

**Raising the Bar:  
Leveraging Accreditation and Its  
Influence on Transfer and Credit Mobility**

**No Easy Answers**  
White Paper Series



## Acknowledgments

This white paper is the product of insightful contributions and strong support from many organizations and individuals. First and foremost, we thank WASC Senior College and University Commission (WSCUC) for its willingness to join forces and take some risks to improve equity in transfer and credit mobility outcomes. We are grateful to Sova for its efforts to facilitate and guide the work of the Beyond Transfer Policy Advisory Board (PAB). We thank HCM Strategists and the Institute for Higher Education Policy that partnered in a body of work this year focused on financial incentives. We are also deeply grateful to the ECMC Foundation, which saw the potential to explore accreditation and funded this project.

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### Definition of Equity

The Beyond Transfer Policy Advisory Board seeks to connect the dots between quality, equity, and outcomes in transfer and credit mobility. *Equity* in postsecondary outcomes will be achieved if the identities assigned to oppressed groups, such as different race, ethnicity, sex, sexual identity, sexual orientation, socioeconomic status, age, disability, and religion, no longer act as powerful predictors of how one fares, with the root causes of inequities, not just their manifestations, eliminated. In the case of postsecondary outcomes, at the national level, there is ample evidence that higher education institutions create particularly burdensome barriers to success for Black, Latinx, and Indigenous students and for students from low-income backgrounds. In addition, states, systems, and institutions need to understand and address equity gaps in the populations they serve, paying attention to the full range of students who are not well supported through to completion. Local data might, for example, point to equity gaps for Asian Pacific Islander Desi American students, or lesbian, gay, bisexual, transgender, and queer (or questioning) and others (LGBTQ+) that must be similarly addressed.

The PAB adapted this definition, with gratitude, from Associated Black Charities and Baltimore Racial Justice Action. See Elizabeth J. Kennedy, *Changing the Future: Building Racial Equity Across Baltimore's Workforce Ecosystem*, Associated Black Charities (ABC), accessed April 16, 2021; and Baltimore Racial Justice Action, *Our Definitions*, accessed April 16, 2021.

## Introduction

The Beyond Transfer Policy Advisory Board (hereafter PAB) members share a commitment to centering students and the recognition of their learning as they transfer across institutions and move through their living, working, and learning experiences beyond high school. As the first step in its work, the PAB issued *The Transfer Reset: Rethinking Equitable Policy for Today's Learners* in 2021. This set of policy recommendations, designed to dismantle inequitable credit mobility and transfer policies and practices, tackled topics including the need for better data, the lack of financial aid for students who transfer, and the need for new technology solutions.<sup>1</sup>

Throughout their work to develop the recommendations in the *Transfer Reset* in 2020 and 2021, PAB members elevated the need to engage accreditors as essential stakeholders in the transfer and credit mobility space, leading to a yearlong effort to consider the intersections between accreditation, credit mobility, and transfer. The PAB explored the opportunities and limits of leveraging accreditation to connect the dots among quality, equity, and outcomes in transfer and credit mobility. We designed recommendations to improve transfer and credit mobility for two groups:

- ▶ College and university leaders, as they consider how accreditation—an intensive process to which faculty and staff already devote considerable time and energy—can be leveraged for advancing equity-minded changes focused on transfer and credit mobility at their institutions; and
- ▶ Accreditors, specifically historically regional institutional accreditors, to find ways that their considerable influence can help their member institutions to improve equitable transfer and credit mobility.

### A Note on Language

The Beyond Transfer PAB does not use the term “transfer students.” In the 21st Century, most students are mobile and would benefit from receiving credit from a variety of high-quality learning experiences, ranging from dual enrollment to work-based learning, military experience, and digital badging (see Figure 1 and the section below entitled “Why Should Accreditors and Institutions Pay Attention?” for more details on students who are mobile). We celebrate the assets brought to postsecondary education by students who are mobile while also recognizing a long history of bias and stigma used against “transfer students”—particularly those who start their educations at community colleges—and how labeling students in this way excludes them. Students will still transfer across institutions, but we need to support credit mobility writ large and build awareness that we are doing nearly all students a disservice by not recognizing the knowledge and skills they transfer from a host of settings, even if they do not change institutions.<sup>2</sup>

## Methodology

The findings and recommendations that follow are rooted in a partnership between the PAB, the WASC Senior College and University Commission ([WSCUC](#)), and [Sova](#). WSCUC and Sova teamed up to work with four WSCUC-accredited institutions (one private and three public institutions) to better understand the progress, barriers, and opportunities institutions face as they seek to improve outcomes and close equity gaps for students who transfer. The findings informed the work of the PAB based on what they learned together.

