



Accrediting Commission of Career Schools and Colleges

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Texas Senate Higher Education Committee

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Accrediting Commission of Career Schools and Colleges (ACCSC)

The Accrediting Commission of Career Schools and Colleges (ACCSC) is nationally recognized by the United States Department of Education as a valid and reliable authority for the assessment of educational quality. ACCSC currently accredits approximately 800 post-secondary institutions across the United States and abroad, including 60 post-secondary institutions in the state of Texas. On behalf of ACCSC and the accreditation community, we appreciate the opportunity to provide comments on the impact of national, regional, and professional accrediting associations on course credit transfer.

ACCSC recognizes that in today's society, which places a premium on postsecondary education, expanded educational access, and the ideals associated with continuous education and life-long learning, the need for greater portability of educational credits has reached an all-time high. This need is experienced on several fronts; however, one area which is in need of an immediate solution is the allowance for transfer of credit between the traditional sector of postsecondary education and the ever emerging private sector of postsecondary education. More students are opting to enroll in and complete programs from this latter sector of education as a means to obtain entry-level skills needed to enter the workforce. However, when these students later seek to continue their education at a traditional college or university, they are often informed that the credits earned from their previous education are not transferable, or even more concerning, are told that their credits are "useless". This is an unacceptable and unfounded.

The inability to transfer credits between institutions can be for several reasons; however, this memorandum will focus on only one – the source of accreditation. The reason for this focus is because a primary basis given by traditional, regionally accredited, postsecondary institutions for not accepting transfer credits from for-profit educational institutions is the "source of accreditation." Regionally accredited institutions often argue that institutional autonomy is a cornerstone of the American higher education system and that an institution should be allowed to make whatever decision relative to transfer of credit as the institution sees fit. We agree, except when the source of accreditation is the sole determinant in transfer-of-credit decisions because that determination relies upon arbitrary assumptions and does not give students or non-regionally accredited institutions an opportunity to demonstrate equivalency of coursework.

The terms "regionally accredited" and "nationally accredited" are largely self-imposed and born from the history of accreditation in this country – the terms themselves represent no valuation of one accreditation over the other. Both types of agencies are recognized by the U.S. Department of Education (the Department) which has the authority to recognize accrediting agencies for the purpose of administering the federal student financial aid programs (Title IV funding) as authorized by the Higher Education Act of 1965. According

to the Department, “[t]he goal of accreditation is to ensure that education provided by institutions of higher education meets acceptable levels of quality.” **In this sense, there is absolutely no distinction between a regional accrediting agency and a national accrediting agency** – all agencies are held to the same rigorous process and criteria under Section 602 of the Code of Federal Regulations (“CFR”). These regulations demand that recognized accrediting agencies’ standards, whether it be regional or national, be sufficiently rigorous to assure that high standards of educational quality and institutional integrity are maintained.

Further, in its *Statement to the Community: Transfer and the Public Interest*, the Council for Higher Education Accreditation (CHEA), an association of 3,000 degree-granting colleges and universities and recognizes 60 institutional and programmatic accrediting organizations, states that institutions and accreditors need to assure that transfer decisions **are not made solely on the source of accreditation of a sending program or institution**. While acknowledging that accreditation is an important factor, CHEA believes that receiving institutions ought to make clear their institutional reasons for accepting or not accepting credits that students seek to transfer. Students should have reasonable explanations about how work offered for credit is or is not of sufficient quality when compared with the receiving institution and how work is or is not comparable with curricula and standards to meet degree requirements of the receiving institution.

ACCSC agrees with the positions articulated by CHEA regarding the transferability of credit, including the notions that:

- Institutions and accreditors need to assure that students and the public are fully and accurately informed about their respective transfer policies and practices;
- Institutions and accreditors need to be flexible and open in considering alternative approaches to managing transfer decisions to benefit students; and
- The considerations that inform transfer decisions are applied consistently.

Although ACCSC recognizes that arbitrary denials of credit transfer are unfair to students, inhibit educational advancement, and drive up the cost of postsecondary education by forcing students to take and pay for the same courses twice, we also recognize that it would not be appropriate for any accreditor to mandate a uniform transfer of credit policy for its accredited institutions. It is wholly appropriate for colleges to make their own institutional decisions about the admission of transfer students and the acceptance or non-acceptance of credits earned elsewhere. However, the reality is that too many regionally accredited colleges and universities continue to sight the “source of accreditation,” more specifically “national accreditation,” as the sole reason why the transfer of credits are denied without any meaningful analysis regarding the comparability and appropriateness of the credits earned. This practice is biased and harmful to students in profound ways and does not align with the expectations of the higher education accreditation community. We encourage Texas policy makers to review our accreditation standards for themselves and to judge the level of rigor required.

It is our hope that as the state of Texas continues to examine the import of credit transfer for students, that consideration is given towards requiring *all* postsecondary institutions, for the purpose of licensure in the state of Texas, to:

- Adopt fair and equitable transfer of credit policies that encourage transfer and prohibits denying credit transfer based solely on the source accreditation;
- Conduct a meaningful analysis of the comparability credits earned in making institutional decisions on accepting or denying credits; and
- Publish via their website or student catalog the institutional transfer-of-credit policy to ensure greater consistencies in making these decisions.

ACCSC encourages the Committee to seek to create fair and effective educational policies which meet the diverse and complex needs of students and which support a student's ability to improve, develop, and advance seamlessly through the state's higher education system. As a supplement to these comments, attached is a copy of ACCSC's *Transfer of Credit Policy Agenda* and a copy of CHEA's *Statement to the Community: Transfer and the Public Interest* for your review and consideration.

