

Credit, Evidence, and Experiential Learning: Assessing Indonesia's Merdeka Belajar-Kampus Merdeka Policy

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Article History Received : 05-09-2026 Revised : 29-09-2026 Published : 05-10-2026 Keywords: <i>credit recognition, experiential learning, higher education policy, learning outcomes, work-integrated learning</i>	The Merdeka Belajar-Kampus Merdeka policy permits Indonesian undergraduates to earn a substantial portion of their degree outside their study programme, but rapid implementation has outrun the design questions on which the validity of the resulting qualification depends. This study aims to examine how the regulatory framework constructs recognition of externally obtained learning, to identify the conditions research establishes as necessary for experiential learning to produce creditable outcomes, and to formulate reconstruction that secures the policy's benefits while protecting qualification validity. The research combines qualitative document analysis with normative examination of higher education regulation, analysing the Higher Education Law, national higher education standards, and the quality assurance regulation, tested against scholarship on workplace affordances, situated learning, experiential education, and comparative credit frameworks. The findings show that the framework construes credit in terms of learning outcomes while implementation has substituted activity equivalence, converting duration into credit without verifying learning; that placement quality depends on affordances the regulatory framework does not address, producing wide variation concealed by uniform credit awards; that reflective writing as sole assessment measures articulacy rather than the capabilities claimed; and that access to good placements currently tracks students' pre-existing social capital. The article recommends learning agreements specifying outcomes and evidence, regulation of placement affordance rather than

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	duration, assessment combining work artefacts with structured host judgement and oral examination, curricular restructuring around a disciplinary core, and development of an institutional intermediary function.

I. INTRODUCTION

The *Merdeka Belajar–Kampus Merdeka* policy has restructured Indonesian undergraduate education around a principle that few systems have adopted at comparable scale: that a substantial portion of a degree may be earned outside the student’s home study programme, including in workplaces, other institutions, community projects, and independent activities. The policy permits students to take a defined volume of credits outside their programme and outside their institution, and obliges institutions to facilitate and recognise this learning.¹

The policy’s ambition is defensible and its diagnosis largely correct. Indonesian undergraduate education has been characterised by narrow disciplinary specialisation, limited contact with practice, and a curriculum organised around content coverage rather than capability. Graduate unemployment coexists with employer complaints about preparedness, a pattern that suggests a mismatch of kind rather than of quantity. Opening the curriculum to experiential and cross-disciplinary learning addresses this directly.

Whether it does so effectively depends on questions of design that the policy’s rapid implementation has largely outrun. Experiential learning is not self-evidently educative: time spent in a workplace produces learning under some conditions and not others, and the conditions are reasonably well established in the research literature.² Credit is a claim about learning, and awarding credit for activity without evidence of learning degrades the currency for every student who holds it. And the recognition of learning across institutions requires an infrastructure of comparable learning outcomes, transparent credit definitions, and mutual trust that Indonesian higher education has not systematically built.

¹ Peraturan Menteri Pendidikan dan Kebudayaan Nomor 3 Tahun 2020 tentang Standar Nasional Pendidikan Tinggi, Pasal 15 dan Pasal 18; Peraturan Menteri Pendidikan, Kebudayaan, Riset, dan Teknologi Nomor 53 Tahun 2023 tentang Penjaminan Mutu Pendidikan Tinggi, Pasal 16–18.

² Stephen Billett, “Learning through Work: Workplace Affordances and Individual Engagement,” *Journal of Workplace Learning* 16, no. 6 (2004): 312–324.

The ideal condition is specified in the regulatory framework. The Higher Education Law establishes that higher education must develop students' capability, character, and civilisation, and must be organised on principles including quality, relevance, and academic responsibility.³ The quality assurance regulation requires that curricula be constructed around graduate learning outcomes and that assessment evidence the achievement of those outcomes.⁴ Read together, these establish that recognition of external learning is lawful only where the learning achieved corresponds to the outcomes the programme certifies.

