

Centering Learners in Credit Mobility Policy and Practice

Practical Guidance to Assess Your Credit Mobility Policy Landscape and Advance Key Policy Components

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Effective policy creates the conditions for credit mobility to be sustainable, equitable, and scalable. This report is designed to help states, systems, and institutions develop, audit, and strengthen the policy frameworks that support mobile students with multiple sources of validated learning. It provides a structured approach to landscape assessment, guidance on what belongs in policy versus procedure, a menu of key policy components mapped to the five principles of holistic credit mobility, and practical resources for stakeholder engagement and policy development. Use this report as a starting point, not a checklist. The right policy approach will depend on your context, level of authority, and position in the policy lifecycle.



How to use this report

This report will guide you in developing, auditing and strengthening policies that support credit mobility. It includes eight parts and a set of model policy resources. While the parts follow a logical sequence, you can start at any point depending on where you are in the policy lifecycle and the type of policymaking authority you hold. We encourage users to begin with Part I, which helps you map your current policy landscape and identify where you have the authority to act.

Part I: Before You Build: Mapping Your Policy Landscape

Before drafting or revising policy, institutions and systems benefit from understanding what policies already exist, at what level, and whether those policies are actually driving practice. This landscape mapping step, often skipped in the urgency to develop new policy, is essential for avoiding duplication, identifying genuine gaps, and understanding where you have authority to act.

1.A. Start with an Inventory

A policy inventory asks a simple but often revelatory question: what do we actually have in writing that governs how we handle learning from students who arrive with prior credit? Gather policies, procedures, and handbook language related to each of the following credit types. For each, note whether the governing document is statute, board or system regulation, institutional policy, departmental procedure, or informal practice.

Credit Type	Questions to Ask
Transfer Credit	What policy governs acceptance of transfer coursework? Is there a minimum credit acceptance floor? Are there restrictions on source institution type?
Credit for Prior Learning (CPL)	Do you have a written CPL policy? Does it cover all CPL modalities: PLA portfolio, exams (CLEP, DSST, AP, IB), industry credentials, military credit, workforce training?
Dual Enrollment / Early College	How is dual enrollment credit evaluated upon matriculation? Are there restrictions by course type, institution, or delivery modality?
Military Credit	Do you follow ACE military credit recommendations? Is military credit handled in a unified policy or separately across units?
Noncredit to Credit	Do you have a pathway for noncredit learning to apply toward credit-bearing credentials? Is "noncredit" defined consistently across your institution or system?
CPL Transcripted at Another Institution	Do you accept and apply CPL that was evaluated and awarded by another institution, or do you re-evaluate? Is that a written policy or an informal practice?
Degree Requirements	What residency requirements govern how many credits must be earned at your institution, and do they limit how much prior learning can apply? Is there a cap on total credits that can transfer into a baccalaureate degree? Do general education or block transfer policies guarantee that a completed core or transfer block is accepted in full as degree requirements?

1.B. Distinguish Policy from Lore

One of the most important, and humbling, exercises in policy development is asking whether what your institution treats as policy is actually policy. In many institutions, restrictions on credit acceptance have been informally applied for so long that they are assumed to be policy, state law, or accreditor requirements when they are none of those things. Before investing in new policy development, identify what is actually constraining practice.

The Four Questions

For every constraint or limitation you identify in your landscape assessment, ask:

1. Is this written policy, or is it practice?
2. If it is policy, is it state statute/regulation, system policy, accreditation requirement, or institutional policy?
3. What is the source of this restriction, and is that source accurate?
4. Do we have the authority to change it or interpret it?

These questions frequently reveal that institutions are operating under self-imposed constraints they have the authority to remove. At the same time, they help identify restrictions that are genuinely embedded in statute or accreditor standards, which require a different process to change. Getting clear on this distinction saves significant time and prevents institutions from writing institutional policy to address a gap that can only be closed at the state level, or vice versa.