Respectfully submitted,

The Accrediting Commission of Career Schools and Colleges (ACCSC)

ACCSCT

Accrediting Commission
of Career Schools and
Colleges of Technology

setting the standard for
quality education

Transfer of Credit A Policy Agenda

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Transfer of Credit – A Policy Agenda

Executive Summary

In today's society which places a premium on postsecondary education, expanded educational access, and the ideals associated with continuous education and life-long learning, the need for greater portability of educational credits has reached an all-time high. This need is experienced on several fronts; however, one area which is in need of an immediate solution is the allowance for transfer of credit between the traditional sector of postsecondary education and the ever emerging private for-profit sector of postsecondary education. More and more students are opting to enroll in and complete programs from this latter sector of education as a means to obtain entry-level skills needed to enter the workforce. However, when these students later seek to continue their education at a traditional college or university, they are often informed that the credit earned from their previous education is not transferable. A universally accepted and enforced policy on transfer of credit is now more than ever required to address the needs of students in the rapidly changing and evolving higher education community. Educational leaders must seek to create fair and effective educational policies which meet the diverse and complex needs of students and which support a student's ability to improve, develop, and advance seamlessly through the higher education system. This white paper puts forth a policy agenda for the transfer-of-credit issues and targets the accrediting community, higher education associations and state and federal laws and regulations.

Transfer of Credit A Policy Agenda

In today's society which places a premium on postsecondary education, expanded educational access, and the ideals associated with continuous education and life-long learning, the need for greater portability of educational credits has reached an all-time high. This need is experienced on several fronts; however, one area which is in need of an immediate solution is the allowance for transfer of credit between the traditional sector of postsecondary education and the ever emerging private for-profit sector of postsecondary education.¹ More and more students are opting to enroll in and complete programs from this latter sector of education as a means to obtain entry-level skills needed to enter the workforce. However, when these students later seek to continue their education at a traditional college or university, they are often informed that the credit earned from their previous education is not transferable. A universally accepted and enforced policy on transfer of credit is now more than ever required to address the needs of students in the rapidly changing and evolving higher education community.

Denials of credit transfer are unfair to students, inhibit educational advancement, and drive up the cost of postsecondary education by forcing students to take and pay for the same courses twice. At a time when the postsecondary student population is increasing and educational choices are expanding, unduly restrictive transfer-of-credit policies only serve to burden the

¹ For the purposes of this white paper, the traditional sector of postsecondary education is defined as two- and four-year institutions which are institutionally accredited by one of the USDOE recognized regional accrediting agencies. The private for-profit sector of postsecondary education is defined as institutions which are institutionally accredited by one of the USDOE recognized national accrediting agencies.

already increasing demands being placed on the postsecondary education system in the United States.

At the May 5, 2005 House Subcommittee for 21st Century Competitiveness hearing on *College Credit Mobility: Can Transfer of Credit Policies Be Improved?*, Subcommittee Chairman Howard P. (Buck) McKeon (R- CA) noted the following:

With data showing more than 50 percent of students attend multiple institutions of higher education, it has become increasingly important for students to have the flexibility to transfer their credits from one school to another. And, with increasing numbers of non-traditional students pursuing higher education for the first time, or returning to school to complete their education, it has become more important than ever that college students are free to transfer from one institution to another without unfairly losing credit for quality courses they have completed (McKeon, 2005).

Consider as support of these ideas the following inquiry from a student who attended an accredited for-profit postsecondary educational institution:

I've been struggling to find a college in order that I may complete a Bachelor degree. I'm trying to find out what college would take a large amount of my credits. I completed an Associate degree in Computer Animation in May 2001 from [School Name]. I don't have much money to spend on school applications which result in the finding that none of my credits are transferable. Already two schools in New York City have turned me down such as the School of Visual Arts and F.I.T. This has

made me discouraged about the school I attended. I ask that you please help me find a school that will gladly take a large amount of my credits or any.

This example, while anecdotal, is representative of the difficulties that many students face when attempting to transfer educational credit from the for-profit postsecondary sector of education to the traditional sector of postsecondary education.

The inability to transfer credits between institutions can be for several reasons; however, this white paper will focus on only one – the source of accreditation. The reason for this focus is because a primary basis given by traditional postsecondary institutions for not accepting transfer credits from for-profit educational institutions is the source of accreditation. A 2001 study by the Institute for Higher Education Policy entitled *Transfer of Credit from Nationally Accredited to Regionally Accredited Institutions* found that “[v]irtually all degree granting, regionally accredited intuitions have their credits generally accepted, while only 18 percent of nationally accredited, degree granting, institutions have their credits generally accepted” (IHEP, 2001, p.13). The main reason cited by regionally accredited institutions for not accepting credits from other institutions in this study was the source of accreditation.

The terms “regionally accredited” and “nationally accredited” are derived from the recognition status given by the United States Department of Education (the Department or USDOE) which has authority to recognize accrediting agencies for the purpose of administering the federal student financial aid programs (Title IV funding) as authorized by the Higher Education Act of 1965. Recognition by the Department serves to acknowledge that an accrediting

agency – regional or national – is a reliable authority for determining educational quality. Each accrediting agency recognized by the Department has a statement of scope which defines the parameters of accreditation authority. The following are two examples of USDOE scope statements:

Accrediting Commission of Career Schools and Colleges of Technology (ACCSCT): *Scope of recognition: the accreditation of private, postsecondary, non-degree-granting institutions and degree-granting institutions, including those granting associate and baccalaureate degrees, that are predominantly organized to educate students for occupational, trade and technical careers, and including institutions that offer programs via distance education.*

Southern Association of Colleges and Schools, Commission on Colleges (SACS): *Scope of recognition: the accreditation and preaccreditation ("Candidate for Accreditation") of degree-granting institutions of higher education in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia, including distance education programs offered at those institutions (United States Department of Education, 2001).*

The Department’s recognition of an accrediting agency, overall, is an acknowledgement that the agency is a reliable authority for establishing educational quality and assessment standards and all institutional accrediting agencies – regional and national – must

follow the same recognition criteria. The Department's recognition makes no distinction as to the reliability of one agency over another and does not distinguish a regional accrediting agency as superior to a national accrediting agency.

