institutions must treat credit previously awarded through high school dual enrollment or prior learning assessment the same as credit earned through traditional college coursework. In a recent membership survey, AACRAO found that a small percentage of institutions impose additional criteria that restrict the transferability of dual enrollment courses, such as requiring that:

- ◆ college or university faculty teach the course, rather than high school faculty;
- ◆ the course be physically taught on a college campus, rather than on a high school campus;
- ◆ the course receive college credit that is not applied to high school graduation requirements; and
- ◆ the course credit is awarded by an institution accredited by the National Alliance of Concurrent Enrollment Partnerships.<sup>21</sup>

In addition, another AACRAO membership survey revealed that more than half (54 percent) of institutions do not accept credits for prior learning awarded by another institution.<sup>22</sup> The commission urges institutions to honor the learning completed via high school dual enrollment coursework and validated by prior learning assessments from other institutions. Institutions should not impose additional criteria or attempt to reevaluate previously awarded credit simply because the learner earned it through one of these means.

### ***Advancing this Recommendation in Practice***

In [A Guide to Best Practices: Awarding Transfer and Prior Learning Credit](#), **AACRAO** urged institutions to “[e]stablish a minimum percentage to be used when matching content” and identified 70 percent as the recommended threshold to determine course equivalency.<sup>23</sup>

The 70 percent threshold is widely used in the field. For example, the **Ohio Articulation and Transfer Advisory Council** applies this threshold to all courses approved in the statewide [Transfer Assurance Guides \(TAGs\)](#).<sup>24</sup> TAGs help learners identify courses in a particular major that will transfer across Ohio’s public colleges and universities. Ohio also developed TAGs to crosswalk career and technical education courses taken through Ohio high schools or career education centers, as well as TAGs for military training and industry-recognized credentials.<sup>25</sup>

For their part, accreditors have consistently pointed to the need to eliminate extraneous criteria in the learning evaluation process. In 2021, the **Council for Higher Education Accreditation** came together with the **American Council on Education** and **AACRAO** to issue the Joint Statement on the Transfer and Award of Credit, which emphasized that learning experiences of different types should be treated the same in the learning evaluation process:

[T]he standards for evaluating and awarding credit for prior learning should be the same, regardless of where the prior learning took place. This is true whether the learning was acquired at another institution, as part of a high school dual-enrollment program, during on-the-job

training at an employer or in the military, or through experiential learning. The award of credit also needs to be independent of the learning modality by which it was acquired.<sup>26</sup>

In its [2025 Statement on the Use of Artificial Intelligence \(AI\) to Advance Learning Evaluation and Recognition](#), the **Council of Regional Accrediting Commissions (C-RAC)** upheld this reasoning while placing renewed attention on learning outcomes. Writing on behalf of the seven federally-recognized accrediting commissions that oversee accreditation for approximately 3,000 institutions across the globe, C-RAC states:

[I]nstitutions should commit to a default in learning evaluation that credits are applied to program completion **unless there is evidence** that the required learning outcomes are not met. Decision-making should not be based upon anecdotes, assumptions about quality, locations where earned, or an unexamined history of 'how things have always been done.'<sup>27</sup>

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- 2. When learning outcomes do not overlap by at least 70%, institutions should maintain focus on whether evidence suggests that the learner is *prepared enough* to be successful in subsequent education, with institutions providing appropriate support to promote student success, as needed.**
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Unfortunately, all too often, learning evaluation decisions are based upon assumptions of academic quality (e.g., perceived quality of the sending institution), rather than based on actual evidence of how learners do or do not succeed after transfer. The commission is therefore purposefully calling for the intentional integration of student outcomes data into the learning evaluation process (see the next recommendation for a discussion of relevant metrics and data usage).

To protect against learning evaluation decisions being rooted in assumptions of academic quality, institutions and systems should establish a standard that learning experiences are not rejected unless there is evidence that a course or learning

experience is not of sufficient quality and would not contribute to a student being well enough prepared to be successful after transfer. This standard of evidence should be paired with an expectation that institutions will provide adequate co-curricular supports (e.g., tutoring, office hours, etc.) to promote student success.

### ***Advancing this Recommendation in Practice***

Accreditors ask institutions to take a holistic view of how decision making may impact future student success. In its 2025 Statement on the Use of Artificial Intelligence (AI) to Advance Learning Evaluation and Recognition, **C-RAC** offers the following guidance:

[D]uring the evaluation of courses and other learning experiences to either establish equivalencies or grant students credit, institutional representatives should ask themselves the following questions:

- ◆ Are learning outcomes well-enough aligned that a student—if supported well—could be successful?
- ◆ What evidence is presented that a student’s performance after transfer would truly be undermined?
- ◆ Is there evidence that a course or learning experience would not holistically contribute to a student being academically prepared for transfer?<sup>28</sup>

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### **3. Institutions and systems should collect and use student outcome data to make ongoing improvements to the learning evaluation process, learning outcome goals, curricular pathways, classroom pedagogy, and student support services.**

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Institutions and systems should systematically track and analyze relevant data points to understand how their learning evaluation processes function. For example, they might track:

- ◆ **Timeliness of Learning Evaluation:** How long the evaluation process takes from point of initiation to final determination, and how the timing of this process impacts learners' admission, advising, course registration, and degree planning;
- ◆ **Learning Evaluation Volume:** The total number of learning evaluations conducted by type of learning experience (e.g., traditional college course, high school dual enrollment credit, credit for prior learning);
- ◆ **Credit Transferability and Applicability Rates:** The number or proportion of credits accepted for transfer and the number or proportion of credits deemed credential-applicable;
- ◆ **Prior Learning Assessment Data:** The number of prior learning assessment attempts by assessment type (e.g., portfolio review, skills demonstration), as well as the rate and amount of credit awarded;
- ◆ **Course Rejections and Rationale:** The number of courses rejected for transfer and the rationale provided, based on learning outcomes and any available data on student course performance over time;
- ◆ **Learning Evaluation Appeals:** The number of appeals submitted by course or prior learning experience and the outcome of those appeals;
- ◆ **Completion Metrics:** Completion rates for learners seeking to transfer credits from previous work or learning, including time to completion and credits to completion; and
- ◆ **Excess Credits:** The number or rate of credits accepted for transfer but ultimately deemed inapplicable to graduation requirements.

