

THE UNIVERSITY OF HONG KONG

Credit Accumulation and Transfer Policy

The University of Hong Kong first introduced a credit unit system in 1998 as part of its Institutional Curriculum Reform initiative. Since the implementation of the four-year undergraduate curriculum in 2012, the University has seized the opportunity to continuously improve its credit unit system. All undergraduate curricula and taught postgraduate curricula adhere to a uniform policy of credit accumulation and transfer.

1. The University's Credit Unit System

- 1.1 The University's credit unit system is based on the European Credit Transfer and Accumulation System (ECTS). The normal study load per credit consists of 25 hours (± 5) of student learning (i.e. within the range of 20 to 30 hours), which includes all learning activities and experiences, both within and outside the classroom, and any assessment tasks and examinations required to achieve the learning outcomes of a course.
- 1.2 In all regulations approved by the Senate, the progression and completion requirements of undergraduate curricula and taught postgraduate curricula are expressed in terms of credit units as outlined in this policy statement.
- 1.3 The HKU credit unit system is a semester-based system and courses should normally be completed (including any assessment or non-classroom activities) within the semester in which the approved learning activities take place.
- 1.4 Students must achieve the stated learning outcomes of the courses in order to be awarded credit for the purpose of credit accumulation towards meeting curriculum requirements.
- 1.5 The University's Credit Accumulation and Transfer Policy is intended, *inter alia*, to facilitate learner mobility, lifelong learning and recognition of prior learning. In granting Advanced Standing, credit transfer and exemption, the relevant Faculty Board must ensure a broad equivalency in level, standard, content and learning outcomes between the study completed by the student elsewhere and specific courses at HKU. Equivalency may be assessed on the basis of programme/course learning outcomes, course content (e.g. breadth, depth and currency of knowledge), volume of learning, assessment requirements, credit values etc. The Faculty Board should consider the academic merit of each application and make a decision, which should be fair, timely, academically defensible and evidence-based, and which should not compromise the integrity of the curriculum. There shall be no appeals against the Faculty Board's decision.
- 1.6 Given the nature of capstone experience, Advanced Standing or exemption will not be granted, while credit transfer may be allowed subject to the relevant Faculty Board's approval.

- 1.7 Where Faculties see the need to formulate Faculty-specific policies for the granting of Advanced Standing, credit transfer and exemption, such policies should be aligned with the institutional policy and clearly communicated to staff and students online and in student handbooks.
- 1.8 Credit requirements of internal dual degrees, and joint/dual degrees offered in partnership with external institutions are subject to the Senate's approval on the advice of the Academic Board.

2. Credit and Residency Requirements for Undergraduate Curricula

- 2.1 A standard undergraduate course is valued at 6 credits and represents one-tenth of a full year's academic work. Courses with other multiples of 3 credits may be allowed by the Senate with good academic or professional rationale in order to reflect differences in academic study load. No course should have a credit value of less than 3 credits and no course should normally have a credit value of more than 30 credits.
- 2.2 A standard 6-credit course normally consists of approximately 150 hours of student learning as defined in paragraph 1.1 above; and in all cases the student study load required for a standard 6-credit course will be within the range of no less than 120 hours and no more than 180 hours.
- 2.3 Unless with the Senate's approval, no student in a standard four-year undergraduate curriculum shall be required to complete more than 240 credits: credit requirements for major programmes will be determined by Senate, but in all cases will be within the range of 72 to 96 credits; credit requirements for minor programmes will be determined by Senate, but in all cases will be within the range of 36 to 48 credits. The Common Core Curriculum will consist of 36 credits for all single undergraduate degree curricula and 24 credits for all dual degree curricula, unless otherwise prescribed in the curriculum regulations and syllabuses.
- 2.4 A semester as defined by the Senate (but excluding the Summer Semester and extended semesters as approved by Senate for the clinical Faculties) will consist of 30 credits of undergraduate academic work and a standard four-year undergraduate degree curriculum will consist of eight semesters.
 - 2.4.1 Students may choose to take unbalanced study loads in different semesters but will not normally be allowed to take fewer than 24 credits or more than 36 credits in any one semester. Students may, of their own volition, take additional credits not exceeding 6 credits in each semester, and/or further credits during the Summer Semester, up to a maximum of 288 credits under a standard four-year undergraduate curriculum. The maximum study load of 72 credits per academic year shall normally include courses taken to make up for failed credits. Notwithstanding the heavy curriculum requirements for the achievement of two degrees, students in dual degree curricula cannot be required to complete more than 72 credits in each academic year, unless with Senate's approval.