The yearlong work with WSCUC and the four WSCUC member institutions was supplemented by research interviews with multiple institutional, specialized, and professional accreditors and other critical stakeholders as well as a comprehensive literature review of accreditor websites, policy manuals, and resources. While the recommendations in this paper are framed for institutions and historically-regional institutional accreditors (hereafter accreditors), we expect the recommendations will influence many accreditation stakeholders whose decisions affect transfer. We see this as a first step, and we look forward to additional work that brings in other institutional, specialized, and professional accreditors, and others involved in the broader accreditation arena.

## Why Focus on Accreditation?

Many have asked why the Beyond Transfer PAB decided to focus on accreditation. Two board members, Shirleatha Lee and Maria Hesse, [explained](#) that there is great power in engaging accreditors for (at least) the following reasons, described in more detail below:

- ▶ Accreditation influences institutional behavior and reaches institutions at scale;
- ▶ Accreditation offers a platform for long-term change that hits at the heart of high-quality teaching and learning and how institutions operate; and
- ▶ Higher education practitioners and peers are responsible for accreditation, so their engagement can help promote deep and lasting change.<sup>3</sup>

## Accreditors Have Unique Influence and Scale

Experts focused on credit mobility and transfer often lament the lack of national and federal systems, policies, and processes. There is no federal policy on transfer, and there are no technology solutions used nationally. Even the federal Integrated Postsecondary Education Data System (IPEDS) reporting on outcomes for students who transfer is universally lambasted as inadequate.

While accreditation may feel like an imperfect solution, it is one of the only systemic levers available that is pervasive enough to drive the type of change needed while crossing state, system, and institutional borders. Moreover, accrediting bodies have tremendous oversight and influence. To access the billions of dollars appropriated for federal student aid (Title IV of the Higher Education Act), institutions must be accredited by an agency recognized by the Secretary of Education. When that level of funding is at stake, institutions respond.

## Accreditors Are Well-Aligned to Institutional Concerns About Quality

Accreditation is a signal that a college or university is an institution of excellence—one that is willing to examine itself and improve. If accreditors asserted that attention to credit mobility and transfer was an assumed marker of quality, institutions would respond; and over time the culture of higher education would reflect that assumption.

Some observers feel that changing accreditation will take too long. Engaging accreditors is not the only strategy to pursue; the field must simultaneously consider changes such as financial incentives for institutions, technology solutions, and new ways of thinking about equitable affordability.

History provides an example of how accreditors shifted higher education culture by, over time, embracing learning outcomes assessment. Accreditation metrics previously focused on inputs—such as faculty credentials and the number of books in the library—as markers of quality. The idea of measuring learning outcomes met resistance. While accreditors did not embrace learning outcomes quickly and without prodding, they nonetheless shifted to a focus on learning outcomes that—because of their scale and influence—has played a significant role in changing attitudes and culture. Accreditation metrics now reflect an expectation that learning outcomes assessment will “yield data useful for and applied to institutional strengthening.”<sup>4</sup> Accreditation can similarly drive a culture change focused on credit mobility and transfer that matches the magnitude of shifting from inputs to learning outcomes, while always keeping quality front and center.

**“We are asking institutions to demonstrate the quality and outcomes of their programs. Often when I hear others speaking about why accreditation is such a barrier, they’re referencing accreditation standards we no longer subscribe to. We have long since focused on outcomes, but I do admit that in the past, accreditation was very input-based. Like, how many of these do you have, how many of that? What percentage of? No longer.”<sup>5</sup>**

– Dr. Christy Faison, Middle States Commission on Higher Education (MSCHE)

## We are Responsible: Higher Education Practitioners and Peers as Accreditation Stakeholders

Accreditation engages key institutional stakeholders—including faculty—in discussions of quality and decision-making about whether institutions meet accreditation standards. Elevating discussions about credit mobility and equity in outcomes for students who transfer through accreditation is, by definition, a process that will engage the heart and soul of postsecondary institutions. It is a lever for stimulating change from within that is more likely to permeate the culture of an institution and result in long-term, sustainable change.

**“When people say, ‘The accreditors won’t let us,’ I say, ‘Look in the mirror.’ The Commission is made up of institutional actors, and they make our policies and standards. Plus, our members are invited to weigh in and review the Commission’s recommendations.”<sup>6</sup>**

– Representative from an institutional accretor

## Why Should Accreditors and Institutions Pay Attention?

Students who transfer and are mobile are highly diverse by key characteristics such as race and ethnicity, age and income. As Figure 1 demonstrates, however, the current postsecondary system does not serve them well, and they face high barriers to completion. Addressing these barriers to completion for students who transfer and are mobile is imperative to achieving equitable outcomes for students. This section weaves data and evidence together to tell more of that story.