The actual condition diverges in three recurring ways. Credit conversion is frequently performed by administrative equivalence a specified duration of activity converted to a specified number of credits rather than by evidence of outcome achievement. Supervision of external placements is often nominal, with the host organisation lacking any educational mandate and the home institution lacking any presence. And the assessment of experiential learning relies heavily on reflective reports whose relationship to the learning outcomes claimed is rarely specified.

Scholarly debate bears on these questions from several directions. Workplace learning research has established that learning at work depends on the affordances the setting provides and on the learner's engagement with them, and that neither can be assumed.⁵ Situated learning theory explains why participation in a community of practice is educative, and equally why peripheral participation that never becomes legitimate produces little.⁶ Higher education scholarship has examined the purposes of undergraduate education under conditions of uncertainty, arguing that preparation for an unknown future requires the development of dispositions and qualities rather than the accumulation of knowledge.⁷

The research gap this article addresses lies in the limited examination of MBKM as a problem of credit validity and outcome evidence. Indonesian scholarship has documented implementation experience, student satisfaction, and institutional readiness extensively, but has rarely asked what conditions must obtain for external learning to be legitimately

³ Undang-Undang Nomor 12 Tahun 2012 tentang Pendidikan Tinggi, Pasal 4 dan Pasal 6.

⁴ Permendikbudristek Nomor 53 Tahun 2023, Pasal 10 dan Pasal 20–22.

⁵ Billett, "Learning through Work," 315–321; Michael Eraut, "Informal Learning in the Workplace," *Studies in Continuing Education* 26, no. 2 (2004): 247–273.

⁶ Jean Lave and Etienne Wenger, *Situated Learning: Legitimate Peripheral Participation* (Cambridge: Cambridge University Press, 1991), 29–58.

⁷ Ronald Barnett, "Learning for an Unknown Future," *Higher Education Research and Development* 23, no. 3 (2004): 247–260.

credited, or analysed the regulatory architecture against those conditions. The novelty of this article lies in that analysis, and in its argument that the policy's principal risk is not under-implementation but credential dilution the award of credit for activity whose learning value is unevidenced.

Three research questions follow. First, how does the regulatory framework construct the recognition of learning obtained outside the study programme, and what does it require by way of evidence? Second, what conditions does the research literature identify as necessary for experiential learning to produce the outcomes that credit would certify? Third, what reconstruction of curriculum design, supervision, and assessment would secure the policy's benefits while protecting the validity of the qualification?

II. LITERATURE REVIEW AND THEORETICAL FRAMEWORK

Experiential learning theory provides the starting point but requires immediate qualification. Kolb's cycle concrete experience, reflective observation, abstract conceptualisation, active experimentation remains the most widely cited model, and its influence on the design of placement programmes internationally is considerable.⁸ Its limitation for the present analysis is that it describes a process available to a learner rather than a condition produced by a setting. A placement in which a student performs routine tasks without guidance, feedback, or opportunity for consequential participation supplies concrete experience and little else; the remaining stages of the cycle do not occur spontaneously.

Billett's work on workplace affordances addresses this gap directly. Learning at work depends on what the workplace affords access to activities of increasing complexity, guidance from experienced practitioners, and opportunity to participate in consequential work and on how the individual engages with what is afforded.⁹ The implication for policy is that placement quality is a property of the host setting and its arrangements, not of the duration of the placement, and that programmes which specify duration without specifying affordance are regulating the wrong variable.

Eraut's analysis of informal workplace learning adds a further consideration: much of what is learned at work is tacit, acquired without deliberate intention, and difficult for the

⁸ David A. Kolb, *Experiential Learning: Experience as the Source of Learning and Development* (Englewood Cliffs: Prentice Hall, 1984), 20–38.

