



## DOE Improved the Statewide Course Numbering System; Oversight and Accuracy Issues Remain

### *at a glance*

Consistent with our recommendations, the Legislature and the Department of Education improved the usefulness of the Statewide Course Numbering System. Specifically, the Legislature required non-public institutions to identify the courses they offer that are included in the system in their college catalogs while the department addressed inappropriately equated classes and clarified state policies on academic calendars and discontinued courses. The department should make additional improvements by updating faculty information for non-public institutions, identifying equivalent courses that are not guaranteed to transfer, improving communication among institutions, and monitoring credit transfers.

### Scope

In accordance with state law, this progress report informs the Legislature of actions taken in response to two 2007 OPPAGA reports.<sup>1, 2, 3</sup>

### Background

The Statewide Course Numbering System provides an inventory of postsecondary

courses offered by public and participating non-public postsecondary institutions. The Legislature established the system in 1971 to facilitate the transfer of credit for academic courses among the state's public community colleges and universities.<sup>4</sup> In 1998, the Legislature authorized non-public colleges and universities to participate in the system. Currently, 26 non-public institutions participate in the Statewide Course Numbering System.<sup>5</sup> During the 2009-10 academic year, approximately 5,700 students transferred from these 26 institutions to institutions in the Florida college system.

When students transfer between participating institutions, their new colleges and universities do not have to award transfer credit for all courses the students have taken. However, state law requires institutions to award credit for a course in the Statewide Course Numbering System if they offer an equivalent course and the course to be transferred is taught by an instructor who meets the institution's faculty qualification criteria.<sup>6, 7</sup>

<sup>1</sup> Section 11.51(6), *F.S.*

<sup>2</sup> *Institutions Do Not Have to Accept Transfer Credit for Many of the Courses in the Statewide Course Numbering System*, OPPAGA [Report No. 07-22](#), March 2007.

<sup>3</sup> *Students Encounter Barriers When Transferring Credit from Non-Public Institutions to Community Colleges*, OPPAGA [Report No. 07-49](#), December 2007.

<sup>4</sup> In 1971, the system was called the Florida Common Course Numbering and Designation System.

<sup>5</sup> The Commission for Independent Education licenses the 26 non-public institutions.

<sup>6</sup> The Department of Education has set up a process to determine whether the qualifications of faculty at non-public institutions meet the qualification requirements of faculty at public institutions. Most non-public institutions that participate in the Statewide Course Numbering System are

Our prior reports identified barriers that students encountered when transferring courses in the Statewide Course Numbering System from non-public institutions to public institutions. Specifically, non-public institutions frequently did not indicate in their college catalogs which courses would be eligible for transfer, making it difficult for students to plan for their academic future. Further, public colleges had not awarded appropriate credit for nearly one-third of the courses eligible to be transferred from non-public institutions due to institutional practices and errors. As a result, students could be required to retake eligible courses that they already completed, thereby delaying and potentially deterring their educational progress. In addition, some courses from non-public institutions included in the Statewide Course Numbering System could have inaccurate faculty information, which may have affected the transferability of course credits.

## Current Status

Consistent with our recommendations, the Legislature and the Department of Education improved the accuracy and usefulness of the Statewide Course Numbering System. The Legislature passed legislation that required non-public institutions to identify the courses they offer that are included in the system in their college catalogs while the department addressed inappropriately equated classes and clarified state policies on academic calendars and discontinued courses. The department should make additional improvements by updating faculty information for non-public institutions, identifying equivalent courses that are not guaranteed to transfer, improving

communication among institutions, and monitoring credit transfers.

### ***The Legislature and the department improved the usefulness of the Statewide Course Numbering System***

The Legislature established new requirements for the Statewide Course Numbering System. The 2007 Legislature addressed issues raised in our March 2007 report by passing Ch. 2007-246, *Laws of Florida*. This law directed the department to identify courses that may be inappropriately designated as equivalent for purposes of credit transfer. The law also required participating non-public postsecondary institutions to identify in their catalogs the courses that they offer that are included in the Statewide Course Numbering System; the institutions must do so as a condition for initial and continued participation in the system.

The department corrected inappropriately equated vocational and college credit courses. Our December 2007 report found that Florida colleges did not always award appropriate credit for eligible courses from non-public institutions because the department had incorrectly equated lower level undergraduate courses at non-public institutions to vocational courses at Florida colleges. Since vocational courses are not guaranteed to transfer into an associate degree program, some students were denied credit for these courses. To resolve this issue, the department identified these courses, changed their course numbers when appropriate to reflect that they were college credit courses, conducted additional checks of the accuracy of the information in the system, and resolved the inconsistencies.

The department clarified system policies for differing academic calendars and discontinued classes. Consistent with our March 2007 report's recommendations, the department clarified information in the Statewide Course Numbering System Catalog for the 2010-11 academic year regarding the

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not accredited by the Southern Association of Colleges and Schools (SACS), the accrediting body for public colleges and universities. The department awards a transfer level to each course it identifies in which a non-public institution's faculty meets the faculty requirements at public institutions.