- 2.4.2 Students may choose to take an unbalanced study load in different years and may, with the approval of the relevant Faculty Board, exceed the maximum study load of 72 credits per academic year but shall not in any case exceed the maximum curriculum load¹ for the normative period of study of 288 credits under a standard four-year undergraduate curriculum, except as provided for in paragraph 2.4.3 below.
- 2.4.3 Where students are required to make up for failed credits, students may be required or permitted by the relevant Faculty Board to exceed the annual study load of 72 credits but which shall not, in total, exceed the maximum curriculum study load¹ for the maximum period of registration of 432 credits under a standard four-year undergraduate curriculum.
- 2.5 In addition to the primary definition of course study load described in paragraph 2.2 above, study load should be defined according to the output requirements for all assessable coursework and examinations, and the contact hours of instruction required for achieving the stated learning outcomes of the course. Every undergraduate curriculum and major and minor programme will provide a Credit Unit Statement for its courses in which the standard 6-credit course will be defined according to: (a) the total student commitment of approximately 150 hours (but within the range of 120-180 hours), (b) the output requirements for assessable coursework and examinations, and (c) the number of contact hours of instruction required in order to achieve the stated learning outcomes of the courses within the curriculum or programme. All undergraduate curriculum and major and minor programme Credit Unit Statements approved by the Senate will form part of this Credit Accumulation and Transfer Policy document.
- 2.6 All credit-bearing courses within major programmes and non-programme based curricula will be classified as either Introductory Courses or Advanced Courses. Introductory Courses are normally taken in the first four semesters of study under a standard four-year undergraduate curriculum, unless taken to meet pre-requisite or co-requisite requirements for progression in the major programme or the degree curriculum. Advanced Courses are normally taken in the subsequent semesters of study. The learning outcomes required in all courses should reflect the desired progression in learning from Introductory to Advanced Courses.
- 2.7 Credits awarded for one course may not be counted towards the fulfillment of requirements of more than one part of a curriculum or programme, but a course or combination of courses which constitute a prerequisite for more than one major or minor programme may be used to satisfy the requirements of both programmes up to the credit limits specified by Senate, especially in cases where students require such credits in order to declare a double major.
- 2.8 In order to qualify for the award of any standard four-year undergraduate degree, students who are awarded Advanced Standing must accumulate a minimum of 120 credits during their candidature at the University through

¹ The Senate is the approving authority for a waiver of the maximum curriculum load, a case of which must be made by the relevant Faculty Board with justifications.

study at this University or from transfer of credits for courses completed at other institutions, subject to the provisions of Statute III.5 and Regulation UG2(b)² of the “Regulations for First Degree Curricula”. Students in undergraduate curricula requiring more than four years of study must accumulate at least half of the credits normally required for those degree curricula during their candidature at the University.

- 2.9 Any student may complete the credit requirements for graduation in a degree curriculum in less than four academic years or eight semesters within the limitations of paragraphs 2.4, 2.8 and 6.1 and in accordance with Statute III.5. All students must complete the credit requirements for graduation in a degree curriculum within the prescribed maximum period of registration.

3. Credit Requirements for Taught Postgraduate Curricula

- 3.1 All taught postgraduate courses are in multiples of 3 credits to cater to different curricular needs and requirements. A capstone experience carries a minimum of 6 credits, the successful completion of which forms part of the graduation requirement for a Master’s degree. Courses which do not carry any credit may be approved by the Faculty Board with good reasons.
- 3.2 The normative credit requirements are: (a) 60 – 90 credits for a Master’s degree or an advanced diploma; (b) 45 – 60 credits for a postgraduate diploma; and (c) 30 – 45 credits for a postgraduate certificate.
- 3.3 A Master’s degree or an advanced diploma normally requires a minimum of one year of full-time study (or equivalent). A postgraduate diploma or a postgraduate certificate typically entails one year of full-time study (or equivalent), unless otherwise approved by the Senate.
- 3.4 The normative study load of a year of full-time study is 60 credits, subject to a maximum of 90 credits. Variations from this range shall be approved by the Senate. The annual study load of part-time study is normally less than 60 credits.
- 3.5 Individual curricula may stipulate a higher credit requirement and/or a longer study period than the limits specified in paragraphs 3.2 to 3.4 above where so necessitated by international disciplinary benchmarking or specific professional/accreditation requirements, subject to the Senate’s approval.
- 3.6 A postgraduate diploma or a postgraduate certificate may be offered as one or a combination of the following:
- (a) a standalone curriculum for direct admission of students and an award on its own;