⁹ Billett, "Learning through Work," 315–321; Stephen Billett, *Integrating Practice-Based Experiences into Higher Education* (Dordrecht: Springer, 2015), 15–38.

learner to articulate.¹⁰ This has an uncomfortable consequence for assessment. Reflective writing, the standard assessment instrument for placement learning, measures the learner's capacity to articulate which is itself a valuable capability but is not the same as the capability the placement developed. Assessment designs that rely exclusively on reflection systematically favour articulate students and may miss substantial learning in those less practised at academic self-description.

Situated learning theory supplies the social dimension. Lave and Wenger's account holds that learning occurs through legitimate peripheral participation in a community of practice, with the learner moving from the periphery toward fuller participation as competence develops.¹¹ The conditions embedded in this formulation are demanding: the participation must be legitimate, meaning that the learner's contribution matters; and the trajectory toward fuller participation must be available. A student placed in an organisation with no intention of involving them in real work satisfies neither condition.

The final theoretical component concerns credit and its meaning. Credit systems function as a currency, and their value depends on the reliability of the claim they encode: that a stated volume of learning, defined by outcomes, has been achieved and verified. Comparative credit frameworks accordingly define credit in terms of learning outcomes and notional learning hours together, and make recognition conditional on outcome correspondence rather than on activity equivalence.¹² Where credit is awarded for time served without outcome evidence, the currency inflates, and the loss falls on all holders.

The theoretical gap addressed here is the absence of an integration between workplace learning theory and credit validity in the analysis of large-scale experiential learning policy. The workplace learning literature has developed largely in relation to professional programmes with established clinical traditions; the credit literature has developed largely in relation to mobility between academic programmes. MBKM combines both problems at national scale, and the combination generates questions that neither literature addresses alone.

III. RESEARCH METHOD

This study employs qualitative document analysis combined with normative examination of the higher education regulatory framework. The approach is appropriate

¹⁰ Eraut, "Informal Learning in the Workplace," 250–262.

¹¹ Lave and Wenger, *Situated Learning*, 29–58.

¹² European Commission, *ECTS Users' Guide 2015* (Luxembourg: Publications Office of the European Union, 2015), 10–24.

because the research questions concern the construction and validity of credit recognition, which is a matter of regulatory design and conceptual coherence rather than of observable frequency.¹³

Three approaches are combined. The statutory approach examines legislation and subordinate regulation governing higher education standards, curriculum, and quality assurance. The conceptual approach examines the categories of credit, learning outcome, and recognition, testing their consistency across instruments. The comparative approach examines credit frameworks and work-integrated learning arrangements developed in other systems, with attention to the conditions each attaches to recognition.

Materials are organised in three tiers. Primary materials comprise Law Number 12 of 2012 on Higher Education; Regulation of the Minister of Education and Culture Number 3 of 2020 on National Higher Education Standards; and Regulation of the Minister of Education, Culture, Research and Technology Number 53 of 2023 on Higher Education Quality Assurance. Secondary materials comprise peer-reviewed scholarship on workplace learning, situated learning, experiential education, and higher education purpose. Supporting materials comprise comparative credit framework documentation and international reports on higher education participation and outcomes.¹⁴

Analysis proceeded in four stages. The regulatory corpus was coded for provisions governing credit, recognition, and the assessment of learning obtained outside the study programme. The conditions for valid recognition implied by those provisions were then made explicit. Conditions for effective experiential learning were derived from the research literature. Finally, the two sets of conditions were compared, gaps identified, and reconstruction proposals developed and tested against the regulatory framework. The analysis examines design rather than delivery; propositions about institutional practice are derived from documented structure and comparative evidence.

IV. RESULTS AND DISCUSSION

A. Recognition: Outcome Correspondence or Activity Equivalence?

The regulatory framework construes credit in terms of learning outcomes. Curricula must be designed around graduate learning outcomes; assessment must evidence their

¹³ Glenn A. Bowen, "Document Analysis as a Qualitative Research Method," *Qualitative Research Journal* 9, no. 2 (2009): 27–40; Peter Mahmud Marzuki, *Penelitian Hukum*, rev. ed. (Jakarta: Kencana Prenada Media, 2017), 133–142.