<sup>7</sup> Section 1007.24 (7), *F.S.*

amount of credit students will receive when transferring from a quarter to a semester grading system.<sup>8</sup> In addition, the department addressed a recommendation in our December 2007 report by clarifying state policy on awarding credit for discontinued courses. Specifically, the department added a notice on its website explaining that courses listed as discontinued that have an equivalent number and transfer level are eligible for transfer.

Some, but not all, non-public institutions now identify Statewide Course Numbering System courses in their catalogs. While the department has taken steps to address problems in the Statewide Course Numbering System identified in our prior reports, some participating non-public institutions have not revised their catalogs to clearly list courses that are eligible to transfer. We reviewed the catalogs of 26 participating non-public institutions and found that 13 complied with the statutory requirement to designate courses that are eligible to transfer. However, the catalogs of 13 of the non-public institutions did not clearly designate such courses (see Appendix A).<sup>9</sup> As a result, students at these institutions may have an increased risk of being required to retake classes when they transfer to public colleges and universities.

To address this situation, the Commission for Independent Education has directed all participating institutions to clearly indicate which courses are included in the system with the next printing of their school catalogs. To ensure that participating non-public postsecondary institutions fully comply with this requirement, we recommend that the Department of Education verify compliance with this provision annually.

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<sup>8</sup> The Statewide Course Numbering System Catalog uses the example that 4.0 quarter hours often transfers as 2.67 semester hours.

<sup>9</sup> Of the 13 institutions that did not clearly designate courses in the State Course Numbering System, 3 were new to the system, 1 was in the process of withdrawing from the system, and 2 were accredited by the same accrediting body as public institutions.

### ***The department needs to further improve system accuracy and policies for awarding transfer credits from non-public institutions***

While the department has corrected some problems in the system and clarified specific system policies, additional actions are needed to improve the system's accuracy and ensure that participating institutions are following system guidelines.

The department is taking action to improve faculty information for non-public institution courses, but this data may still be inaccurate. In order for a non-public institution's course to be guaranteed to transfer, it must be taught by faculty with comparable credentials as a public institution's faculty. However, our March 2007 report concluded that the system's information on faculty at non-public institutions was not updated and therefore may not have always been current or accurate. This may have misled Florida college and public university registrars about whether courses must be accepted for transfer. We recommended that the department require all non-public institutions to submit at least annually a list showing the faculty teaching current course offerings in the Statewide Course Numbering System and that it use this list to update the system.

While the department is taking steps to address this issue, some information on non-public institution faculty qualifications may still be inaccurate. The department is beginning to revise its faculty credential database, and once these changes are made, it plans to conduct annual faculty reviews of participating non-public institutions. We continue to recommend the department verify faculty information for non-public institution courses on an annual basis.

The system still includes courses that are misidentified as equivalent and are not guaranteed to transfer from non-public institutions. Our March 2007 report noted

that the Statewide Course Numbering System inaccurately identified courses as equivalent that were not guaranteed to transfer because a non-public institution's courses may have been taught by faculty who did not have credentials equivalent to those of public institution faculty.<sup>10</sup> The department had assigned these courses the same course numbers based on their content and not on faculty credentials. However, this created a problem for students because such courses appeared to be guaranteed to transfer when they did not have this status. We recommended that the department either remove such courses that were assigned equivalent numbers or assign them a different number. The Legislature addressed this issue by passing legislation requiring the department to identify these courses and correct the information on them in the Statewide Course Numbering System.<sup>11</sup>

However, our review of courses currently listed by non-public institutions found that this problem still persists. The department reports it is working to resolve this issue. We continue to recommend the department review the course numbers and transfer levels of courses listed by non-public institutions and assign different numbers to courses that are equated to courses at public institutions but are not guaranteed to transfer because of faculty credentials.

The department has not provided updated written guidance for colleges and universities regarding transfer of courses from non-public institutions. Our December 2007 report found that students did not always receive the appropriate credit for courses they completed at non-public institutions when transferring to some public colleges because of institutional policies, practices, and errors. In addition, non-public

institutions reported that their students experienced problems receiving appropriate transfer credits. We recommended that the department provide public colleges, public universities, and non-public institutions a technical assistance paper communicating specific policies for awarding transfer credit to students from non-public institutions who participate in the Statewide Course Numbering System.

The department has not yet provided participating institutions with a technical assistance paper addressing this issue. Consequently, we continue to recommend that the department issue stronger guidance on how public institutions should use the system to properly evaluate and award transfer credit for courses taken at non-public institutions.

The department has not verified that students receive appropriate transfer credit using the Statewide Course Numbering System. Our December 2007 found that Florida colleges did not award students appropriate transfer credit for nearly a third of eligible transfer courses from non-public institutions. We recommended that the department verify that Statewide Course Numbering System policies for the transfer of credit from non-public institutions to public colleges are being properly implemented so that students receive appropriate credit.

