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Report No. 07-49

Students Encounter Barriers When Transferring Credit from Non-Public Institutions to Community Colleges

at a glance

Non-public colleges and universities may participate in the Statewide Course Numbering System to facilitate articulation for students transferring to a public community college or university. However, the system has only a limited effect in meeting this goal. Specifically,

- transcripts of a sample of students who transferred from non-public institutions to the state's community colleges during the 2004-05 and 2005-06 school years showed that only 16% of the 3,630 courses these students completed at non-public institutions were eligible for transfer to a community college; the remaining courses were not eligible to transfer primarily because they were not included in the Statewide Course Numbering System; and
- community colleges did not award credit compliant with the Statewide Course Numbering System for nearly one-third (29%) of the 573 courses we examined that were eligible to transfer.

As a result of these problems, students may be required to take additional courses or retake eligible courses they have already completed, thereby delaying and potentially deterring their educational progress.

Scope

As directed by the Legislature, this is the second of two reports addressing issues associated with students transferring credit from non-public higher education institutions to Florida's public community colleges using the Statewide Course Numbering System. This report examines the extent to which students transferring from non-public institutions to community colleges receive appropriate transfer credits.¹ We did not examine the articulation of students who transfer from non-public institutions to the state's 11 public universities because few students who had previously attended a non-public institution in the course numbering system were enrolled in a state university during the 2004-05 academic year.²

Background

The Statewide Course Numbering System was established in 1971 to facilitate the transfer of credit for academic courses between the state's public community colleges and universities. In 1998, subsequent legislation allowed non-public colleges and universities to participate in the transfer system. Currently, 24 non-public institutions participate in the system. (See Exhibit 1.) All but one of these

¹ Report No. 07-22 identified potential problems and maintenance issues associated with the Statewide Course Numbering System.

² We identified 390 students who transferred from a non-public institution to one of Florida's public universities during the 2004-05 academic year.

non-public institutions are governed by the Commission for Independent Education, which is located within the Department of Education and assists its institutions with a variety of issues including articulation.³

Exhibit 1

Twenty-Four Non-Public Institutions Participate in the Statewide Course Numbering System

• Art Institute of Fort Lauderdale	• Jones College
• Central Florida College	• Keiser Career College
• City College	• Keiser University
• City College-Casselberry	• Key College
• College of Business & Technology	• Miami International University of Art & Design
• Everest University (formerly Florida Metropolitan University)	• Professional Health Training Academy
• Everglades University	• Rasmussen College
• Florida College	• Remington College
• Florida College of Natural Health	• Southwest Florida College
• Florida National College	• St. Petersburg Theological Seminary
• Full Sail Real World Education	• Trinity Baptist College
• Hobe Sound Bible College	• Trinity College of Florida

Source: Florida Department of Education.

Institutions that participate in the Statewide Course Numbering System do not have to accept transfer credit for all courses that are included in the system. The institutions are required by law to accept credit for courses in the Statewide Course Numbering System only if

- they offer equivalent courses, and
- the courses to be transferred are taught by faculty meeting their faculty qualification criteria.⁴

Most (20) of these 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. Because public institutions require faculty to meet SACS guidelines, courses transferring from non-public institutions that are not SACS accredited must also meet those guidelines. Public institutions potentially risk their accreditation if they accept

credit for courses taught by faculty that do not meet the same credentials of their faculty. To address this requirement in Florida, the Statewide Course Numbering System Unit in the Department of Education uses SACS guidelines to review the credentials of non-public faculty teaching courses submitted for inclusion in the system.

In addition to evaluating faculty credentials, the department facilitates faculty discipline committees that evaluate course content for inclusion and classification in the course numbering system. Courses in the statewide system are identified by a three-letter prefix and four-digit number. The three-letter prefix provides the general subject area of the course, such as biological sciences or history, while the four digit number denotes the course level and content. Equivalent courses have the same prefix and last three digits.

The 2007 Legislature responded to issues raised in our prior report by passing HB 7147, which established new requirements for the Statewide Course Numbering System.⁵ This law directed the department to

- conduct a comprehensive review to identify courses that have not been taught at an institution for the preceding five years or courses that may be inappropriately designated as equivalent for purposes of credit transfer;
- update the system based on courses that meet the above conditions and submit a report of its findings to the Legislature by February 1, 2008; and
- develop and maintain a listing of all courses in the system and the institutions that offer each course by July 1, 2008.

The legislation also requires that participating non-public postsecondary institutions must identify in their college catalogs what specific offered courses are included in the Statewide Course Numbering System.

³ Florida College also participates in the Statewide Course Numbering System, but is a member of the Independent Colleges and Universities of Florida (ICUF).

⁴ Section 1007.24(7), F.S.

⁵ Chapter 2007-246, *Laws of Florida*.

Methodology

To determine whether students transferring from non-public institutions to community colleges receive appropriate credit for the coursework they have taken, we examined a sample of records of students who had previously attended non-public institutions and transferred to one of Florida's 28 community colleges during the 2004-05 and 2005-06 academic years. We focused our review on five non-public institutions that the Commission for Independent Education identified as most likely to produce transfer students—Florida Metropolitan University, Keiser University, the Art Institute of Fort Lauderdale, Jones College, and Southwest Florida College.^{6,7} Students transferring from these institutions enrolled at all 28 of Florida's public community colleges.⁸ We focused our analysis on the 13 community colleges that served the highest number of these transfer students.⁹ We reviewed these student's non-public and community college transcripts to determine (1) what coursework they had taken that was eligible to transfer according to the Statewide Course Numbering System and (2) whether the students subsequently received eligible credit from their community college.

Our sample included 314 students who completed 3,630 courses at non-public institutions and attempted to transfer their coursework into a community college. These students typically

⁶ The Commission on Independent Education also identified City College and Everglades University as likely to produce transfer students. However, City College elected not to participate in our study and we determined few Everglades University students transferred to a Florida community college in 2004-05 or 2005-06.

⁷ On November 5, 2007, Florida Metropolitan University changed its name to Everest University.

⁸ We identified 3,451 students who had previously attended one of the five non-public institutions identified above and enrolled at a community college during the academic years of 2004-05 and 2005-06. We selected the 13 colleges with 50 or more matches which included 3,226 students or 93% of the population. Colleges provided OPPAGA with transcripts for 748 students. Some of the students we identified never submitted their non-public institution transcript to the community college or never matriculated at the college. Table A-1 (Appendix A) provides the student totals for each college.

