



“OUR ACCREDITOR WON’T LET US”

A NEW LOOK AT TRANSFER ADMISSIONS: A THOUGHT PAPER

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Connecting flights and layovers in airports have been part of airline travel for decades and depending on one’s specific travel plans and experiences, most Americans think little of the inconvenience of having to take two flights to reach their destinations within the United States. Similarly, international travelers flying to all but the largest of the world’s population centers have not only come to expect that they will need multiple flights to reach their final destinations, but in most cases, they will also need *multiple airlines* to get to where they want to go. While anyone who has traveled internationally can attest that itineraries to remote locations are sometimes grueling, the airline industry has used a variety of tactics, including small regional carriers, alternate airports, and land-based shuttle services to get people to where they want to go. And again, while these arrangements can often be inconvenient, uncomfortable, and expensive, the airline industry has, nevertheless, gone to great lengths to deliver the global connections that are largely taken for granted today.

The challenge of transferring between colleges and universities continues to be an enduring challenge for many students in U.S. higher education, and yet as an “industry,” colleges and universities continue to largely operate in accordance with institution-centric policies and practices that ignore the needs of students who began their studies at “College X” and for a variety of reasons

need to conclude their studies at “University Y.” While the consequences of transfer roadblocks are not as sensational as passengers stranded at major airports due to weather-related disruptions, the cost of the lack of commitment and coordination across higher education to assist capable students in completing their educational journeys is immeasurable.

Every year, thousands of college and university students transfer or seek to transfer credits between different institutions. For many students, transferring credits represents a strategic choice to save money, time, or both. Students exercise that choice by taking and transferring specific, pre-approved courses back to their home institutions to facilitate the completion of their degrees. Indeed, many colleges and the states in which they operate have, over many years, evolved sophisticated agreements and collaborations that have facilitated the enrollment and transfer of specific types of students, such as articulation agreements and mandated transfer between state-supported two-year colleges and state-supported universities. In recent years, dual enrollment programs have exploded across the country, providing students unprecedented opportunities to earn substantial college credit before graduating from high school.

Such initiatives, while laudable, focus primarily on young students beginning their collegiate experiences and others who are fortunately positioned to execute an uninterrupted journey through well-planned and well-financed academic careers. This has rarely been the case for nontraditional/adult students and is becoming less true for many 18- to 22-year-olds.

According to data from the National Student Clearinghouse Research Center (NSC Research Center), “the total six-year transfer rate for the fall 2011 cohort was 38.0 percent, representing 1,069,243 transfer students” ([Transfer and Mobility: A National View of Student Movement in Postsecondary Institutions](#), Fall 2011 Cohort. 2018). The report further notes that the transfer rate for students who began their studies at two-year institutions was 36.7 percent while the transfer rate for students who started at four-year institutions was 38.5 percent.

These numbers tell a mixed story of “vertical” transfer (two-year to four-year transfer) and increasing incidents of lateral or “horizontal” transfer (from two-year to two-year and from four-year to four-year) for a variety of reasons, likely including academic, social, and financial drivers. As is generally anticipated, the largest percentage of two-year students, at 59.2 percent, transfer to four-year institutions with most of this transfer occurring during the third and fourth years of their college enrollment. Data on the transfer patterns of students who began at four-year institutions reveal that while 50.5 percent of these students will in fact transfer to two-year colleges, much of this transfer represents the strategic use of two-year colleges to make up or earn more course credits in the summer before heading back to their home institutions ([Transfer and Mobility: A National View of Student Movement in Postsecondary Institutions](#), Fall 2011 Cohort. 2018).

But as significant as these yearly inter-institutional migration numbers are, they tell us nothing about the experiences of thousands of students whose transfer dreams never gain traction due to low grades, poor academic preparation, and other factors related to legitimate admission criteria. Finally, what is virtually unknown is how many students fail to achieve any transfer at all as a result of the accreditation status of the college or university where they began their studies.

