



March 2007

Report No. 07-22

Institutions Do Not Have to Accept Transfer Credit for Many of the Courses in the Statewide Course Numbering System

at a glance

The Statewide Course Numbering System was designed to facilitate transfer of credit between participating institutions of higher education. However, institutions are not required to grant credit for courses in the system if they do not offer the same course or the faculty teaching the course do not meet their criteria. In addition, the system contains many non-equivalent courses that may not be accepted for transfer credit. Finally, many courses taught at non-public institutions are not in the Statewide Course Numbering System.

Students in non-public institutions cannot easily discern which courses are in the Statewide Course Numbering System and meet criteria for transfer. Therefore, they may take courses that will not count toward a degree when they transfer to another institution.

In addition, the transfer designations in the Statewide Course Numbering System may be inaccurate. Since adding non-public institutions to the system, the Statewide Course Numbering System unit has not been able to maintain the system in a timely and consistent manner.

Scope

As directed by the Legislature, this report examines issues associated with students transferring credit from a non-public higher education institution to a public institution using the Statewide Course Numbering System. It also identifies system maintenance issues that pose problems to users. The report focuses on the 32 non-public institutions that participate in the Statewide Course Numbering System and are regulated by the Commission for Independent Education.

This is the first of two reports addressing the Statewide Course Numbering System. The second report will examine the extent to which students transferring from a non-public institution to a public community college receive appropriate transfer credits.

Background

The Statewide Course Numbering System provides an inventory of postsecondary course offerings by public and participating private institutions of higher learning. The system was established in 1971 to facilitate the transfer of credit for academic courses between the state's public community colleges and universities.¹ It is recognized as being

¹ In 1971, the system was called the Florida Common Course Numbering and Designation System.

a successful component of the state's 2+2 articulation system.

Subsequent legislation allowed more institutions to participate in the Statewide Course Numbering System. These institutions include district technical centers and non-public institutions. Currently, all 28 community colleges, 10 of the 11 state universities, 40 area technical education centers, and 33 non-public postsecondary institutions are included in the system (see Appendix A for a complete listing of these non-public institutions).² Thirty-two of the non-public institutions are licensed by the Commission for Independent Education (CIE), which ensures the protection of students attending these institutions and helps the institutions with professional development and articulation.³

Currently, institutions are required to accept credit for courses in the Statewide Course Numbering System

- if they offer equivalent courses, and
- if the courses to be transferred are taught by faculty meeting their faculty qualification criteria.

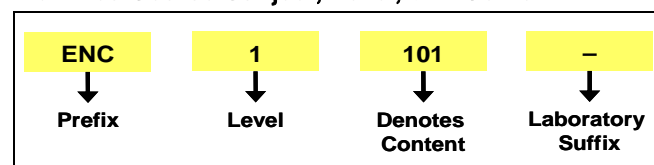
Most (29) of the non-public institutions are not accredited by the Southern Association of Colleges and Schools (SACS), which is the accrediting body for all public community colleges and universities. Faculty at these institutions may not meet the credentials SACS recommends, which poses a barrier to credit transfer. To overcome this barrier, when these institutions ask for courses to be placed in the Statewide Course Numbering System, the Department of Education reviews the credentials of the faculty teaching the courses.

The Statewide Course Numbering System unit is located within the Office of Articulation in the Florida Department of Education. The unit maintains and oversees the Statewide Course Numbering System. In addition, the unit facilitates faculty discipline committees that evaluate course content for classification within the system.

Department of Education officials estimate that the Statewide Course Numbering System's expenditures were \$353,000 in 2005-06.⁴ The unit receives state funding for five full-time professional positions (5 FTE). Besides state appropriations, the Statewide Course Numbering System also receives revenue from non-public institution membership fees. Non-public institutions designated as 'for-profit' pay a \$1,000 initial fee to participate in the system and several transaction fees.⁵ In 2005-06, the Statewide Course Numbering System unit received \$6,520 from for-profit institutions on the system.