⁹ We selected the following community colleges: Brevard, Broward, Daytona Beach, Edison College, Florida Community College at Jacksonville, Hillsborough, Miami Dade College, Palm Beach, Polk, Seminole, St. Petersburg College, Tallahassee, and Valencia.

completed nine courses at their non-public institutions. Appendix A provides additional information on our sample and research methodology.

Findings

The Statewide Course Numbering System had only a limited effect on articulation for students in our sample who transferred from a non-public institution to a community college. Students encountered two main barriers when attempting to transfer credit.

- Only 16% of the 3,630 courses students completed at non-public institutions were eligible for transfer to a community college using the Statewide Course Numbering System. The remaining courses were not eligible to transfer because they were not included in the course numbering system, or did not meet the state guidelines that guarantee course transfer.
- In addition, community colleges did not award appropriate credit for nearly one-third (29%) of the 573 courses that were eligible to transfer.

While relatively few students transfer from non-public institutions to Florida's community colleges, these problems are significant for the affected students and may require them to take additional courses or retake eligible courses they have already completed, thereby delaying and potentially deterring their educational progress.¹⁰

Most courses completed by students were not eligible to transfer into a community college

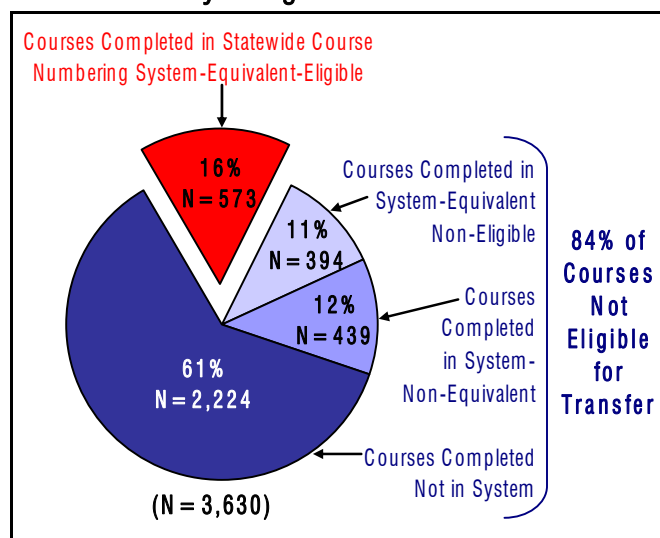
The primary articulation barrier encountered by the students in our sample was that most courses they had taken at their non-public institutions were not eligible to transfer into a community college. Specifically, 3,057 (84%) of the 3,630

¹⁰ We identified 3,451 that had transferred from one of the five non-public institutions and enrolled at a community college during 2004-05 and 2005-06. During 2005-06, 49,470 students were enrolled at these five institutions. As an estimate, the 3,451 students represent 7% of the total students enrolled at a non-public institution in 2005-06.

courses students had completed at non-public institutions were not eligible to transfer (see Exhibit 2). These courses were not eligible to transfer using the Statewide Course Numbering System for three reasons:

- the courses were not included in the Statewide Course Numbering System;
- the courses were included in the system but were not equivalent to any other course in the system; and
- the courses were equivalent to other courses in the Statewide Course Numbering System but did not meet all the conditions needed to guarantee transfer into a community college.

Exhibit 2
Most of the Courses Students Completed at Non-Public Institutions Were Not Eligible for Transfer into a Community College



Source: OPPAGA transcript analysis.

Although many courses were not eligible to transfer according to the Statewide Course Numbering System guidelines, colleges did award students credit for some (26% or 796) of the 3,057 courses.¹¹ These are local institutional decisions that are not prohibited by the Statewide Course Numbering System guidelines. According to the

¹¹ The 796 courses included 562 courses that were not in the Statewide Course Numbering System; 118 courses that were included in the system as non-equivalent courses; and 116 courses that were included in the system as equivalent courses but did not satisfy conditions guaranteed to transfer.

Department of Education, local articulation agreements between the non-public institutions and colleges could have also facilitated the transfer of credit.

Most courses (61%) completed by students at non-public institutions were not included in the Statewide Course Numbering System. Unlike public institutions that are required to include all of their courses in the Statewide Course Numbering System, non-public institutions submit only those courses they would like to be included. Non-public institutions generally do not include all of their course offerings in the System and students completing these courses are not guaranteed to receive transfer credit. Most (2,224, or 61%) of the 3,630 courses completed at non-public institutions by students in our sample were not included in the Statewide Course Numbering System and thus ineligible for transfer.

Some courses (12%) completed by students were included in the Statewide Course Numbering System but were not equivalent to other courses. Institutions participating in the Statewide Course Numbering System are required only to accept transfer credits for courses that are equivalent to those they offer to their own students. Equivalent courses have the same academic content and are taught by faculty with comparable credentials. However, the Statewide Course Numbering System also includes non-equivalent courses, which have a specified curriculum but are unique to an institution. Institutions may, but are not required to grant credit for non-equivalent courses. Some (439, or 12%) of the courses taken by students in our sample at non-public institutions were included in the Statewide Course Numbering System but were not equivalent to another course and therefore not guaranteed to transfer.¹²

Some courses (11%) completed by students were equivalent but did not meet other transfer conditions. In addition to being equivalent, courses offered by non-public institutions must meet certain conditions in order to be guaranteed to transfer to a public institution. Generally,

¹² Community colleges awarded credit for 118 of the 439 (27%) non-equivalent courses in the Statewide Course Numbering System. However, this was a decision made by the individual college, not mandated by a statewide policy.

students may transfer credit for equivalent courses only if the receiving institution (1) offers the course, (2) the course instructor meets the academic credential requirements of the receiving institution, (3) the course was currently included in the System at the time it was taken, and (4) the student received a passing grade in the class. The students in our sample took 394 equivalent courses that did not meet at least one of these conditions necessary to guarantee transfer.¹³

- Some students attempted to transfer courses to community colleges that did not offer an equivalent course. Students in our sample attempted to transfer credits for 209 courses that were not eligible to transfer because the receiving community college did not offer the course. These students would have been eligible for transfer credit if they attended a different community college that offered the course.
- Students attempted to transfer credit for 64 courses that were ineligible for transfer because the instructor did not meet the faculty requirements of the receiving community colleges.
- Students attempted to transfer credit for 120 courses that they completed before the courses were approved in the Statewide Course Numbering System.