Institutions should then use this data to gauge how learning evaluation policies and practices impact student success. For example, if an institution sees evidence that learners are not successfully completing a course for which they met prerequisite requirements through transfer, high school dual enrollment, or prior learning assessment, the institution might: develop student supports or pedagogical innovations locally, or work with sending institutions or high school districts to improve alignment of learning outcomes.

When institutions reject a course or prior learning experience for transfer or credential applicability, they should document a rationale based on the learning outcomes and any available student outcome data. If an institution challenges or overrides a prior state or system-based articulation rule, or an individual challenges or overrides a prior institutional articulation rule, evidence should be provided to show that doing so is in the interest of student success.

### ***Advancing this Recommendation in Practice***

The **Beyond Transfer Policy Advisory Board's** 2023 [Inquiry Guide](#) (note: a 2026 revision is forthcoming) provides practical guidance to institutions on data that could help them better understand how the learning evaluation process functions— such as the share of courses evaluated that are accepted for transfer and the share that are deemed credential-eligible—and how their transfer students fare over time.

The Inquiry Guide also suggests discussion questions and activities to help professionals understand those data points. For example, one activity involves randomly sampling the transcripts of transfer learners who recently graduated and analyzing their course-taking patterns and outcomes.

Suggested questions include:

- ◆ What outcomes did the learners achieve?
- ◆ Where and when did learners repeat courses?
- ◆ What differences do we see by program? Transfer partner?
- ◆ What might this mean about the institution's policies and practices?

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#### 4. **Once an institution decides to award and apply credit for a transferred course or other prior learning experience, that decision should become a precedent for all future learners.**

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Given the many professionals who evaluate prior learning, it is essential for institutions to develop clear and consistent protocols to document new course equivalencies or substitutions when they are identified to set a precedent. Unfortunately, the decentralized nature of learning evaluation means that institutions may miss opportunities to streamline decision making in this manner.

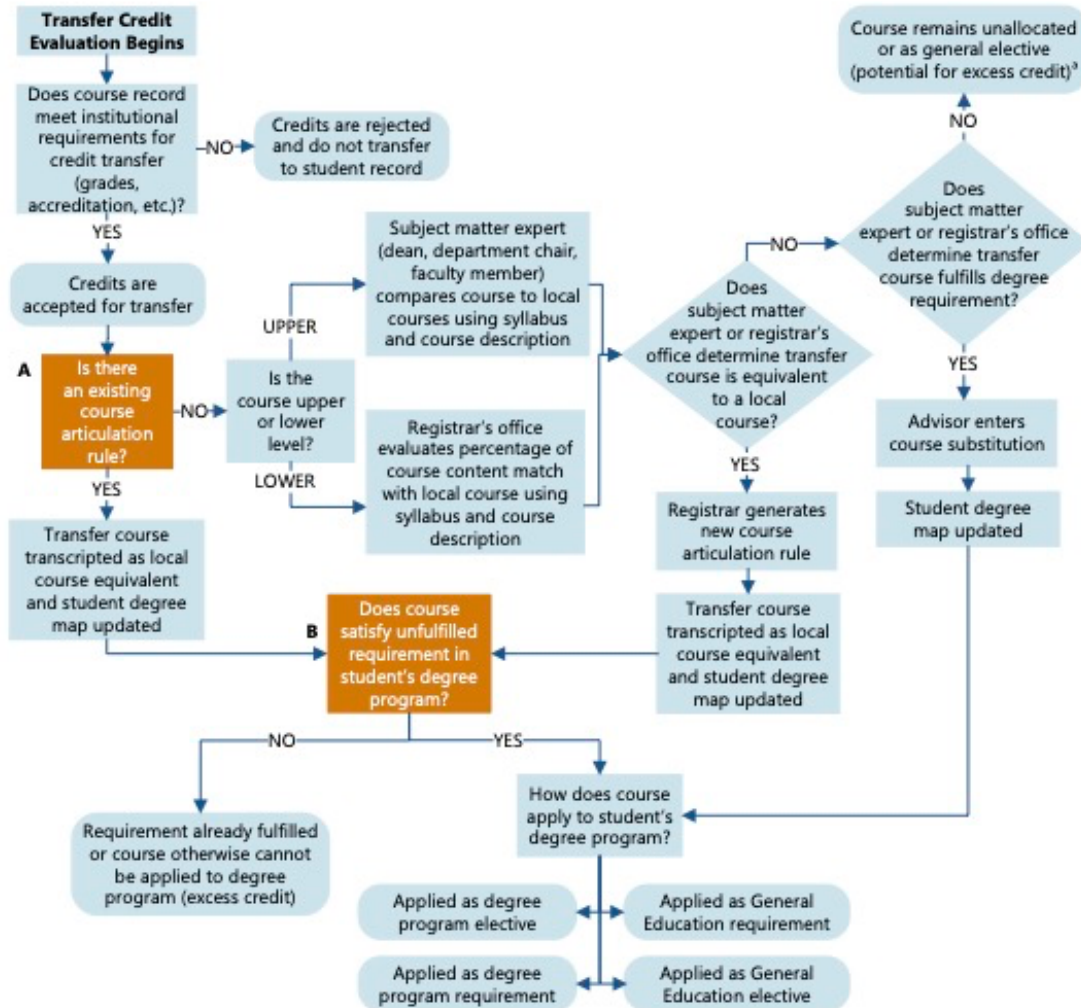
For example, Sova's examination of credit evaluation processes across five public institutions in California found that professionals often manually review credits on a student-by-student basis, leading to inconsistent determinations for learners with identical coursework.<sup>29</sup> Instead, institutions should add new articulation rules into their student information and degree audit systems and apply them to future learner cases.