The only distinction worth noting is that, as the two example scope statements provided above demonstrate, the scope of recognition for SACS, a regional accrediting body, includes the term "institutions of higher education" whereas the statement for ACCSCT, a national accrediting agency, does not. The term "institution of higher education" has a specific definition in the Title IV federal regulations which means that an institution must be, among other things, a public or private *nonprofit* educational institution (United States Department of Education, 2001, 34 CFR §600.4.).

This difference, however, does not serve to distinguish the reliability of one accrediting agency over another in terms of the quality of substantive standards, policies, procedures or the ability to evaluate and recognize the quality of education within the institutions it accredits. Therefore, the use of the Department's regional versus national recognition designators as the sole determinant in making transfer-of-credit decisions is meritless and arbitrarily limiting.

The reliance upon the source of accreditation for transfer-of-credit decisions also runs counter to guidelines provided by several higher education associations. According to the American Association of College Registrars and Admissions Officers (AACRAO), transfer of credit between institutions fundamentally should involve the following three considerations:

1. The educational quality of the institution from which the student transfers;

2. The comparability of the nature, content, and level of credit earned to that offered by the receiving institution; and
3. The appropriateness and applicability of the credit earned to the programs offered by the receiving institutions in light of the student's educational goals (AACRAO, 1998, p. 158)

The American Council on Education (ACE), the AACRAO, and the Council on Higher Education Accreditation (CHEA) issued in September 2001 an updated *Joint Statement on the Transfer and Award of Credit* (originally published in 1978) indicating that policies and procedures for the transfer of credit "should provide maximum consideration for the individual student who has changed institutions and objectives" (ACE, 2001). Facilitating less restrictive transfer of credit has become of paramount importance because of the changing nature of higher education in the United States and the growth of educational access and opportunities to students outside of traditional colleges and universities. As articulated in the *Joint Statement*, the need for guidelines for transfer-of-credit decisions has "been brought about, in part, by the changing nature of postsecondary education" (ACE, 2001).

The *Joint Statement* and CHEA's *Statement to the Community: Transfer and the Public Interest* clearly posit that institutions and accreditors need to assure that transfer decisions are not based solely on the source of accreditation (ACE, 2001, CHEA, 2000). The distinction between regionally accredited institutions and nationally accredited institutions is often used improperly and only serves to discriminate against students who attend for-profit postsecondary educational institutions.

Even with all of this guidance from the higher education community, regionally accredited institutions continue to make transfer-of-credit decisions based solely upon the source of accreditation. The following are examples of the struggle one student encountered when attempting to have his credits transferred from a nationally accredited institution to a regionally accredited institution.

From Houston Baptist University:

“[School Name] is not accredited by the Regional Accrediting Bodies which Houston Baptist accepts. No, we would not accept course credit from it.”

From the University of Dallas:

“Please note that the University of Dallas does not accept credits from [School Name] due to our accreditation standards.”

From Texas Tech University:

“Because [School Name] is not accredited through one of the Regional Accrediting Bodies, Texas Tech University would not award transfer credit for any courses completed there.”

While there are indeed distinctions between institutions accredited by regionally recognized accrediting agencies and nationally recognized accrediting agencies, these distinctions do not warrant such arbitrary treatment of credit transfer decisions. First, there is the distinction that, generally, regionally accredited institutions are nonprofit whereas institutions accredited by a national accrediting agency are for-profit (although this is not exclusively the case). Second, regionally accredited institutions tend to be focused on awarding degrees in liberal arts education such as

English, math, history, art, and the social and natural sciences or professional/technical education in fields such as engineering, law, education, medicine or business. Institutions that are accredited by a national agency tend to be focused on career and technical oriented education in fields such as the traditional trades, allied health, occupational business practice, multimedia and graphic design, recording and industrial arts, and computer and electronics science and may not always lead to a degree. Third, the educational programs offered in private for-profit institutions place emphasis on very specific career and technical educational outcomes with fewer “general education subjects” (i.e., English, math, and social and natural science) whereas programs offered at traditional educational institutions may place a greater emphasis on general education subjects. (This notwithstanding, national accrediting agencies have standards which require that a minimum of 25% of a degree program must include general education subjects.)

Due to these distinctions, regionally accredited institutions claim that the education provided by nationally accredited institutions is not as academically rigorous as their own and thus not equivalent and eligible for transfer of educational credit. Regionally accredited institutions typically do not give students an opportunity to demonstrate otherwise and instead have transfer-of-credit policies which simply assume that credits earned at nationally accredited institutions are not equivalent. This, however, is an arbitrary assumption not based in fact and serves only to cause hardship on thousands of students each year.

These types of arbitrary transfer-of-credit policies which require students to unnecessarily repeat coursework have an economic impact on individual students, education funding, and the taxpayers who

provide many of the dollars used for education funding. Moreover, the inability to transfer credit discourages students from pursuing continuing education due to the time, effort and cost associated with repeating coursework. Some believe that economics are a driving force behind restrictive transfer-of-credit policies due to the tuition revenue lost when transfer credits are accepted.

Regional accreditors and their accredited institutions argue that institutional autonomy is a cornerstone of the American higher education system and that an institution should be allowed to make whatever decision relative to transfer of credit as the institution sees fit. This argument has merit except when the source of accreditation is the sole determinant in transfer-of-credit decisions because it relies upon arbitrary assumptions and does not give students or non-regionally accredited institutions an opportunity to demonstrate the equivalency of coursework.