Students are moving in and out of work and learning experiences at high rates, accumulating high-quality learning. Consider a few key data points:

- ▶ At least 39 million Americans have some college credits and have not yet received a credential;<sup>7</sup>
- ▶ 38% of all first-time students transfer institutions within their first six years.<sup>8</sup> Of those who transfer, almost half (45%) change institutions two or more times;<sup>9</sup>
- ▶ Approximately 34% of high school students take college courses in high school and 88% of high schools offer dual enrollment;<sup>10</sup>
- ▶ Approximately one-third of veterans hold a certificate or certification but no additional education;<sup>11</sup> and
- ▶ 64% of students work while in college.<sup>12</sup>

While historically the field has focused on students who transfer—those who move across institutions—these data demonstrate that nearly all students would benefit from an intentional effort to connect learning and evidence of learning across the ecosystem to smooth their pathways.

**“With nearly 40% of all learners porting credit from other institutions into their degree programs and the recent rise in interest in and focus on noncredit bearing learning opportunities, the number of learners who enter the institutional transfer labyrinth will only increase.”<sup>13</sup>**

– Melanie Gottlieb, Executive Director, American Association of Collegiate Registrars and Admissions Officers

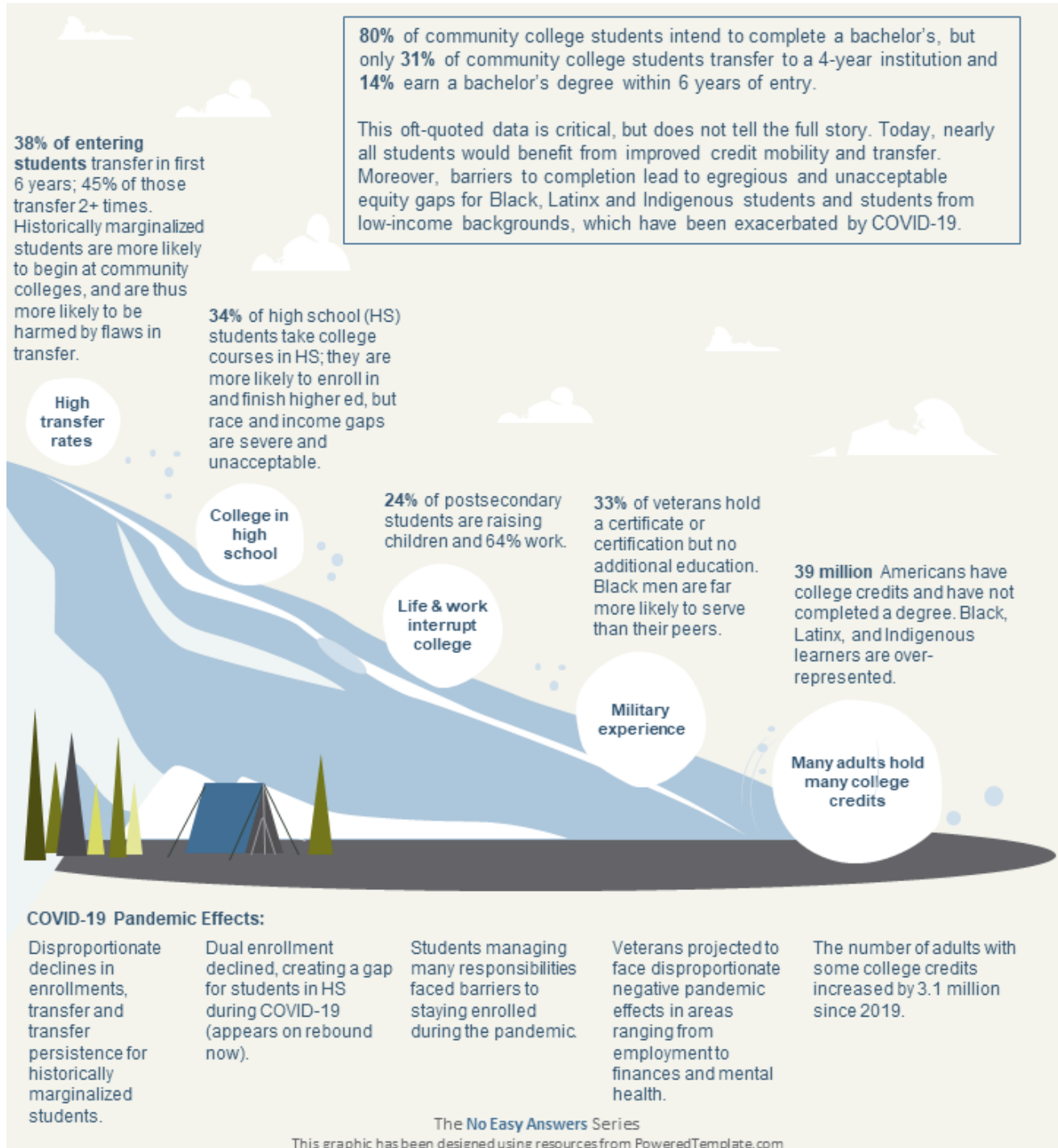
Barriers to completion for students who transfer remain a significant challenge. Currently, 80% of students who enter community college intend to transfer and obtain a bachelor’s degree, yet just 14% percent complete a bachelor’s degree in six years.<sup>14</sup> Those aggregated numbers cover deep inequities by income and race and ethnicity. Within the disaggregated data, we see that the barriers to completion are higher for Black and Latinx students and students from low-income backgrounds. For example, completion rates for a bachelor’s degree within six years of entering a community college by race and ethnicity are 10% for Black students, 13% for Latinx students, 21% for White students, and 26% for Asian students.<sup>15</sup> Completion rates for a bachelor’s degree within six years of entering a community college by income are 9% for lower-income students and 20% for higher-income students.<sup>16</sup> Moreover, Black, Latinx, and Indigenous students and students from low-income backgrounds are disproportionately more likely to begin their postsecondary careers at community colleges. Their pathway to a bachelor’s degree is, therefore, far more likely to be impeded by the hurdles currently present in the transfer and credit mobility ecosystem.