##### ***Advancing this Recommendation in Practice***

**MDRC's** research has helped illuminate the credit evaluation process and the experiences of campus professionals engaged in this process. In one in-depth study across three **University of Texas (UT) System** institutions, MDRC spotlighted ways institutions can improve workflows and institutionalize new articulation rules to avoid manually reviewing every course.<sup>30</sup>

As depicted in the flowchart below, when a UT institution finds no existing course equivalency, the registrar's office or appropriate academic department or discipline faculty conducts a manual review. If either entity finds that the new course is indeed equivalent to a local course at the institution, the registrar's office creates and archives a new articulation, which is then applied automatically when a future student attempts to transfer the same course. In this way, these institutions avoid repeating a time-intensive manual review process each time a new student tries to transfer the same course.

### Path of a Course Record Evaluated for Transfer Credit



SOURCES: Document analysis and interviews and focus groups with administrators and staff and faculty members.

NOTES: Beginning in the top left corner, Figure 3 depicts how a transfer student's previous credits are evaluated for transfer to the student's degree plan at the receiving institution. The rectangles represent steps and important branching points in the transfer credit evaluation process. The diamond represents where a decision made by a faculty or staff member determines the transferability and/or applicability of a course to a student's degree plan. The rounded rectangles reflect the credit transfer and applicability outcomes that result from the credit evaluation process.

This figure depicts the evaluation of transfer credits in a context where the institution has technology to automate course-to-course articulation rules and is required to follow statewide articulation agreements for common lower-level curricular requirements.

\*This outcome could result in excess credit, but this process is individualized so the actual outcomes vary by student. Subject matter experts can determine that a course is not equivalent to a local course, but the student's prior learning still partially or fully satisfies a degree requirement.

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**5. Institutions and systems should document as a matter of policy essential information about the learning evaluation process (e.g., decision-making authority and workflow, timelines, appeal processes, staff training, and rubrics used to evaluate learning) and make that policy available to the public.**

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While federal law requires institutions to make available their transfer of credit policies—including credit for prior learning policies—to current and prospective learners, it does not specify sufficient details to make the process easier to understand. Moreover, in a survey of its institutional members, AACRAO found that most respondents (69 percent) do not make their credit for prior learning policy easily accessible on their websites and/or in their academic catalogs.

Learners and campus professionals alike need a clear understanding of how the learning evaluation process works, including how a learner can initiate an evaluation; which campus units are involved and the decision-making authority each unit has; the rules it applies (e.g., course articulations) or the criteria it uses to make a decision; and how long the process takes. A written policy that denotes such aspects of the learning evaluation process should be specified on an institution’s public website, such as an admissions webpage, and in the course catalog and schedule of classes. In addition, all learners completing an admissions application should receive the learning evaluation policy along with information on the potential benefits of applying prior learning (e.g., shortened time and cost to degree) and any potential adverse impacts (e.g., financial aid eligibility).

With respect to credit for prior learning (CPL), an institution should further specify in its learning evaluation policy:

- ◆ which course credits learners can earn through CPL;
- ◆ how many course credits they can earn and apply to a credential;
- ◆ the types of CPL evaluations available (e.g., faculty-developed examination, standardized examination, portfolio assessment, etc.);
- ◆ the fees associated with each type of CPL evaluation;
- ◆ the availability of financial support with fees, if applicable;

- ◆ the maximum time for institutional reviews and credit determinations by type of CPL evaluation, if that differs;
- ◆ the appeals process for CPL evaluation decisions; and
- ◆ the transcription of CPL credit as course credit or degree requirements.

Further, the policy should clearly state who has decision-making authority, including which units or individuals are responsible for: evaluating previously earned CPL credit; determining applicability of transferred CPL credit; developing and administering local prior learning assessments (e.g., faculty-developed examinations, portfolio assessment); and determining use of standardized examinations (e.g., CLEP, DANTES) or third-party credit evaluations (e.g., ACE, National College Credit Recommendation Service).

### ***Advancing this Recommendation in Practice***

The **Texas A&M University System** has a transparent policy governing how its institutions review and award credit for prior learning. [Policy 11.05.01: Institutional Requirements for Transfer and Acceptance of Prior and External Learning Experiences](#) requires that its institutions:

- ◆ Delineate areas of responsibility across various units, including administration, registrars, faculty, and advisors;
- ◆ Make decisions using with objective standards and apply them consistently to all learners through rubrics and course numbering conventions;
- ◆ Publish their criteria and make a searchable inventory of approved nonacademic providers available to the public;
- ◆ Conduct the evaluation process in a timely manner; and
- ◆ Publish this process and make it transparent to learners.

The **Florida Board of Governors, State Board of Education, and Department of Veterans' Affairs** have collaborated to advance uniform, statewide processes for awarding [postsecondary credit for military training](#)

[and occupations](#). Informed by the recommendations of the **American Council on Education (ACE) Military Guide**, Florida’s approach includes a public-facing policy, recommended procedures, and a Statewide Credit for Military Experience Equivalency List.