² Regulation UG2(b) of the “Regulations for First Degree Curricula” reads: “in accordance with Statute III.5 and notwithstanding the granting of advanced and/or transfer credits, a minimum of two semesters of study at this University shall be required before a candidate is considered for the award of a first degree, other than a degree in medicine or surgery, and a minimum of four semesters of study at this University shall be required before a candidate is considered for a first degree in medicine or surgery”.

- (b) an exit award to recognise the achievements of students who have not completed all the requirements of a higher award but who have satisfied the requirements of the exit award as specified in curriculum regulations. Those who have been granted the exit award shall not be re-admitted to the curriculum of the higher award;
- (c) articulation of a postgraduate diploma with a Master's degree (or articulation of a postgraduate certificate with a postgraduate diploma and/or a Master's degree) as specified in curriculum regulations, to enable students who have completed the requirements of a lower award to transfer their candidature to a higher award, with the earned credits to count towards the higher award, subject to the condition that the students will not be awarded the lower qualification.
 - i) For the purpose of determining the maximum period of registration for the higher award, the period of study shall be counted from the commencement date of the lower award.
 - ii) The Faculty may make regulatory provision for students who ultimately have not completed the requirements of the higher award to be granted the lower qualification as an exit award.
 - iii) If arrangements exist to enable students who have been awarded a lower qualification to apply for admission to a higher award, such provision should be specified in the relevant curriculum regulations, inclusive of the stipulation of the maximum time lag between completion of the lower award and enrolment for the higher award, and granting of advanced standing and/or exemption. Generally, if the two curricula have a significant overlap (viz. exceeding 30% of the curriculum of the higher award), the two awards should be made an impermissible combination. In other words, students who have been awarded the lower qualification shall not be allowed to enroll for the higher award.

3.7 A taught postgraduate curriculum should normally consist of postgraduate-level courses only. Cross-listing³ of undergraduate courses in a taught postgraduate curriculum with the credits earned to count towards fulfilling curriculum requirements may be allowed, but it must be justified with good academic reasons for the Academic Board's approval, and in any case, is subject to either a cap of 15% of the total credit requirement or 12 credits in the case of a Master's degree or an advanced diploma, and either 15% of the total credit requirement or 6 credits in the case of a postgraduate diploma or a postgraduate certificate.

3.8 A Credit Unit Statement should be drawn up for each taught postgraduate curriculum in which its courses are defined according to: (a) the total student commitment in terms of learning hours; (b) the output requirements for assessable coursework and examinations; and (c) the number of contact hours of instruction required in order to achieve the stated learning outcomes of the

³ The same course should be listed in undergraduate and taught postgraduate curricula by using the same course code.

courses within the curriculum. The Credit Unit Statements of all taught postgraduate curricula approved by the Senate will form part of this Credit Accumulation and Transfer Policy document.

4. Grade Point Average (GPA)

- 4.1 All course results, including failures, will be included in the calculation of Semester GPA, Year GPA, Cumulative GPA, and Graduation GPA. For undergraduate students in the 2017-18 intake and thereafter who have successfully completed six Common Core courses, the calculation of Graduation GPA is subject to the proviso that either five Common Core courses with the highest grades (covering all four Areas of Inquiry), or all six courses will be counted towards Graduation GPA, depending on which generates the higher Graduation GPA.
- 4.2. The calculation of the various forms of GPA stated in paragraph 4.1 above will be made according to a standard set of formulas elaborated at [Annex I](#) (document 269/1214 amended).