¹⁴ OECD, *Education at a Glance 2023: OECD Indicators* (Paris: OECD Publishing, 2023), 155–190.

achievement; and the quality assurance framework makes outcome achievement the object of internal and external review.¹⁵ On this construction, recognition of learning obtained outside the study programme is legitimate where that learning corresponds to outcomes the programme certifies, and is verified accordingly.

Implementation practice has substantially diverged from this construction. The common approach converts activity into credit by administrative formula a specified period of placement, a specified project, or a specified module completed elsewhere, mapped to a credit value derived from duration. This produces administrative certainty and is defensible as a transitional simplification. It is not, however, what the framework requires, and the difference is consequential.

The difference can be stated precisely. Under activity equivalence, the question asked is: did the student complete the specified activity for the specified period? Under outcome correspondence, the question asked is: what did the student learn, does it correspond to outcomes this programme certifies, and what evidences it? The first question can be answered from an attendance record and a host organisation's letter. The second requires specification of outcomes in advance, collection of evidence during, and academic judgement at the conclusion.

The implication is not that activity-based conversion is always wrong. Where an activity has been designed with specified outcomes, supervised against them, and assessed accordingly, the conversion is a shorthand for a judgement that has actually been made. Where no such design exists, the conversion is a shorthand for a judgement that has not been made, and the credit records a claim the institution cannot support.

B. Placement Quality and the Regulation of Affordance

The research evidence indicates that what a student learns in a workplace depends on the activities they are given access to, the guidance available, and whether their participation is consequential.¹⁶ None of these is regulated by duration, and all of them vary enormously across host organisations.

Three placement patterns can be distinguished analytically. In the first, the student performs peripheral tasks with no trajectory toward greater responsibility and no guidance; learning is incidental and largely concerns organisational norms rather than professional capability. In the second, the student performs real work with guidance from

¹⁵ Permendikbudristek Nomor 53 Tahun 2023, Pasal 10, Pasal 20, dan Pasal 32.

¹⁶ Billett, *Integrating Practice-Based Experiences*, 15–38; Lave and Wenger, *Situated Learning*, 29–58.

an experienced practitioner and progressive increase in complexity; learning is substantial and corresponds closely to what a professional programme would wish to certify. In the third common in projects designed primarily for institutional reporting the student produces an artefact for the placement rather than participating in the organisation's work at all; learning concerns project management and documentation.

The regulatory framework does not currently distinguish among these, and quality assurance processes that count placements cannot distinguish among them either. A framework that instead required host organisations to specify, in advance, what activities the student would undertake and who would guide them and that made recognition conditional on that specification would regulate the variable that actually determines learning. This is not an onerous requirement; it is the substance of what a placement agreement should contain, and its absence is the reason placement quality is currently unmanaged.

Table 1. Conditions for Valid Recognition of External Learning

Condition	What It Requires	Common Practice	Risk if Absent
Outcome specification	Stated learning outcomes agreed before the activity	Activity described by type and duration	Credit records an unverified claim
Affordance	Access to consequential work with guidance and progression	Unspecified; varies by host	Time served without learning
Academic supervision	Institutional presence during the activity	Nominal; frequently administrative	No intervention when learning is not occurring
Evidence of achievement	Artefacts and performance assessed against outcomes	Reflective report of unspecified relation to outcomes	Assessment measures articulacy, not capability
Comparability	Shared definition of	Bilateral ad hoc	Recognition

Condition	What It Requires	Common Practice	Risk if Absent
lity of credit	credit and outcome mapping across institutions	arrangements	depends on trust that is unbuilt

Source: Author's analysis of the regulatory framework and workplace learning literature, 2026.