Following the development of these assets for military credit, Florida developed a similar process and policy for awarding postsecondary credit for college-level training and experience acquired while serving as a [law enforcement officer](#). Beyond aligning credit equivalencies to the learner’s program of study, the regulation further establishes a rank order for the awarding of credit—general education courses first, followed by program-specific courses and then elective courses.

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## 6. Institutions and systems should provide transparent, public data on credential applicability.

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To further improve transparency in learning evaluation, institutions and systems should make relevant data publicly available in consumer-friendly dashboards or other reporting mechanisms. For example, an institution might share how many incoming learners succeed in applying prior learning to a credential and how this impacts learners’ time and credits to completion. Such information may help prospective learners identify an institution as a “transfer friendly”

### *Advancing this Recommendation in Practice*

In 2025, the **Texas state legislature** passed [Senate Bill 3039](#), which requires institutions to post on their admissions webpage “the five majors or degree or certificate programs offered by the institution with the highest number of courses for which academic credit is denied or not applied toward the major or program,” and “the five courses for each [major/degree/certificate] for

which academic credit is most frequently denied because the credit is not applicable toward the major or program.”<sup>31</sup>

This law builds upon prior legislation ([Senate Bill 25](#)) that requires public two- and four-year institutions to report data to the **Texas Higher Education Coordinating Board** on lower-division courses denied for transfer credit. Institutions must also report the reasons for the denials. The board then provides an annual public report recommending ways to improve course transfer, reduce excess credits, and lower time and cost to a degree.

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## 7. Institutions and systems should make course equivalencies publicly available in searchable databases.

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While federal law requires institutions to list its articulation agreements, it does not require them to publish course equivalencies—information that could help prospective learners understand how their prior learning would count toward their intended credential.

As a first step, institutions should centralize all existing articulation agreements and make course equivalency information publicly available through searchable databases so that learners and campus professionals can easily reference this information. Institutions also should regularly update these databases with real-time information and further enhance them by incorporating high school dual enrollment courses and credit for prior learning crosswalks. In this way, learners can scan a range of prior learning experiences to understand the institution’s credit transfer and applicability rules.

Institutions should design these databases with interoperability and learner usability in mind. A long-term goal should be integrating course equivalency information with existing student information systems, records management systems, degree auditing, and program planning tools to make information accessible to learners and campus professionals.

### ***Advancing this Recommendation in Practice***

While several educational technology companies offer ready-made software solutions to help institutions archive and apply course articulation rules, some institutions have developed innovative home-grown solutions focusing on their learners' needs. One example is the [Transfer Explorer or T-Rex](#), developed by the **City University of New York (CUNY) system** and **Ithaca S+R**. First launched in 2020, the platform makes CUNY's 1.6 million transfer articulation rules publicly searchable, enabling users to see in real-time how a specific course or prior learning experience will transfer for general education and major requirements across any CUNY campus.<sup>32</sup> T-Rex also includes features that can support learners in transfer and degree planning, such as tools to understand how transferred credits will apply to a specific major at a specific campus, and dashboards to compare transfer student outcomes across campuses. Recent research has shown that CUNY community college students who used CUNY T-Rex have fewer excess credits when they transfer to a CUNY four-year college than otherwise similar students.<sup>33</sup>

Inspired by and building upon CUNY T-Rex, ITHAKA has developed a national version of Transfer Explorer (<https://transferexplorer.org>) with investment from private philanthropy. Transfer Explorer is a free, public application that extracts and normalizes catalog, equivalency, and program requirements data directly from participating institutions' source systems on a weekly basis, allowing users to explore how previously evaluated college courses and other prior learning would transfer and apply to requirements at those participating institutions. As of December 2025, Transfer Explorer features as destinations both bachelor's institutions and community colleges in four states (associated with **CUNY**, the **Connecticut State Colleges and Universities system**, the **South Carolina Commission on Higher Education**, and the **Washington Student Achievement Council**), and is poised to expand to additional states, systems, and institutions in 2026.<sup>34</sup> Transfer Explorer is looking into using AI for multiple tasks, such as streamlining institutional data processing and eventually providing degree planning guidance to learners and course equivalency recommendations to institutions.

With respect to credit for prior learning (CPL) crosswalks, the **California Community College system** has developed a comprehensive platform to support the CPL lifecycle for military, working adults, apprentices, and all those with prior learning. The [Mapping Articulated Pathways \(MAP\) initiative](#) and the MAP CPL dashboard standardize and scale how colleges award course credit for prior learning experiences within the system with an eye toward ensuring future transferability and applicability of those courses within the state's existing 2+2 degree pathways.<sup>35</sup> The system also is integrating the MAP dashboard with other student-facing transfer and degree planning tools, such as Program Pathways Mapper, the California Virtual Campus, the forthcoming Credential Registry and Career Passport (Learning and Employment Record) and ASSIST.org, which helps learners identify course equivalencies across public and private institutions in the state.

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**8. Institutions and systems should use technology that automatically applies existing course equivalencies to speed the learning evaluation timeline and free staff for other critical functions (e.g., developing new transfer partnerships, advising learners, and curricular and student support innovations).**

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The highly manual nature of learning evaluation requires significant time from student service professionals and faculty, creating protracted timelines for decision making. Creating more efficient and systematic processes not only requires clarity and transparency in how decisions are made and by whom, but also reorganizing workflows to better use technology. With centralized articulation databases, institutions can apply existing course equivalency rules with greater consistency and speed and reduce the need for manual course-by-course evaluations.