Courses in the statewide system are identified by a three letter prefix and four-digit number. In addition, courses with laboratories are assigned a one-digit suffix. The three-letter prefix provides the general subject area, such as biological sciences or history, to which the course belongs. The first digit denotes the course level: 0 for vocational, 1 and 2 for undergraduate lower level, 3 and 4 for undergraduate upper level, and 5 through 9 for graduate courses. The last three digits identify the course content. Equivalent courses have the same prefix and last three digits. Exhibit 1 provides an example of this course identification system. This example shows an English composition class offered at the freshman level that does not include a laboratory.

Exhibit 1
The Statewide Course Numbering System
Identifies Course Subject, Level, and Content



Source: Statewide Course Numbering System Guidelines, 2006.

² New College of Florida is the only state institution that does not participate on the Statewide Course Numbering System because it is not a credit-based institution.

³ One of the non-public institutions is a member of the Independent Colleges and Universities of Florida (ICUF) and accredited by the Southern Association of Colleges and Schools (SACS).

⁴ This figure is an estimate because the Statewide Course Numbering System unit's expenditures are included in the Office of Strategic Initiatives, Department of Education's expenditures.

⁵ In 2005-06 for-profit institutions paid \$13.79 for each new course, \$6.90 per course change, and \$0.40 per previously approved course.

Findings

Students transferring from non-public postsecondary institutions into public institutions may not be able to transfer credit for the courses they have taken

A concern with the Statewide Course Numbering System is that students who transfer from non-public to public institutions may not receive credit for all the courses they have taken. While a common perception is that all courses in the system will transfer to any participating institution, this may not occur because

- many courses offered by non-public institutions are not in the system;
- students may not be aware of which courses are in the system;
- some courses in the system are not guaranteed to transfer; and
- students transferring from institutions that use the quarter system may have to take additional courses to meet the graduation requirements of institutions that use the semester system.

Many courses offered at a non-public institution are not in the Statewide Course Numbering System. Thirty-two non-public institutions licensed by the Commission for Independent Education offering over 3,000 approved courses participate in the Statewide Course Numbering System.⁶ However the system does not include every course these institutions offer. For example, as of Fall 2006, one non-public institution offered more than 250 courses, of which only 122 were in the system. This occurs because non-public institutions are not required to list all of their courses in the system but can select which courses they would like to be included. In addition, seven non-public institutions paid their initial fee and therefore are listed as participating in the system but have not yet submitted courses for inclusion in the system.

Non-public institutions may not list all of their courses in the Statewide Course Numbering System because they know that the courses are not guaranteed transfer credit and need not be in the system. For example, remedial courses are not guaranteed academic or vocational credit and thus the non-public institutions would not list them in the system. In addition, some non-public institutions may not be aware of the benefits of listing their courses. Most of these institutions are not accredited by the Southern Association of Colleges and Schools, and a primary benefit of the Statewide Course Numbering System is to allow their students to transfer credits into state institutions without this accreditation. Placing some courses in the Statewide Course Numbering System is much less expensive than obtaining SACS accreditation. However, these institutions may be unaware of the advantages of fully using the system.

Students may take courses that will not transfer because they do not know which courses offered at non-public institutions are in the Statewide Course Numbering System. One reason why students attending non-public institutions may take classes that cannot transfer to public institutions is because the students do not know which classes will transfer. Most non-public institutions' catalogs do not distinguish between courses that are guaranteed to transfer credit in the Statewide Course Numbering System.

In addition, some non-public institutions assign prefixes and numbers to classes in their catalogs that are similar to those used by the Statewide Course Numbering System. For example, one non-public institution lists an introductory philosophy course in its catalog as PHIP 2100. While this course is not in the Statewide Course Numbering System, a nearly identical course number (PHI 2100) is an active course in the Statewide Course Numbering System and offered by public and non-public institutions. The use of course numbers similar to those used by the Statewide Course Numbering System can mislead students as to whether a particular class is part of the Statewide Course Numbering System and eligible for transfer.

⁶ Florida College also participates in the Statewide Course Numbering System, but is not included in this review.

Many courses in the Statewide Course Numbering System do not automatically transfer to other institutions. While the Statewide Course Numbering System was designed to facilitate transfer of similar courses between postsecondary institutions, not all courses in the system automatically transfer for three reasons.