5. Advanced Standing

- 5.1 Students may, with the approval of the relevant Faculty Board, be granted Advanced Standing for approved studies completed before admission to the University. In such cases, credit is granted to advance a student's academic progress. Such advancement may be granted with regard to individual course credits, particular sections of a curriculum or programme, or blocks of credit required for progression from one semester to another. Students awarded Advanced Standing will not be required to complete any further courses in order to satisfy the requirements of those parts of the curriculum or programme for which they have been granted Advanced Standing. Students who are awarded Advanced Standing will not be granted any further credit transfer for those studies for which Advanced Standing has been granted.
- 5.2 For undergraduate curricula, a maximum of 120 credits of Advanced Standing may be awarded.
- 5.3 For taught postgraduate curricula, the maximum limit of Advanced Standing is 20% of the total credit requirement, subject to the overriding condition that the combined total of Advanced Standing and credit transfer is 50% of the total credit requirement.

6. Credit Transfer

- 6.1 Students may, with the approval of the relevant Faculty Board, transfer credits for courses completed at other institutions (whether inside or outside of Hong Kong) at any time during their candidature, but the results of those courses will not be included in the calculation of GPA. The principles for granting and calculating credit transfer are set out at [Annex II](#) (document 149/115 amended). Students awarded credit for courses completed outside the University in satisfaction of degree requirements will not be required to complete any further internal courses in order to satisfy those requirements.

- 6.2 For undergraduate curricula and subject to paragraphs 2.8 and 5.1, a maximum of 120 credits may be transferred.
- 6.3 For taught postgraduate curricula, the maximum limit of credit transfer is 50% of the total credit requirement, subject to the overriding condition that the combined total of Advanced Standing and credit transfer is 50% of the total credit requirement.

7. Course Exemption

- 7.1 Students may, with the approval of the relevant Faculty Board, be granted exemption from required courses. Students who are exempted from required courses must replace the relevant number of exempted credits with courses of the same credit value.

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Credit Accumulation and Transfer Policy –
Calculation of Grade Point Average

‘Grade Point Average’ or ‘GPA’ is a numerical measure of a candidate’s academic achievement over a specified period of time, and is calculated by the total of the product of grade points earned for each course attempted (including failed courses) and its credit value being divided by the total number of credits attempted:

$$GPA = \frac{\sum_i \text{Course Grade Point} \times \text{Course Credit Value}}{\sum_i \text{Course Credit Value}}$$

(where ‘i’ is the number of all passed and failed courses taken by the student over a specified period)

‘Semester Grade Point Average’ or ‘SGPA’ is the GPA in respect of courses attempted by a candidate (including failed courses) during a given semester:

$$SGPA = \frac{\sum_j \text{Course Grade Point} \times \text{Course Credit Value}}{\sum_j \text{Course Credit Value}}$$

(where ‘j’ is the number of all passed and failed courses taken by the student during a given semester)

‘Year Grade Point Average’ or ‘YGPA’ is the GPA in respect of courses attempted by a candidate (including failed courses) during a given academic year:

$$YGPA = \frac{\sum_k \text{Course Grade Point} \times \text{Course Credit Value}}{\sum_k \text{Course Credit Value}}$$

(where ‘k’ is the number of all passed and failed courses taken by the student during a given academic year)

‘Cumulative Grade Point Average’ or ‘CGPA’ is the GPA in respect of courses attempted by a candidate (including failed courses) at the time of calculation:

$$CGPA = \frac{\sum_l \text{Course Grade Point} \times \text{Course Credit Value}}{\sum_l \text{Course Credit Value}}$$

(where ‘l’ is the number of all passed and failed courses taken by the student up to the time of calculation of the CGPA)

‘Graduation Grade Point Average’ or ‘GGPA’ is the GPA in respect of courses attempted by a candidate (including failed courses) at the point of graduation:

$$GGPA = \frac{\sum \text{Course Grade Point} \times \text{Course Credit Value}}{\sum \text{Course Credit Value}}$$

(where ‘l’ is the number of all passed and failed courses taken by the student at the point of graduation)

subject to the proviso that for undergraduate students in the 2017-18 intake and thereafter who have successfully completed six Common Core courses, either five Common Core courses with the highest grades (covering all four Areas of Inquiry), or all six courses will be counted towards GGPA, depending on which generates the higher GGPA.