¹³ Some equivalent courses were not eligible to transfer for multiple reasons (n=12). Community colleges awarded credit for 116 of the 394 (29%) of the equivalent courses in the Statewide Course Numbering System that were not eligible for transfer.

- Students attempted to transfer credit for 13 courses although they did not receive a passing grade for the course.

Limited course offerings and unclear designation of courses eligible to transfer contribute to students completing few eligible courses. The course taking patterns of students are influenced by many different factors, many of which are beyond an institution's control. However, there are two factors over which institutions do have some control that contribute to students articulating from non-public institutions to community colleges using the Statewide Course Numbering System. First, non-public institutions participating in the Statewide Course Numbering System offer many courses that are not eligible to transfer to one of the state's community colleges. As shown in Exhibit 3, the percentage of courses offered by the non-public institutions we examined that were eligible for transfer ranged from 11% to 57%. Thus, students who attend these institutions intending to transfer may have limited options.

Second, the course catalogs published by non-public institutions do not clearly identify those courses they offer that are listed the Statewide Course Numbering System and eligible to transfer.¹⁴ Consequently, students intending to transfer may not be able to readily determine which courses to take in order to ensure a smooth transition to a community college.

¹⁴ HB 7147 passed during the 2007 legislative session requires non-public institutions participating in the Statewide Course Numbering System to identify in their college catalogs what specific offered courses are included in the system.

Exhibit 3

Many Courses Listed in the Catalogs of Non-Public Institutions Are Not Eligible to Transfer to Community Colleges Under the Statewide Course Numbering System

Non-Public Institution	Courses in 2006-07 Catalog	Courses Eligible to Transfer to Community Colleges Using the Statewide Course Numbering System	Percentage of Courses Eligible to Transfer to Community Colleges
Art Institute of Fort Lauderdale	558	61	11%
Florida Metropolitan University	557	112	20%
Southwest Florida College	257	66	26%
Keiser University	440	241	55%
Jones College	139	79	57%

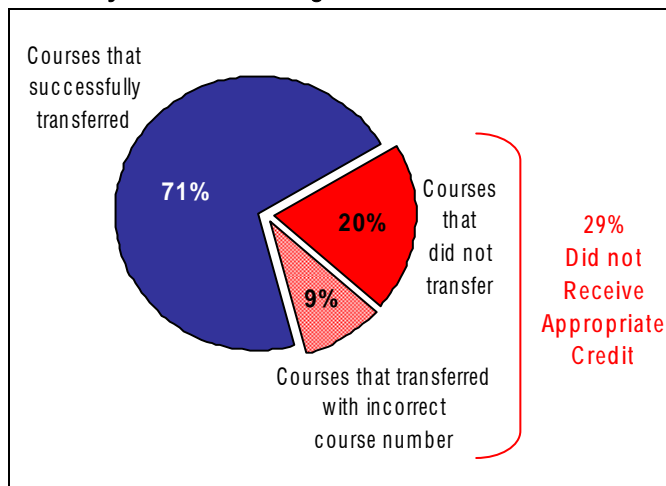
Source: OPPAGA analysis of Non-Public Institution Catalogs 2006-07.

Community colleges did not award appropriate credit for all courses eligible to transfer

Students in our sample also encountered articulation problems with courses they had taken that were eligible to transfer. Of the 3,630 courses these students had completed at non-public institutions, 573 (16%) were eligible to transfer to a community college. However, as shown in Exhibit 4, community colleges did not award appropriate credit for nearly one-third (167) of these courses.¹⁵ Two transfer problems occurred:

- community colleges did not award any credit for 115 (20%) of the eligible courses completed by students; and
- community colleges did not award credit for the correct course in 52 (9%) of the eligible courses.

Exhibit 4
Community Colleges Did Not Award Appropriate Credit for Nearly One-Third of Eligible Courses



Source: OPPAGA transcript analysis.

Community colleges did not award credit for some eligible courses

Community colleges did not award any credit for 115 (20%) of the 573 courses that were eligible to transfer. As discussed below, certain courses and institutions were more likely to have credit transfer problems.

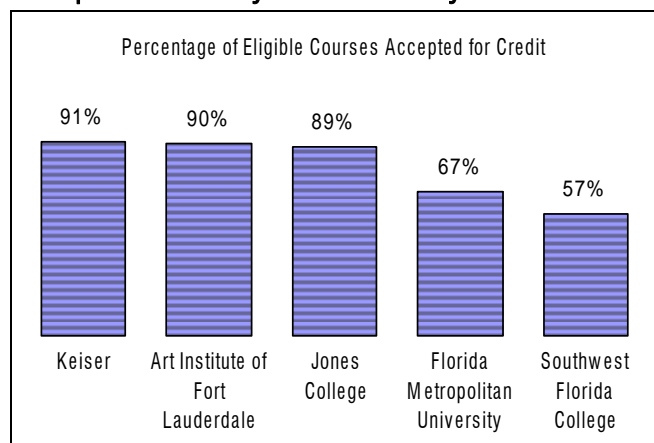
General education courses were more likely to transfer to community college. The 573 courses eligible to transfer in our sample were represented by 106 individual course numbers. Students completed some of these courses more frequently than others. The majority (59%) of eligible courses completed by students in our sample came from 15 of the 106 different courses.¹⁶ The remaining courses had fewer than 10 completions. Our assessment of the 13 most frequently completed courses found that some courses were more likely to successfully transfer than others. General education courses had the highest transfer rates. For example, 100% of college algebra and 93% of English composition courses in our sample successfully transferred to community colleges. In contrast, non-general education courses such as legal assisting (40%) and accounting (65%) courses were least likely to transfer. See Appendix B for the transfer rates of 13 most frequently completed courses.

Courses from two non-public institutions were more likely to have credit transfer problems. The transfer rate for eligible courses varied depending on which of the non-public institutions students attended. As shown in Exhibit 5, courses from both Florida Metropolitan University and Southwest Florida College were the least likely to transfer into community colleges. Only 57% of eligible courses completed at Southwest Florida College and 67% of eligible courses from Florida Metropolitan University successfully transferred. In contrast, at least 90% of eligible courses completed from the Art Institute of Fort Lauderdale and Keiser University successfully transferred.

¹⁵ Of the students in our sample, 203 students had completed courses eligible to transfer, almost half (47%) of these students did not receive appropriate credit for all of their eligible coursework upon transferring to a community college.