In addition, using AI to evaluate prior learning can further streamline processes. For instance, machine-translation models and natural-language processing can quickly analyze the multitude of data already available, including faculty-developed articulation agreements, course catalog descriptions, course syllabi, and historic

student enrollment data to yield reliable recommendations for new course articulations.<sup>36</sup>

Institutions looking to implement AI for learning evaluation should ensure transparency about the data used to generate information about course equivalency to build confidence in the technology and support its adoption. Institutions might further consider implementing new articulations identified by AI technology when there is clear alignment of learning outcomes (at least 70 percent). When alignment is less clear or when it requires additional data, these recommendations might first be validated through faculty review.

AI's value in learning evaluation extends beyond automation; it allows institutions to redirect staff effort toward higher-order responsibilities that demand human insight. Consequently, the goal of integrating AI is not to supplant professional judgment but to deploy it more strategically. Leveraging technology in this way can refocus personnel on higher order cognitive processes and complex problem solving that AI cannot perform, such as:

- ◆ Updating or developing new transfer partnerships that provide students with holistic support;
- ◆ Aligning or developing new and in-demand programs and courses, including integrating evidence-based pedagogical approaches and just-in-time academic supports that promote learner success;
- ◆ Developing credit for prior learning crosswalks and implementing local prior learning assessments;
- ◆ Reviewing credit determination appeals, communicating decision making to the learner and other campus professionals engaged in credit evaluation, and determining whether to develop new articulation rules;
- ◆ Participating in ongoing training with other campus professionals engaged in the learning evaluation process;
- ◆ Advising and mentoring incoming and continuing learners; and
- ◆ Analyzing data to assess how the learning evaluation process advances or inhibits student success.

### ***Advancing this Recommendation in Practice:***

Based upon research from the **Computational Approaches to Human Learning research lab at the University of California, Berkeley**, the [AI Transfer and Articulation Infrastructure Network \(ATAIN\)](#) is helping innovative institutions harness AI to improve credit mobility, with an initial cohort of fifty-nine community colleges and universities across the U.S.<sup>37</sup> ATAIN is convened by the **American Association of Community Colleges** and includes the **Association of Public and Land-Grant Universities, Sova, and Equivalence Systems**.

ATAIN provides technical assistance, community, and tools for institutions, including the **CourseWise** software platform. CourseWise analyzes existing course equivalencies across participating institutions to recommend new equivalencies; supports articulation approval workflow management, and provides metrics to help institutions gauge their performance relative to their peers, including an articulation coverage score. Additional features are in development, including a transcript upload and evaluation tool and a student-facing, individualized degree/program mapping tool.

Developed by **Arizona State University** and built for every institution, **Triangulator** also applies a network effect as it gathers data from participating institutions.<sup>38</sup> Currently, **Triangulator** connects over twenty institutions through advanced algorithms to grow and improve transfer equivalencies while decreasing time to evaluation. With a built-in AI normalizer, Triangulator removes technical barriers to enable all institutions, regardless of their initial data readiness, to contribute and benefit from structured, comparable data. Through flexible APIs, it integrates matching algorithms to analyze course information, match course content and recommend new equivalencies, helping institutions be more proactive in transfer credit evaluation.

By reducing the time required to evaluate courses while preserving institutional autonomy over all decisions, Triangulator supports both operational efficiency and academic policy. Institutions gain access to a rich repository of courses and equivalencies, automated matching capabilities, and

customizable workflows that integrate faculty participation when needed. With six methods for generating suggestions, Triangulator opens the door for broader collaboration and more accurate, scalable credit mobility equivalency patterns.

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**9. Institutions and systems should communicate preliminary credit determinations in time for learners to make informed decisions about admissions offers and meet enrollment deadlines (e.g., course registration, financial aid verification, student housing), and honor any decisions communicated to students even if the preliminary decision does not hold.**

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Available research shows that credit evaluation timelines rarely improve yield in the admissions process or set up newly admitted learners for success. For example, in a study of five public California institutions, Sova found that the process frequently dragged out long after learners needed to make enrollment and course registration decisions, in some cases taking as long as 24 weeks to reach a decision.<sup>39</sup>

Institutions should redesign workflows to provide these decisions before the enrollment deadline. For learners, this deadline looms large not only because it typically requires a nonrefundable deposit, but because it sets in motion other time-sensitive steps that can have much larger financial consequences, such as confirming housing and transportation options; completing verification processes for federal financial aid or veteran education benefits; and attending orientation and completing course registration. Perhaps most concerning is that learners who do not have the needed information in hand may enroll in courses they do not need, resulting in excess credits and lengthened time to completion.

When processing an admissions application, institutions should evaluate all previous transcripts to determine how the credits may transfer and apply to general education and program requirements. In addition to evaluating the credits against the learner's intended major, institutions should also use degree-modeling software to help students identify which programs will maximize credit applicability.

Institutions can then communicate which credits it will accept for transfer and how they can be applied to various programs. Preliminary decisions should be honored for that learner, even if the final determination differs.

Such information would empower learners to make enrollment decisions based on a clear understanding of how much additional time (and by extension, money) it will take to graduate.

### ***Advancing this Recommendation in Practice***

Business processes and workflow redesigns greatly impact the learning evaluation process. For example, **Metropolitan State University (MSU) of Denver** realized in 2019 that it needed to drastically overhaul workflows to keep up with the high demand for learning evaluation.<sup>40</sup> With transfer students comprising more than half of its incoming learners, maintaining the status quo would have been too costly for learners and the institution. MSU Denver began by engaging campus professionals to map existing processes, identify key decision points, and clarify workflows. The team identified three time-consuming processes: transcript intake, transcript evaluation, and manually reviewing courses without existing articulations. The institution then redesigned workflows, shortening the evaluation time to one week.

