Statement on the Use of Artificial Intelligence (AI) to Advance Learning Evaluation and Recognition: Full Statement

2025

Council of Regional Accrediting Commissions

Who Are We?

The Council of Regional Accrediting Commissions (C-RAC) includes seven federally-recognized accrediting commissions that are responsible for accrediting approximately 3,000 postsecondary, degree-granting colleges and universities in the United States, as well as internationally. Accrediting commissions are private, nonprofit organizations. The commissions and visiting teams at the heart of the accrediting enterprise are made up of volunteers, and at least one of every seven commissioners is a representative of the public.

For more than 100 years, accreditation has served U.S. higher education through external review to assure quality and spur improvement. Accreditors, together with the federal government and states, form a triad charged with shared accountability for ensuring that students attending these institutions benefit from quality educational opportunities. The public can feel confident that the colleges and universities accredited by C-RAC members are held accountable for student outcomes, responsible governance, and continuous improvement.

C-RAC

Statement

The Council of Regional Accrediting Commissions (C-RAC) and its members believe that "Accreditation is one of the most powerful levers available for influencing change and assuring value in higher education."[2] In short, innovating to advance student success is a central tenet of accreditation expectations.

Advances in Artificial Intelligence (AI) are occurring at an unprecedented rate, and those advances offer exciting opportunities for improving institutional quality and student success when implemented well and with appropriate safeguards in place.

There is ample evidence that when students can successfully transfer across institutions, many of them perform very well academically after transfer.[3]

Evidence shows that transfer students and students who would benefit from learning mobility[4] face multiple obstacles that derail their progress towards credential completion.[5] A recent survey of adult Americans conducted by Public Agenda for the Beyond Transfer Policy Advisory Board and Sova showed that nearly four in ten respondents reported they tried to transfer credit toward a college degree or credential. Of those, 58% reported some of their credits were not accepted for transfer, leading to negative outcomes such as having to repeat classes and losing financial aid. Perhaps most concerning: 16% of respondents who tried to transfer credit reported giving up on pursuing a college degree or credential altogether because the process of transferring was so difficult.[6]

Learning evaluation, also known as credit evaluation, is the process of determining whether a student will receive credit for their prior learning, inclusive of a variety of learning experiences such as dual enrollment in high school, military experience, work-based learning, and courses at institutions of higher education. Learning evaluation is a highly decentralized and inconsistent process. Even within single institutions, it often looks different right down to the department level. It is also a time-consuming process that represents a burden on institutional representatives and resources. Unfortunately, current approaches frequently result in delays in students receiving necessary information about how their credits will transfer, the need to retake courses, and other negative consequences for students.[7] Technological advances, such as AI, can help institutions improve this process.

Recognizing that the learning evaluation process represents a moment when critical decisions are made about learners' academic progress that are consequential to their lives, several C-RAC members serve on the national Learning Evaluation and Recognition for the Next Generation (LEARN) Commission.[8] The LEARN Commission, which is expected to issue guidance for institutions in late 2025, is examining policies and practices for undergraduate learning evaluation, including credits that are transferred across institutions, credits earned through high school dual enrollment, and credits awarded for prior learning. The Commission is further examining the potential risks and benefits of applying AI to learning evaluation processes.

In addition to promoting sound institutional policies and procedures, C-RAC members have a history of encouraging institutions to find ways to better support students and the mobility of their learning and credit, as well as working with institutions to support AI-assisted practices.[9]

Recommendations

As institutions assess how they serve learners entering their institutions with a variety of prior learning experiences–such as previously earned postsecondary credit, work-based learning, military experience, and college credit earned through high school dual enrollment or Advanced Placement exams–they should examine their current learning evaluation practices to identify areas of success as well as opportunities for improvement. One key technological consideration is AI.

AI and other new technology innovations offer exciting opportunities to:

- Reduce credit loss for students by analyzing existing course equivalencies and identifying new or expanded matches so more classes count toward degree completion;
- Provide students with critical information about degree-applicable credit in a timely manner;
- Reduce the administrative burden of learning evaluation; and
- Free up faculty and staff time to focus on teaching, mentoring and guidance rather than paperwork.