First, a course in the Statewide Course Numbering System may not have an equivalent course offered by other institutions. When institutions submit new courses to be placed in the system, faculty discipline committees review the content of the course to determine course equivalency. If the faculty discipline committee decides the course is not equivalent to another course in the system, it assigns the course a unique number. Non-equivalent courses do not have to be accepted for transfer credit, but many such courses are in the system. For example, the system includes more than 6,000 non-equivalent courses taught in community colleges and close to 1,300 non-equivalent courses taught in non-public institutions.

Second, institutions are not required to award transfer credit for courses that are not equivalent to the courses they offer.⁷ While non-public institutions offer over 1,100 courses that are in the Statewide Course Numbering System and deemed to be equivalent to a course offered by at least one other institution, only 22 of these courses are offered at all 28 public community colleges in the state.⁸ This represents the majority of the 31 courses that are taught in all community colleges. Students have no guarantee that all of their classes will transfer unless they check in advance to see that the institution to which they wish to transfer offers equivalent courses.

Third, non-public institution courses may be taught by faculty who do not have credentials that meet the criteria of public institutions. Because all public institutions are accredited by the Southern Association of Colleges and Schools, they require

faculty to meet SACS guidelines.⁹ If the faculty credentials do not meet these criteria, the course is designated for an A.S./Occupational level or as 'not for transfer' in the Statewide Course Numbering System. According to department officials, the system includes 43 courses that have numbers, such as ENC 1101, indicating they are academic courses, but have an A.S./Occupational level or 'not for transfer' level. These courses may look as if they should transfer for credit even though public institutions do not have to accept them.

Students transferring equivalent courses may be required to take additional coursework. While s.1007.24(7), *Florida Statutes*, guarantees the transfer of credit for academically equivalent courses taught by faculty with appropriate credentials, a student transferring from non-public to public institutions may not receive all of the credit they expect. This occurs because most non-public institutions offer courses on a quarter system, while public institutions are on a semester system. As a result, a student who completes a four-credit-hour course at a private institution that operates on the quarter system will receive a prorated number of hours (approximately 2.75 hours) for the course when transferring to a public institution.¹⁰ As public institutions typically require 3 semester hours of credit for required courses, these students may have to take additional coursework to fulfill their degree requirements.

Transfer level designations in the Statewide Course Numbering System may be inaccurate

The Statewide Course Numbering System unit has not recently checked the credentials of all faculty who teach academic courses in non-SACS accredited institutions. This can result in inaccurate transfer level designations. The Statewide Course Numbering System unit verifies

⁷ Courses are deemed academic or A.S./Occupational based on their faculty credentials.

⁸ Twenty-two courses is the number of unduplicated courses designated for academic transfer. Very few courses offered at non-public institutions designated at an A.S./occupational level are eligible for credit at 25 or more community colleges.

⁹ SACS provides that institutions may employ faculty who do not have the academic credentials specified in its guidelines if the institutions can demonstrate that they have other credentials that are deemed to be equivalent. This generally means that institutions must maintain portfolios showing the credentials and work of those faculty. The Statewide Course Numbering System does not evaluate portfolios.

¹⁰ The 2.75 hours is based on most institutional transfer policies. Each community college has a policy for transferring different numbers of credit hours.

faculty credentials when institutions that are not SACS accredited first submit courses for inclusion in the Statewide Course Numbering System or report change in faculty teaching the courses. The institutions are required to report any changes in faculty to the Statewide Course Numbering System, but they may not always report these changes in a timely manner. The Statewide Course Numbering System unit periodically reviews faculty credentials for all numbering system courses taught in non-SACS accredited institutions; however, workload issues prevent them from doing this as often as needed. The unit last conducted a complete review of faculty credentials in non-public institutions in 2004.

Inaccurate transfer-level designations can mislead registrars as to which courses they must accept for transfer. Inaccuracies in the Statewide Course Numbering System can result in institutions making inappropriate decisions concerning courses that are eligible for transfer. Registrars use the system's transfer level when evaluating a student's transcript. Errors in these fields may result in mistakes.

Furthermore, errors in the transfer level fields can result in unnecessary duplication of effort. Registrars reported that when they suspect errors in these fields, they spend time gathering information about the course to determine if it is eligible for credit. This can include contacting the non-public institution, reviewing course curriculum, or reviewing credentials of faculty teaching the course. These efforts duplicate processes the Statewide Course Numbering System unit already has completed for approved courses.