The issue is not that an institution should be required to accept credits from all other institution. Instead, all institutions faced with transfer-of-credit decisions should look at several factors before making these decisions. Students should be given the opportunity to present course syllabi, course descriptions and other supporting documentation in an effort to make a case for equivalency. The arbitrary assumption that nationally accredited institutions are non-academic or academically less rigorous thus rendering their credit un-transferable only serves to create unfair and discriminatory transfer-of-credit policies and practices which needlessly harm students.

Policy Agenda

The Accrediting Community

As posited in the *Joint Statement* and CHEA's *Statement to the Community*, source of accreditation should not be the sole determinant of transfer-of-credit decisions. CHEA seeks to have the higher education community use its recognition as an additional indicator of the validity and reliability of an accrediting agency's effectiveness in quality assurance. However, although CHEA has issued its *Statement to the Community: Transfer and the Public Interest* which clearly posits that institutions and accreditors should not base transfer-of-credit decisions solely on the source of accreditation, CHEA has not made this a substantive criterion for an accrediting agency's recognition by CHEA. If CHEA would commit to the position that transfer-of-credit decisions are not to be based solely on the source of accreditation and make it a substantive criterion for CHEA recognition, accreditors would be required to establish standards which prohibit this practice among its accredited institutions.

CHEA's commitment to this position, however, is not necessary for accrediting agencies to independently establish their own standards prohibiting restrictive transfer-of-credit policies. The Accrediting Commission of Career Schools and Colleges of Technology, and other nationally recognized accrediting agencies, have promulgated transfer-of-credit resolutions which can be incorporated into the substantive standards.

Accrediting standards which would require institutions to use fair and non-restrictive transfer-of-credit policies would also shift the burden of accountability for transfer-of-credit decisions from solely being placed upon the sending institution to a shared accountability between both the

sending and receiving institutions. Currently, accountability for transfer of credit is placed wholly upon sending institutions in that these institutions must demonstrate the equivalency of credit to a receiving institution. By setting standards which prohibit restrictive transfer-of-credit policies, an accrediting agency could also hold accountable receiving institutions for policies and practices related both to acceptance and denial of credit transfer.

State and Federal Initiatives

It bears repeating that the policy goal articulated herein is not to compel regionally accredited institutions to accept transfer credits from nationally accredited institutions, but instead to keep any institution from using source of accreditation as the sole determinant in transfer-of-credit decisions. Students should always be given the opportunity to demonstrate comparability and applicability of prior earned educational credit to continuing educational goals. The state and federal governments can assist in facilitating more open transfer-of-credit policies in this regard. Some states already do this in by requiring state institutions to accept credits from other institutions, to include community colleges, within the state college system. These policies, however, do not address the matter of transfer of credit between regionally and nationally accredited institutions and thus more can be done.

At the state level, licensure is typically required of all institutions seeking to operate in that state. Because a function of the state educational oversight authority in the triad (oversight by the state government, federal government and accreditation) is consumer protection, state regulations should require that in order for any institution to be licensed to operate in that state, the institution must have a fair transfer-of-credit

policy which does not use source of accreditation as a sole determinant of acceptance. In this way, the state authority will help to protect student interests and will help to prevent the use of state educational assistance grants and scholarships from being allocated for a student to take the same or similar course twice.

At the federal level, the Higher Education Act of 1965 (HEA) should be amended to expressly prohibit restrictive transfer-of-credit policies for institutions which participate in the Title IV federal student financial assistance program (i.e., Pell Grants, federally subsidized loans, SEOGs, etc.). The Title IV regulations set forth eligibility criteria for institutions which seek to participate in student federal financial assistance programs. These criteria compel institutions to operate in certain ways and to adopt certain policies if they want to participate in Title IV (United States Department of Education, 2001, 34 CFR § 600). Included within these criteria, stemming from amendments to the HEA, should be a prohibition against the denial of transfer of credit based solely on the source of accreditation of the institution from which the student is transferring as long as the institution's accrediting agency is recognized by the USDOE.

Also at the federal level, an accrediting agency must petition approval from the Department for recognition as a reliable authority on educational quality and to act as a gatekeeper to Title IV funds. Again, this process sets forth several criteria and requirements which an accrediting agencies must demonstrate operationally in order to receive that recognition (United States Department of Education, 2001, 34 CFR § 602). If the Congress were to amend HEA to prohibit restrictive transfer-of-credit policies, then the Department's regulations could also be revised to prohibit accrediting agencies from adopting or enforcing

standards or policies that restrict transfers of credit between institutions accredited by agencies recognized by the Secretary of Education. In addition, the Department could require accrediting agencies to adopt standards which require its accredited institutions to adopt fair and non-restrictive transfer-of-credit policies.

The policy instruments suggested here include state licensing criteria, Title IV regulations as part of the Higher Education Act of 1965 as amended, and the CHEA recognition criteria for accrediting agencies. The institutions or agencies which would be targets for these policy initiatives include state legislatures and licensing agencies, the United States Congress as it seeks to reauthorize HEA, the USDOE as negotiated rulemaking establishes the regulations from the reauthorization of HEA, and the Board of Directors for ACE, AACRAO, and CHEA.

A National Agenda

First and foremost, a national agenda should be established and led by the national trade association for postsecondary career and technical education, the Career College Association (CCA), along with the Council of Recognized National Accrediting Agencies (CRNAA). These agencies would be responsible for meeting with their constituents and building partnerships with other national associations such as CHEA, ACE, and AACRAO in an effort to establish a workable and mutually acceptable set of policy initiatives such as those described in this paper. However, even without the support of CHEA, ACE and AACRAO, CCA and CRNAA should work together to establish a transfer-of-credit agenda which paves the way for greater inclusivity nationally.