1.C. Map Your Level of Authority

Policy in higher education operates at multiple levels, and interventions need to be calibrated to the level where authority exists. A useful framing for holistic credit mobility is to think in three tiers:

Level	Who Acts	Examples Relevant to Credit Mobility
State (Statute & Regulation)	Legislature, Governor, Coordinating/Governing Board	Statewide CPL portability requirements Minimum credit transfer acceptance floors Degree credit hour caps (e.g., NJ 60/120) Catalog year protections Statewide general education alignment
System	System Board, Chief Academic Officer, Statewide Articulation Body	Systemwide equivalency standards and data requirements Shared CPL assessment frameworks across institutions Cross-institution transfer guarantees within a system Common definitions (e.g., "noncredit," "competency")
Institutional	Board of Trustees, President, Provost, Academic Governance	Institutional CPL policy covering all modalities Credit acceptance policies for specific learning types Student rights and appeals processes Residency and upper-division requirements Credit applicability and equivalency review cycles

Part II: The Policy Lifecycle

Policy development is rarely linear, and it rarely happens quickly. Practitioners who have been through statewide or institutional policy processes often describe the timeline as longer and more politically complex than anticipated. Understanding the stages of the policy lifecycle, and realistic expectations for each, helps institutions and state leaders plan for sustainable change rather than stalled efforts.

Stage	What It Involves	Common Pitfalls
Landscape Assessment	Inventory existing policies, identify gaps, distinguish policy from practice, map levels of authority.	Skipping this step and drafting policy without knowing what already exists.
Stakeholder Mapping	Identify who has authority, who will be affected, who needs to be engaged early, and whose buy-in is essential versus nice-to-have.	Involving stakeholders too late, after a draft is already written.
Guiding Principles	Agree on the values and outcomes the policy must achieve before drafting language. Anchors disagreements in substance rather than politics.	Jumping to language before aligning on purpose.
Policy Drafting	Develop draft language. Determine what belongs in policy and what belongs in procedure. Circulate for review.	Overloading policy with procedural detail, which makes it brittle and hard to update.
Review and Adoption	Navigate governance processes: faculty senate, academic affairs committee, board approval, public comment (if regulatory), legislative process (if statutory).	Underestimating governance timelines, particularly at the state level.

Implementation Planning	Develop procedures and operational guidance. Train staff. Update advising resources and student-facing materials.	Treating adoption as the finish line rather than the starting line.
Review Cycle	Establish a formal schedule for reviewing policy effectiveness. Designate a role responsible for policy maintenance and data monitoring.	No one owns the policy after adoption; it becomes outdated without anyone noticing.

A Note on Timing

Institutional policy changes can take one to two academic years to move through governance (longer if they touch faculty curricular authority). State-level statutory or regulatory changes often require two to four years, depending on legislative calendar, political climate, and stakeholder alignment. For institutions beginning from scratch with comprehensive credit mobility policies, plan for 18 to 24 months from landscape assessment to adoption. Build in time for the unexpected: key champions leave, legislative sessions pass, and administrations change. The institutions that succeed are those that maintain momentum through transitions, not just those that start with the most favorable conditions.

Part III: Policy vs. Procedure: What Belongs Where

One of the most consequential decisions in policy development is determining what to put in policy and what to put in procedure. Getting this wrong in either direction creates problems. Policy that is too detailed becomes rigid and must go through full governance processes for minor operational updates. Procedure that embeds substantive commitments to students goes unnoticed by those who need to enforce it and may not have the same legal standing as formal policy.

Belongs in POLICY	*Belongs in PROCEDURE*
• Eligibility: who is covered and what learning types are in scope • Student rights: right to request evaluation, right to appeal, catalog year protections • Institutional commitments: credit acceptance standards, timelines, equivalency review requirements • Principles governing credit applicability (e.g., elective credit floors, portability of transcripted CPL) • Non-discrimination commitments (e.g., not restricting credit based on source institution type)	• *Specific forms, documentation requirements, and submission deadlines* • *Internal routing and review workflows (who evaluates, in what order, using what rubric)* • *Scoring criteria and equivalency determination guidelines for specific modalities* • *Fee schedules (though fee caps or prohibitions may belong in policy)* • *Staff responsibilities and communication templates*



Model in Practice: Three Paths to Policy

For most institutions and systems, keeping policy and procedure separate provides greater flexibility: substantive commitments stay in durable policy, while operational details can be updated without triggering full governance processes. If your institution is drafting CPL policy for the first time, a lean policy document paired with a detailed procedure guide may be a more sustainable model. Consider these three contrasting paths:

Leading with policy. Idaho demonstrates the policy-first path. Through State Board of Education policy, Idaho established a statewide expectation that CPL evaluated and transcripted at one public institution be accepted at others without re-evaluation. A clear policy floor of this kind gives every institution in the state a shared standard to build procedures around, and it gives students a consistent, portable guarantee regardless of where they begin. Where the authority and alignment exist to set policy directly, this path establishes the most durable foundation.