Inaccuracies have occurred due to institutional reporting and workload problems. In order for the Statewide Course Numbering System to have accurate information, participating institutions must report accurate data and staff must validate and update this information in a timely manner. There are problems in both of these areas.

- Institutional reporting. Non-public institutions are required to report changes in their institutional status, course offerings, or faculty to the Statewide Course Numbering System unit. However, according to the unit, they do

not always do this in a timely manner. Thus, the Statewide Course Numbering System unit cannot be certain that the information regarding courses and faculty is accurate.

- Workload issues. According to the department, the workload of the Statewide Course Numbering System unit has increased without a corresponding increase in resources. The addition of the non-public institutions to the Statewide Course Numbering System in 1998 substantially increased the unit's workload—currently, 32 non-public Commission for Independent Education licensed institutions are in the system and have submitted more than 3,500 courses. As most of those non-public institutions are not accredited by SACS, the unit must also verify faculty credentials, create transfer level designations, and serve as the liaison between non-public and public institutions. In addition, the unit's workload has increased due to the growth of public universities and community colleges and their course offerings. Since 2004, community colleges and state universities have added more than 3,000 new courses each year.

Overall, during the 2005-06 academic year, the unit processed nearly 25,000 requests for changes to the system, supported the faculty discipline committees that determine course equivalency, and handled student complaints regarding institutions that do not give the transfer credit they expected. In addition, the unit is in the process of revising the postsecondary adult vocational courses in the system.¹¹

Options and Recommendations

Legislative options

To address these problems, the Legislature may want to consider the policy options outlined below.

- Modify s. 1007.24(7), *Florida Statutes*.
- Allocate additional FTE to the Department of Education, Statewide Course Numbering System.

¹¹ This revision includes dividing courses into smaller subunits based on occupational completion points.

Statutory revision. To clarify which courses in the Statewide Course Numbering System are eligible for transfer, the Legislature may wish to modify s. 1007.24(7), *Florida Statutes*. Current language reads

Any student who transfers among postsecondary institutions that are fully accredited by a regional or national accrediting agency recognized by the United States Department of Education and that participate in the statewide course numbering system shall be awarded credit by the receiving institution for courses satisfactorily completed by the student at the previous institutions. Credit shall be awarded if the courses are judged by the appropriate statewide course numbering system faculty committees representing school districts, public postsecondary educational institutions, and participating nonpublic postsecondary educational institutions to be academically equivalent to courses offered at the receiving institution, including equivalency of faculty credentials, regardless of the public or nonpublic control of the previous institution.

These two sentences can be confusing to students and institutions as they appear to contradict one another, with the first suggesting that all courses in the system should be awarded transfer credit and the second providing that courses will transfer only if certain conditions are met. The Legislature should consider modifying the first sentence to clarify that receiving institutions shall award transfer credit only if specified conditions are met.

Additional positions for the Statewide Course Numbering System. The Legislature could also consider the level of resources it appropriates to the Statewide Course Numbering System. Department officials indicate that addressing the problems with the system would require two additional full-time equivalent professional staff. The department has not requested these positions in its 2007-08 fiscal year legislative budget request.

If appropriated, one of these positions would act as a liaison between the non-public institutions licensed by the Commission for Independent Education and the Statewide Course Numbering System unit. This position would meet with the commission and licensed institutions to explain the system, help institutions decide which courses

to include in the system, receive student complaints about the system and course transfer issues, help Statewide Course Numbering System staff review the credentials of faculty teaching courses in the system, monitor institution compliance with course numbering requirements, recommend sanctions to the commission when necessary, and perform other needed functions.

This position could be funded from the licensure fees the Commission for Independent Education collects from non-public institutions each year. The commission's executive director indicated that the commission would be willing to fund the position if it were primarily responsible for statewide course numbering activities related to non-public schools. Alternatively, the position could be funded through increased fees charged to private, for-profit institutions that participate in the system. According to department officials, however, these fees totaled only \$6,520 in Fiscal Year 2005-06. Thus, a substantial increase in fees would be needed to fund the position, which could discourage non-public institutions from participating in the system.