The department has not verified that the students that transfer from non-public institutions to Florida colleges (approximately 5,700 during the 2009-10 academic year) are receiving the appropriate credit for completing courses in the Statewide Course Numbering System. However, the Florida College System reports that it is exploring options to track credit transfer from non-public institutions into public colleges.

Some non-public institutions are concerned about a lack of state oversight for ensuring that participating institutions consistently implement the law and policies so that students receive appropriate transfer credit.

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<sup>10</sup> SACS provides that institutions may employ faculty who do not have the academic credentials specified in its guidelines if the institutions can demonstrate they have other credentials that are deemed to be equivalent. This generally means that institutions must maintain portfolios of faculty credentials.

<sup>11</sup> Chapter 2007-246, *Laws of Florida*.

These non-public institutions also reported public colleges and universities were not awarding students transfer credits for eligible courses in the Statewide Course Numbering System if the non-public institution was not regionally accredited. When this occurs, students may be required to submit additional documentation about the course to be considered for transfer credit. This should not be necessary for courses that are equivalent

and guaranteed to transfer in the Statewide Course Numbering System.

To help ensure that students get appropriate transfer credits, we continue to recommend that the department periodically verify whether students transferring from non-public institutions are awarded the credit guaranteed by the Statewide Course Numbering System.

**Appendix A**

**Disclosure of Transferable Courses in Participating Non-Public Institution Catalogs**

As of May 2010, there were 26 non-public institutions participating in the Statewide Course Numbering System. We reviewed each institution’s 2009-10 catalog to determine if the institution correctly identified those courses that were included in the system and thus eligible to transfer to other institutions.<sup>12</sup> Thirteen institutions either identified the courses included in the system or had a statement in their catalog that explained the difference between the course numbering taxonomy for institutional courses and courses in the system. However, 13 institutions did not differentiate between institutional courses and system courses in their catalogs. Of these institutions, three were new to the system, one was in the process of withdrawing from the system, and two were regionally accredited by the same accrediting body as public institutions.

**Table A-1  
Many Non-Public Institutions Identify the Differences between Institutional Courses and Courses Included in the Statewide Course Numbering System**

Institution	Catalog Identifies Course Numbering Courses	Comment
Art Institute of Fort Lauderdale	No	The catalog does not identify which courses are included in the Statewide Course Numbering System.
Central Florida College	Yes	The catalog identifies specific courses included in the Statewide Course Numbering System.
City College	Yes	The catalog explains the difference between the Statewide Course Numbering System taxonomy and the institutional course number taxonomy.
City College-Casselberry	Yes	The catalog explains the difference between the Statewide Course Numbering System taxonomy and the institutional course number taxonomy.
College of Business and Technology	Yes	The catalog explains difference between the Statewide Course Numbering System taxonomy and the institutional course number taxonomy.
Everest Institute	No	The catalog does not identify which courses are included in the Statewide Course Numbering System
Everest University	No	The catalog does not identify which courses are included in the Statewide Course Numbering System
Everglades University <sup>1</sup>	No	The catalog does not identify which courses are included in the Statewide Course Numbering System.
Florida College of Natural Health	No	The catalog does not include any information on the Statewide Course Numbering System. The Department of Education has contacted the institution to verify Statewide Course Numbering System courses because the institution has been inactive in the system.
Florida National College	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.

<sup>12</sup> Since some institutions print catalogs every two years, we used the most recent available catalog and catalog update. For some institutions, the most recent catalog was a 2008-09 catalog that included an addendum that was added at the end of the year.

Institution	Catalog Identifies Course Numbering Courses	Comment
Full Sail University	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.
Health Career Institute	No	The institution recently joined the Statewide Course Numbering System.
Hobe Sound Bible College	No	The catalog contains no information on the Statewide Course Numbering System.
Jones College	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.
Jose Maria Vargas University	No	The institution recently joined the Statewide Course Numbering System.
Keiser Career College	No	The catalog does not identify which courses are included in the Statewide Course Numbering System.
Keiser University <sup>1</sup>	No	The catalog does not identify which courses are included in the Statewide Course Numbering System.
Key College	No	The catalog does not identify which courses are included in the Statewide Course Numbering System.
Miami International University of Art and Design	No	The institution is in the process of withdrawing all courses from the Statewide Course Numbering System.
Professional Training Centers	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.
Rasmussen College <sup>1</sup>	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.
Southwest Florida College	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.
St. Petersburg Theological Seminary	Yes	The catalog identifies courses included in the Statewide Course Numbering System.
Taylor College	No	The institution is in the process of establishing programs and including courses in the Statewide Course Numbering System.
Trinity Baptist College	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.
Trinity College of Florida	Yes	The catalog identifies the differences between courses included in the Statewide Course Numbering System and institutional courses.

<sup>1</sup> The institution has regional accreditation. Consequently, the department does not review faculty credentials for the institution's courses included in the Statewide Course Numbering System.

Source: OPPAGA review of institution catalogs.

The Florida Legislature  
*Office of Program Policy Analysis  
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