Building toward policy through principles and practice. EDWorks of Northeast Tennessee, a regional consortium without statutory authority, illustrates how a group of institutions can move toward shared policy even when no single body can mandate it. The consortium paired a structured fact base from stakeholder listening sessions with analysis of existing state and institutional policy to develop a set of guiding principles, refining them iteratively to build buy-in across members. These principles do not yet carry the force of policy, but they establish the shared aims and common language from which durable institutional and, over time, state-level policy can be written. For institutions that lack the authority or readiness to adopt formal policy immediately, principles, practice, and procedure can lay the groundwork that policy later formalizes.

Integrating policy and procedure. Nevada merged the two into a single comprehensive CPL framework, combining the what and the how in one document. This approach succeeded because it was developed collaboratively by institutions and the system, with broad buy-in secured before adoption. Integration of this kind asks a great deal of the conditions around it: strong trust, shared governance, and sustained collaboration. Where those conditions are present, a unified document can work well; where they are not, the separation of policy and procedure described above remains the safer default.

Part IV: Getting Alignment on Terms

Policy is only as clear as the terms it uses. In holistic credit mobility, definitional inconsistency is a persistent source of confusion and inequity. Students may not apply for CPL because they do not understand what it covers. Advisors may apply policies inconsistently because terms like "noncredit" or "portfolio assessment" mean different things across departments. Cross-institution policy alignment is nearly impossible when each institution uses different definitions.

The accompanying *Glossary of Credit Mobility Terms* provides general definitions of key concepts used throughout these resources. When developing policy, however, institutions and systems must go a step further by establishing shared understandings of how these terms will be interpreted and applied in their particular context. The table below highlights terms that warrant particular attention alongside the policy decisions or ambiguities that stakeholders should address. These working definitions and interpretations should be documented and used consistently in procedures, student-facing materials, and staff training.

Term	Why Definitional Alignment Matters
Credit for Prior Learning (CPL)	CPL is used broadly to describe multiple distinct modalities: standardized exams (CLEP, DSST, AP, IB), portfolio assessment, military credit, industry credential evaluation, and challenge exams. Policies that say only "CPL" without specifying which modalities are covered leave significant ambiguity.
Noncredit / Non-credit-bearing	"Noncredit" is used differently across institutions and sectors. In some contexts it refers to workforce continuing education; in others it describes any course not carrying college credit hour designations. When developing noncredit-to-credit pathway policies, defining what counts as noncredit learning is essential.
Validated Learning	The holistic credit mobility framework uses "validated learning" to describe learning that has been assessed, documented, or otherwise verified as meeting established learning outcomes or competency expectations, regardless of its source. Policies should establish clear standards for what constitutes sufficient validation, including when institutions will recognize learning already assessed by another credible entity and when additional evaluation is warranted.
Equivalency	Whether a course or experience is "equivalent" to an institutional course involves both content alignment and learning outcome alignment. Policy should specify whether equivalency requires full alignment or allows partial alignment (and how partial alignment is handled).
CPL Portability	CPL is "portable" when credit awarded and transcripted at one institution can be accepted and applied at another without re-evaluation. Defining portability expectations in policy, including what documentation is required, is essential for cross-institution credit mobility.
Residency Requirements	Institutional residency requirements typically specify a minimum number of credits that must be earned directly at the awarding institution. These requirements can create an unintentional ceiling on how much prior learning can apply toward a credential. Policy should define whether and how CPL, transfer credit, or other prior learning counts toward or against residency.

Part V: Key Policy Components: Mapped to the Five Principles

The following tables present key policy components organized by the five principles of holistic credit mobility. Each section identifies policy actions at the state/system level and the institutional level. Use these as a menu of options to consider in the context of your landscape assessment and level of authority, not as an exhaustive mandate.

Principle I: Count Validated Learning Regardless of Source

Policy Component	State / System Action	Institutional Action
CPL Transcriptability	Require that CPL awarded and transcripted at one public institution be accepted at other public institutions without re-evaluation. Specify required documentation and timelines. (e.g. Idaho State Board of Education CPL Transfer Policy (III.L): requires acceptance of transcripted CPL across all Idaho public institutions.)	Develop written policy committing to accept transcripted CPL from partner and transfer institutions. Designate a process owner for CPL portability decisions. Develop institutional CPL policy using state framework as a floor, not a ceiling. Document how institutional policy exceeds minimum state requirements
Modality Coverage	Enumerate in statute or system policy which CPL modalities all public institutions must accept (e.g., CLEP, DSST, AP, IB, ACE-recommended military, portfolio).	Ensure institutional CPL policy covers all modalities, not just commonly used ones. Review for gaps annually.

