

**U.S. House of Representatives**  
**Committee on Education and the Workforce**  
**Subcommittee on 21<sup>st</sup> Century Competitiveness**

**Hearing on**  
**“College Credit Mobility:**  
**Can Transfer of Credit Policies Be Improved”**

**May 5, 2005**

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## **Introduction**

Chairman McKeon, Ranking Member Mr. Kildee, members of the committee, my name is Jerome H. Sullivan and I am Executive Director of the American Association of Collegiate Registrars and Admissions Officers. I am honored to have this opportunity to share the views of our members with the Subcommittee regarding the portability of academic credit and student mobility among institutions of higher education.

AACRAO is a nonprofit association of more than 2,400 institutions of higher education and more than 9,500 campus enrollment services officials. The campus officials who comprise our membership range from front-line staff to senior administrators with primary responsibility for admissions, enrollment planning, records management, administrative computing and other important operations and student services central to the smooth and efficient administration of colleges and universities. Our membership includes public and private non-profit institutions as well as for-profit collegiate institutions.

Today's hearing focuses on the portability of academic credit and whether transfer of academic credit policies can be improved. As a national organization of transfer of credit administrators who both send and receive transfer students, AACRAO is in a unique position to address this topic in terms of current practices among institutions, within individual states and across the nation. We recognize both great successes and challenges in the current state of transfer and portability of credit. On the one hand, American higher education is undoubtedly the most flexible and transfer-friendly system in the

world. On the other hand, student mobility is not entirely without constraint, and carries costs for institutions and students. Clearly, the more these costs can be contained or eliminated, the more efficient and productive we collectively can become, and the more options students will have. I would like to briefly address the present state of affairs with regard to transfer and bring some of the pending initiatives on transfer to the Subcommittee's attention. Additionally, I'd like to offer a few solutions to ease credit portability and student mobility.

### **Transfer: A Complex Issue**

Transfer and articulation are complex phenomena involving planned and unplanned movement of students among institutions of higher education. Planned transfers may be facilitated by carefully negotiated articulation agreements between institutions, and enable students to start an academic program at one institution with the knowledge that they will continue their program and obtain their academic credential at another institution. It is important to note that not all planned transfers are based on such prior institutional arrangements, and that students may independently plan to transfer from one institution to another without informing their advisors or having complete knowledge of the credit-acceptance policies of the institution to which they intend to transfer. But of course, not all transfers are planned.

Beyond planned transfers, unanticipated factors and the general mobility of our society create numerous circumstances under which students must move from one institution to

another without prior planning. Reasons for such movements can range from mismatches between students and institutions to geographic relocations by the families. The fundamental challenge with transfer, whether planned or unplanned, is to aggregate coursework conducted at different institutions with different academic policies, different curricula, and different levels of expected rigor into an academic credential that the issuing institution can stand behind. Transfer is complex, then, because disparate and sometimes incommensurable coursework is brought together, often without prior involvement of the institution from which the student expects to graduate.

### **Who Transfers?**

Once it was assumed that transfer students were young people who, because they wanted to stay close to home for two years after high school – for financial reasons or reasons of convenience—attended a local two-year “junior college” or “community college” before transferring to a four-year institution. Today, nearly 60 percent of community college students are over the age of 22. Sixteen percent of all community college students are in their thirties; 10 percent are in their forties; and 5 percent are in their fifties or older.

Transfer students are no longer only those who begin college at a two-year institution and then move to a four-year. There are “lateral transfers” – students who transfer from a two-year school to another two-year, or from a four-year school to another four-year. There are also “reverse transfers” – students who start at a four-year school but graduate from a two-year school. And, there are “swirling” transfers – students who are enrolled

in two or more schools simultaneously. While it is still true that more students at two-year colleges transfer—about 42 percent—than those at four-year institutions—about 23 percent—one-third of college seniors have transferred at some time in their career.