The second position would assist in maintaining the Statewide Course Numbering System and updating information in it. This position would probably require general revenue funding. The department estimates the cost of adding either position is \$57,000 per fiscal year.¹²

Recommendations to the department

To improve information students have about course transferability and the accuracy of the information in the Statewide Course Numbering System, OPPAGA recommends that the Department of Education

- improve the oversight of non-public institutions participating in the Statewide Course Numbering System, and
- improve the maintenance of the Statewide Course Numbering System and communication between the institutions and students.

¹² This cost includes salary (\$42,525) and benefits (\$14,528) for a Program Specialist III.

Provide stronger oversight of non-public institutions. The Commission for Independent Education is responsible for ensuring that non-public institutions of higher education engage in fair consumer practices and has the power to fine or suspend or revoke the licenses of institutions that do not comply with this mandate.¹³ The commission should take action to require institutions to correct problems the Statewide Course Numbering System reports to their office. OPPAGA recommends that the commission require those institutions participating in the Statewide Course Numbering System to identify in their course catalogs which courses are eligible for transfer to another institution.¹⁴

Improve maintenance and communication. OPPAGA recommends that the Department of Education, Statewide Course Numbering System unit take the actions discussed below.

- Review the course numbers and transfer levels of courses listed by non-public institutions and either remove courses that were erroneously assigned academic course numbers but with A.S./Occupational transfer levels or assign them different numbers. Courses should not be given the same prefixes and numbers if they cannot be guaranteed to transfer. Also, the unit should remove all courses with a “not for transfer” transfer level from the system. These are courses taught by faculty who do not meet the minimum guidelines for community college or university faculty. The courses are in the system because the Statewide Course Numbering System unit did not want to deny a request to put a course in

the system. However, their inclusion is confusing and a potential source of error.

- Add the following statement to the guidelines it provides to all participating institutions for inclusion in their course catalogs: “Participating non-public institutions may have different academic calendars than public institutions. Public institutions may award fewer credit hours for courses taken at an institution that operates on a quarter system.”
- Require all non-public institutions to submit at least annually a list showing their current course offerings in the Statewide Course Numbering System and faculty teaching the courses. The Statewide Course Numbering System unit should then use this list to update the system. Currently non-public institutions are required to submit information only when they make changes to the courses or faculty teaching, but many fail to do so. Requiring at least an annual update will help keep information in the system current.
- Work with the Commission for Independent Education to educate non-public institutions about the benefits of participating in the Statewide Course Numbering System and its guidelines, rules, policies, and procedures. The unit should also inform the commission when non-public institutions violate numbering system rules.

Agency Response

In accordance with the provisions of s. 11.51(5), *Florida Statutes*, a draft of our report was submitted to the Commissioner of Education to review and respond. The Commissioner’s written response is reprinted herein in Appendix B.

¹³ Sections 1005.34 and 1005.38(1), *F.S.*

¹⁴ Section 1005.04(a), *F.S.*

Appendix A

Non-Public Institutions Participating in the Statewide Course Numbering System

Table A-1 lists all 33 non-public institutions that participate in the Statewide Course Numbering System. In addition, this exhibit provides whether an institution is non-profit or for profit, the type of agency responsible for their accreditation, entry year on the Statewide Course Numbering System, and the number of courses approved in the system.

Table A-1
Thirty-Three Non-Public Institutions Participate in the Statewide Course Numbering System