At the federal level, CCA and CRNAA should work together more drafting and

distributing HEA reauthorization proposals and meeting with key members of Congress to discuss reauthorization proposals for HEA in regard to the transfer of credit issue. *The College Access & Opportunity Act* (H.R.609) includes a provision *that earned credits could not be denied based solely on the accreditor of the institution where the credits were earned, so long as the accreditor is recognized by the U.S. Secretary of Education.* This provision has been supported by nationally recognized accreditors such as ACCSCT and regional accreditors such as the Higher Learning Commission for the North Central Accreditation of Colleges and Schools (“NCACS”). Additional coalition building to support this provision, however, is a necessary component to ensure its appearance in the final version of HEA. This same type of cooperation is also necessary for meeting with USDOE officials as the regulations associated with HEA are discussed both before and during negotiated rulemaking.

At the state level, state associations such as the Florida Association of Postsecondary Schools and Colleges (FAPCS) and the California Association of Private Postsecondary Schools (CAPPS) can carry the national agenda to the states and be responsible for lobbying for the state level transfer-of-credit policies described in this paper. State associations for career schools will be well served to engage in this issue through the state legislative and regulation development processes as a means to establish greater educational opportunities for both educational institutions and the students they serve.

Lastly, grassroots coalitions should be established and asked by the national and state level and associations to campaign and lobby legislative bodies, organizations and individual legislators and policymakers in an effort to demonstrate the scope of the issue.

The grassroots outreach will help to demonstrate the urgency and widespread nature of the problems associated with unfair and restrictive transfer-of-credit policies throughout the nation.

Partnerships are important. The United States Congress, state legislatures, and federal and state policymakers will be more likely to accept proposals which enjoy wide support. Thus, the partnerships with CHEA, ACE and AACRAO are important because the postsecondary higher education community can be much more effective for a broader array of students if united on such issues as transfer of credit. A variety of interested parties, led by CCA and CRNAA, can be responsible for contacting the Board of Directors of each of these organizations as a mechanism to build bridges and to show how the evolution of the postsecondary educational community in the United States is a corollary to the associated trends in continuing education and life-long learning. Trotting out real-world examples of the harm caused by restrictive transfer-of-credit policies may be useful, if only anecdotal, and help policy makers and legislators see the ultimate effect of these policies.

In 2002-2003 the private for-profit postsecondary community along with the national accreditation community came together to change the criteria used by EDUCAUSE for the administration of the .edu domain. Specifically, in 2002 when EDUCAUSE took over the administration of the .edu domain from the United States Department of Commerce, it required that an institution had to be accredited by a regional accrediting agency in order to make application for the utilization of that domain. Through much effort and lobbying, EDUCAUSE changed its criteria to require instead that institutions must be accredited by an accrediting agency which is recognized by the USDOE in order to make application and receive a .edu domain. This

is a good corollary to the type of effort needed for the transfer-of-credit policy agenda described herein (ACCSCT, 2003).

In addition, other organizations at the national level, such as the United States Department of Defense, the American Bar Association, and the National League of Nurses as well as state level organizations such as the Florida Commission for Independent Education and Oregon and Arizona State Boards of Nursing have embraced national accreditation as a reliable authority for assessing quality education.

To touch again briefly on the economics of arbitrarily restrictive transfer-of-credit policies, there can be a positive economic impact for both state and federal authorities as well as for the traditional higher education sector. Specifically, federal student financial assistance dollars and state educational grant dollars would not be spent twice for students to enroll in similar courses twice (English 101 for example). Receiving institutions which develop and adhere to fair and non-restrictive transfer-of-credit policies may lose tuition revenue by not requiring a student to repeat already completed coursework. However, these same institutions may also realize increased enrollment as more students from nationally recognized accredited institutions take advantage of transfer the credit opportunities. Increased student enrollment will most likely act to offset and eclipse any tuition revenue lost through the acceptance of a greater number of transfer credits and there would be a more efficient use of existing tuition funding resources.

Other outcomes for this policy agenda would be a reinforced acceptance of the ideals associated with continuous education and life-long learning. The employment community places a premium on credentialing as well as expanded skills and knowledge bases of employees. Thus, by opening additional opportunities for

educational advancement, the postsecondary sector would be providing a greater service to students and their other associated constituents.

Conclusion

It is the duty of educational leaders to design and implement educational policies which support and positively affect the ongoing development and growth of students and to support societal infrastructure. Education is a cornerstone of development and must be conceived in such a way as to serve a broad array of student needs as well as society as a whole. Students who choose career and technical educational options should be given every opportunity to expand their horizons and to participate in the life-long learning and continuing education goals which are important societal aspects of the new American marketplace. Thus, policies in the American higher education system – such as the transfer-of-credit policy agenda described herein – are in need of change to bring about these desired results. The current transfer-of-credit policies of many regionally accredited institutions are arbitrary and discriminatory – particularly toward students who choose career and technical education options – and serve more the perceived economic needs of those institutions as opposed to the real needs of students.

The American higher education system can do more to further the ideals associated with continuous improvement and life-long learning. Educational leaders must recognize that in order to support the nation in the highly competitive, global marketplace in which we live, a strong, highly educated and highly trained workforce dedicated to continuous improvement is necessary. Educational leaders must also recognize that student needs are as diverse and complex as

the world in we live. Accordingly educational leaders must seek to create fair and effective educational policies which meet those diverse and complex student needs and which support a student's ability to improve, develop, and advance seamlessly through the higher education system.