Accreditation as Transfer Criteria

In 2018, within the span of about two months, representatives of three very different types of institutions, unbeknownst to each other, reached out to their same accreditor. The first institution, Valparaiso University, is a private, church-affiliated university of about 1,200 students in a largely rural community in Indiana. The second, Saint Mary-of-the-Woods College (SMWC), enrolls 1,100 students, is a Catholic former women’s college (now co-ed), and even more rurally located in the same state. The third, Adler University, is a private, nonprofit University with 1,800 students, located in the heart of Chicago’s loop. Each representative explained their version of the same scenario: the sudden closure of a college in their area prompted inquiries by students from the closed institutions about continuing their studies as transfer students at Valparaiso, Saint Mary-of-the-Woods, and Adler.

While each of these veteran administrators was quite familiar with the transfer policies and practices in place at their institutions, each of these representatives was compelled to contact their accreditor, the Higher Learning Commission (HLC), to discuss not only their institution’s options with respect to the possible acceptance of credit from these closing or closed institutions, but more importantly, to discuss their own sense of moral and professional obligation to assist students who, through no fault of their own, found themselves locked out of their colleges without warning.

There are many reasons why a particular student might be denied a request to transfer themselves and their course credits to another institution. The best reasons for denial are based on a fair and honest assessment of a student’s capacity for success at the institution to which they desire to transfer based on relevant transfer admission criteria. With respect to courses requested for transfer, they should be equivalent to courses for which they will substitute and if a course is judged equivalent, the student’s performance in the course should document sufficient command of course outcomes needed for success in courses still to be completed. The sum of these judgments must confirm the student’s preparedness to succeed in subsequent courses and learning experiences at the institution to which they seek to transfer.

Principled transfer decisions demand as much process as needed to assess a student's capacity for success post-transfer. And although there are several ways of documenting a student's preparedness for subsequent coursework (e.g., proficiency tests, portfolios, escrowed credits, etc.), higher education has not fully embraced processes that measure each student's capacity for success after transfer.

Accreditation, having it or not, or having a specific type or not, has emerged as a quick and inexpensive proxy for determining which students even get to pitch their requests for transfer admission and credit. Many would-be transfer students are informed that an institution's accreditor will not permit the acceptance of transfer credit from unaccredited institutions or from institutions that are not accredited by specific accreditors. For its part, HLC does not limit an institution's acceptance of transfer credit. In fact, HLC has no requirement that institutions from which transfer credits are accepted be accredited at all.

HLC's position on transfer credit is articulated throughout the organization's policies and procedural documents in several ways. At its most basic level, HLC's Assumed Practice B.1.f requires that member institutions have a process for ensuring that all courses transferred and applied toward degree requirements demonstrate equivalence with its own courses required for that degree or are of equivalent rigor (Higher Learning Commission. [Assumed Practices, Policy Number CRRT.B.10.020](#)). Member institutions are also required to publish their transfer policies pursuant to HLC Assumed Practice A.5.d and [Federal Compliance requirements](#) as promulgated by the U.S. Department of Education. Within HLC's Criteria for Accreditation, Core Component 4.A.2 requires a member institution to evaluate all the credit that it transcripts, while Core Component 4.A.3 requires that member institutions have policies that ensure the quality of the credit it accepts in transfer (Higher Learning Commission. [Criteria for Accreditation, Policy Number CRRT.B.10.010](#)).

Outside of its policies, HLC has also publicly supported an open and student-focused review of student transfer requests through its endorsement of the [2017 Joint Statement on the Transfer and Award of Credit](#) developed by the American Association of Collegiate Registrars and Admissions Officers (AACRAO), the Council for Higher

Education Accreditation (CHEA), and the American Council on Education (ACE).

In short, there are no HLC barriers to an open and fluid process for evaluating and awarding appropriate transfer credit. HLC places authority and responsibility for the review and awarding of transfer credit with receiving institutions. Far from using accreditation as a shortcut to making transfer decisions, HLC's transfer framework anticipates that faculty, staff, and administrative leaders will do the evaluative work required to facilitate the transfer of qualified students who are prepared to succeed in the institutions to which they desire to transfer.