Institution	Status	Accreditation Agency	Entry Year	SCNS Equivalent Courses	SCNS Unique Courses	Total SCNS Courses
Florida College ¹	Non-Profit	Regional	1982	382	66	448
Florida National College	For-Profit	Regional	2003	188	68	256
Keiser University	For-Profit	Regional	1998	354	124	478
Miami International University of Art and Design	For-Profit	Regional	2004	131	180	311
City College of Fort Lauderdale	Non-Profit	National	2000	148	74	222
City College-Casselberry	Non-Profit	National	2000	6	1	7
Hobe Sound Bible College	Non-Profit	National	2000	22	36	58
Jones College	Non-Profit	National	1998	121	21	142
Southwest Florida College	Non-Profit	National	1999	87	51	138
St. Petersburg Theological Seminary	Non-Profit	National	2001	8	44	52
Trinity Baptist College	Non-Profit	National	2003	8	0	8
Trinity College of Florida	Non-Profit	National	2005	17	5	22
Art Institute of Fort Lauderdale	For-Profit	National	1999	133	227	360
Central Florida College	For-Profit	National	2001	21	21	42
College for Professional Studies	For-Profit	National	2000	58	17	75
College of Business and Technology	For-Profit	National	2004	41	50	91
Edutech Centers	For-Profit	National	2002	N/A	N/A	0
Everglades University	For-Profit	National	1998	108	76	184
Florida Career College	For-Profit	National	2002	N/A	N/A	0
Florida College of Natural Health	For-Profit	National	2000	5	34	39
Florida Metropolitan University	For-Profit	National	1998	245	247	492
Florida Technical College	For-Profit	National	1999	N/A	N/A	0
Full Sail Real World Education	For-Profit	National	2000	N/A	N/A	0
Gulf Coast College	For-Profit	National	2005	45	2	47
Herzing College	For-Profit	National	2001	N/A	N/A	0
International Academy of Design and Technology	For-Profit	National	1998	2	15	17
Keiser Career College	For-Profit	National	2003	29	58	87
Key College	For-Profit	National	2002	14	2	16
North Florida Institute	For-Profit	National	2002	N/A	N/A	0
Professional Health Training Academy	For-Profit	National	2006	N/A	N/A	0
Remington College	For-Profit	National	2004	N/A	N/A	0
Schiller International University	For-Profit	National	1998	10	0	10
Webster College	For-Profit	National	1998	78	19	97

¹ Florida College is a member of the Independent Colleges and Universities of Florida (ICUF).

Source: Statewide Course Numbering System, January 2007.

Appendix B

FLORIDA DEPARTMENT OF EDUCATION



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March 15, 2007

Gary R. VanLandingham, Ph.D.
Director, Office of Program Policy
Analysis & Government Accountability
Claude Pepper Building, Room 312
111 West Madison Street
Tallahassee, Florida 32399-1475

Dear Dr. VanLandingham:

Thank you for the opportunity to provide a response to the March 2007 OPPAGA report: *Institutions Do Not Have to Accept Transfer Credit for Many of the Courses in the Statewide Course Numbering System*. Florida is a national leader in articulation, and the Statewide Course Numbering System is a model for cooperation between all public and many private institutions. The inclusion of nationally-accredited institutions, with 1,428 courses designated for guaranteed transfer to an associate in arts or baccalaureate degree, provides students with a variety of options and aids in their educational pursuits.

The strength of the Statewide Course Numbering System is the guarantee of credit for equivalent courses (there are 15,444 numbers with equivalent courses in the system), while preserving institutional control and academic diversity in the curricula for participating institutions.

The Department shares in OPPAGA's assessment that data must be accurate and clearly communicated to ensure credits are properly transferred and students are adequately informed of their rights. To this end, the Statewide Course Numbering System will examine its policies and procedures in the following:

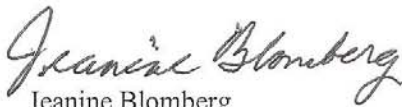
- Conduct course and faculty verifications each semester to enhance oversight of institutions and to ensure accurate course information.

Gary R. VanLandingham, Ph.D.
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- Ensure that only general education courses that meet faculty guidelines for transferable academic credit are given statewide course numbers; remove those existing courses that do not meet these guidelines.
- Work with nationally-accredited institutions to ensure course and credit information is clearly labeled in their catalogs and in Statewide Course Numbering System advising materials. This may include course transfer identifiers and quarter- vs. semester-hour statements.
- Continue to work with the Commission for Independent Education to strengthen Statewide Course Numbering System oversight and facilitate institution participation.

The Department of Education appreciates OPPAGA's efforts in this study. Should you have additional questions about the Statewide Course Numbering System please contact Mr. Matthew Bouck, the Statewide Course Numbering System Administrator, at matthew.bouck@fldoe.org or (850) 245-0427.

Sincerely,


Jeanine Blomberg
Commissioner

JB/mcb

c: Chancellor David Armstrong
Chancellor Mark Rosenberg
Dr. Heather Sherry

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