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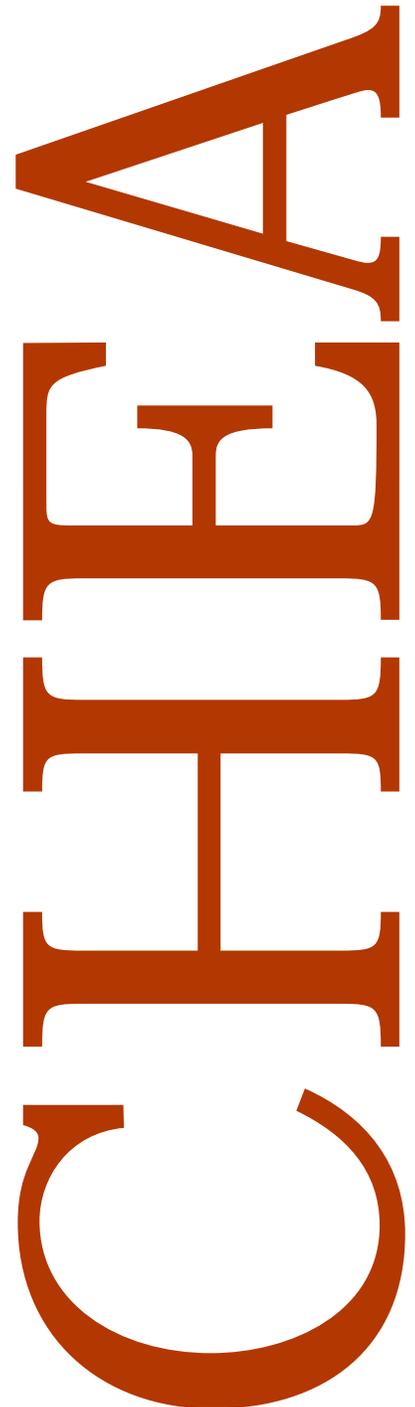
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**Council for
Higher Education
Accreditation**

A Statement to the Community:
Transfer and the Public Interest

This statement, prepared by the Council for Higher Education Accreditation Committee on Transfer and the Public Interest, is addressed to institutions, accreditors and national higher education associations seeking to maintain and enhance conditions of transfer for students.

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A Statement to the Community: Transfer and the Public Interest

In December 1998, the Council for Higher Education Accreditation (CHEA) convened a Committee on Transfer and the Public Interest to examine the role of transfer in higher education. This committee attempted to define the responsibilities of national, regional and specialized accreditors as they work with colleges and universities to assure quality in a changing environment for transfer. This statement, the result of the committee's efforts, is addressed to institutions, accreditors and national higher education associations seeking to maintain and enhance conditions of transfer for students. Transfer issues are not simple, new or easily resolved. This statement seeks to energize the ongoing national conversation about transfer decision-making, setting into motion a more open and accountable transfer process.

“Transfer” as used here refers to the movement of students from one college, university or other education provider to another and to the process by which credits representing educational experiences, courses, degrees or credentials are accepted or not accepted by a receiving institution. The classic form of transfer is vertical transfer, which is to say movement from a two-year college to a four-year college.

Why Examine Transfer at This Time?

Higher education is experiencing a significant change in how students attend college and who provides higher education. Both can have profound effects on students and their opportunities to transfer successfully. The challenge is to make transfer as efficient and effective as possible for those students who have had courses or educational experiences comparable to those offered for credit by the receiving institution. Sound transfer policy and practice, maintaining institutional and accrediting standards, is part of higher education's commitment to students.

Transfer in higher education is more varied and pervasive now than it used to be. In addition to vertical transfer, students now pursue horizontal transfer as they move from one two-year college to another or from one four-year institution to another. Many students now attend more than one institution at a time, and accordingly face issues not previously seen when they seek to transfer credits. Online courses and courses taken in other countries pose yet another set of issues.

Even more students will seek transfer as “new providers” of higher education (e.g., virtual institutions and corporate providers) and distance learning programs offered by traditional providers increase their enrollments. Accreditors and the colleges will have to find new and better ways to meet the need for transfer services.

Among the key indicators of these changes:

- the majority of 1996 baccalaureate graduates attended at least two colleges and universities;
- many students taking distance learning courses are enrolled in another institution different from the distance learning providers;
- students attending corporate universities and certain unaccredited institutions are seeking to transfer their coursework to accredited institutions;
- increasing numbers of virtual institutions and corporate providers are forming partnerships with traditional providers to offer courses and programs; and
- increasing numbers of students are enrolling in foreign institutions and seeking to transfer credits into American colleges and universities.

Finally, proposals for innovative practices pose new ways to manage credit accumulation and transfer (e.g., third-party verification of transfer credits, electronic storage of and instant access to transfer credits for purposes of review). As these new methods of managing transfer transactions gain prominence, they may well influence how transfer decisions are made.

All of these indicators suggest that higher education is changing in ways that make transfer more important to more students and at the same time more complex.

Making Transfer Decisions: Roles and Responsibilities to Assure Quality

Institutions, accreditors and national higher education associations play significant roles and sustain important responsibilities in the transfer process. Each has responsibilities with regard to quality assurance and fairness.

The Role and Responsibilities of Institutions. Colleges and universities are ultimately responsible for decisions about the admission of transfer students and the acceptance or non-acceptance of credits earned elsewhere. Typically, academic faculty and student affairs professionals (working within the framework of faculty rules and standards) determine the transferability of courses and programs. Institutions must balance responsiveness to students' preferences about transfer with institutional commitment to the value and quality of degrees or other credentials.

The Role and Responsibilities of Accreditors. Institutional (national and regional) accreditors have policies and standards that, in turn, call on institutions and programs to develop and maintain clear transfer policy and practices. Accreditors have expectations, for example, that degree requirements for native students be consistent with those that apply to transfer students. Specialized (programmatic) accreditors often have policies or standards to address transfer, with particular attention to admissions practices and assuring equitable treatment for transfer students.

Accreditors are responsible for assuring that institutional transfer practices are consistent with accreditation standards and policies on transfer. They are responsible for maintaining effective communication among accrediting organizations as a means to meet students' needs in the transfer process while also sustaining quality.