In addition to the equity imperative, institutional leaders and accreditors must give attention to other strong incentives to improve equitable outcomes in transfer and credit mobility. For many institutions, students who transfer and are mobile are the majority of their students. Serving those students well is critical to meeting institutional missions. Furthermore, postsecondary institutions are facing declining birth rates, declining numbers of high school graduates, enrollment declines following the COVID-19 pandemic, and an erosion of public trust.<sup>17</sup> In this environment, students who are mobile are a critical source of tuition revenue; serving them well is a financial imperative for many institutions.

Finally, several interviewees noted that postsecondary education often receives a lot of criticism from federal and state lawmakers. If institutions can improve equitable outcomes for students who transfer, and accreditors can support them, that effort can build goodwill with lawmakers. Otherwise, interviewees noted that history shows that lawmakers will step in. A representative from an institutional accreditor stated, “Legislators will not be patient anymore.”<sup>18</sup>

## Figure 1. Credit Mobility, Transfer, and Equity

If the traditional, full-time, uninterrupted approach to postsecondary education can't change enough to work for today's students, improvements in credit mobility and transfer must step in to fill the void.



(Data Sources: National Student Clearinghouse, US Department of Education, Community College Research Center, Monaghan and Attewell, and Aspen Institute)



## Why Do This Hard Work?

### *Is There an Easier Answer?*

History is littered with simple answers to complex problems that did not produce change. Transfer and credit mobility are notoriously complicated and messy areas with no easy answers or quick fixes. Working with historically-regional institutional accreditors—a stakeholder group with the power to shift the conversation—is not a simple answer, but this approach holds strong potential. We cannot shy away from the hard work.

Two policy approaches appear to be “simple” answers to “fixing transfer,” but they are only part of a comprehensive solution:

- ▶ *Make it the law that if an institution is accredited, another accredited institution must accept and apply all credits from that institution.* According to the Education Commission of the States, 38 states already have a transferable core of lower-division courses, and 35 states have a statewide guaranteed transfer of an associate degree.<sup>19</sup> These policies are valuable, but they have not fixed transfer. In some cases, students’ credits might be transferred as elective credit and not applied to student completion. In other cases, policies might simply be ignored or worked around by institutional actors. Given many such state policies are already in place, there is little evidence that a law mandating acceptance of credit at the accreditation level would compel institutional actors to behave differently; and
- ▶ *Convert community colleges to baccalaureate-granting institutions so that students don’t have to transfer to finish.* Students will continue to be highly mobile across institutions, regardless of what degrees community colleges can offer. While historical definitions of transfer have been focused on vertical transfer from two-year to four-year institutions, the reality is much more complicated. According to the National Student Clearinghouse, the transfer rate for students who begin at four-year institutions is on par with that of students who start at two-year institutions (38% vs. 37%). Many students who start at a four-year institution and transfer go to a two-year institution (almost 60%).<sup>20</sup> Therefore, single-institution solutions like community college baccalaureate offerings are not sufficient to meet the needs of students who increasingly acquire learning in multiple settings on their way to a credential.