**MDRC** has several research [reports](#) and [actionable tools](#) to support institutions with transfer process mapping.

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## **10. Institutions and systems should communicate final determinations to the learner in writing and include a rationale for any credit deemed inapplicable to degree requirements.**

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Though institutions should communicate preliminary credit determinations before the admissions deadline, they may need additional time to manually review transferred courses for which there is no previously established equivalent, or locally administer prior learning assessments (e.g., portfolio reviews, skills

demonstrations, etc.). Institutions should examine workflow processes to speed these additional steps.

Institutions should provide final determinations in writing, such as through degree audit systems. For example, if a course is accepted for transfer, has a local course equivalent but is determined to be inapplicable to the student's major, the institution should communicate how the course will appear in the degree audit (e.g. listed as unassigned elective credit). An institution might also explain whether other programs might maximize transferred credits to improve credit applicability.

As noted above, if a final determination negates a previously communicated preliminary determination, the student should be held harmless. The preliminary decision should stand for that particular learner while the final rule should be recorded and applied for subsequent learners.

### *Advancing this Recommendation in Practice*

In 2024, the **Colorado state legislature** passed [Senate Bill 24-164](#), which requires the **Colorado Commission on Higher Education** to adopt policies related to institutions providing “a timely response on applications for transferring credits, and transparency on how and why a credit is accepted or rejected by an institution and how and why a credit is or is not applied toward degree requirements.”<sup>41</sup>

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## **11. Institutions must provide clear processes for appealing credit determinations and review appeals within 10 business days.**

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To ensure due process for learners, institutions and systems should have standardized and transparent processes for appealing credit determinations. Learners may have good reasons for seeking an appeal. For example, after reviewing the rationale for a credit rejection, a learner may realize that additional information (e.g., course descriptions or syllabi, course assignments, further

portfolio submissions) could demonstrate that they did indeed meet learning outcomes. A clear appeals process allows learners to advocate for themselves.

High-ranking administrators—department chairs, deans, or chairs of general education curriculum committees—should review information from the initial review as well as the additional information supplied by the learner in their appeal. Decisions should be communicated to the learner within 10 business days of receipt, unless otherwise prescribed by state law. Receiving timely information will help learners make any necessary course registration changes within an optimal timeframe, or to seek a second appeal if the institution provides such a process.

A learner appeals process should be considered a last resort. Ideally, institutions will have clean, clear processes in place that maximize credential applicability and reduce the need for appeals.

### *Advancing this Recommendation in Practice*

In Texas, public institutions of higher education are encouraged to work together to resolve transfer credit disputes. If a resolution is not found to the satisfaction of the learner and/or institutions involved, the appeal can be elevated to the **Commissioner of Higher Education**. See for example [this Texas State University](#) website.

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## **12. Institutions should transcript learning determined to have an institutional equivalent as a course.**

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There are no consistent national standards for transcribing prior learning once it is accepted. ACE and the Council for Adult and Experiential Learning found over 70 transcription policies across 36 states, including those set by governors, legislatures, administrative code, and higher education governing boards, system offices, and agencies. In some cases, policies on the books simply require institutions to establish a transcription policy but do not make requirements or offer guidance on transcription itself.<sup>42</sup>

AACRAO's research finds that variability in transcription practices increases for credit that is earned through high school dual enrollment and prior learning assessment. For example, institutions may only record the total credits awarded, record dual enrollment credit as credit for prior learning, record credit awarded by the type of prior learning assessment, record credit as its course equivalent, or record credit as a course equivalent with a special notation.

Inconsistent transcription practices can affect credit transferability and applicability down the road. For example, AACRAO found that 54 percent of institutions do not accept credits for prior learning for transfer.<sup>43</sup> Therefore, the commission recommends that credit be transcribed as course equivalents whenever possible.

### *Advancing this Recommendation in Practice*

**eTranscript California** is a secure, statewide electronic transcript exchange that adheres to the California electronic transcript standard and the national PESC XML and EDI TS130 transcript standards. More than 100 higher education institutions are registered users, and the service is free for **California Community Colleges**.

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## **13. Institutions should send machine-readable transcript data to other institutions.**

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There is also high variability in practices for how institutions exchange transcripts with each other. Technology for exchanging machine-readable transcripts has long existed, but variations in how institutions implement this technology can create processing delays. For example, the AACRAO Standardization of Postsecondary Education Electronic Data Exchange Committee found that while institutions were increasingly shifting to use of PDF transcripts, they varied in their use of embedded data (e.g., EDI or XML) that enable automatic "reading" of the data to be pulled into student information systems.

High school dual enrollment learners should receive free and proactive access to their electronic transcripts to help them transfer credits upon enrolling in postsecondary education.

### ***Advancing this Recommendation in Practice***

The commission supports AACRAO's [Best Practices for PDF Transcript Exchange](#), which include guidance on document security, records management, and data mining.<sup>44</sup>

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## **14. Institutions should ensure there is adequate staffing of the learning evaluation process and coordinate across responsible units.**

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To transform learning evaluation processes, institutions must allocate adequate resources, including personnel, to all steps. This includes staff time in front-end operations such as transcript processing and review along with articulation agreement management, technology development and deployment, data analytics, faculty and staff training, curricular pathway design, high school dual enrollment course design, prior learning assessment administration, and learner advising.

While technology can reduce staff time in some areas, such as processing transcripts and applying existing course equivalencies and transfer rules, other areas may require more staff time.

Further, appropriate incentives, such as course release time or professional development stipends, should ensure that faculty are able to participate meaningfully in matters of curriculum.