### **The Institutional Transfer Process**

To better appreciate the transfer process, it may be helpful to review the careful procedures institutions typically follow in handling transfer decisions. The admissions process for transfer students is significantly more complicated because beyond an evaluation of the applicant's qualifications, separate determinations must be made about credit acceptance and placement of the student. The process of transfer credit evaluation typically involves transfer professionals and the faculty, and requires an in-depth analysis of every course-entry on the transcript. The credit evaluation process is abstractly divided into three distinct judgments. First, an assessment of the quality of the course must be made. Second, the course must be evaluated on the basis of its comparability to courses at the receiving institution. Finally, the coursework for which credit is granted must be determined to be applicable to the program of study for which the student has applied. For purposes of ensuring student success and protecting the integrity of academic credentials, all three judgments must be made in the affirmative for credit to be granted. Courses of poor quality, courses for which the receiving has no general counterpart, and courses that simply do not apply to the degree being sought should not, and are not, typically ported over. This standard benefits students by ensuring that they are not inappropriately placed in courses for which they are ill prepared.

Concrete determinations with regard to the three-part analysis described above can range in difficulty. Transfer professionals at institutions with significant transfers-in often have a course-by-course understanding of academic offerings of their feeder schools. This course-level understanding is typically arrived at through intensive reviews of course syllabi, textbooks and supplemental materials used in courses, knowledge of faculty and their qualifications at sending institutions, and lengthy consultations with departmental faculty at the receiving institution in connection with each course. Expensive and labor-intensive as it is, this process represents the ideal method of credit evaluation. The good news is that once a particular course from a specific institution has been evaluated, if it is encountered again on a different student's transcript, the same credit decision can be applied until the course content changes. At many institutions, evaluations are captured in course-equivalency databases that are available to evaluators as a means of expediting the process. At most institutions, however, the process is entirely manual, and is driven by the experience and knowledge of expert evaluators.

### **State and Institutional Initiatives on Transfer**

No single model of articulation and transfer can be identified as the universal standard or even as the preferred model for the nation. Most states employ a combination of approaches ranging from informal efforts of transfer professionals that try to do right by the student, to more formal institution-based agreements, to state-mandated policies.

Historically, two- and four-year college transfer and articulation agreements were primarily institutional initiatives rather than state mandates. Now, nearly every state has some policy on transfer of credits for students moving from two- to four-year institutions. Striking differences have emerged, however, in articulation policies and practices among the states. These differences include not only how policies and practices were initially established, but also their degree of selectivity, specificity and uniformity.

Some widely used transfer practices are statewide articulation agreements, state-level transfer/articulation bodies, transfer/articulation officers located at both two- and four-year institutions, and feedback systems to determine whether state policies are being implemented. Colorado, Florida, Illinois, Washington, and Minnesota provide examples of state-level agencies that have been directed by their legislatures to establish policies relating to the flow of undergraduate students between and among the institutions they coordinate. The states, in general, are already making tremendous efforts at setting up articulation mechanisms, including Web sites that can easily be accessed by students, parents and counselors.

Vertical transfer (two- to four-year) is the type of transfer most often addressed in state transfer or articulation policies. State articulation policies are most likely to mandate transfer of general education or transfer of associate degrees, focus mainly on transfer among public institutions, and tend not to have an enforcement mechanism.

At least thirty-eight states have transfer/articulation legislation via statutes, bills or resolutions. Cooperative agreements comprising formal voluntary agreements between institutions and formulated on a course-by-course or per discipline basis exist in at least 40 states. Transfer data is collected in 33 states for reporting and accountability purposes. Eighteen states offer student transfer incentive programs, including financial aid, guaranteed transfer credit, and/or an admissions priority. Twenty-six states publish student guidelines to outline requirements and types of articulation agreements between institutions. Twenty-three states have a statewide common core curriculum and eight states have common course numbering for all institutions. Finally, at least five states have specialized vocational-technical credit transfer organized via collaborations between two-year colleges and vocational institutions.