	(Example: Indiana Code § 21-42-7-2 requires state educational institutions to award credit for military training and service, using the American Council on Education (ACE) Guide to evaluate military coursework)	
Non-Discrimination in Credit Acceptance	Prohibit policies that restrict transfer credit acceptance based solely on source institution type (e.g., for-profit, technical college, online-only). Require evaluation based on learning outcomes.	Audit institutional policies and faculty guidance for source-based restrictions. Replace with learning outcome-based evaluation criteria.
CPL Fees	Cap or prohibit CPL assessment fees that create financial barriers to prior learning evaluation. Align fee structures with financial aid eligibility rules.	Review and publish CPL fee structures. Consider waiving or reducing fees for Pell-eligible students or veterans.
Recency and Age of Learning	Prohibit the use of the age of prior learning as a blanket basis for denying credit. Where recency is a documented, field-specific concern (for example, certain clinical, licensure, or rapidly changing technical competencies), require that policy tie any time limit to a specific accreditation or licensure rationale, and provide a validation pathway through which students may demonstrate current competency rather than face automatic denial.[1]	Review institutional policies for time limits on credit, prior learning, or coursework. Replace blanket age-based expiration with learning-outcome- and competency-based review. Where a recency standard is genuinely warranted, publish it in advance, apply it consistently, and offer students an option to validate current competency through assessment, portfolio, or updated credentialing.

[1] The framework identifies the age of prior learning as a common barrier for returning adults, alongside the source of that learning. Strong policy treats the two the same way: just as credit should not be denied because of where learning occurred, it should not be

Principle II: Avoid Repeated Learning of the Same Content

Policy Component	State / System Action	Institutional Action
Learning Outcome Alignment Standards	Establish statewide standards for determining course equivalency based on learning outcome alignment, not just course title or credits. Specify minimum percentage of learning outcomes that must align for equivalency to be granted.	Adopt learning outcome-based equivalency criteria across all departments. Train faculty evaluators on consistent application.
Prohibition on Duplicative Requirements	Prohibit institutions from requiring students to repeat coursework for which they have received credit at another institution, absent documented evidence of substantive content difference.	Review program requirements for any provisions that effectively require students to repeat credited learning. Develop exception and appeal process for documented cases.

denied simply because of when it occurred. Blanket time limits on the age of credit or prior learning function as a proxy screen rather than a measure of whether a student still holds the relevant knowledge. The better-designed approach reserves any recency standard for fields where currency is a documented, articulable concern (such as certain clinical, licensure, or rapidly changing technical competencies), ties that standard to a specific accreditation or licensure rationale rather than a default institution-wide rule, and gives students a pathway to demonstrate current competency instead of facing automatic denial. There is no research-backed number of years after which learning ceases to count; the question policy should ask is whether the learning meets current outcomes, not how old the transcript is.

Equivalency Table Maintenance	Require institutions to maintain and publish current course equivalency tables. Specify review frequency and accountability for accuracy.	Assign staff responsibility for equivalency table accuracy. Build equivalency review into annual academic calendar. Remove tables that are outdated rather than leaving stale data in place.
Elective Credit Floor	Require all institutions to award at minimum elective credit for courses that do not meet direct equivalency requirements but meet college-level standards, preventing credit from being disregarded entirely.	Review current treatment of transfer and CPL credits that do not receive direct equivalency. Ensure elective credit is consistently awarded in the absence of equivalency, not denied.

Principle III: Link Learning Across K-12, Higher Education, and Workforce

Policy Component	State / System Action	Institutional Action
Dual Enrollment Articulation Policy	Establish statewide dual enrollment policies that specify credit acceptance standards, quality assurance expectations, and applicability of dual enrollment credit toward degree requirements at all public institutions. (e.g., Florida Statute § 1007.271 establishes the statewide dual enrollment program and requires that dual enrollment courses be creditable toward a career certificate, associate degree, or baccalaureate degree.)	Ensure all dual enrollment courses articulate into the receiving institution's program requirements, not merely as elective credit. Communicate articulation outcomes clearly to students while still in high school.
Industry Credential Recognition	Develop statewide frameworks for evaluating industry credentials and certifications for college credit. Align with ACE-recommended credit and workforce sector standards. Identify high-demand credentials that warrant system-level equivalency agreements.	Establish a process for evaluating industry credentials against institutional courses. Designate faculty leads by discipline for credential review. Publish recognized credentials and their credit equivalencies publicly.
Noncredit-to-Credit Pathways	Define noncredit consistently across the public system. Establish policy allowing noncredit learning from approved providers to apply toward credit-bearing credentials. Create quality assurance standards for noncredit-to-credit pathway evaluation.	Develop institutional policy on noncredit-to-credit pathways. Identify which noncredit programs have or could have credit pathway equivalencies. Ensure advising staff can explain options to students.