¹⁶ The 15 course numbers included the following courses: POS1041, POS2041, PSY1012, and PSY2012. The POS1041 and POS2041 courses are combined in this analysis because they are the same course; PSY1012 and PSY2012 are also combined for this analysis. The number of courses unduplicated in this analysis is 13.

Exhibit 5 Eligible Courses from Southwest Florida College and Florida Metropolitan University Were Less Likely to Transfer



Note: The number of courses eligible for transfer ranged from 10 courses at the Art Institute of Florida to 235 courses at Keiser University.

Source: OPPAGA transcript analysis.

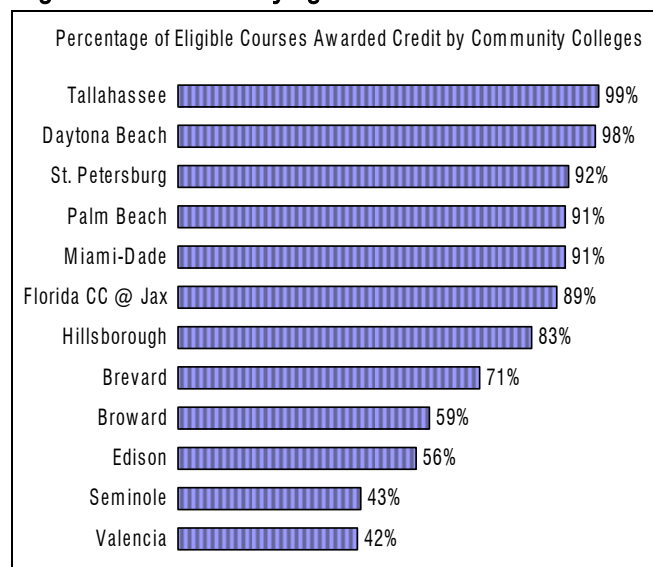
Community colleges awarded credit for eligible courses at varying rates. While each of the community colleges we examined failed to award credit for at least one eligible course in our sample, the percentage of eligible credit accepted for transfer varied across institutions (see Exhibit 6).¹⁷ Four of the 12 colleges in our sample awarded credit for less than 60% of eligible courses, while five other colleges awarded credit for at least 90% of the eligible coursework.

Community colleges did not always award credit for the correct course

In addition to not awarding credit for classes that should have transferred, community colleges did not award credit for the correct course in 52 cases (9% of eligible courses). The types and number of courses in which incorrect course credit was awarded varied across subject areas and institutions. For example, community colleges awarded students elective credit that was not tied to a specific course number for 46% (n=24) of the cases. In addition, for the remaining courses community colleges awarded a different academic course number (54% or 28). While this different course number could potentially benefit the student, colleges did not comply with the recommended equivalent course in the Statewide Course Numbering System.

¹⁷ Polk Community College is not included in this analysis, as students transferring to Polk only attempted to transfer five eligible courses.

Exhibit 6 Community Colleges Awarded Credit for Eligible Courses at Varying Rates



Note: The total number of courses eligible for transfer ranged across institutions, from 19 courses (Valencia CC) to 94 courses (Tallahassee CC). Polk Community College is not included in this analysis, as students transferring to Polk only attempted to transfer five eligible courses.

Source: OPPAGA transcript analysis.

As a result of these discrepancies, students may have been required to repeat a course they had already taken or encountered additional transfer problems if they subsequently transferred to a state university and the course number for which they should have received credit met a pre-requisite or satisfied a degree requirement.

Community college policies, practices, and errors contributed to transfer problems

To identify reasons why credit transfer problems occurred, we contacted the six community colleges in our sample with the highest number of eligible courses that did not transfer. The reasons reported for these credit transfer problems typically involved institutional practices that conflicted with the intent of the Statewide Course Numbering System. In addition, some colleges reported making errors in evaluating student transcripts.

Institutional practices that conflicted with the intent of the Statewide Course Numbering System accounted for most of the credit transfer problems. The six community colleges we contacted reported that during the time period

covered by our sample they had used internal practices that conflicted with Florida law regarding student transfer credit from non-public institutions participating in the Statewide Course Numbering System. Some community colleges have changed their practices to conform with state law, although other community colleges continue to use practices that are inconsistent with Florida law.

- Differing policies for accepting credit from non-regionally accredited institutions. One community college had a policy to not accept credit from non-regionally accredited institutions. To address this problem, which also existed at several other state institutions, the Department of Education issued a memorandum in 2005 to clarify how s. 1007.24(6), *Florida Statutes*, which governs the transfer of credit, should be implemented. The memorandum stated that students who transfer eligible courses from non-public institutions that participate in the Statewide Course Numbering System have the same articulation rights as students transferring from Florida's public institutions. This institution reported that it is currently following procedures consistent with Statewide Course Numbering System guidelines and state law.
- Differing course levels. Some community colleges indicated that they did not accept transfers of eligible courses because the equivalent course number assigned by the Statewide Course Numbering System was at a different level than the course offered at the community college. For example, the course Principles of Accounting I (APA2111) is designated as an undergraduate lower division course in the Statewide Course Numbering System, but is equated to Bookkeeping I (APA0111) a vocational course at some community colleges. Because this course is classified as a vocational class at community colleges, some institutions reported that they will not apply the course to a college credit program. However, this practice conflicts with the current policy of the Statewide Course Numbering System that requires colleges to accept credit for the course. Students who take this accounting course at a non-public institution may not be aware that it is classified as a vocational course at public institutions.
- Transferring discontinued courses. The community colleges we contacted generally did not award credit for courses they no longer offered. This practice violates provisions of the Statewide Course Numbering System which require institutions to award credit for a course if the student completed the course prior to it being discontinued by the community college. This practice remains unresolved between the department and community colleges, as the colleges do not wish to award credit for courses no longer offered at their institution.
- Enrolling in a different program of study. Some colleges reported a policy to not award credit for eligible coursework if the course did not apply to the student's degree program at the community college. For example, one student in our sample completed a speech course (SPC2016) and enrolled in an AS Legal Assisting program. Because the program did not require this speech course, the community college did not award transfer credit to the student. However, according to Statewide Course Numbering System guidelines, colleges must accept equivalent courses regardless whether they apply to a student's degree program.¹⁸
- Transferring with a prior degree. Some community colleges in our sample did not award transfer credits to students who already had an associate degree as the coursework would not apply towards the students' new degree programs. In addition, some community colleges reported only accepting credit towards new degree programs if credit earned in a previous degree applied to the new program. The department reported that the colleges should have awarded credit for the eligible coursework. However, the Statewide Course Numbering System Handbook does not include any guidance for colleges regarding awarding credit to students with a previous degree.

