**CYoshitomi - Department of Education Regulatory Negotiations**

**Conference Agenda**

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**Topic 3:   DOE Regulatory Negotiations: Accreditations - Transfer of Credit**

The Department also seeks the advice of negotiators on how to ensure that transfer of credits remain the decision of institutions, but disallow institutions from categorically denying credits from national accreditors if the courses completed by the student are in alignment with those offered by the accepting institution.

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| 1. | **PLA vs Transfer of Credit** Caution must be exercised so that these two mechanisms are not confused with one another, particularly since traditional PLA approaches may incur additional costs outside of tuition at the receiving institution, as compared to transfer credit evaluation processes. Of course, more robust, flexible and feasible PLA options should be made available for learning that has not already been documented (transcripted) in some way. - Will Pena |
| 2. | **Transfer of Credit - Michale McComis** In alignment with Section 668.43(a)(11), the agency requires institutions to disclose to students its transfer of credit policies and ensures that such policies:  (i) allow for an assessment of any previously earned credits or credits earned using funding from any federal program,  (ii) do not preclude a review of earned credits or coursework based solely upon the source of accreditation (i.e., national, regional, or specialized) or the type of institution; and  (iii) make a fair and reasonable assessment of alignment between the transfer courses and the school's requirements and awards credits accordingly.  668.43(a)  (11) A description of the transfer of credit policies established by the institution which must include a statement of the institution's current transfer of credit policies that includes, at a minimum—  (i) Any established criteria the institution uses regarding the transfer of credit earned at another institution; and  (ii) A list of institutions with which the institution has established an articulation agreement; and... |
| 3. | **Defining the Problem - Christi** In our discussion yesterday, and continuing to read through the background to this question, I wonder if the issue is clearly defined. Is it really so narrow--transfer of credit from national accreditors--or is it the complexity and challenge in translating all kinds of learning as a currency that students bring to institutions? There is transfer credit, workplace learning, military experience or transcripts, badges, industry or other certifications, PLA by test or other means, and more.  It seems to me we are trying to solve for how we assess, translate, and thus award credit for diverse kinds of learning, which is why competency-based education has been particularly appealing to learners with such backgrounds. I am not suggesting that CBE is a panacea, but rather that educational models that allow for breaking learning down into translatable units result in recognition of all kinds of learning and experiences. Rather than regulating transfer policy, which is problematic for reasons already mentioned, can we consider larger experiments, pilots, waivers, or a demonstration project designed to tackle assessment and transfer for different kinds of learning (beyond work done in PLA already)? The field needs to see this benchmarked and in practice if the Department hopes to encourage and scale such work. |
| 4. | **Transfer of credit** With respect, this issue will be much exacerbated by the proposal that credit hour definitions may vary by institution ... or at least by accreditor. More institutions may become leery of transcripts of institutions accredited even by regional accreditors. |
| 5. | **Transfer of Credit** I see both sides of this issue. Representing institutions that receive credit (and particularly diverse sources of credit as open-access institutions), constraining institutions from "denying credits " is extremely problematic. Community colleges are already required to have transfer of credit policies, and will not categorically deny credits and/or refuse evaluation on the basis of accreditor. It's less about accreditation source, and more about the quality and transparency of the originating institution. If the institution does not have clear and transparent learning outcomes, we cannot assume that English 1101 from University A equals English 1101 at Community College B. For students to succeed in our institutions, we must be able to assess their learning from a previous institution. What good does it do if we are forced to accept that credit, and the student goes on to fail English 1102? If it becomes harder for us to enforce quality standards, we will improperly place students at our institutions, and the impact on student success (and thus, employability in the community) over the long term will be staggering.  I also represent institutions frustrated by TOC policies when we are the originating institution sending a student on for transfer. Even within my own state, we have complicated articulations with universities where one department will accept a math course, and another department at the same university will not accept the same math course. I accept that there are sometimes good reasons for this phenomenon (engineering math is not the same as math for liberal arts majors). But it causes confusion and often erroneous course choice for students intending to transfer.  I don't think there is an easy fix for this, but suspect that consistency and transparency in several areas, regardless of accreditation type, would be helpful. I would consider these to broadly fall under incoming transfer of credit, and outgoing transfer of credit:  1. Clear incoming transfer of credit policies--statutorily required already, but to what degree are the criteria for a clear transfer policy agreed upon and met? Do accreditors set standards, and are they the same between different types of accreditation?.  2. Clear outgoing transfer of credit policies: requirements for clearly published and/or accessible learning outcomes available to students and other institutions. Again, is this uniform and consistent? Based on experiences at my own institution, I can say "no."  Unless there are common definitions, language, and criteria for learning outcomes and transfer...I think we will continue to struggle with this issue. I also suspect there are states/systems that could be evaluated as best practice models for help with this challenge--some use common course naming schemes, transfer councils, etc. very successfully. There could be encouragement/incentive to follow such models.  As for encouragement of PLA (and other forms of learning, I would submit), see my other comments below. -Christi |
| 6. | **Update: C-RAC's response to this issue/ Gellman-Danley** We had three members of the Council of Regional Accrediting Agencies at the last hearing. We are committed as a whole (all seven regionals) to address this issue. Please do not cause upheavals that may be best handled among the accrediting agencies. I'm going on record as showing our commitment. As it stands now, we do leave it to the institutions. We do not discourage that; it is a myth. However, we have to be very honest. With recent collapses such as Corinthian, our institutions have become very cautious about TOC from certain national accreditors. We need to come together as accreditors to overcome this generalization. On this issue, we need to bring in some institutions to help us work through the challenges and create a very fair orientation to reviewing academic rigor and content versus a blantantly unfair generality about national accreditors. |
| 7. | **Transfer of Credit - D. Phelan** As a practical matter, much of the determination of how course are transferred in, and their relative equivalency, is generally handled by the institution's registrar, or in larger institutions, by the department. Ideally, they are guided by institutional and/or departmental policies regarding the nature of the course, course title, syllabi, even course descriptions from the catalogue. A transparent declaration of these policies seems essential here so as to facilitate transfer, as well as to avoid sweeping statements regarding acceptance or lack of it. As Christi noted below, this is not a discussion for nationals to regionals...it is also a challenge among institutions within the regionals. We need to keep the student at the center of these discussions so as to avoid their needless delay in academic progression and repeated expenditures for like courses. |
| 8. | **Transfer of credit** My understanding is that the Department is prohibited from mandating transfer of credit. Therefore this does not seem like an appropriate topic for neg reg. Instead a collaborative process between national and regional accreditors, the Department, ACE, and SHEEO seems like a better approach. |

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