	(e.g., Ohio Revised Code § 3333.34 creates a statewide system of stackable certificates that transfer to college credit, available across multiple provider types including employers.)	
Military Credit	Require all public institutions to follow ACE Guide recommendations for military credit. Prohibit re-evaluation of military training that has been awarded credit at another public institution.	Audit current military credit acceptance and applicability. Ensure military credit is applied toward degree requirements, not warehoused as non-applicable electives.
Stackable Pathway Policy	Establish policy enabling stackable credentials at the sub-associate, associate, and bachelor's levels, with explicit on-ramps and off-ramps. Ensure credentials stack toward, not alongside, degree requirements.	Map institutional stackable credentials to program degree requirements. Confirm that completion of a lower credential creates forward progress toward the next level, not a parallel track.

Principle IV: Provide Clear Guidance on How Learning Will Count Toward a Specific Degree

Policy Component	State / System Action	Institutional Action
Transparency Mandate	Require all public institutions to publish, in accessible format, their credit acceptance policies for each credit type, including CPL modalities, dual enrollment, military credit, and transfer credit.	Audit student-facing materials for clarity and accuracy. Ensure policies are accessible to prospective students before admission, not only after enrollment.
Timely Credit Evaluation	Establish statutory or regulatory timelines for credit evaluation and notification (commonly 30 days from transcript receipt or CPL application submission). Require institutions to notify students in writing of credit decisions and available appeal processes.	Review current average time-to-decision for transfer credit and CPL evaluation. Set internal benchmarks aligned with or exceeding state timelines. Report evaluation timelines publicly.
Catalog Year Rights	Establish catalog year protection policy ensuring students are held to degree requirements in effect at the time of their initial enrollment, not requirements that change mid-pathway.	Communicate catalog year rights to students at enrollment and upon re-enrollment after a stop-out. Document catalog year in student record systems and advising tools.
Cross-Institution Information Sharing	Establish data sharing standards enabling sending and receiving institutions to share equivalency and applicability information. Support development of shared transfer planning technology platforms.	Participate in state or regional credit mobility technology platforms. Ensure institutional equivalency data loaded in public-facing tools is accurate and regularly reviewed.

Principle V: Maximize Program Flexibility to Accommodate Diverse Learning Pathways

Policy Component	State / System Action	Institutional Action
Degree Credit Hour Caps	Establish statutory or regulatory caps on total credit hours required for associate (60) and bachelor's (120) degrees, with defined exceptions for programs with accreditation-driven requirements. Require institutional review of programs that exceed caps. (e.g., New Jersey S1265 (2018) caps degree credit hour requirements at 60 for associate and 120 for baccalaureate degrees.)	Audit all degree programs for compliance with credit hour standards. Undertake program review to reduce "curricular bloat" that disadvantages mobile learners without adding essential learning outcomes.
Residency Requirement Review	Require institutions to review and justify residency requirements that restrict how much prior learning can apply toward a credential. Prohibit residency requirements from counting CPL against the residency threshold.	Review institutional residency requirements. Evaluate whether current requirements serve a genuine learning outcome purpose or primarily reflect historical practice. Develop exceptions for transfer-intensive populations and returning adult learners.
AAS-to-Bachelor's Pathways	Establish policy enabling applied associate degree graduates to continue toward bachelor's degrees without being required to repeat technical coursework that meets bachelor's program learning outcomes.	Identify AAS programs with significant enrollment that could develop upward transfer pathways. Work with four-year partners to map technical coursework alignment. Develop explicit AAS-to-bachelor's articulation agreements.

Meta-Major and Program Flexibility Framework	Encourage or require institutions serving large transfer or adult populations to develop meta-major structures that allow exploration within guardrails and reduce excess credit accumulation from major changes.	Develop or strengthen meta-major frameworks that group related programs and align lower-division coursework across program clusters. Ensure meta-major structure accommodates transfer and CPL credit within each cluster.
CPL Applicability, Not Just Acceptance	Require institutions to report not only credits accepted but credits applied toward degree requirements. Create incentives for institutions where CPL is applied toward major and general education requirements, not only as elective credit.	Track and publish CPL applicability data alongside acceptance data. Review patterns where CPL consistently lands only as elective credit and investigate whether program requirements can be adjusted to allow direct application.