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Principles for Granting and Calculating Credit Transfer

1. Overriding Principles

- 1.1 Faculty Boards are the authority for approving credit transfer in accordance with the University's "Credit Accumulation and Transfer Policy", and the regulatory provisions and principles as approved by the Senate from time to time.
- 1.2 The HKU credit system is based on the ECTS (European Credit Transfer and Accumulation System) model, a "top-down" credit system which considers a full-time undergraduate course-load in all participating or ECTS-compliant institutions to be of similar academic value. A full year of study in one institution will be equal to a full year of study in a partner institution. Consequently, a semester of study in the two institutions will also be considered as equal in credit value under normal circumstances. This ECTS principle of equality of student effort overrides any other calculations (such as contact hours or assignment load) used in assigning credits to individual components of the curriculum.
- 1.3 Under the ECTS model, the purest form of credit transfer would be to assign a full year (in the case of an undergraduate curriculum, 60 credits) or a full semester (in the case of an undergraduate curriculum, 30 credits) of transfer credit to the student in much the same way that the University currently awards advanced standing. All institutions using the ECTS model accept that a full-time undergraduate student spends on average approximately 1,500 hours in learning activities over the course of a normal academic year, although the total can vary considerably from one institution to another, between programmes within a particular institution, and even among students in a single programme. Undergraduate courses completed in all ECTS-compliant exchange institutions that use a similar 60-credit standard for dividing the academic year should therefore be awarded the same credit loading when transferred to HKU. The same principle applies to the calculation of credit transfer in the case of a taught postgraduate curriculum.
- 1.4 Grades gained by students in other institutions will not appear on student transcripts.
- 1.5 Save for some curricula which specifically require students to transfer credits and some which do not allow credit transfer owing to professional requirements, students should be allowed to decide whether they apply for the credits gained for courses which they complete while on exchange. If they so decide, they must apply for and obtain approval for the proposed credit transfer before departing on exchange.

- 1.6 In selecting new exchange partner institutions, care must be exercised to evaluate the academic standing of the proposed institutions before any exchange agreement is signed, so that students who study on exchange are awarded a proper equivalent of credit at HKU for the work that they undertake in the exchange institutions.
- 1.7 In case any major inconsistencies of practice among Faculties arise, the Vice-President and Pro-Vice-Chancellor (Teaching & Learning) will discuss with the Faculties concerned, and review the prevailing policy as he/she considers appropriate.
2. Undergraduate Curricula
 - 2.1 Unless the course is judged to be unacceptable for credit transfer (*e.g.* remedial courses, courses with duplicate course content), the method of calculating the transfer of credits should normally follow the “top-down” approach, *i.e.* a semester of full-time study in an exchange institution should normally translate into a full semester’s credit at HKU (*e.g.* in the case of an undergraduate curriculum, up to 30 credits per semester or up to 60 credits per year, subject to a maximum of 36 credits per semester or 72 credits per year). In making a decision, the Board of the student’s home Faculty may take into account course content, hours of student learning, learning activities, learning outcomes, forms of assessment and appropriateness for HKU’s curriculum or programme *etc.* In the case of a second major or a minor offered by another Faculty, that Faculty’s advice must be solicited before a decision on credit transfer is made.
 - 2.2 The HKU standard loading of 60 credit units per annum is not used by all ECTS-compliant institutions. Full-time credit loadings of 30 credits and 120 credits are also common. Exchange students transferring credits from these institutions must have their exchange credits doubled or halved respectively in order to arrive at a HKU equivalent of up to 60 credits.
 - 2.3 Most UK universities still divide their academic years into three terms. In such cases, each term of work will be worth one-third (up to 20 credits) of the total annual load of up to 60 credits.
 - 2.4 Some of HKU’s overseas exchange partners do not use the ECTS method of credit accumulation and transfer, rendering credit transfer calculations difficult. This is particularly true of North American and Asian universities where a bewildering array of credit systems flourishes.
 - 2.5 Many summer courses that are offered in partner institutions do not follow the ECTS mode, in which case Faculties should consider factors such as the total number of hours of academic work required for the summer course, course content, learning activities, learning outcomes, assessment *etc.*, similar to the expectations which are at the core of the HKU credit system.
 - 2.6 Faculty Boards must only allocate total transfer credits for a semester or a year of exchange study in multiples of 6 credits (though non-standard credit transfer is allowed for individual exchange courses). Direct transfer of credits from partner institutions according to the strict ECTS pattern suggested above

may lead to a problem of “odd credits” being accumulated by students who go on exchange. The requirement for students to seek approval for their course selection and credit transfer before proceeding on exchange will provide them with the opportunity to minimize such problems where they may adversely influence completion of requirements for the disciplinary professional core or majors.