C. Assessment and the Limits of Reflection

Reflective writing has become the default assessment instrument for experiential components, and its dominance deserves scrutiny.

Reflection has genuine value. Making tacit learning explicit is itself a developmental process, and the capacity to analyse one's own practice is among the more durable outcomes a placement can produce.¹⁷ The difficulty is not with reflection but with its use as the sole evidence of outcomes that are not about reflection. Where a placement is claimed to develop, say, the capacity to analyse a legal problem in a practice setting, the evidence should include an analysis of a legal problem, not only an account of how the student felt about analysing one.

Three improvements are available and none is costly. First, the evidence should include artefacts produced in the course of the work drafts, analyses, designs, records of contribution accompanied by an account of the student's specific role in producing them. Second, the host supervisor's assessment should be structured against the specified outcomes rather than solicited as a general testimonial; a form that asks what the student did and how well, against named capabilities, produces usable evidence, while a request for comments produces courtesy. Third, an oral examination in which the student is questioned about decisions taken during the placement discriminates effectively between genuine and superficial engagement, at modest cost.

There is a further consideration concerning fairness. Reflective assessment advantages students whose academic writing is strong and whose prior socialisation has taught them what markers reward. Since one of MBKM's equity claims is that it opens

¹⁷ Donald A. Schön, *The Reflective Practitioner: How Professionals Think in Action* (New York: Basic Books, 1983), 49–69.

opportunity to students without professional networks, an assessment regime that measures academic articulacy rather than professional capability works against that claim.

D. Institutional Effects: Curriculum, Workload, and the Home Programme

MBKM has effects on the home study programme that are frequently treated as implementation friction and are better understood as design consequences.

The first is curricular. A programme from which students may be absent for a substantial portion of their studies cannot be constructed as a tightly sequenced progression in which each course presupposes the last. It must instead be built around a core that all students complete and a periphery that admits substitution. Programmes that have not undertaken this restructuring experience MBKM as disruption, because it is disruptive to a curriculum designed on contrary assumptions. The restructuring is substantial intellectual work, and it is the element for which institutions have received the least support.

The second concerns academic workload. Supervising external learning well is more labour-intensive than teaching a class, not less: it requires negotiation with hosts, individual outcome specification, periodic contact, and individual assessment. Where institutional workload models count supervision at a nominal rate, the rational response is to supervise nominally. This is a straightforward incentive problem with a straightforward remedy, and its persistence is a reasonable indicator of how seriously an institution has taken the policy.

The third concerns the position of the home discipline. A policy that encourages students to spend time outside their programme can be read by academic staff as a statement that the discipline is insufficient, and this reading generates resistance that is frequently dismissed as conservatism. It deserves better. Disciplinary depth is not an obstacle to capability; it is a condition of it, and a graduate who has had varied experiences without acquiring the analytical apparatus of a field is not well served. The defensible position is that experiential components should extend disciplinary capability into practice settings rather than substitute for its development, and programme design should make this explicit rather than leaving staff to infer the opposite.

E. Comparative Perspectives on Work-Integrated Learning

Comparative experience with work-integrated learning at scale supports three observations.

The first concerns intermediary capability. Systems in which placement learning works well generally maintain an institutional function a placement office, industry liaison unit, or cooperative education department with the capability to recruit hosts, negotiate learning agreements, prepare host supervisors, and monitor quality. Where this function does not exist, placement quality depends on the individual relationships of academic staff, and access to good placements is distributed accordingly. The equity implication is direct: students with family or personal connections obtain better placements, which is precisely the distributional pattern the policy claims to counteract.

The second concerns host preparation. Host supervisors are practitioners, not educators, and their capacity to guide a student's learning cannot be assumed. Brief preparation what the student should be able to do, what kinds of tasks develop it, how to give useful feedback substantially improves placement quality at low cost, and is among the more reliably effective interventions available.