### ***No, There are No Easy Answers.***

We must keep raising the bar. Policies that mandate transfer of a core and policies that allow community colleges to offer bachelor’s degrees are important building blocks in an ecosystem that supports credit mobility, but these policies alone are insufficient. True change within the postsecondary landscape requires a variety of solutions with a multitude of stakeholders—accreditors included—to achieve equity.

# Accreditation, Transfer, and Credit Mobility Intersections

## *Where are the Opportunities to Sharpen Focus?*

While all accreditors must meet federal requirements, each has its own unique mission and approach, and their policies and standards differ. Some are more prescriptive than others. For example, some accreditors have minimum credential requirements for faculty, and others do not.

**The absence of robust policies, standards, and site visit guidance related to transfer, credit mobility, credit portability, and applicability of credit to major speaks to a significant gap in priorities.**

The federal government stipulates that accreditors must require their member institutions to have a policy that includes the criteria for accepting transfer credit.<sup>21</sup> That policy must also be easy to find for students. The accreditors do not dictate or prescribe what is in those policies. As one specialized accreditor noted, "What we care about is whether you are following your own policies. We are not prescriptive about what those policies must include."<sup>22</sup>

When an institution undergoes a comprehensive accreditation evaluation (which varies by accreditor and may be every six to ten years with interim checks in-between), institutions are asked a set of questions such as: What is the policy? Is the policy clear? And, where can students find it? Institutional teams respond to these questions in their self-studies, and they offer data and evidence to demonstrate they are meeting the accreditation standard. Evaluation teams (also referred to as "accreditation site visit teams") then review the self-study and may ask follow-up questions. Accreditors offer training for members of the evaluation teams, designed to ensure that the team members understand their responsibility to ask questions and assure quality through this process.

Accreditation currently shines a light on transfer by requesting that institutions have a policy that students can find, asking questions about those policies during site visits, and requesting data on the outcomes of students who transfer. During the review of accreditation standards and policy manuals, we found limited mentions of *transfer*. Language on topics such as credit mobility, applicability of credit, or portability of learning was even harder to find.

The *absence* of a robust set of policies, standards, and site visit guidance related to transfer, credit mobility, credit portability, and applicability of credit to major speaks to a significant gap in priorities. Additionally, some accreditor policies might adversely affect students who transfer, such as limitations on the number of credits for prior learning that can be accepted. While such policies are intended to protect students, these policies must be reexamined as potential barriers. Accreditors should survey institutions and examine student outcomes data to better understand if such policies are functioning as intended.

Key takeaways from the research suggest that the current approach to accreditation does not prohibit institutions from advancing equity-focused changes to transfer and credit mobility. Though one often hears "our accreditor won't let us," that is in fact rarely true.

At the same time, however, accreditation does not currently:

- ▶ Acknowledge that most students would benefit from improved credit mobility;
- ▶ Ask mission-related questions that reflect the importance of transfer and credit mobility;
- ▶ Demand attention to equity through transparency and rigorous analysis of disaggregated outcomes for students who transfer and are mobile; or
- ▶ Provide strong guidance to institutions in areas such as credit evaluation that have serious consequences for students who transfer.

Accreditors must maximize their influence and become a leader in credit mobility solutions.

### ***Are Accreditors Willing to Engage in this Conversation?***

Accreditors' responses to this research were mixed. In some cases, accreditors declined to be interviewed or never responded to multiple attempts at outreach. Other accreditors were very responsive, eager to be engaged, and have already taken steps to address equity in transfer and credit mobility.<sup>23</sup>

As WSCUC President Jamienne Studley highlighted in an *Inside Higher Ed* blog entitled [Who Knew? Five Surprises About Accreditation](#), accreditation agencies are stepping up their game in an evolving higher education landscape. WSCUC, which has long required disaggregated student outcomes data, now publishes a comprehensive Key Indicators Dashboard along with guides for institutions and site visit teams to use evidence to dig deep into specific performance, populations, and patterns.<sup>24</sup> Similarly, the Northwest Commission on Colleges and Universities (NWCCU) and the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) are participating in the Postsecondary Data Partnership to transform data on equitable student success.<sup>25</sup>