Several common patterns are evident in the practices nationwide: First, despite changes in students' enrollment patterns, even the newer articulation and transfer policies focus almost exclusively on the traditional view that students transfer solely from two-year to four-year colleges. Second, state-level agreements tend to focus on transfer between public institutions and do not take into account the possibility of transfer to or from private or for-profit institutions. A survey we conducted in 2002 of state transfer officers, however, indicates that 66 percent of respondents have articulation agreements between public and private institutions within their state and 41 percent have articulation agreements, privately arrived at, between public institutions and proprietary institutions. Whatever the coverage of a state's policy, however, one of the most evident trends is the move away from voluntary agreements toward formal state-mandated policies.



## **Current National Efforts to Facilitate Transfer**

There are many national efforts in place to supplement and enhance institution-to-institution and state articulation policies. Since 1977, AACRAO, for example, has maintained a database of institution-to-institution transfer credit practices, called Transfer Credit Practices (TCP). When it began, information was collected from only one reporting school in each state, typically a flagship, and disseminated in print form. Now, as times, technology and transfer have changed, TCP is a more robust, online database that includes several reporting institutions from each state. The database reports the transfer acceptance practices of reporting institutions and assists credit evaluators in determining how other institutions within their state evaluate course-by-course transfer credit. In addition, the AACRAO Web site provides a comprehensive list (Attachment 1) of state practices including mandates and articulation agreements as well as a variety of articles and links to outside sources that help transfer evaluators with credit applicability, equivalency and comparability determinations.

Since 1978, AACRAO has maintained an agreement with the American Council of Education and the accreditation community, now represented by the Council for Higher Education Accreditation (CHEA), called *“The Joint Statement on Transfer and the Award of Credit”* (Attachment 2). This agreement, which emphasizes standards for evaluation of transfer credit, advocates equal examination of course quality, comparability and applicability.

AACRAO is engaged in other efforts, too, including a cooperative agreement with the New England Transfer Association and participation on the CHEA's Committee on Transfer and the Public Interest. Further, our publication, *The College Transfer Student in America: The Forgotten Student*, offers research and practical advice to campus administrators concerning everything from maximizing the effectiveness of articulation agreements to addressing the specific and unique needs of an institution's transfer population.

Obviously, AACRAO has done a lot of work on transfer issues. I would also like to recognize the contributions of others, particularly my fellow panelists, for their efforts to streamline transfer for both institutions and students. The National Articulation and Transfer Network—with which AACRAO is pleased to be associated—and its *CollegeStepz* Web site is an important resource for minority and underserved students. Further, its collection of nationwide articulation data is a good step toward development of a national research model. In Ohio, the development and implementation of the Degree Audit Reporting System (DARS) and Course Applicability System (CAS) have proven effective at streamlining equivalencies and portability. The ability to plan coursework around the prospect of a future transfer ensures that scarce time and resources are not spent in classes that won't contribute to successful degree completion, wherever it may be earned.

## **Inefficiencies in the System**

While institutional and state systems for transfer of credit are largely successful, we know that the system can be improved. There are inefficiencies for both students and for institutions. Uncertainty and lack of transparency cause significant difficulties for all parties in the transfer process. Many students cite denial of transfer credit as their primary source of concern. Students are sometimes misled to believe that their coursework at one institution will automatically transfer to another institution. Oftentimes students simply assume that coursework will transfer, without fully understanding the nuances of the evaluation process or the tremendous differences and diversity of higher education programs. The very quality of choice that we so value in American higher education precludes one national definition for each course, and causes slight differences that must be painstakingly evaluated as we review courses with identical titles from various institutions. Where the differences are truly slight, credit must be granted to expedite time-to-degree and avoid repetition and added costs for the sake of marginal new learning. Where significant differences are detected between courses of similar designation, however, for the sake of both the student and the reliability of institutional credentials, credit should not be granted. I don't believe any observer of the transfer phenomenon would disagree with the foregoing statement. The challenge is to understand how these determinations are made, how they are made erroneously from time to time, and how to improve the process.