The Role and Responsibilities of National Higher Education Associations. For many years, institutions and accreditors have based their scrutiny of transfer primarily on three criteria contained in the 1978 Joint Statement on Transfer and Award of Academic Credit developed by three national higher education associations. These criteria are:

- the educational quality of the sending institution;
- the comparability of credit to be transferred to the receiving institution; and
- the appropriateness and the applicability of the credit in relation to the programs offered by the receiving institution.

National higher education associations lead the ongoing national conversation about transfer. They work with agencies of the federal government to address transfer issues that reach the level of national public policy, and they provide a national voice for assuring that students are well served by transfer practices that meet students' needs while also sustaining the quality of the system itself.

Criteria for Transfer Decisions

CHEA believes that the three criteria of quality, comparability, and appropriateness and applicability offered in the 1978 Joint Statement remain central to assuring quality in transfer decision-making. The following additional criteria expand this list and are offered to assist institutions, accreditors and higher education associations in future transfer decisions. These criteria are intended to sustain academic quality in an environment of more varied transfer, assure consistency of transfer practice and encourage appropriate accountability about transfer policy and practice.

Balance in the Use of Accreditation Status in Transfer Decisions. Institutions and accreditors need to assure that transfer decisions are not made solely on the source of accreditation of a sending program or institution. While acknowledging that accreditation is an important factor, CHEA believes that receiving institutions ought to make clear their institutional reasons for accepting or not accepting credits that students seek to transfer. Students should have reasonable explanations about how work offered for credit is or is not of sufficient quality when compared with the receiving institution and how work is or is not comparable with curricula and standards to meet degree requirements of the receiving institution.

Consistency. Institutions and accreditors need to reaffirm that the considerations that inform transfer decisions are applied consistently in the context of changing student attendance patterns (students likely to engage in more transfer) and emerging new providers of higher education (new sources of credits and experience to be evaluated). New providers and new attendance patterns increase the number and type of transfer issues that institutions will address—making consistency even more important in the future.

Accountability for Effective Public Communication. Institutions and accreditors need to assure that students and the public are fully and accurately informed about their respective transfer policies and practices. The public has a significant interest in higher education's effective management of transfer, especially in an environment of expanding access and mobility. Public funding is routinely provided to colleges and universities. This funding is accompanied by public expectations that the transfer process is built on a strong commitment to fairness and efficiency.

Commitment to Address Innovation. Institutions and accreditors need to be flexible and open in considering alternative approaches to managing transfer when these approaches will benefit students. Distance learning and other applications of technology generate alternative approaches to many functions of colleges and universities. Transfer is inevitably among these.

Finally, CHEA is committed to working with other national higher education associations to convene a group of higher education leaders to address emerging issues for transfer and to develop additional tools and sound practices that can assist institutions as they manage transfer. This national conversation should include attention to how higher education's future will differ from its past and, above all, our responsibilities to students in an increasingly mobile, fast-paced and international environment.

Approved by CHEA Board of Directors, September 25, 2000

Appendix

This appendix contains brief descriptions of methods of managing transfer available in addition to institutional transfer decision-making. It includes a description of transfer and credit equivalency as determined by the American Council on Education's (ACE's) Center for Adult Learning and Educational Credentials, the Servicemembers Opportunity Colleges' (SOC) approach to transfer oversight, and a profile of statewide articulation policies. It also includes a description of the most common method of determining levels of transfer activity or "transfer rates" as developed by the Center for the Study of Community Colleges.

Transfer and Credit Equivalency (American Council on Education)

Colleges and universities are not the sole providers of teaching and learning in higher education. Students can and do receive education and training from a variety of sources including the military, the workplace, apprenticeship and training programs and indigenous high school advanced placement programs. To help institutions reach judgments about how to treat such education for transfer purposes, ACE's Center for Adult Learning and Educational Credentials operates programs to determine credit equivalencies for various modes of extra-institutional learning. Virtually every higher education admissions office has the following two references, both of which are published by ACE:

- ***The National Guide to Educational Credit for Training Programs***

This guide evaluates formal educational programs and courses offered by organizations for their employees, members, or customers and makes college credit recommendations accordingly. These organizations include business and industry, labor unions, professional and voluntary associations, schools, institutes, and government agencies. In addition, the guide contains credit recommendations for courses offered by home-study schools that are accredited by the Distance Education and Training Council.

- ***The Guide to the Evaluation of Educational Experiences in the Armed Services***

This guide evaluates and makes credit recommendations for formal educational programs and courses offered by the United States armed services. The guide also makes credit recommendations for Military Occupational Specialties (MOS). In addition, this guide is available in an online searchable format.

Credit by Examination

ACE evaluates examinations published by a variety of organizations and has recommended college credit for students who are successful in passing them. The more prominent examinations include: the ACT Proficiency Examination Program (PEP); Regents' College Examinations; the College Board's Advanced Placement (AP) Program; the College Board's College-Level Examination Program (CLEP); and the Defense Activity for Non-Traditional Education Support (DANTES) Subject Standardized Testing (DSST) Program. The examinations cover a wide spectrum of the subject matter taught in higher education.

In practice, the majority of higher education institutions accept the examinations for credit in one form or another. Institutions may have varying standards for acceptance and applicability toward the student's academic program. However, the examinations have been an integral and accepted component of the transfer process for many years. To assist the colleges and universities in making credit decisions, ACE publishes the *Guide to Educational Credit by Examination* that reviews the content and psychometric properties of these

tests and industry certification examinations. Specific credit recommendations are included based on student scoring levels and overall performance.