¹⁸ The only exceptions to guaranteed transfer are: a course not offered at the receiving institution, courses offered prior to the transfer date (date of approval), special topic courses (thesis, internships, etc.), college prep courses, and applied courses in performing arts.

Community college reported making errors in some cases. In addition to institutional policies and practices, some registrars acknowledged that their institutions made errors in the cases we examined. Upon being contacted by OPPAGA regarding the eligible courses that did not transfer, some colleges adjusted the students' transcripts to correct these mistakes. However, in all but one institution, the students were no longer enrolled at that college.

Recommendations

While the individual community colleges have varying practices in place to check for errors during transcript evaluations, the Department of Education currently has no process in place to monitor the articulation process to help ensure that students transferring from non-public institutions into public institutions are receiving the appropriate credit. To facilitate the smooth transition of students transferring from non-public institutions to community colleges and ensure that these students receive the appropriate credit for equivalent courses they take that are included in the Statewide Course Numbering System, OPPAGA recommends that the Department of Education take the actions described below.

- Improve communication with participating institutions. OPPAGA recommends that the Department of Education's Statewide Course Numbering System unit provide community colleges, universities, and non-public institutions a technical assistance paper communicating the specific policies for awarding transfer credit to students from non-public institutions who participate in the Statewide Course Numbering System. This technical assistance paper also should communicate the policy for awarding the correct course number for equivalent courses. While some of this information may be found in the Statewide Course Numbering System Handbook, the paper would help ensure that institutional personnel understand those policies involving transfer of credit from non-public institutions. Community colleges and universities should be required to distribute this information to all of their personnel

involved in evaluating transcripts and should take steps to ensure that these policies are being implemented as intended.

In addition, OPPAGA recommends Statewide Course Numbering System staff continue to attend the annual statewide meeting of the community college registrars and offer a training session to inform the registrars of the appropriate policies for awarding credit to students from non-public institutions. At this meeting, the course numbering unit staff should be available to answer any questions regarding the implementation of these policies.

- Implement an appropriate policy for awarding credit for discontinued courses. To resolve the problem of the department and colleges having different policies on awarding credit for discontinued courses, we recommend that the department work with the community colleges to resolve this issue by either taking steps to enforce the current policy or amend the policy. The department should clarify this policy in the Statewide Course Numbering System Handbook and issue a department memorandum communicating the policy to all institutions participating in the system.
- Monitor how institutions transfer credit for equivalent courses in the Statewide Course Numbering System. To help ensure that the articulation process functions as intended, we recommend that the department take steps to strengthen its monitoring systems. Specifically, the department should assign non-public institutions participating in the Statewide Course Numbering System a unique report code, which would enable it to track the transfer of students from non-public institutions to community colleges. Community colleges should then report the specific previous non-public institution (in a data field) that transfer students had attended. In addition, the Department of Education in cooperation with the Commission for Independent Education should develop a plan to ensure the successful transfer of eligible courses from non-public institutions to community colleges. This plan should include

a method for the department to verify that Statewide Course Numbering System policies for the transfer of credit from non-public institutions to community colleges are being properly implemented. Finally, this plan should include a timeline for implementation and an annual report to the Legislature identifying any transfer problems and the actions participating institutions are taking to resolve these problems. We recommend the department submit this plan to the Legislature by March 1, 2008.

- Review courses that are equivalent courses with different academic levels in the Statewide Course Numbering System. To address the problem of community colleges not awarding credit for eligible courses because of the equivalent course number assigned by the department, we recommend that the department identify those courses which are lower level undergraduate courses at one institution but equated to vocational courses at another institution.¹⁹ The department should either adjust the level of the course number or give the course a non-equivalent number.

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 for review and response. The Commissioner's written response has been reproduced in Appendix C. Where necessary and appropriate, OPPAGA comments have been inserted into the response.

¹⁹ The course level is denoted by the first digit of the course number.

Appendix A

Methodology

To determine whether students who transfer from non-public postsecondary institutions received appropriate credit for courses in the Statewide Course Numbering System when they transferred to Florida's public community colleges, we identified students who enrolled at non-public institutions and transferred to community colleges during the 2004-05 and 2005-06 academic years. As the Department of Education does not maintain information about courses that community college students completed at non-public institutions, we requested that non-public institutions and community colleges provide transcript information on a sample of such students. We reviewed all courses completed at non-public institutions for these students to determine which courses were eligible to transfer to the students' community college, and then determined whether the community colleges granted appropriate transfer credit for these courses.

Identifying student population

To select our sample population, we asked the Commission for Independent Education to identify non-public institutions that participate in the Statewide Course Numbering System and were likely to have students transferring to public institutions.²⁰ We contacted the institutions identified by the commission and requested that they identify students who had attended their institutions during the 2003-04 and/or 2004-05 academic years and subsequently attempted to transfer to another institution. We matched students from these non-public institutions to the department's community college enrollment data file for the 2004-05 and 2005-06 academic years and identified 13 community colleges that had 50 or more student matches.²¹ We requested these community colleges to provide the students' non-public and community college transcripts. As shown in Table A-1, column 2, the community colleges submitted matching transcripts for 748 students.²²

Sample selection

We selected a representative sample of 437 students to review. Our sample was selected based on both the student's non-public institution and community college and represented nearly 60% of the total population. As shown in Table A-1, we examined all transfer students with transcripts at Brevard Community College and a sample of students at the remaining community colleges in our sample.²³

²⁰ The Commission identified Florida Metropolitan University, Keiser University, the Art Institute of Fort Lauderdale, Jones College, Southwest Florida College, City College, and Everglades University.

²¹ We identified 3,451 students who had previously attended a non-public institution and enrolled at a community college. We selected the 13 colleges with 50 or more matches, these colleges represented 93% (3,226) of the total students identified. Community colleges were only able to provide both non-public and community college transcripts for 748 of the students.

²² Some community colleges provided less than 50 sets of transcripts because students did not have their non-public transcript sent to the community college.

²³ We reviewed all transfer students with transcripts at Brevard Community College as a test case. Upon completing the review of Brevard students, we sampled the remaining institutions due to the workload involved in reviewing each transcript.