- 2.7 Odd credits derived from the calculation of credit transfer may be rounded up or down, for which reference may be made to the conversion table in [Attachment I](#) (document 273/1114). “Odd credits” are not considered particularly problematic for elective courses. For instance, if the proper amount to be transferred from the exchange institution is only 5 credits, the Faculty ought to assess the content of the course and its equivalence with the required HKU course in order to determine whether the course can be accepted to fulfill a 6-credit requirement. It should be noted that the conversion table is intended for general reference only, and that Faculty Boards have the discretion to determine the rounding up or down of odd credits having regard to *e.g.* course content, hours of student learning, learning activities, learning outcomes, forms of assessment and appropriateness for HKU’s curriculum or programme.
- 2.8 It is the responsibility of the student’s home Faculty (in consultation with relevant programmes and/or other Faculties offering a major, minor or professional core) to determine whether a course completed on exchange is acceptable for a major, minor or professional core requirement in a specific curriculum, and only whole courses will be permitted for credit transfer in fulfillment of major, minor or professional core requirements. Any course which is rejected for a major, minor or professional core requirement may be considered as an elective course subject to the Faculty Board’s approval. Before approval for credit transfer is given, exchange students may need to be reminded of the potential problems of “odd credits”, and of the possibility that they may be required to complete more than 240 credits to fulfill the curriculum requirements if *e.g.* some of the credits that are transferred to HKU cannot be counted towards the major or professional core requirement. In these circumstances, it is the student’s choice to accept or reject the terms of the credit transfer. In accordance with paragraph 2.3 of the University’s “Credit Accumulation and Transfer Policy”, no student in a 4-year undergraduate degree curriculum from 2012 should be required to complete more than 240 credits. Therefore, situations where more than 240 credits are required to be completed should be avoided as far as possible, in spite of the fact that any need for a student to complete more than 240 credits as a result of choosing to participate in exchange studies can be interpreted as resulting purely from student choice rather than institutional compulsion.
3. Taught Postgraduate Curricula
- 3.1 Where partner institutions do not adopt the ECTS model, the credit values of external courses should be converted using the “top-down” method by which a year of full-time (or part-time) study in another institution is deemed to be equivalent to a year of full-time (or part-time) study at HKU. Accordingly, the credit value of an external course should be converted as follows:

$$\text{Course credit value in another institution} \times \frac{\text{A year of full-time (or part-time) study load at HKU}}{\text{A year of full-time (or part-time) study load in another institution}} \\ = \text{Converted course credit value at HKU}$$

- 3.2 The Faculty Board may exercise discretion as necessary to round up or down the converted credit values, so as to make them conform to multiples of 3.

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Credit Transfer - Credit conversion table for accumulated “odd credit” transfers

Exchange course credits to be transferred to HKU from a partner institution should first be converted using the “top-down” method of conversion. If the resulting credit conversion results in a credit total for the semester or year that is not a multiple of 6, the following table should be used to adjust the total credits for the semester or year of exchange study.

| <i>Actual credits transferred from exchange partner institution per semester/year</i> | <i>Total conversion credits to satisfy the HKU 6-credit accumulation structure</i> |
|---|--|
| More than 5.00 but fewer than 8.75 HKU credits | 6 HKU credits |
| More than 8.75 credits but fewer than 14.75 credits | 12 HKU credits |
| More than 14.75 credits but fewer than 20.75 credits | 18 HKU credits |
| More than 20.75 credits but fewer than 26.75 credits | 24 HKU credits |
| More than 26.75 credits but fewer than 32.75 credits | 30 HKU credits |
| More than 32.75 credits but fewer than 38.75 credits | 36 HKU credits |
| More than 38.75 credits but fewer than 44.75 credits | 42 HKU credits |
| More than 44.75 credits but fewer than 50.75 credits | 48 HKU credits |
| More than 50.75 credits but fewer than 56.75 credits | 54 HKU credits |
| More than 56.75 credits but fewer than 62.75 credits | 60 HKU credits |
| More than 62.75 credits but fewer than 68.75 credits | 66 HKU credits |
| More than 68.75 credits | 72 HKU credits* |

* 72 credits is the maximum credit conversion allowed under the Senate’s Credit Accumulation and Transfer Policy