In thinking back on early conversations, there was nothing noteworthy about the transfer policies and practices of these three institutions. Each college or university had a transfer policy governing its practices for the review and awarding of transfer credit, and each institution had its own history of accepting or not accepting credits from specific institutions for reasons related to institutional accreditation. What quickly became apparent were the personal, professional, and ethical dilemmas these institutional representatives were facing as they considered their institutions' response to groups of displaced students as a result of the quick and unexpected closures of their home institutions. These college leaders were clear in their desire to help these students and equally clear on the challenge of helping their institutions review and open their transfer practices in ways that might provide a soft place to land for students capable of succeeding at these three institutions. When asked, each of these representatives agreed to discuss their concerns with counterparts from the other institutions who had contacted HLC. What followed was a series of conversations to consider new perspectives on this old challenge.

Even across only three institutions, the full range of possibilities, with respect to transfer policies, was evident. One institution's policy made no mention of accreditation status as a criterion for transfer consideration. Another institution recognized any form of federally recognized accreditation as a condition for transfer consideration, while the third institution only permitted transfer from other regionally accredited colleges and universities. Over time, these institutional policy positions, and other institutional factors, including cost, location, academic programs, and competition, led to predictable patterns of transfer requests until the sudden closure of two chains of institutions left groups of adult students scrambling to find other options

to continue and complete their studies. While it might have been easier to allow their current practices to decide the fate of these displaced adult students, each of these leaders was willing to review internal practice and to seek external consultation regarding if and how their institutions could position themselves to assist as many of these students as possible.

As these conversations continued, it became clear that transfer inquiries at Valparaiso would not yield applications from a handful of students who ultimately decided to pursue their transfer opportunities elsewhere. Nevertheless, this rich and candid three-way conversation proved helpful and empowering as two of these institutions moved to provide their transfer applicants with both admission and posting of a significant number of transferred credits. This discussion group also provided important support as leaders from Adler and SMWC braced themselves for the wisdom of their decisions to be revealed in the academic performance of their transfer cohorts.

Adler University Results

The sudden 2019 closing of Argosy University in Chicago placed almost insurmountable obstacles in the paths of Argosy students seeking to complete their degrees somewhere else. (Note: In 2011, Argosy voluntarily resigned its accreditation with HLC and moved to another institutional accreditor.) With only weeks between the initial publication of the impending closure of Argosy and the actual shuttering of its campuses, standard mechanisms that would typically be leveraged to support the transition of students, staff, and faculty, such as the development of teach-out plans, articulation agreements, and procedural communications, could not be used. As a result, students in Argosy's programs found themselves facing the inability to pay for basic living expenses and ongoing coursework, the potential loss of academic credit, the loss of academic records, the loss of creditworthiness to continue qualifying for student aid, and the very real possibility that they would not be able to finish the degree programs in which they were enrolled.

Considerable commitment was needed from all stakeholders and departments to successfully support the receipt of Argosy teach-out and transfer students into Adler's programs. Adler faculty, administrators, and department staff did a considerable amount of

work, putting in long days across weeks and months, even after students were admitted, to attain the necessary authorizations, create curriculum crosswalks, develop revised admissions pathways, and provide orientation and student services that would provide adequate levels of support for the matriculation and integration of Argosy students into Adler's learning community.

Central to Adler's efforts to support the onboarding of teach-out and transfer students was the issue of transfer. Coming to an understanding of the difference between transfer and teach-out pushed institutional inquiries to HLC, the Illinois State Board of Higher Education, and programmatic accreditors. For Argosy students to find opportunities for enrollment into which they would be able to bring earned credits without having to retake considerable portions of completed coursework, Adler had to create onboarding pathways that kept them whole, if possible. Given the abrupt closure of Argosy, there was insufficient time to develop teach-out agreements as a primary mechanism for the mass migration of students to Adler and other institutions across the region.