The Higher Learning Commission (HLC) has begun studying its role vis-à-vis nondegree credentials, issuing a set of papers that stated, "it is imperative that HLC and its Board work with its membership to look outside the walls of their institutions to survey, recognize, collaborate on, and incorporate new pathways to attain workforce and academic preparedness."<sup>26</sup> HLC also hosts a web page entitled "Ask the Right Questions: A Student Guide to Higher Education" that encourages students to ask hard questions and really understand how prior learning and transfer of credit work at institutions.<sup>27</sup>

The Middle States Commission on Higher Education (MSCHE) has a representative on the advisory board for State University of New York Empire State College's Credential As You Go initiative. The Commission has issued "Transfer of Credit, Prior Learning, and Articulation Agreements Procedures," which include some detailed guidance such as:

- ▶ "The institution will minimize additional fees or finance charges related to the evaluation of transfer of credit for prospective students and will be transparent about any additional financial charges or fees, if any.

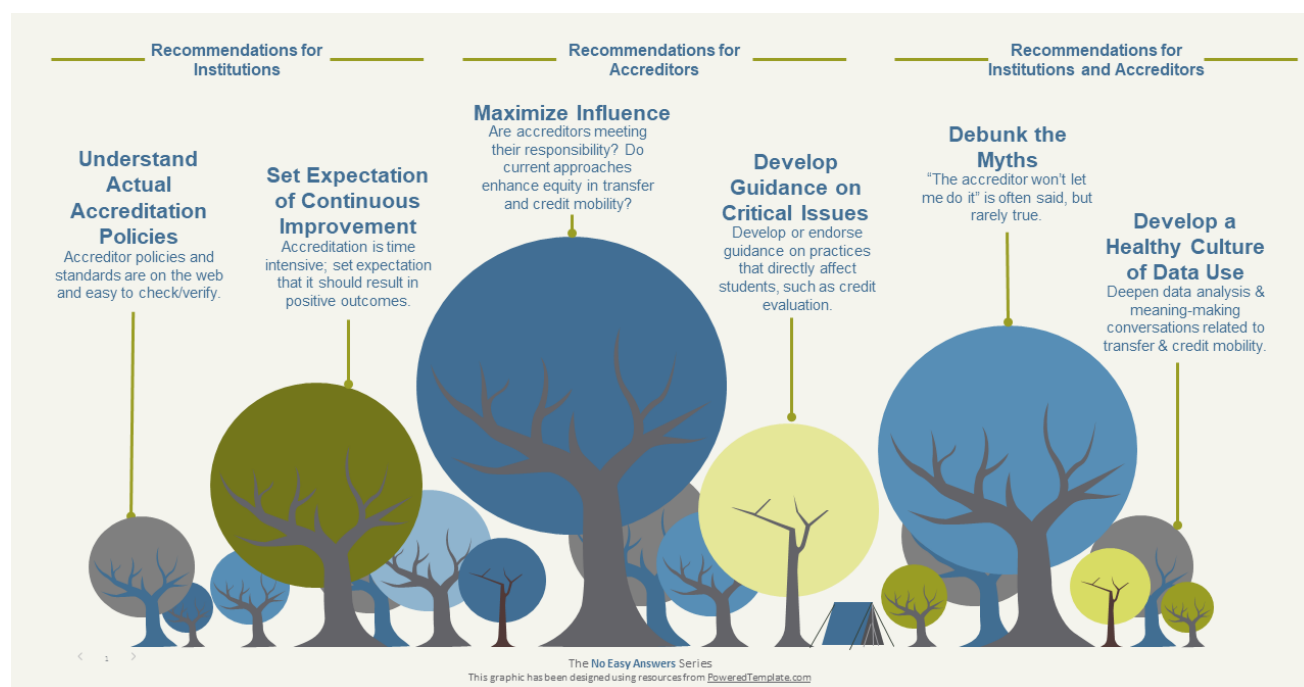
- ▶ The institution will conduct evaluations of transcripts and prior learning in a timely manner and institutional decision-making regarding individual students will be swift and definitive.
- ▶ The institution will inform students in writing when their expectations for the transferability of learning credits to other institutions may not be fully realized. The institution should notify students as early as possible in order to be informative and helpful to students for decision-making.”<sup>28</sup>(emphasis added)

While these individual initiatives do not add up to a holistic and comprehensive shift, taken together they do suggest that accreditors are willing to engage and are in fact taking steps to do so.