The third concerns credit portability between institutions, which MBKM requires and which no Indonesian infrastructure currently supports systematically. Comparative credit frameworks achieve portability through published learning outcomes, a common credit definition, transparent grade interpretation, and institutional trust developed over time. Indonesia has the credit definition and, in the quality assurance framework, the requirement of stated outcomes; what is absent is the publication of those outcomes in a form that permits comparison, and the trust that accumulates when institutions can see what a partner actually certifies.

F. Reconstruction Proposals

Five proposals follow from the analysis.

First, make recognition conditional on documented outcome correspondence rather than on activity duration. In operational terms, this means a learning agreement completed before the activity that states the outcomes claimed, the activities intended to develop them, the supervision arrangements, and the evidence to be produced.

Second, regulate placement affordance rather than placement duration. The host's specification of tasks and guidance should be a condition of approval, and approval should be reviewable where the specification is not honoured.

Third, reform assessment to combine work artefacts, structured host assessment against named outcomes, and oral examination, with reflection retained as one component rather than as the whole.

Fourth, restructure programmes around a disciplinary core and a substitutable periphery, and fund the curricular work this requires. Without it, the policy will continue to be experienced as an external imposition on curricula designed for different assumptions.

Fifth, build the intermediary function, including host recruitment and preparation, both to raise placement quality and to prevent access to good placements from tracking students' pre-existing social capital.

G. Equity and the Distribution of Opportunity

The equity case for MBKM is substantial and should be stated before its difficulties are examined. Indonesian undergraduate education has historically distributed access to professional experience through informal channels: internships obtained through family connections, research assistantships allocated through personal relationships with academic staff, and exposure to workplaces concentrated among students in metropolitan institutions. A policy that makes experiential learning a curricular entitlement rather than a private opportunity is, in principle, strongly redistributive.

Whether it is redistributive in practice depends on three conditions.

The first is institutional brokerage. Where the institution recruits hosts and allocates placements, opportunity is distributed by institutional process. Where students must find their own placements which is common opportunity is distributed by social capital, and the policy converts an informal advantage into formal credit. The difference between these two arrangements determines whether the policy narrows or widens the gap it identifies, and the arrangement is currently determined by institutional capacity rather than by regulation.

The second is cost. Placements in major cities impose transport, accommodation, and living costs that fall on the student. Where these are unsupported, the range of placements genuinely available to a student is determined by household income, and the most valuable opportunities are systematically allocated to those who least need them. Support schemes exist but are unevenly available, and their design deserves more attention than it has received.

The third is the quality gradient. Because placement quality varies enormously and the credit awarded does not, a student in a nominal placement and a student in a rich one receive identical recognition for materially different learning. The transcript conceals the difference; the labour market does not, since employers form their own judgements about which experiences signal capability. A policy that awards uniform credit for non-uniform

learning transfers the distinction from the visible credential to the invisible network, which is the opposite of the intended effect.

These three considerations converge on a single recommendation: institutional brokerage, supported placement costs, and quality regulation are not administrative refinements of the policy but the conditions of its equity claim. A version of MBKM without them remains defensible as an educational reform and cannot be defended as a redistributive one.

H. Objections, Limitations, and What Remains Contested

Three objections warrant direct engagement.

The first holds that the outcome-correspondence requirement proposed here is unworkable at scale, and that activity conversion is the only feasible approach for a system with millions of students. The objection has practical weight. The response is that outcome specification is front-loaded rather than continuous: a learning agreement template completed once per placement type, with outcomes drawn from the programme's existing published outcomes, is not more burdensome than the documentation currently produced, and it replaces rather than supplements it. The genuinely costly component is individual assessment, and the proposal above addresses this through structured host judgement rather than through additional academic labour.