Part VI: Student Rights and Protections

Policy for holistic credit mobility is most complete when it explicitly establishes and protects student rights throughout the credit evaluation process. Student rights provisions are frequently absent from or underspecified in institutional CPL and transfer policies. Including them is a signal of genuine commitment to the student-centered approach that holistic credit mobility requires.

Key Provisions to Include

Student Right	What to Include in Policy
Right to Request Evaluation	Students have the right to request evaluation of any prior learning they believe may qualify for credit. Institutions may not require students to demonstrate likely success before allowing an evaluation request.
Right to Timely Notification	Students must be notified of credit decisions in writing within a specified timeframe (commonly within 30 days of a student's request for evaluation or submission of required documentation, whichever is later). As a best practice, institutions should aim to evaluate and communicate credit decisions as early as possible, ideally at or before the point of admission, so that students can make informed enrollment and planning decisions. Decisions must include a clear explanation of what credit was awarded, how it applies, and what recourse is available if the student disagrees.
Right to Appeal	Students have the right to appeal credit evaluation decisions. Policy should specify the grounds for appeal, the process and timeline, and the body responsible for hearing appeals. Decisions on appeal should be made by individuals not involved in the original evaluation.

Catalog Year Protection	Students are entitled to degree requirements in effect at the time of their initial enrollment. This protection applies when students stop out and return, and when they transfer with accepted credits. Students may elect to follow a more recent catalog if doing so benefits them.
Right to Feedback	Students denied credit for prior learning are entitled to written feedback explaining the basis for the decision, including what additional documentation or demonstration might result in a different outcome.
Prohibition on Retaliation	Institutions should explicitly state that students who exercise their rights under CPL, transfer, or appeals policies will not face any adverse academic or administrative consequences.

Part VII: Stakeholder Engagement in Policy Development

Policies that are developed without meaningful stakeholder engagement are harder to implement and more likely to be undermined in practice. The institutions and states that have achieved durable policy change in holistic credit mobility share a common characteristic: they brought the right people to the table before drafting language, not after.

Who Needs to Be at the Table

Stakeholder Group	Why They Matter for Holistic Credit Mobility Policy
Faculty at Sending and Receiving Institutions	Faculty have primary authority over curriculum and credit evaluation. Policy that lacks faculty buy-in will be inconsistently applied. Engage faculty from both sending and receiving institutions, particularly in disciplines with high transfer volume.
Registrars and Transfer Articulation Staff	Registrars manage the operational infrastructure of credit evaluation and are best positioned to identify where policy intent breaks down in practice.
Academic Advisors	Advisors are the primary point of student contact for credit mobility questions. They need to understand and trust policy in order to communicate it accurately. Advisors also surface the student experience gaps that policy drafters often miss.
Financial Aid Officers	CPL fees, credit load implications, and financial aid eligibility intersect with credit mobility policy in ways that can inadvertently create barriers. Financial aid staff should review draft policy language for unintended financial consequences.

Student Representatives	Students with firsthand experience navigating credit mobility, particularly transfer students, veterans, and working adults, bring insight that no other stakeholder can provide. Include student voices formally, not as a courtesy.
Workforce and Employer Partners	For noncredit-to-credit and industry credential policies, employer and workforce sector representatives provide essential validation of what learning has labor market relevance.
Partner Institution Representatives	Policies developed by sending institutions without input from receiving institutions (and vice versa) frequently fail to achieve portability. Cross-institution policy development, as modeled in California's community college CPL policy development process, which included California State University and University of California representatives, produces more durable outcomes.

A Note on the Policy Development Process

The sequence of engagement matters as much as who is included. Share data and context before proposing solutions. Establish guiding principles before drafting language. Give stakeholders the opportunity to shape the framework before reacting to a draft. Institutions and states that have moved too quickly to text, circulating draft policy language before establishing shared principles, frequently encounter resistance that delays adoption significantly. The investment of time at the front end shortens the overall timeline and produces more workable policy.

Part VIII: Talking Points and Anticipated Objections

Policy advocates for holistic credit mobility frequently encounter a predictable set of objections. The following talking points and responses are drawn from the experience of states and institutions that have navigated policy change in this area.

