



American Association of Collegiate Registrars and Admissions Officers

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December 15, 2003

The Honorable Howard P. "Buck" McKeon
U.S. House of Representatives
Subcommittee on 21st Century Competitiveness
2181 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman McKeon,

I write on behalf of the American Association of Collegiate Registrars and Admissions Officers to respectfully inform you of our concerns with certain provisions of H.R. 3311, the "Affordability in Higher Education Act." Specifically, we are alarmed by Title III of the legislation, which proposes a variety of new federal mandates on inter-institutional transfer of academic credit.

AACRAO is a nonprofit, voluntary, professional association of more than 9,000 higher education admissions, registration, financial aid professionals and enrollment managers who represent approximately 2,300 institutions in more than 35 countries. Our members are professionals with responsibilities that include evaluation and application of transfer credit and compliance with the Higher Education Act of 1965 at their respective institutions.

As transfer practitioners on campus, we believe the proposed legislative language would have significant adverse consequences for students, taxpayers, and the American tradition of federal non-interference with academic judgments of colleges and universities. Historically, the federal government has wisely allowed colleges and universities to autonomously determine the terms and conditions their student must meet to earn various academic degrees. Your proposed legislation would, for the first time, create a new federal mandate on a fundamentally academic issue, i.e., transfer of credit, and as such, would undermine the ability of institutions to safeguard the integrity of their own credentials.

The United States has the world's most mobile system of higher education. The Department of Education's Office of Educational Research and Improvement has found that the proportion of undergraduates attending multiple institutions of higher education grew from 40 to 54 percent (and among bachelor's degree recipients, from 49 to 58 percent) during the 1970s and 1980s. His early data suggest the proportion of transfer students surpassed the 60 percent mark in the 1990s. In addition, OERI found that the number of institutions attended by students had no effect on degree completion.

Not only is there every evidence that student mobility is at an all-time high without *any* documented adverse impact on degree completion, state policymakers and the higher education community are actively working on improving credit portability and making transfer even more seamless. AACRAO, for example, has just launched a new centralized database of transfer credit practices. The National Transfer and Articulation Network is working to improve inter-

institutional articulation agreements. A number of states have put various mechanisms in place to help facilitate inter-institutional portability of academic credit. In view of all these positive developments, a one-size-fits-all federal mandate could not have been proposed at a less propitious time. As the problem the proposed provisions seek to redress is unknown, we are unable to address the concerns motivating legislative action. Congress mandated that the U.S. Department of Education study the transfer issue during the last reauthorization of the Higher Education Act in 1998, yet the Department has not fulfilled its mandate. We fear that federal intrusion into academic prerogatives of the world's best higher education system will cause irreparable harm to the nation if Congress acts before it has adequate facts at its disposal.

We are alarmed because the transfer-related provisions HR 3311 are a too blunt an instrument to address any shortcomings in the credit evaluation procedures, and would certainly harm transfer students, institutions of higher education, and the public.

First, the proposed legislation would allow Department of Education program reviewers and auditors to second-guess academic judgments about course-equivalencies, and thus represents an unprecedented federal intrusion on the academic autonomy of colleges and universities. Academic degrees are made up of credits and federal regulation of credit-equivalencies is tantamount to a federal degree recognition policy.

Second, credit evaluation is a complex and deliberate process of placing students in courses for which they have the necessary prerequisites. Today's voluntary system of inter-institutional transfer is based on principles articulated in the Joint Statement on Transfer of Credit that consist of a three-part analysis of incoming academic credits to determine the quality of previous coursework, the comparability of such coursework to courses offered at the receiving institution, and the applicability of the coursework to the program of study the student seeks to pursue. Credit evaluation professionals on campus go to great lengths to correctly analyze transfer applicants' transcripts and provide fair and accurate equivalencies that avoid duplication of effort and that correctly place these students in the sequences of courses for which they are academically qualified. The proposed transfer provisions would do away with the subtleties of credit evaluation by federally reducing academic credit evaluation to an analysis of course comparability and student performance. As such, legislation would undermine academic quality at the same time as it would cause many students to be misplaced in courses for which they are not academically prepared.

Third, the legislation would not only hurt students by distorting their qualifications and causing incorrect placements, it would outright deny Title IV eligibility for some transfer students. By mandating that schools award academic credits even for coursework that is not applicable to the students' academic program, the proposed language would push many students out of eligibility for federal financial assistance by penalizing them under federal Satisfactory Academic Progress regulations that cap the number of credit hours a student can take and maintain Title IV eligibility. This outcome is in direct conflict with the spirit of your legislative efforts to reduce federal red tape in student aid programs.

Fourth, the proposed legislation would set up new and cumbersome reporting requirements to generate information of dubious value. In mandating a new data reporting burden, this provision provides a partial answer to the problem of escalating costs that the college price provisions of the bill seek to address.

Fifth, the proposed legislation would require accrediting bodies to serve as federal agents in enforcing the transfer mandates of HR 3311. Not only would this be a redundant distraction for accreditors, it would add significantly to the costs of accreditation and represents another costly federal mandate working at cross-purposes with the price provisions.

AACRAO believes that one-size-fits-all legislative mandates on a complex topic such as credit evaluation would result in poor student placements, diminished quality, and wasted resources. Institutions of higher education have an obligation to their students, their graduates, employers, other institutions of higher education, and the public to protect the integrity of the degrees they confer. In an age when fraudulent credentials are becoming a national and international security problem, Congress should be strengthening, not undermining, the ability of colleges and universities to control the award of *their own* credentials.

I thank you in advance for your consideration of this matter. We are mindful of your extraordinary contributions to the nation's students, and stand ready to work with you to improve portability of academic credit.

Respectfully,

Jerome H. Sullivan
Executive Director

cc: Members of the House Education and Workforce Committee
Senator Judd Gregg
Senator Edward M. Kennedy