The second holds that the analysis undervalues the developmental effects of experience that do not map onto programme outcomes maturity, confidence, understanding of organisational life. This is a fair point and the response should concede it. Such effects are real and valuable, and a university is entitled to regard them as worthwhile. The argument here concerns what may be certified by credit, not what is worth doing: an activity may be valuable without being creditable against a specific programme outcome, and conflating the two is what produces the validity problem. A defensible design distinguishes credited components, assessed against outcomes, from non-credited components valued for other reasons.

The third holds that the policy's disruption of disciplinary curricula is its principal defect and that the appropriate response is retrenchment. The analysis here does not support that conclusion. The diagnosis motivating the policy narrow specialisation with limited contact with practice is substantially correct, and the alternative of returning to a fully internal curriculum reinstates a known problem to avoid a new one. The more defensible position is that the policy requires the design work it has not yet received.

Two limitations of this study should be stated. It examines regulatory design and not institutional practice, and the characterisations of implementation offered here are inferred from documented structure and comparative evidence rather than observed directly. And it treats the credit framework as the relevant standard of validity, which is appropriate for analysing a credit-based policy but sets aside the broader question of whether credit is the right instrument for recognising experiential learning at all a question that comparative debate has not settled and that this article does not attempt to resolve.

I. Quality Assurance and the Accreditation Interface

The final structural question concerns how external learning enters quality assurance, since accreditation ultimately determines what institutions treat as consequential.

Under the quality assurance framework, programmes are evaluated against the achievement of graduate learning outcomes, and the evidence institutions present is expected to demonstrate that achievement.¹⁸ Where a substantial share of learning occurs outside the programme, the evidence base for accreditation necessarily includes that learning, and the adequacy of the institution's recognition procedures becomes an accreditation question in its own right. This is a considerable lever, and it is currently underused: assessment of MBKM in accreditation has tended to focus on participation volume how many students undertook external activities rather than on the soundness of the recognition decisions made.

Shifting the accreditation question from volume to soundness would change institutional behaviour more efficiently than any additional regulation. An assessor who asks to see the learning agreements for a sample of recognised activities, the evidence on which credit was awarded, and the academic judgement recorded, is asking for exactly what a defensible recognition process produces and what an undefensible one cannot. Institutions respond to what accreditation examines, and examining participation counts has predictably produced participation counts.

A second accreditation consideration concerns comparability between institutions. Where a student's credit transfers from one institution to another, the receiving institution relies on the sending institution's judgement. Under current arrangements there is little basis for that reliance beyond accreditation status, which is a coarse signal. Publication of programme learning outcomes in a standard format which the framework already requires

¹⁸ Permendikbudristek Nomor 53 Tahun 2023, Pasal 32 dan Pasal 38.

institutions to define would give receiving institutions something to compare, and would cost little beyond the discipline of publishing what has already been written.

A third consideration is longitudinal. The value of the policy will ultimately be judged by graduate outcomes, and the system currently lacks the tracer infrastructure to make that judgement. Graduate tracer studies exist but are of uneven quality and are rarely designed to compare outcomes across types of learning experience. A tracer design capable of distinguishing students by the character of their external learning, rather than merely by its occurrence, would allow the policy to be evaluated on its own terms within a reasonable period. Building that capacity is a modest investment against the scale of the policy, and its absence means that vigorous claims about the policy's effects favourable and unfavourable alike currently rest on very little.

V. CONCLUSION

This article has examined the *Merdeka Belajar–Kampus Merdeka* policy as a problem of credit validity, and has argued that its principal risk is the award of credit for activity whose learning value is unevidenced.

In response to the first research question, the regulatory framework constructs credit in terms of learning outcomes and makes recognition legitimate only where external learning corresponds to outcomes the programme certifies; implementation practice has substantially substituted activity equivalence, which records a claim the institution has not verified. In response to the second, the research literature establishes that experiential learning depends on the affordances a setting provides access to consequential work, guidance, and progression and that these are neither guaranteed by duration nor evidenced by reflective writing alone. In response to the third, reconstruction requires learning agreements specifying outcomes and evidence, regulation of placement affordance rather than duration, assessment combining artefacts and structured host judgement with oral examination, curricular restructuring around a disciplinary core, and an intermediary function capable of recruiting and preparing hosts.