Common Objection	Effective Response
"Our accreditor requires us to restrict CPL to a certain percentage of degree credits."	Review the actual accreditor standards. Most regional accreditors have moved away from prescriptive CPL caps, and what institutions believe to be accreditor requirements often reflect internal policy choices made years ago. Verify the current standard in writing before treating it as a binding constraint.
"If we accept more CPL, we will lose enrollment revenue."	Research consistently shows that students who receive CPL are more likely to complete their credential than those who do not, and completion, not enrollment, drives long-term institutional health. The question is not whether to accept CPL but whether the enrollment model should be built on requiring students to repeat learning they have already demonstrated.
"Faculty need to control what counts for credit in their discipline."	Faculty authority over curriculum is appropriate and important. Holistic credit mobility policy does not ask faculty to lower standards; it asks faculty to evaluate learning outcomes rather than learning sources. The question is not where or how learning took place, but whether it aligns with the learning outcomes of the course.

"We can't guarantee that CPL from another institution meets our standards."	This concern is understandable, but the appropriate response is to establish shared standards through policy, not to refuse to honor decisions made by accredited peer institutions. CPL portability frameworks, like those in Idaho and Maryland, establish exactly these standards.
"We do not have the staff capacity to implement a comprehensive CPL policy."	Start with what you can manage and build. A CPL policy that covers four modalities and is well-implemented is more valuable than one that covers twelve modalities inconsistently. Use the policy lifecycle framework above to phase in coverage over time, and make the case for staff investment using data on student demand and completion outcomes.
"Transfer students already have plenty of support. This is not a priority."	Transfer students disproportionately include first-generation, low-income, and adult learners, the populations most likely to have prior learning and least likely to receive credit for it without policy support. The equity case for holistic credit mobility policy is well-documented.

Model Policy Resources and References

The following models span different types of holistic credit mobility and different levels of authority, from statewide statute to system policy. None is offered as perfect, but each illustrates the strong-policy components described earlier in this section: clear scope, defined terms, learning-outcome-based evaluation, student rights, transparency, and a focus on whether credit applies toward a credential, not merely whether it is accepted. Several also demonstrate something the framework treats as essential: policies designed to interact, so that learning from one source carries forward rather than stalling at the next transition.

1. **Dual enrollment, connected to transfer: Ohio College Credit Plus, within the Ohio Articulation and Transfer Policy.**

   Ohio's College Credit Plus (established 2015) lets students in grades 7 through 12 earn college and high school credit simultaneously, with all public institutions required to participate and no cost to public-school students at public institutions. What makes Ohio instructive is the intentional integration: College Credit Plus credit is governed within the same statewide Articulation and Transfer Policy that carries Ohio's transfer guarantees (see Appendix T of that policy, which specifically addresses transcription of CCP credit), so a student's dual enrollment credit follows them into and across Ohio's public institutions rather than stalling at the transition. It models how separate policies can be deliberately designed to interlock.

   Policy language: Ohio Articulation and Transfer Policy (Updated July 2025), Appendix T.[2] If that direct link has moved, the policy is

[2] "The Ohio Articulation and Transfer Policy," Ohio Department of Higher Education, 2025, https://dam.assets.ohio.gov/image/upload/transfercredit.ohio.gov/files/transfer/policy/OATN_Policy_Update_as_of_July_2025.pdf.

available from the Transfer Credit Ohio policy page[3]; search for "Ohio Articulation and Transfer Policy" and see Appendix T. College Credit Plus program and rules.[4]

2. Transfer pathways: Tennessee Transfer Pathways.

Created under the Complete College Tennessee Act and codified at Tennessee Code § 49-7-202(r), Tennessee maintains roughly 50 major-specific transfer pathways. The statute itself guarantees that pathway courses "shall transfer and apply toward the requirements for graduation with a bachelor's degree at all public universities," that an associate graduate is deemed to have met general education and core requirements and transfers as a junior, and that the 41-hour lower-division general education core is fully transferable as a block. The guarantee is written into law, follows the student, and is applicability-focused (credit counts toward the major, not merely accepted).