At Adler, an important part of the solution centered on the creation of a different kind of policy, one that would create an institutional standard for students caught in the scenario of an abruptly closing institution. Specifically, Adler developed a transfer and teach-out policy for students coming from abruptly closing institutions. The policy created guidance and boundaries for Adler to expand the number of transfer credits permitted, abbreviate residency requirements, and adjust admissions criteria for, and only for, students from abruptly closing institutions.

Establishing this policy created considerable concern and questioning among Adler's administration. A key area of discussion focused on the quality of these transfer students' academic experience to date. Adler's new policy led its leaders to examine the rigor and level of excellence of Adler courses compared to Argosy courses for a program in which both institutions held the same programmatic accreditation.

Almost two full academic years (summer 2019 through spring 2021) into their matriculation at Adler, and predominantly spread across a five-year doctoral program, the students in this cohort are largely midstream in their academic journey. A total of 241 applications were received from Argosy students as a result of its closing. Of these, 93 were ultimately admitted under the University's teach-out and transfer policy. As of this writing, 90 of the 93 students admitted (96.8%) have either successfully completed their

degrees or are continuing in good academic standing. As of the Fall 2020 term, the year-to-year persistence rate of the Argosy cohort was 98.7% compared to 96.5% for their Adler peers. In the same time period, 100% of the Argosy cohort who identify as ethnic or racial minorities had persisted (all data from the Adler University Spring 2021 - Day 10 Statistics Report). The Adler community continues to monitor, support, and, above all, learn from this cohort.

Saint Mary-of-the-Woods College Results

Harrison College announced the closing of its doors in September 2018 with almost no teach-out or graduation options for students. Two Harrison campuses were located within 75 miles of SMWC and primarily enrolled adult students in nursing and allied health programs. These were working adults with families for whom enrolling in a teach-out school much further away or in another state was not a likely option. Additionally, these students were largely not interested in switching from in-person to online delivery.

Despite many years of not accepting Harrison credits, SMWC quickly assessed and responded with a decision to accept students and their credits. Several factors supported this change in SMWC's transfer practice. Harrison held national accreditation and several programmatic accreditations from the Commission on Collegiate Nursing Education (CCNE) and the Commission on Accreditation of Allied Health Education Programs (CAAHEP), indicating an assessed level of quality and an ability to meet established standards. Secondly, a few members of the SMWC community had enjoyed professional relationships with colleagues from Harrison for several years. Lastly, the Harrison students who inquired about transferring to SMWC were strong students. These former Harrison nursing students had earned similar or higher Test of Essential Academic Skills (TEAS) scores than SMWC's traditional incoming students. Administered by the test maker Assessment Technologies Institute (ATI), the TEAS is an external measurement and a widely recognized predictor of student success.

SMWC remained consistent with its other transfer policies by allowing relevant academic departments to make decisions on which courses matched SMWC courses. The college was able to obtain some Harrison

syllabi and the college also had several faculty advisors who were familiar with Harrison courses. SMWC policies included requirements that transferring courses must have been completed with a grade of C or better and a residency of 18 or 30 credit hours in order to graduate with an associate's or bachelor's degree. SMWC was supported in its efforts to help former Harrison students by critical external partners, including the Indiana State Board of Nursing (ISBN) and the Indiana Commission for Higher Education. The ISBN was cautiously optimistic for SMWC and expanded the college's nursing cohort size. The ISBN and was also willing to allow the Harrison cohort to test under Harrison's old school code thereby protecting SMWC's National Council Licensure Examination (NCLEX) pass rate.

Like Adler, SMWC moved quickly to help students maintain satisfactory progress for financial aid purposes. Since most of these students wanted to enroll right away, SMWC was able to enroll students within the next month in an 8-week course that met in the evenings one night a week to begin their transition. This course would last through the end of the fall term, leading to enrollment in full 16-week classes in the spring. The fact that former Harrison students were used to 12-week classes was only one area in which these students had to make significant adaptations. During the first spring class meeting, several offices and services such as the registrar, bookstore, business office, and financial aid staff were on hand to help ease the transition and tie up loose ends.