Servicemembers Opportunity Colleges (SOC)

Servicemembers Opportunity Colleges (SOC) is a consortium of about 1,400 institutions dedicated to helping servicemembers and their families get college degrees. SOC is committed to ensuring that students who are in the military do not have to repeat classes unnecessarily and can achieve their degree goals, rather than just accumulate course credit as they move from place to place. To be a member of SOC, institutions must agree to:

- a) design transfer practices that minimize loss of credit and avoid duplication of coursework;
- b) limit the amount of coursework that students must take at a single college to no more than 25 percent of degree requirements;
- c) award credit recommended by the American Council on Education's (ACE) *Guide to the Evaluation of Educational Experiences in the Armed Services* for military training and experience when applicable to servicemembers' degree programs; and
- d) award credit for at least one of the nationally recognized testing programs, such as the College Level Examination Program (CLEP), the DANTES Subject Standardized Tests (DSST), or the Regents College Examinations (RCE).

SOC also maintains "degree networks" of approximately 130 institutions that agree to a guaranteed transfer system among network members. SOC publishes transferability tables containing those courses that have been identified by degree network institutions as guaranteed to be accepted for transfer. SOC publishes *Credit Education Supplements* that match ACE-recommended credit for military service school courses and occupations with course requirements within the network degree systems. Credit-matching information for national test programs is also provided.

Statewide Articulation Policy

Ignash and Townsend surveyed the fifty states in Spring 1999 to determine which had a statewide articulation agreement, when the agreement was developed, what the agreement included, what sort of communication methods were used to provide information to students and how the agreement was evaluated for effectiveness. Forty-three states responded with usable results. The following table describes types of transfer covered by state policy and the percentage of undergraduates covered by the statewide agreements in the thirty-four states.

State*	Type of Transfer Covered by State Policy							Percentage of Undergraduate students covered by statewide articulation agreement	
	2- to 4-year	2 to 2	4 to 4	4 to 2 (reverse transfers)	Publics Only	Publics and private non-profit	Publics and private for profit	Publics	Privates
Alabama	X	X	X	X	X			100%	0%
Arizona	X							100%	
Arkansas	X	X	X	X	X			100%	
California	X	X	X			X	X	100%	75%
Colorado	X				X			31%	0%
Connecticut	X	X	X	X		X			
Florida	X	X	X			X	X	100%	5%
Georgia	X	X	X	X	X			100%	0%
Hawaii	X	X	X	X	X			100%	0%
Idaho	X	X	X	X		X		100%	50%
Illinois	X	X	X	X		X	X	100%	60-65%
Indiana								100%	0%
Iowa	X							100%	0%
Kansas	X				X			100%	0%
Kentucky	X	X	X	X	X			100%	0%
Louisiana	X	X	X	X	X			100%	0%
Maryland	X	X	X	X	X			100%	0%
Massachusetts	X				X				
Mississippi	X	X			X			100%	0%
Missouri	X	X	X	X	X			100%	
Montana	X	X	X	X	X				
Nevada	X				X			98%	
New Mexico	X	X	X	X	X			100%	0%
North Dakota	X	X	X	X		X	X	100%	60%
Ohio	X	X	X	X	X			100%	0%
Oklahoma	X	X	X	X	X			100%	0%
Oregon	X				X			100%	
Rhode Island	X		X	X	X			100%	0%
South Dakota	X		X					100%	
Utah	X	X	X	X	X		X**		
Virginia	X				X			100%	
Washington	X					X			
West Virginia	X	X	X	X	X			100%	
Wyoming	X				X			100%	
Total "yes"	33	21	22	19	23	7	4		

*Percentage includes regionally accredited private institutions only.

**Some voluntary compliance among the major, for-profit private institutions.

Source: Ignash, J.M., and B.K. Townsend, (forthcoming 2001). "Statewide Transfer and Articulation Policies: Current Practices and Emerging Issues," Table 9.1: Institutions, Sectors, and Percent of Undergraduates Included in Statewide Articulation Policies. Included in Townsend, B.K., and S. Twombly, eds. "Community Colleges: Policy in the Future Context." *Educational Policy in the 21st Century, Volume 2*. Westport, Connecticut: Albex Publishing.

Transfer Rate

(Two-Year to Four-Year Institutions)

Since 1989, the Center for the Study of Community Colleges has been collecting data on transfer using the definition, “All students entering the two-year college in a given year who have no prior college experience and who complete at least 12 college credit units within four years of entry, divided into the number of that group who take one or more classes at an in-state, public university within four-years.” The data show that approximately 22 percent of the entrants who receive 12 credits matriculate at a university. This is assuredly an undercount because the definition omits those who take longer than four years to transfer, who transfer to an independent university, or who transfer out of state. The data regarding numbers of students transferring are remarkably consistent when aggregated nationwide over time. Using data from the National Longitudinal Study of the High School Graduating Class of 1972, for example, Adelman reported that “1 out of 5 individuals who attend two-year colleges eventually attends a four-year college.”

Another way of looking at the community college contribution to students attaining the baccalaureate is by conducting retrospective studies, examining the transcripts of baccalaureate recipients to see how many transferred credits from community colleges. Here the figures usually show that between 30 and 60 percent of the people obtaining degrees from public universities have some community college courses on their record.

The national averages mask the wide variation in transfer rates among states and among colleges in the same state. The range between states is from 11 to 40%, but the range within the state may be from 4 percent to more than 50 percent . Some of the reasons for the wide interstate disparity are related to the history and structure of higher education within a state. Where the two-year colleges were organized as branch campuses of the state university, the transfer rates are high; where they began as technical institutes emphasizing trade and industry programs, the transfer rates are low. Deviations from the norm appear also in states where transfer to independent universities is a prominent feature of the higher education system. Transfer rates among colleges in the same state show wide variation because of local conditions, including community demographics and college proximity to a university campus. However, one conclusion seems clear: transfer rates within a college, college system, or state change little from year to year. They are embedded in institutional histories and circumstances. Most colleges draw the same types of students from the same secondary schools year after year. And they send the same proportion of them on to the same universities. The only trends affecting that situation are massive shifts in community demographics (rare phenomena) or long-term, well-funded occupational programs designed for specific local industries, again, rare phenomena.

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