As I noted earlier in this testimony, credit may be denied for a number of reasons. Concerns about quality, comparability or applicability can result in adverse decisions. These concerns are, on occasion, caused or exacerbated by lack of adequate information about the sending institution, its academic policies, or its curriculum. Perhaps the greatest challenge in the evaluation process is this lack of adequate information about the student's prior coursework. In many cases, transfer evaluators at the receiving institution have only a single sheet of paper—the transcript—through which to determine the award of credit. The transcript lists the name of the sending institution, the names of the courses the student took and the grades the student earned. With this information the evaluator is left to figure out much about the sending institution, the substance of the coursework—whether it is comparable to courses taught at the receiving institution—and the student's academic achievement. With such little information, credit evaluators rely on quality measures like the accreditation of the sending institution and course descriptions in course catalogs to complete their evaluations. In addition to credits from traditional colleges and universities, credit evaluators examine and make determinations about credits earned through experiential learning, distance education, international education and vocational schools. When there is a question regarding the applicability or comparability of a specific course, credit evaluators defer to faculty members in the relevant field for guidance. Greater transparency of sending institutions can alleviate such concerns, and facilitate successful transfer of credit where appropriate.

Beyond the factual difficulties of the task of evaluation, other issues compound the problems. These include proper disclosures and more accurate advance information—to

student and institutions—about portability of credits, as well as a greater effort on the part of all institutions to address the unique needs of the transfer population.

### **Possible Solutions**

From our perspective, the primary national policy priority regarding transfer is to enable and facilitate solutions that ease the portability of credit. Successful policy solutions will recognize that transfer is ubiquitous and will only become increasingly important as a mechanism for students to attain degree completion. Such solutions should be flexible enough to accommodate the myriad unique types of students and institutions involved in the transfer of credit process and should not be one-size-fits-all. Transfer policy should be based on assumptions that encourage students to matriculate through the educational system towards degree completion; that maintain a balance between public benefit and administrative burden; and that continue to recognize the institutional autonomy of curricula and degree requirements.

In addition to the efforts AACRAO and others here today are already engaged in, effective state policies are at the heart of programmatic success and degree attainment for transfer students. We believe that federal policy could supplement these efforts, however, and I'd like to offer a few suggestions.

First, the federal government could facilitate a voluntary data collection to provide receiving institutions with more detailed information about courses for which credit is

sought by incoming transfer applicants. In creating better tools to support transfer credit evaluation on campus, the federal government can eliminate much of the friction in the system and promote the optimal outcome for students. One possible information collection and dissemination mechanism for this effort could be the College Opportunities Online portal on the U.S. Department of Education's Web site. Another possible portal for voluntary submission of course information would be the CollegeStepz Web site operated under the auspices of the National Articulation and Transfer Network. Such a site would voluntarily collect information such as institutional course inventories, catalog descriptions, syllabi, text books and faculty qualifications. This national information repository would not only help credit evaluators, it would help students better understand the academic offerings of participating institutions.

Second, federal policymakers should consider a disclosure requirement for institutions that make claims with regard to transferability of their coursework to other institutions. It appears that much of the student discontent about denials of transfer credit are based on claims made by sending institutions that turn out to be misleading. These claims are particularly troublesome when made at the point of recruitment, when students are basing enrollment decisions on them. Any claims about other institutions' credit acceptance policies should be based on facts. We believe institutions making claims about transferability of their credits to other institutions should be required to provide: (1) the basis for the transferability claim; (2) the number and types of articulation agreements in which the institution participates; and (3) the number of documented cases of successful transfer on a course-by-course basis.

Third, Congress could authorize a grant program to promote articulation agreements and increase degree attainment. Such grants could be awarded on a competitive basis to institutions to enable them to focus on improving transfer opportunities for traditional and non-traditional students. Additionally, the grants could promote articulation agreements among different institutions in order to improve the degree completion for incoming transfer students.

## **Conclusion**

On behalf of the members of AACRAO, I thank you for your consideration of our views.

We appreciate your extraordinary efforts on behalf of students and look forward to working with you as you advance the cause of education.