## Toward Solutions

Research and engagement for this paper revealed great potential for ongoing work that invites accreditors in as genuine partners supporting the work of achieving equity in transfer and credit mobility—and in other areas of reform. The following recommendations are designed to support both institutional leaders and historically-regional institutional accreditors as they continue down the path of improving transfer and credit mobility. We hope the recommendations are valuable for many accreditation stakeholders, and we look forward to additional work that brings in other institutional, specialized, and professional accreditors, and others involved in the broader accreditation arena. Figure 2 provides an overview of the recommendations.

**Figure 2. Accreditation as a Solution for Transfer and Credit Mobility**



## Recommendations for Institutions

### **1** *Investigate Your Accreditor's Actual Policies and Standards*

Each accrediting body has its own unique mission and approach, and policies and standards differ. Some accreditors are more prescriptive than others. For example, some accreditors have minimum credential requirements for faculty by institutional type (and for dual enrollment), and others do not.

**At the end of the day, institutional policies govern how credits transfer—not accreditor policies.**

Accreditation policies and standards are not intended to create barriers for institutions, and reading accreditation policies would often clear up confusion. The accreditors have very accessible versions of their manuals online that can be investigated through a word search. Please see Appendix A for links to accreditors' transfer and credit mobility policies and standards that can help institutional actors quickly identify their accreditor's policies.

One observer stated that the real issue is about power at the institutional level. This person observed, "Ninety percent of the time it's not accreditation. It's about institutional policy, faculty governance, and the balance of power between the records, administration, and the faculty."<sup>29</sup> At the end of the day, institutional policies govern how credits transfer—not accreditor policies.

In short, institutional leaders should query the excuse, "we can't do that because of accreditation." Look at the policies, or send an inquiry to your accreditor. Indeed, multiple stakeholders at institutions can play a role here. For example:

- ▶ Boards influence policy at institutions, and it is a board's responsibility to ask hard questions. If board members are told something cannot be changed because of accreditation, they should ask to see that policy; and
- ▶ Accreditors also have a process for third-party comments. Key stakeholders—such as students or transfer partners—can call upon an accreditor to conduct outreach to institutions to ensure they are following policies correctly.

### **2** *Set the Expectation that Accreditation Should Foster Continuous Improvement in Transfer and Credit Mobility*

Accreditation is a time-intensive process to which institutions dedicate significant time and resources. Leadership at colleges and universities can set the tone for how the process is approached, leveraged, and aligned with the institution's own strategic planning. Accreditation can be wrongly presented as a compliance exercise, necessary for access to federal financial aid and generally a drain on institutional resources. Conversely, institutional leaders can promote a culture of continuous improvement. Institutions spend significant time and energy on accreditation, and stakeholders should expect positive outcomes from this process.

In the area of transfer and credit mobility, institutions can meet a relatively low bar of showing accreditors they have a policy and where to find it. On the other hand, institutions (particularly those that serve a significant number of students who transfer) can look hard at data, engage in meaning-making conversations, ascertain whether their current policies and practices result in equitable outcomes, and leverage accreditation as an opportunity for continuous improvement (see Appendix B for an Inquiry Guide).

## Recommendations for Accreditors

### **3 Maximize Your Influence**

Accreditors are not, and should not be, unduly prescriptive in their policies and standards. Accreditors do, however, hold enormous influence and have a responsibility to guide institutions toward equity in student outcomes.

How can accreditors maximize their influence over equity in transfer and credit mobility, without being prescriptive? Some recommendations include:

- ▶ Survey members and ask questions about whether current policies create the conditions for intended outcomes, and whether any serve as barriers to transfer and credit mobility;
- ▶ Identify within your commissioners and broader members those who are transfer advocates, and work with them to understand how transfer and credit mobility could be elevated and more clearly tied to demonstrating that institutions are meeting their missions, particularly for institutions serving large proportions of students who transfer and are mobile;
- ▶ Interrogate current assumptions built into accreditation. For example, accreditation calls for curricular coherence, ensuring that credentials represent more than an accumulation of courses or credits. Are program pathways functioning in that way, or is there room for more flexibility? Does evidence of student outcomes support assumptions such as these?;
- ▶ Embed transfer and credit mobility content into evaluator training, to ensure that accreditation reviews and site visits include good questions and analysis;
- ▶ Design conference and meeting content to spotlight good practices in transfer and credit mobility; and
- ▶ Educate your board on how important transfer and credit mobility are to learners in the 21st Century.

Teach-out plans can serve as a case in point. Following institutional closure, many actors—institutions, state policymakers, and accreditors—come together to find ways to protect students through teach-out plans. Institutional closures are often framed as a crisis, and compromises are found to ensure that students can continue their educations, and finish on time. Accreditors play an important role in guiding teach-out plans by setting up relationships that allow students from closed institutions to seamlessly transfer and apply their credits to program completion.