Table A-1
The Number of Students in Our Analysis Varied by Institution

Community College	Number of Students			
	With Transcripts	Selected for Sample	in Analysis	Completing Eligible Courses
Brevard	94	94	67	23
Broward	94	30	16	11
Daytona Beach	29	28	23	20
Edison	49	30	26	16
FCC @ Jacksonville	89	30	20	16
Hillsborough	59	30	23	18
Miami Dade	44	30	17	14
Palm Beach	37	30	23	16
Polk	15	15	8	4
St. Petersburg	64	30	22	15
Seminole	43	30	23	17
Tallahassee	31	30	28	22
Valencia	100	30	18	11
Total	748	437	314	203

Transcript analysis

We subsequently excluded 123 students from our sample because they did not complete courses at the community college, did not enroll in college credit coursework at the community college, or completed courses at non-public institutions before 1998. There were thus 314 students in our final sample.

To determine whether these students received transfer credit for courses they completed at non-public institutions that were eligible to transfer to community colleges, we examined the transcript of each student and used the course numbers of classes completed at the non-public institutions to determine which courses were listed in the Statewide Course Numbering System. Table A-2 provides an overview of the process we used to assess each course taken by the students. For example, if a student in our sample enrolled in the English Composition class (ENC1101) at a non-public institution, we identified whether the course was completed and the grade the student received. We next verified whether this course was in the Statewide Course Numbering System and was offered at the student's community college. We also examined whether the course was designated as an equivalent class in the System and when the course was approved on the Statewide Course Numbering System. Next, we examined the student's community college transcript to determine if they received credit for the course and what specific course number they received credit for completing.

Table A-2
There Were Multiple Steps in Reviewing Student Transcripts

Step 1: Identify the courses completed at the non-public institution

Course Number at Non-Public Institution	Date Completed	Grade
ENC1101	May 2003	A

Step 2: Determine whether courses are approved in the Statewide Course Numbering System

Course Number at Non-Public Institution	Is the course in the Statewide Course Numbering System?	Is the course an equivalent course or unique (non-equivalent)?	When was the course approved in the Statewide Course Numbering System?
ENC1101	Yes	Equivalent	January 1998

Step 3: Determine whether student received credit for course at the community college

Did the course transfer to the Community College?	What course number did the student receive?
Yes	ENC1101

Data analysis

After reviewing student transcripts, we determined if the courses completed by students were eligible to transfer using the Statewide Course Numbering System. We determined if courses were eligible to transfer using the following guidelines:

- the course was approved in the System and designated as equivalent;
- the course was completed after the course was approved in the system (see step 2);
- the course met the faculty guidelines at community colleges; and
- the student received a passing grade in the course.

Only 573 courses out of the 3,630 courses completed by students in our sample met the above criteria. As shown by the last column in Table A-1, only 203 students completed courses eligible for transfer.

Appendix B

Courses Eligible for Transfer

While students in our sample completed more than 3,000 courses at non-public institutions, only 573 of these courses were eligible to transfer to a community college. These 573 courses represented 106 individual courses that were represented by course numbers in the Statewide Common Course Numbering System. Table B-1 lists the courses most frequently completed by our student sample that were in eligible to transfer to a community college based on the Statewide Course Numbering System guidelines and the percentage of courses that successfully transferred to a community college. For example, students completed 14 courses of College Algebra (MAC2105) all of which successfully transferred into a community college. In contrast, students completed 15 courses of Introduction to Paralegal (PLA1003) of which only 40% successfully transferred.

Table B-1
Certain Eligible Courses Were More Likely to Transfer

Course Number at Non-Public Institution	Course Title at Non-Public Institution	Total Completed Courses	Percentage of Courses Transferring into Community Colleges
MAC2105	College Algebra	14	100%
MAT1033	Intermediate Algebra	26	100%
BSC1005	General Biology	23	96%
GEB1011	Principles of Business	19	95%
PSYX012 ¹	General Psychology	35	94%
ENC1101	Composition I	41	93%
POSX041 ²	American National Government	33	82%
CGS1000	Introduction to Computers	27	81%
MAN2021	Principles of Management	43	79%
MGF1106	College Math	11	73%
SPC2016	Oral Communications	35	71%
APA2111	Principles of Accounting I	17	65%
PLA1003	Introduction to Paralegal	15	40%

¹ PSY1012 and PSY2012 are the same course according to the Statewide Course Numbering System.

² POS1041 and POS2041 are the same course according to the Statewide Course Numbering System.

Appendix C

FLORIDA DEPARTMENT OF EDUCATION



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Commissioner of Education



December 20, 2007

Mr. Gary R. VanLandingham
Office of Program Policy Analysis
and Government Accountability
111 West Madison Street, Suite 312
Tallahassee, Florida 32399-1475

Dear Mr. VanLandingham:

The attached response regarding the draft report *Students Encounter Barriers When Transferring Credit from Non-Public Institutions to Community Colleges* is for your information.

If you have any questions, please contact Ed Jordan, Acting Inspector General, at 245-0403.

Sincerely,

Dr. Eric J. Smith

EJS/ej/br

c: Theresa Klebacha

FLORIDA DEPARTMENT OF EDUCATION



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Dr. Eric J. Smith
Commissioner of Education

Dr. Willis N. Holcombe, Chancellor
Division of Community Colleges

December 17, 2007

MEMORANDUM

TO: Mr. Ed Jordan, Director of Auditing
Office of the Inspector General

FROM: Dr. Willis N. Holcombe, Chancellor *WJH*
Division of Community Colleges

SUBJECT: OPPAGA Report: *Students Encounter Barriers When Transferring Credit from Non-Public Institutions to Community Colleges*

Thank you for the opportunity to respond to the report *Students Encounter Barriers When Transferring Credit from Non-Public Institutions to Community Colleges*. OPPAGA is to be commended for its work in this time-consuming task.

Florida is a national model for the inclusion of nationally accredited institutions in its Statewide Course Numbering System (SCNS); thereby including these students in the transfer guarantees for equivalent courses to public community colleges and universities. Community colleges, in particular, are accessible to all students and offer a wide range of services, from workforce education to preparation for transfer to a university. The system serves almost 800,000 students and annually produces more than 66,000 certificates and degrees.