## A Closer Look: Supporting Faculty Engagement in Learning Evaluation

Faculty often play a direct role in the learning evaluation process, including: developing articulation agreements and manually reviewing new courses to determine equivalence; conducting prior learning assessments; making final decisions on credit applicability to program requirements; and rendering decisions in student appeals. Yet there is emerging evidence that faculty do not receive the level of support that matches the outsize role they play in the learning evaluation process.

For example, a recent survey of almost 4,000 two- and four-year faculty found that they frequently have limited knowledge of transfer policies and transfer student outcomes and lack sufficient correct information to engage collaboratively on transfer student success initiatives.<sup>45</sup> An MDRC study further found that faculty engaged directly in learning evaluation experienced several practical challenges, including:

1. **Subjectivity in the process:** Faculty reported high subjectivity and variability in interpreting whether learners met learning outcomes;
2. **Working with incomplete information:** Faculty reported needing to make decisions with incomplete information, such as when course catalog descriptions and syllabi do not provide sufficient details about the course learning outcomes;
3. **Perceptions of transfer learner preparedness:** Faculty seldom have access to institutional data on transfer student outcomes and rely on anecdotal evidence that transfer students are less academically prepared; and
4. **Maintenance of articulation agreements:** Faculty reported difficulty in maintaining existing articulation agreements, given the frequency of curricular updates across institutions.<sup>46</sup>

**Herein lies a critical tension that must be addressed: faculty have a strong interest in maintaining oversight in learning evaluation decision making, yet need support to make their share of the work more sustainable and efficient.**

To better understand faculty experiences and identify opportunities to support their important role in learning evaluation, Sova and the LEARN Commission designed a qualitative study that combined semi-structured interviews and focus groups with 11

faculty leaders across nine U.S. institutions. Questions probed the full arc of the faculty experience, including how they engage in learning evaluation, what guides their decision making, where barriers emerge, and how they envision the future of learning evaluation. Key insights are summarized here.

- ◆ **Faculty take their role as ethical and evidence-informed decision makers seriously.**

Participants noted that evaluation is not just an exercise in counting learning outcomes, but a holistic assessment that invokes principles of integrity, fairness, and readiness. For example, an associate chair of mathematics at an R2 doctoral institution invokes the principle of fairness by asking, “Would I want my son to pay for this again?” when conducting course evaluations. A dean of applied and technical programs at an associate institution similarly offered a guiding principle to gauge readiness: “If they can handle the next class, they’ve earned the credit.”

- ◆ **Faculty strive to balance institutional and learner interests.**

Faculty experience ethical dilemmas as they balance what may feel like opposing interests. One participant reflected: “We’ve had students who lose time because of delays or inconsistencies in how things are reviewed. The goal is to make sure they can succeed in the next course, not just to say no. That’s the balance: You want to protect the integrity of the program, but you also don’t want to create barriers [for the learner] that don’t need to exist.” A chair of music at an associate’s institution noted how specialized accreditation factors into decision making: “[W]e just went through accreditation, and we’re making sure everything aligns with [the National Association of Schools of Music] standards. Before that, I was probably more generous in granting equivalencies, but after accreditation, we’re being a bit more careful.”

- ◆ **Faculty rarely receive formal training to ensure that decision making is well-calibrated and consistent.**

While faculty perceive the stakes to be high, they seldom receive any formal training or tools that would aid their work. Participants reflected on this tension: “Right now, it’s a text or an email with instructions, but no real training,” said a professor of communication studies and director of student success analytics at

an R2 doctoral institution. A chair of economics at a master's institution concurred: "There's no written set of standards that I know of; it's really just what seems reasonable to the person doing it." Participants offered several ideas to better support faculty, including asynchronous training videos, standardized rubrics, and a community of practice.

◆ **Faculty understand technology as a tool to enhance transparency and decision making.**

While some participants described clear technology-enabled processes at their institutions, including use of such software as DegreeWorks, CollegeSources' Transfer Evaluation System and Transfer Explorer, others described learning evaluation processes at their institution as "extremely dated" and manual. One faculty advisor at a tribal college noted, "I'm the only person who does transcript evaluation, and it's completely manual. I have to look at the transcript and write on a sheet of paper what I believe the direct equivalent is," after which "it's a manual handoff from me to the dean to admissions." A dean of applied and technical programs at an associate institution similarly reflected: "Everything runs on email; [there is] no centralized tracking or visibility."

Participants shared optimism that improvements in technology infrastructure could enhance decision making. A chair of economics at a master's institution explained, "A shared database would make it more consistent and fairer, especially if a student takes a similar course at another college and gets a different decision just because it went to someone else." Another faculty leader reflected: "If we could all see the same information at the same time we'd save so much confusion."

◆ **Faculty are curious but cautious about using AI for learning evaluation.**

Faculty identified concrete ways AI can streamline existing processes. For example, one professor at an R2 doctoral institution suggested that AI "could extract learning outcomes from syllabi," while another professor at a different R2 doctoral institution said AI "could help surface matches or show overlap" in courses. While participants were less enthusiastic about AI recommending course equivalencies without human verification, they signaled that their

confidence could grow with full transparency about its use of data, rules, or logic. As one participant said: AI must “show its reasoning.” Participants also cautioned that institutions should ensure data security and bias detection.

◆ **Faculty understand that technology alone cannot solve all challenges in learning evaluation, hence the need to address human process design and dynamics.**

Participants noted that technology alone cannot solve human process challenges, including a lack of trust, authentic buy-in, and shared accountability. Reflecting on manual review processes, an associate chair of mathematics at an R2 doctoral institution said: “The registrar’s office is always under pressure to process things quickly, but we don’t really have any accountability structure for faculty to respond quickly.” Another participant reflected on recent efforts at their campus to improve accountability: “We are now starting to look at data to see which departments or faculty are bottlenecks.”