Besides SMWC helping former Harrison students complete their education, these students broadened and enriched the SMWC community as well. Historically, SMWC students have been traditional-aged females from smaller, rural areas. While the campus population increased its diversity when the College became co-educational, the intent to become a more culturally and gender diverse institution was accelerated by the Harrison College students who were working adults with families from urban communities.

Thirty-two students completed the first 8-week course and began nursing classes in January 2019. By May 2020, 25 former Harrison students had graduated with four others still in progress in fall 2020, resulting in a 91% persistence rate. Compared to SMWC's persistence average of 76% for its traditional students, the former Harrison students clearly demonstrated their motivation and academic preparedness. Of the 25 students who graduated, 24 tested and passed the (NCLEX) on their first attempt. This pass rate also exceeded the SMWC average of 84% on the NCLEX.



LESSONS LEARNED

Despite the very different profiles of the Argosy and Harrison transfer students from the profiles of students typically admitted to Adler and SMWC, each institution took the risk to position itself to be a lifeline for 125 capable and diverse students who responded to their opportunity with superior heart and effort. Adler and SMWC data to date document the success of these students on a variety of measures, including hours attempted, hours completed, GPA, and, ultimately, degree completion. And while the data clearly document the success of these students in this previously unthinkable opportunity, it is also clear that taking this risk also stretched, challenged, and enriched faculty, staff, and administrators at both Adler and SMWC in ways that simply continuing to serve their typical range of students never could.

As these leaders grappled with guiding their institutions to take this calculated risk, several suggestions emerged for institutions facing similar circumstances in the future, or perhaps more importantly, for institutions that desire to make more student-centered transfer decisions on a day-to-day basis.

1

Institutions should ensure that their transfer policies accurately reflect the goals of the institution with respect to transfer. For example, transfer admission and the awarding of credit would be based on comparability of programs and courses and, above all, student preparedness for success in subsequent coursework, rather than factors such as the accreditation status of the school from which credit is sought to be transferred.

2

Despite the need for urgent action on the part of Adler and SMWC, they nevertheless worked quickly to study, plan, and communicate with faculty and staff about both the challenges and opportunities presented by serving these displaced students, including steps that would be taken to help these students come to feel safe and comfortable enough to succeed in their new institutions. Institutions should not underestimate the value of planning for a revision of transfer policies and practices.

3

For interested institutions, ongoing environmental scanning should document the potential for disruptions in enrollments at local and regional competitors as well as the potential

4

for more open and data-driven transfer practices with all other institutions in the region. Interested institutions should begin studying their transfer practices now to improve on their response to current day-to-day transfer requests and to be ready for possible future disruptions.

5

Institutions should adapt the primary tools of higher education: inquiry, measurement, and evaluation to assess student preparedness for success after transfer. Prior Learning Assessment (PLA), placement exams (standardized or home-grown), review of course descriptions and syllabi, and student learning portfolios are only a few tools that can be leveraged to provide students a broader and more equitable transfer experience. Using these tools in service to the transfer process will enable colleges and universities to implement more open and student-centered transfer policies and practices.

Institutions should leverage relationships with state higher education authorities, programmatic accreditors, and other external partners for support in mitigating downside risks to broadening transfer practices.

Conclusion

Given the current and anticipated challenges facing higher education, the best effort of most colleges and universities will be needed to strengthen public confidence in the value of a college education. Colleges and universities have put much thought, research, and money into their attempts to define and “brand” the experiences they are building for their students. And while every institution desires the full opportunity to teach and shape students from the beginning through to the completion of their declared programs, there is little doubt that more and more institutions will be called on to serve as bridges to degree completion for capable students who begin their college careers on someone else’s campus.

Facilitating needed student mobility between institutions, for reasons both planned and unexpected, must become a hallmark of forward-thinking institutions if higher education is to fulfill its promise as a public good benefitting individuals and families, communities, the nation and indeed, the world. After all, what starts off as the trip of a lifetime quickly becomes a very expensive mistake if your final connecting flight never shows up.



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