The theoretical implication is that large-scale experiential learning policy should be analysed at the intersection of workplace learning theory and credit validity, since a policy may succeed in generating experience while failing to generate warranted qualifications, and the two failures have different remedies.

The practical implications are addressed to regulators, who should make outcome correspondence an explicit condition of recognition; to institutions, which should invest in the intermediary function and revise workload models that currently reward nominal

supervision; and to programme leaders, who should undertake the curricular restructuring without which the policy will remain a disruption rather than a design.

Further research should pursue three directions: empirical study of what students actually do during placements and how this varies by host type; evaluation of host supervisor preparation as an intervention; and analysis of how credit conversion decisions are made in practice, with attention to the evidence institutions rely on.

REFERENCES

- Barnett, Ronald. "Learning for an Unknown Future." *Higher Education Research and Development* 23, no. 3 (2004): 247–260.
- Barnett, Ronald. *The Ecological University: A Feasible Utopia*. London: Routledge, 2018.
- Billett, Stephen. *Integrating Practice-Based Experiences into Higher Education*. Dordrecht: Springer, 2015.
- Billett, Stephen. "Learning through Work: Workplace Affordances and Individual Engagement." *Journal of Workplace Learning* 16, no. 6 (2004): 312–324.
- Biesta, Gert. *Good Education in an Age of Measurement: Ethics, Politics, Democracy*. Boulder: Paradigm Publishers, 2010.
- Boud, David, and Nancy Falchikov, eds. *Rethinking Assessment in Higher Education: Learning for the Longer Term*. London: Routledge, 2007.
- Bowen, Glenn A. "Document Analysis as a Qualitative Research Method." *Qualitative Research Journal* 9, no. 2 (2009): 27–40.
- Eraut, Michael. "Informal Learning in the Workplace." *Studies in Continuing Education* 26, no. 2 (2004): 247–273.
- European Commission. *ECTS Users' Guide 2015*. Luxembourg: Publications Office of the European Union, 2015.
- Knight, Jane. "Internationalization Remodeled: Definition, Approaches, and Rationales." *Journal of Studies in International Education* 8, no. 1 (2004): 5–31.
- Kolb, David A. *Experiential Learning: Experience as the Source of Learning and Development*. Englewood Cliffs: Prentice Hall, 1984.
- Lave, Jean, and Etienne Wenger. *Situated Learning: Legitimate Peripheral Participation*. Cambridge: Cambridge University Press, 1991.
- Marginson, Simon. "High Participation Systems of Higher Education." *Journal of Higher Education* 87, no. 2 (2016): 243–271.
- Marzuki, Peter Mahmud. *Penelitian Hukum*. Rev. ed. Jakarta: Kencana Prenada Media, 2017.
- OECD. *Education at a Glance 2023: OECD Indicators*. Paris: OECD Publishing, 2023.
- Peraturan Menteri Pendidikan dan Kebudayaan Nomor 3 Tahun 2020 tentang Standar Nasional Pendidikan Tinggi.



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Peraturan Menteri Pendidikan, Kebudayaan, Riset, dan Teknologi Nomor 53 Tahun 2023 tentang Penjaminan Mutu Pendidikan Tinggi.

Schön, Donald A. *The Reflective Practitioner: How Professionals Think in Action*. New York: Basic Books, 1983.

Trow, Martin. "Reflections on the Transition from Elite to Mass to Universal Access." In *International Handbook of Higher Education*, edited by James J. F. Forest and Philip G. Altbach, 243–280. Dordrecht: Springer, 2007.

Undang-Undang Nomor 12 Tahun 2012 tentang Pendidikan Tinggi.