Policy language: Tennessee Code § 49-7-202. The official Tennessee Code is published through LexisNexis; for a stable, readable version that mirrors the official text, see Justia[5] Administering authority and pathway curricula.[6]

3. General education block transfer: Virginia Passport and Uniform Certificate of General Studies.

Established in the Code of Virginia (§§ 23.1-907 and 23.1-908) and administered through SCHEV's Transfer Virginia initiative, this policy guarantees that Passport and Uniform Certificate of General Studies courses transfer and satisfy lower-division general education requirements at any public institution. It is notably student-protective: a four-year institution cannot use a waiver to generally reject the coursework, the catalog in effect at the time of

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[3] "Transfer to Degree Guarantee," Transfer Credit Ohio, 2026, https://transfercredit.ohio.gov.
[4] "College Credit Plus," Ohio Department of Higher Education, 2026, https://highered.ohio.gov/initiatives/access-acceleration/college-credit-plus.
[5] "Tennessee Code § 49-7-202," Justia, 2026, https://law.justia.com/codes/tennessee/title-49/chapter-7/part-2/section-49-7-202.
[6] "Tennessee Transfer Pathways," Tennessee Higher Education Commission, 2026, https://tn.gov/thec/for-institutions/articulation-and-transfer/tn-transfer-pathway.html.

first enrollment is protected, and a public, centrally administered course roster is maintained for transparency.

Policy language: Code of Virginia § 23.1-907, official state source.[7] Administering authority and course rosters.[8]

4. Credit for prior learning, integrating multiple learning types: Minnesota State Board Policy 3.35.

Minnesota State separates durable policy (Board Policy 3.35) from operational procedure (System Procedures 3.35.1 through 3.35.3), exactly the policy-procedure distinction this section recommends. Its strength is intentional breadth: one coherent CPL framework brings together external assessments (AP, IB, CLEP, industry credentials, apprenticeship and other noncredit instruction), internal faculty assessments, and military courses and occupations, rather than treating each as a separate, siloed policy. It defines terms, requires that credit be awarded based on documented learning rather than participation, specifies degree applicability, honors a sending institution's equivalency determination on transfer, and guarantees students a right to appeal CPL decisions.

Policy language: Minnesota State Board Policy 3.35[9] Procedures[10]

5. Noncredit-to-credit and stackable credentials: Colorado Stackable Credential Pathways.

Colorado offers a strong example of policy designed to bring learning from outside the traditional credit system into credit-bearing pathways. Established by Senate Bill 22-192 (2022) and

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[7] "Code of Virginia § 23.1-907," Virginia Law, 2026, https://law.lis.virginia.gov/vacode/title23.1/chapter9/section23.1-907.

[8] "Transfer Virginia," State Council of Higher Education for Virginia, 2026, https://transfervirginia.org/.

[9] "3.35 Credit for Prior Learning," Minnesota State, 2026, https://minnstate.edu/board/policy/335.html.

[10] "System Procedure 3.35.1 Credit for Prior Learning - External Assessments," Minnesota State, 2026, https://minnstate.edu/board/procedure/335p1.html; "System Procedure 3.35.2 Credit for Prior Learning - Internal College/University Assessments," Minnesota State, 2026, https://minnstate.edu/board/procedure/335p2.html; "System Procedure 3.35.3 Military Courses and Military Occupations," Minnesota State, 2026, https://minnstate.edu/board/procedure/335p3.html.

continued under Senate Bill 24-143 (2024), the policy directed the Colorado Department of Higher Education to build stackable credential pathways across high-demand industries in partnership with industry, K-12, and higher education, explicitly including credentials earned through assessment of prior learning. It pairs this with a Prior Learning Assessment process and a Quality and In-Demand Non-Degree Credentials Framework to evaluate credential quality, and a related provision requires institutions to accept credit for work-related experience as guaranteed-transfer or statewide-articulation credit. The enabling statute (Colorado Revised Statutes § 23-5-145.6) carried a repeal date of July 1, 2026, so it may no longer be active law; the Department's stackable credential work, however, continues. It is included here because it remains an instructive model of well-designed noncredit-to-credit policy, and because the persistence of the work beyond the statute illustrates how strong policy can seed durable practice.

Policy language (statute as enacted): Colorado Revised Statutes § 23-5-145.6, readable text.[11] Official Colorado Revised Statutes are published via the Colorado General Assembly[12] at Administering authority (current program, outcomes reports, and framework).[13]

[11] "Colorado Revised Statutes § 23-5-145.6," Justia, 2026, https://law.justia.com/codes/colorado/title-23/state-universities-and-colleges/general-and-administrative/article-5/section-23-5-145-6.
[12] "Colorado Revised Statutes," Colorado General Assembly, accessed 2026, https://leg.colorado.gov.
[13] "Stackable Credential Pathways Initiative," Colorado Department of Higher Education, 2026, https://cdhe.colorado.gov/stackable-credential-pathways-initiative.

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