In combination with considering technological advances such as AI for learning evaluation, institutions 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." In that spirit, during 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?

Put simply, the use of AI in learning evaluation does not conflict with accreditation standards, policies, or practices. Accreditation is never a reason to not implement technology solutions that leverage AI for learning evaluation. Since innovating to advance student success is a central tenet of accreditation expectations, C-RAC supports the exploration and application of transparent, accountable, and unbiased AI solutions within the practice of learning evaluation and credit transfer.

AI Applications

A recent green paper published by AACRAO and Sova for the LEARN Commission describes many applications of AI in the learning evaluation process.[10] Examples include:

- Conversational AI: "AI systems that process and engage in natural language interactions with users….examples include: chatbots answering learner questions about transfer-credit policies (and) virtual assistants helping learners understand credit-evaluation status."
- Predictive AI: "AI systems that analyze historical data to forecast future outcomes….examples include: predicting the likelihood of credit-transfer acceptance, based on past decisions (and) forecasting learner success in courses, based on prior learning-assessment outcomes."
- Generative AI: "AI systems that create new content based on training data and prompts….examples include: drafting initial credit-equivalency recommendations (and) creating personalized learning plans, based on transferred credits."
- Prescriptive AI: "AI systems that recommend specific actions to achieve desired outcomes….examples include: suggesting optimal credit-transfer pathways (and) recommending additional evidence needed for prior-learning assessment."

There are several national efforts to build solutions to dramatically improve learning mobility with varying uses of AI. Examples include:

- **The AI Transfer and Articulation Infrastructure Network (ATAIN, https://www.atain.org/):** A groundbreaking national network supercharging learning mobility and college transfer success. Powered by CourseWise, an AI platform informed by 10 years of UC Berkeley research, ATAIN reduces repetitive manual work by surfacing equivalencies across courses, credentials, and experiences, so more learning counts toward progress and completion. Faculty remain the ultimate decision-makers, ensuring integrity and rigor while reducing administrative drag. What sets ATAIN apart is that it's not just technology, but infrastructure built by and for institutions: a trusted backbone of shared standards, tools, and partnerships. Together, we're advancing learning mobility and shaping a future where students navigate a boundless sea of opportunity—charting their own best-fit pathways through the rich landscape of degrees, credentials, and experiences.
- **Transfer Explorer (https://transferexplorer.org/):** A student-facing public website offered by the non-profit ITHAKA that collects and normalizes up-to-date catalog, equivalency, and program requirements data direct from the source systems of institutions in multiple states, allowing users to see how prior or potential learning would transfer and apply to the program requirements at the participating institutions. Transfer Explorer is beginning to incorporate AI to streamline the normalization of data, reduce manual entry of prior learning, analyze learning equivalency and degree requirement data, provide guidance to students, and identify and recommend updates to equivalency tables.
- **Arizona State University Triangulator:** A credit mobility solution developed by Arizona State University, designed to recommend transfer course equivalencies. The goals of Triangulator are to reduce evaluation time, increase the number of courses that articulate as direct course equivalencies, advance institutional transfer articulation objectives, and empower schools to maintain autonomy over their decisions. Triangulator is in the early stages of leveraging AI to normalize data submitted by institutions in various formats, enabling even resource-limited schools to participate. Through flexible APIs, it integrates matching algorithms to analyze course information and recommend suggestions for new equivalencies, helping institutions be more proactive in transfer credit review.