As such, and as discussed at our meeting on December 6, 2007, I am disappointed by the title OPPAGA chose for this report in that it suggests that Florida's public community colleges hinder access for transfer students. A more accurate title, per the findings in this report would be: "*Majority of Courses at Non-Public Institutions Do Not Meet Criteria for Transfer to Community Colleges.*"

In addition, I am concerned with the report's assertion that the Statewide Course Numbering System has only "a limited effect" in meeting the goal of facilitating articulation and transfer for students. SCNS actually works quite well when non-public colleges, as demonstrated by Keiser College, participate fully in the System. For example, while "only 16% of the 3,630 courses students completed at non-public institutions were eligible for transfer," the report does not sufficiently emphasize that the majority of the courses which did not transfer from non-public institutions to community colleges were ineligible not



because SCNS was ineffective or the community colleges were resistant, but rather *because the non-public institution had not taken the steps to submit these courses to SCNS*.

In order for more courses/credits to be eligible for inclusion in SCNS and qualify for transfer, non-public institutions in Florida must meet the academic standards, both in course content and faculty credentials that are the baseline for programs in our community colleges and state universities. Accepting courses from institutions which do not adhere to these standards jeopardizes not only accreditation by the Southern Association of Colleges and Schools, but also may adversely impact student learning outcomes and subsequent student success. Our colleges are as committed to student transfer as we are to protecting the integrity of our postsecondary curriculum. The SCNS is a critical factor in assuring that both objectives are met.

Response to Findings

The report identifies three main reasons why courses taken by students at non-public institutions were not accepted for transfer by community colleges:

1. The major reason that 84% of the 3,630 courses reviewed in the study were not eligible to transfer is primarily because the non-public institution did not submit the course(s) for inclusion in SCNS.
2. The second reason why a preponderance of courses from non-public institutions did not transfer is that the academic credentials from faculty teaching at non-public institutions did not meet the minimum requirements/guidelines for faculty credentials adhered to by community colleges and state universities in Florida.
3. Finally, the courses from the non-public institution were not similar in content and therefore were not assigned an equivalent course number to courses offered by public community colleges and/or universities.

We are pleased to note that community colleges exercised considerable flexibility, and did award credit for 796 of the courses that were deemed not eligible for guaranteed transfer.

The report also identifies 573 courses that were eligible for transfer from non-public institutions to community colleges, of which 79% were accepted for credit. Of these courses, 10% were identified as having received credit for a different course number than taken by the non-public institution student. Although this discrepancy would be considered questionable under the SCNS, it is likely that the community college awarded a different course number that would be more advantageous to the student in meeting specific program requirements. OPPAGA researchers apparently did not fully explore the reasons why community colleges occasionally exercised institutional flexibility in evaluating courses for transfer. For example, SPC 1600, (Speech Communication) satisfies statewide common course prerequisites for 25 programs, while SPC 2016 satisfies common course prerequisites for one program. Awarding credit, upon course evaluation, for SPC 1600 in lieu of SPC 2016, is in this case, both acceptable and advantageous to the student. To award the exact equivalent course may sometimes require students to unnecessarily take more credit to meet specific courses required by a program. The Department agrees this is an area worth further study, but with the end goal of student-friendly articulation policies.

OPPAGA Comment

OPPAGA reviewed the 52 courses where the community college awarded the student credit for a different course number. Community colleges awarded credit for a different academic course number for about half of these courses (54% or n=28). These courses could potentially benefit the student. However, for the remaining courses (46% or n=24) community colleges awarded students elective credit that was not tied to a specific course number.

While there are many potential reasons why institutions awarded the wrong course number (including to potentially benefit the student) colleges did not comply with the recommended course in the Statewide Course Numbering System.

OPPAGA also identified 115 courses that did not receive any credit in transfer. *Although OPPAGA did not explore “why” these courses did not transfer, a potential explanation is that the credit in question would not apply to a chosen program.* To accept this credit would only impose excess hours. Again, it is worthwhile for all institutions to review their transfer policies to ensure compliance with transfer guarantees, along with an exploration of reasonable exceptions to the transfer of credit.

OPPAGA Comment

We did contact the six community colleges in our sample with the highest number of eligible courses that did not transfer. Some colleges did not accept the transfer credit because the course would not apply to the student’s chosen program. However, students change majors and this coursework could apply to a new major.

In addition, state reported excess hours should not include credit students earn from non-public institutions. The state does not fund those courses completed at non-public institutions, therefore it is not an additional cost to the state for students to transfer that coursework to public institutions.

Response to Recommendations

These recommendations, while viable, focus solely on issues with the SCNS and community colleges and do not identify the *key* barrier in transfer of credit from non-public institutions: that these courses are not eligible for guaranteed transfer under Florida law. Statute and Southern Association of Colleges and Schools criteria which provide oversight for postsecondary courses in the state should not be identified as barriers, but rather as safeguards which help ensure the academic integrity of postsecondary education in Florida.

Recommendation 1 – Improve communication with participating institutions.

The Department supports all improvements in communication between the SCNS and community college and university representatives. Staff turnover or changes in policies require continuous communication to ensure students are receiving the appropriate credit for their coursework. In addition, this recommendation should also include improvements in communication to and from the non-public institutions.

Recommendation 2 – Implement an appropriate policy for awarding credit for discontinued courses.

The Department supports this recommendation.

Recommendation 3 – Monitor how institutions transfer credit for equivalent courses in the Statewide Course Numbering System.

The Department supports this recommendation; however, transcript reviews can be costly in time and staff. The Department currently employs five full-time equivalent staff members to maintain the Statewide Course Numbering System and manage over 100,000 courses. A March 2007 report issued by OPPAGA recommended the addition of two full-time equivalent staff members, but budget constraints have prevented this recommendation from being implemented. In addition, any potential requirement for transcript review should be buttressed by a requirement for participation by all selected institutions—without the ability for any non-public institution to refuse to participate, as was the case in this report.

Recommendation 4 – Review courses that are equivalent courses with different academic levels in the Statewide Course Numbering System.

The Department supports this recommendation.

Should you have any further questions about the SCNS, please contact Mr. Matthew Bouck at matthew.bouck@fldoe.org; questions about community college articulation should be directed to Ms. Julie Alexander at julie.alexander@fldoe.org. Thank you again for the opportunity to respond to this report.

WNH/jbl

- c: Dr. Eric Smith, Commissioner, Florida Department of Education
Dr. Judith Bilsky, Executive Vice Chancellor, Division of Community Colleges (DCC)
Dr. Heather Sherry, Director, Office of Articulation
Mr. Matthew Bouck, Deputy Director, Office of Articulation
Ms. Julie Alexander, Director of Articulation and Educational Services, DCC



Dr. Steven R. Wallace
College President

December 21, 2007

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

RE Draft Report "Students Encounter Barriers When Transferring Credit from
Non-Public Institutions to Community Colleges." December 2007

Dear Dr. VanLandingham,

Thank you for providing the community colleges an opportunity to see a draft of the above report and to provide input before you finalize the document for the legislature. We congratulate you and your staff on the depth of study which has gone into this complex report. Please find attached our feedback and recommendations.