Yet competing work priorities and underlying self-interests make accountability challenging. As one faculty leader stated: “there are a lot of requests [made of faculty] on top of other work” and that accountability becomes trickier when multiple faculty are involved (“The more people involved, the less motivated they are to participate”). A math professor and director of assessment at an associate’s college noted the difficulty of earning buy-in from four-year faculty colleagues: “Negotiating course equivalencies with other faculty at other institutions can be challenging. People are very invested and in love with their own courses sometimes.”

Given these insights, the commission’s recommendations underscore the need to engage and support faculty through a combination of activities, including: standardized decision-making processes and integrated data insights; the thoughtful deployment of technology, including public course equivalency databases and automating aspects of the evaluation process; convening faculty across disciplines, functional roles, and sectors for joint training and technical assistance; developing training tools like rubrics; and creating incentives like course release time and professional development stipends.

## Aligning the Levers for Systems Transformation

For institutions to accelerate this work at scale, it is imperative to outline how other stakeholders can support the learning evaluation process. That includes state policymakers, higher education associations and technical assistance providers, private philanthropy, and institutional accreditors. In this section, we identify and discuss three specific levers:

- **Strategic Lever #1: Enhancing Student Data and Technology Systems**
- **Strategic Lever #2: Investing in Human Capital**
- **Strategic Lever #3: Building Supportive Policy Conditions**

### *Strategic Lever #1: Enhancing Student Data and Technology Systems*

Most institutions will need to invest significant time, money, and staff expertise on new data collection practices and technology systems that automate routine and essential functions of learning evaluation. Institutions serving the highest share of transfer and adult learners stand to benefit the most from these improvements—in terms of successfully recruiting, retaining, and graduating learners—but may also have the least resources. Further, high learner mobility rates indicate that learners also will benefit from more consistent learning evaluation practices across institutions.

As such, state governments and private philanthropy can increase investments to support data and technology infrastructure improvements at scale, with a focus on the institutions and systems that serve a high share of transfer and adult learners. Because private dollars have seeded many promising credit mobility technologies, including those pioneering applications of AI, investing in technology adoption and scaling would amplify their impact. State governments can further improve data collection and information sharing within and across K-12 education, higher education, and the workforce to monitor learner outcomes and progress, including for subgroups of learners like those with prior high school dual enrollment credit.

State higher education agencies, governing boards, and system offices can support infrastructure development by managing technology vendor selection and procurement processes and by requiring open data standards for third-party vendors to facilitate integration with existing student information systems and

degree-mapping tools. They can also improve data availability by standardizing machine-readable transcript data and course syllabi and by requiring the latter to be publicly available.

Accreditors can support institutions in using data from learning evaluation decision making to demonstrate a clear institutional commitment to student success, academic integrity, and quality as part of the accreditation process.

### *Strategic Lever #2: Investing in Human Capital*

The learning evaluation process is essential to preserving academic quality and warrants strong investments in human capital. Yet the institutions serving the greatest share of transfer and adult learners typically operate with lean staffs.

State governments and system offices may allocate more money to increase staff capacity, including in information technology and institutional research, and create new incentives for faculty engaged in this work. For example, providing faculty with course release time or professional development stipends may boost participation and generate greater buy-in.

In addition, state higher education agencies, system offices, and national higher education associations and technical assistance providers can play a valuable role in convening faculty and staff across campuses, disciplines, units, and roles. Such coordination can improve policy implementation, identify new problems of practice, and inform responsive solutions.

Private philanthropy can also invest in training and technical assistance, as well as incubate and amplify promising practices through funded research and evaluation.

### *Strategic Lever #3: Building Supportive Policy Conditions*

Beyond building immediate institutional capacity to engage in learning evaluation transformation, policymakers can advance supportive policies that increase attention to transfer, credit mobility, and recognition of prior learning.

For example, articulating courses across a state's community college and public university systems can eliminate the need for local articulations between each

community college and university. Other supportive transfer policies include defining articulated general education courses and developing common course numbering systems that make it easier to identify course equivalencies across institutions within the same system or with institutions across different systems. Given the reality of interstate transfer, regional compacts can also reduce the need for institution-to-institution course articulation by working across state lines to develop articulation agreements that cover more institutions.

To maximize high school dual enrollment credit and credit for prior learning, states can identify policies that may inadvertently limit data sharing or place rigid restrictions on the use of credit for prior learning. Further, state higher education agencies and system offices may engage licensing boards, K-12 school districts, and institutional and program accreditors to identify opportunities to enhance learning evaluation, promote credit mobility, and improve learner outcomes.

Further, state higher education agencies, governing boards, and systems offices can establish benchmarks and/or reporting requirements to enhance transparency and better monitor institutional practices and learner outcomes.

Finally, states can create financial incentives that reward two- and four-year institutions for improving transfer student outcomes by including success metrics in state funding formulas.

## Conclusion

The commission remains clear-eyed about the challenge before all of us. Transforming the current patchwork of outdated policies and practices to design a 21<sup>st</sup>-century learning evaluation process that is responsive to the evolving needs of learners will require more than just vision. It will require more, too, than additional resources or an explicit charge to make change. The task must begin at every institution with an honest assessment of who the status quo is and is not serving. This process also will require a shared vision of who stands to gain from change. From the evidence available, the commission sees a unique triple value proposition: Improving the learning evaluation process can and should benefit learners, the institutions that serve them, and the states and regional economies that retain their skilled labor.

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