Notes

1. C-RAC's members are: Accrediting Commission for Community and Junior Colleges (ACCJC); Higher Learning Commission (HLC); Middle States Commission on Higher Education (MSCHE); New England Commission of Higher Education (NECHE); Northwest Commission on Colleges and Universities (NWCCU); Southern Association of Colleges and Schools Commission on Colleges (SACSCOC); WASC Senior College and University Commission (WSCUC).
2. Council of Regional Accrediting Commissions (C-RAC). Home Page. https://www.c-rac.org/
3. See, for example, Jennifer Glynn. Persistence: The Success of Students Who Transfer from Community Colleges to Selective Four-Year Institutions. Jack Kent Cooke Foundation, https://www.jkcf.org/research/persistence/#:~:text=Not%20only%20do%20students%20who,transfer%20from%20other%20four%2Dyear; Grace Chen. (May 2025.) "How Well Do Community College Students Perform After Transferring?" Community College Review. https://www.communitycollegereview.com/blog/how-well-do-community-college-students-perform-after-transferring
4. "Learning mobility" is also sometimes referred to as "credit mobility."
5. National Student Clearinghouse Research Center. (April 18, 2024.) Tracking Transfer: Measures of Effectiveness in Helping Community College Students to Complete Bachelor's Degrees. https://nscresearchcenter.org/tracking-transfer/; RP Group. Through the Gate Transfer Initiative. https://rpgroup.org/Through-the-Gate/Overview; Hans Johnson and Marisol Cuellar Mejia. (2020.) Increasing Community College Transfers: Progress and Barriers. Public Policy Institute of California. https://www.ppic.org/wp-content/uploads/increasing-community-college-transfers-progress-and-barriers-september-2020.pdf
6. Public Agenda. (2025.) Beyond Transfer: Insights from a Survey of American Adults. For the Beyond Transfer Policy Advisory Board and Sova. https://publicagenda.org/resource/beyond-transfer/. Additional transfer student outcomes data include: Of students who began at a community college in fall 2016, only 31.2% transferred to a four-year institution within six years and only 15.3% of the cohort completed a bachelor's degree. Among lower-income students who began at a community college, 10.6% earned a bachelor's degree within six years, half the rate of higher-income students, 21.9% of whom earned bachelor's degrees. See National Student Clearinghouse Research Center. (April 18, 2024). Tracking Transfer: Measures of Effectiveness in Helping Community College Students to Complete Bachelor's Degrees. https://nscresearchcenter.org/tracking-transfer/
7. Sophia Sutcliffe, Marjorie Dorimé-Williams, Gianna Perri, Cyrette Saunier, and Jordan Ozley. (June 2025.) How Faculty Members Influence Credit Transfer at Four-Year Institutions: Building Knowledge to Improve Transfer Student Outcomes. MDRC. https://www.mdrc.org/sites/default/files/CTFR_Report.pdf; Wendy Kilgore. (2024.) Transforming Traditional-Credit Evaluation: Developing a Learner-Centric Approach. AACRAO and Sova, in partnership with Beyond Transfer, for the LEARN Commission. https://www.aacrao.org/docs/default-source/signature-initiative-docs/learning-mobility/learn-commission/traditional-credit-eval-green-paper-final-8-21-2024.pdf?sfvrsn=8380ba1a_1; Sophia Sutcliffe and Barbara Condliffe. (2020.) Infographic: Mapping the College Transfer Process: Barriers to Student Success and Opportunities for Improvement. MDRC. https://www.mdrc.org/work/publications/mapping-college-transfer-process.
8. American Association of Collegiate Registrars and Admissions Officers (AACRAO) and Sova. "LEARN Commission." https://www.aacrao.org/our-work/learning-mobility/learn-commission
9. See, for example, Council of Regional Accrediting Commissions. (May 2021.) "C-RAC Issues Joint Statement on ACE Transfer of Credit Recommendations." https://www.c-rac.org/post/c-rac-issues-joint-statement-on-ace-transfer-of-credit-recommendations; Council of Regional Accrediting Commissions. (January 2025.) "C-RAC Letter to Trump Transition Team." https://www.c-rac.org/post/c-rac-letter-to-trump-transition-team
10. Wendy Kilgore and Jesse Boeding. (2025.) AI-Supported Credit Mobility: Opportunities and Challenges in Higher-Education Transfer Systems. AACRAO and Sova, in partnership with Beyond Transfer, for the LEARN Commission. https://www.aacrao.org/docs/default-source/signature-initiative-docs/learning-mobility/learn-commission/ai-supported-credit-mobility.pdf?sfvrsn=8c8edfcd_4