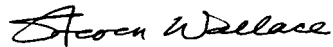
I am compelled to site a relevant comment about this important state and national issue that reflects the view of Florida Community College at Jacksonville and the view of many of my colleagues. It is from The Chronicle of Higher Education, "Colleges, Not Congress, Should Decide," by Barmak Nassirian, August 3, 2007. Dr. Nassirian is an associate executive director of the American Association of Collegiate Registrars and Admissions Officers.

We all intuitively understand that some colleges routinely exceed the minimal levels of quality required by their regional accrediting bodies, let alone the substantially less rigorous demands of some national accrediting groups. If there were no difference in what the two types of accreditors required, career colleges could have easily remedied the perceived discrimination that they decry by simply switching and becoming regionally accredited. It is precisely because they can't obtain regional accreditation -- for substantive reasons that get to the heart of their programmatic offerings -- that they have mounted a legislative campaign.

When institutions have similar accreditation, the transfer of credit issues is greatly reduced and barriers can more easily be overcome. I believe your report validates the effort by community colleges to evaluate each course and accept student transfer credits. Can we do a better job? Yes, of course we can and I believe this report will compel us to improve but the larger issue is still out there. The non-public institutions have complained that community colleges don't accept their credits, yet the facts reveal that the legislature has provided a path for credit transfer and that they have not pursued it. That should be the headline of this report.

Thank you again for the opportunity for input.

Sincerely,

A handwritten signature in cursive script that reads "Steven Wallace".

Dr. Steven R. Wallace
College President

Feedback on DRAFT - OPPAGA Report

“Students Encounter Barriers When Transferring Credit From Non-Public Institutions to Community Colleges”

December 12, 2007

Florida Community College Jacksonville appreciates the in-depth analysis by OPPAGA in completing this complex report. We support all of the recommendations by OPPAGA and offer additional suggestions to remove barriers for students transferring from non-public institutions to community colleges.

- Key Recommendation -- the title should be, **“Low Participation by Non-Public Institutions in Statewide Course Numbering System Presents Barriers for Students Transferring to Community Colleges.”** The rationale for this change is derived from key findings of the study itself:
 - 84% or 3,049 of the courses in the sample were not eligible for transfer in the Statewide Common Number System (SCNS). The title should reflect this bigger problem as the barrier for transfer of credit. The current title implies that the community colleges are the problem, which is clearly not the case.
 - The courses were not eligible for transfer because they were either not entered into the system (61%) by the non-public institution or the courses that were entered into SCNS (23%) did not meet the statutory criteria for transfer. The content was not equivalent, the students didn't pass the course or the faculty credentials did not meet minimum requirements.
 - Transcripts of sample students who transferred from non-public to community colleges during 2004-05 and 2005-06 showed that only 16% of the 3,630 courses completed were eligible for transfer to a community college. Of these 16% that were eligible to transfer to community colleges:
 - 69% received the correct credit.
 - 10% received credit but had the wrong/different course number (in some cases this was actually to the student's benefit and was a conscious decision by the institution).
 - 21% did not receive any credit – these were blatant errors that should not have occurred. The community college system will work to see that this is corrected and that students receive all the credit to which they are entitled.
- Good Points by OPPAGA – Colleges Awarded Credit Though Not Required
 - “Although many courses were not eligible to transfer [non SCNS]...colleges did award students **credit for 26% or 795 courses.**” This validates the routine effort that is made by community colleges to evaluate each transcript and to award students credit they have earned whenever possible even for courses that are not in the SCNS.

- “Institutions may, but are not required to grant credit for non-equivalent courses....colleges **awarded credit for 27% or 439 courses.**” This also or once again validates the routine effort by community colleges to evaluate each transcript and to award students credit they have earned whenever possible even for courses that are not in the SCNS.
- Interestingly, community colleges were twice as likely to award credit where credit was not required by law versus denying credit either by policy or error where credit was required by law. This reinforces the idea that community colleges are not the problem (or do not attempt to impose barriers), but rather are quite flexible in the solution of providing access to these students.
- FCCJ Supports OPPAGA’s Recommendations to:
 - Improve communication with participating institutions.
 - Implement an appropriate policy for awarding credit for discontinued courses.
 - Monitor credit transfer (assign code for transfer students from non-public to public).
 - Review courses that are equivalent courses with different academic levels in the SCNS.

Additional Recommendations: Efficiency & Accountability

FCCJ offers the following recommendations to improve accountability and enhance efficiency.

- **Improve SCNS Efficiency**
 - Add additional staff and resources to the SCNS office by assessing non-public institutions the actual costs involved in maintaining a system to accommodate their courses, per FS 1007.24 (6) ... “Non-public colleges and schools....participating colleges and schools shall bear the costs associated with inclusion in the system and shall meet the terms and conditions for institutional participation in the system. The department shall adopt a fee schedule that includes the expenses incurred through data processing, faculty task force travel and per diem, and staff and clerical support time.....”
 - Require non-public institutions (non SACS) to maintain syllabus and faculty credentials for all courses that are entered into the SCNS. This should be updated every term that a different faculty member teaches the course. SCNS staff should monitor for updates. This information could be posted on a secure DOE server so receiving institutions could view it on-line for ease in transcript analysis. This would help ease the workload burden of transcript analysis for large public institutions, reduce the error rate, and go far in helping students transfer to public institutions with ease.

- Establishment of a threshold level of participation may be desirable, such as at least fifty percent of the institution's courses must be in SCNS.
- **Ensure Accountability in SCNS**
 - Establish common entrance requirements for college credit work that is parallel to public institutions (SAT or College Placement Test).
 - Require FETPIP follow-up for all participants who receive any state funds, so outcome information is standardized and not dependent upon the institution's reporting.
 - Require non-public institutions to inform prospective students of the ratio of transferable courses available within their catalog course inventory so that student-consumers can make a more informed decision regarding their higher education options.

The Florida Legislature

Office of Program Policy Analysis and Government Accountability



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Project conducted by Kim Barrett, Emily Dendy (850/487-9227), Glenda Rabby, and Mark West
Jane Fletcher, Staff Director, Education Policy Area
Gary R. VanLandingham, Ph.D., OPPAGA Director