In the absence of a crisis, it is worth asking both institutions and accreditors: Do more conservative transfer policies really help students? Are current policies based in *evidence* about student outcomes, or are they based in *assumptions* about the student experience?

This research effort revealed that accreditors are a group of extremely diverse organizations. They are not a monolith or even a cohesive unit. Some are already finding ways to maximize their influence, and they came to interviews eager to share how they work in service to equity and to invite additional collaboration. For example, the partnership with Sova that undergirds this effort was WSCUC's idea.

Other accreditors came to the interviews wary, concerned that this research would create new challenges for them. Still others declined to be interviewed or did not respond to repeated outreach attempts. These variations raise questions about how differing approaches play out across agencies and programs, how accreditors view their responsibilities, and what that means for equity in student outcomes. Ultimately, higher education stakeholders have a strategic opportunity to continue to work with a critical mass of accreditors to elevate a focus on equitable transfer and credit mobility. We hope and expect that as we continue this work, more accreditors will come to the table and seek to maximize their influence in service to equity.

**In the absence of a crisis [such as institutional closure], it is worth asking both institutions and accreditors: Do more conservative transfer policies really help students? Are current policies based in evidence about student outcomes, or are they based in assumptions about the student experience?**

#### **4 Develop or Use Guidance Related to Critical Issues in Transfer and Credit Mobility, Starting with Credit Evaluation**

Accreditors typically avoid being prescriptive and telling institutions how to do things. However, they do endorse and sometimes issue best practices, guidance, and principles. Credit evaluation can: take a long time and be an administrative burden for institutions; hold critical information back from students at key times they need it (e.g., they might not receive credit evaluation results until after they have to register); often result in students having to retake courses without providing any explanation; and introduce the personal biases of credit evaluators into the review of student learning and transcripts.

A collaboration between key stakeholders—such as institutional actors and organizations including American Association of Collegiate Registrars and Admissions Officers (AACRAO) and the Council of Regional Accrediting Commissions (C-RAC)—could result in guidance on strong credit evaluation that would be helpful to both students and institutions. Individual accreditors can then choose to endorse or share the guidance with their members. AACRAO has decades of survey data on transfer credit practices that could serve as a tremendous resource for advancing such an effort.

An effort to elevate best practices could encourage institutions to take steps such as:

- ▶ Ensure that credit evaluators receive anti-bias training and professional development in how to best serve students who have been historically marginalized;
- ▶ Guarantee students will receive credit evaluation results with a quick turnaround; and
- ▶ Provide automated student-facing tools that ensure students receive up-to-date, relevant advice on how their credits will apply to program completion.

## Recommendations for Institutions and Accreditors

### 5 ▶ *Debunk the Myths*

A commonly expressed and believed sentiment about accreditation standards is that they stand in the way of change. This sentiment is rarely true. As one stakeholder noted, “The accreditor won’t let me do it’ is absolutely false.”<sup>30</sup> An accreditor stated, “There are a lot of old wives’ tales. Many think, for example, if I accept a student transferring from an unaccredited institution, I cannot accept their credits. That’s not in our policies.”<sup>31</sup> The bottom line is institutions themselves set the policies related to how credit decisions are made and how credits are counted toward the completion of prerequisites and majors.

Accreditors are often frustrated by accusations that their policies are blocking change. Some accreditors feel that the myth that they are in the way is often weaponized against them in ways that do real harm to their reputations as organizations and to the ways that accreditation is viewed by institutional actors.

**Statements like “we can’t do that because of accreditation” are only powerful if people hearing that message do not know enough about accreditation to push back.**

Instead, many of the accreditors interviewed for this research wish to be part of the solution. They would like to be engaged as authentic partners that help institutions improve. They have made significant changes to stop interrogating inputs and instead analyze indicators of student success and learning outcomes. Many are taking steps toward being equity-minded through efforts such as the disaggregated data presented through WSCUC’s Key Indicators Dashboard.<sup>32</sup>



Accreditors and institutional actors have key roles to play in debunking the myth that accreditation stands in the way of change. Accreditors need to reach more institutional actors with clear messages about what they do and do not do. Statements like “we can’t do that because of accreditation” are only powerful if people hearing that message do not know enough about accreditation to push back. Similarly, institutional actors need to ask strategic questions when faced with “the accreditor won’t let us.” Asking to see the policy, understanding its interpretation, and asking the accreditors to weigh in are all powerful ways of interrogating whether accreditation policies are truly a barrier. Such inquiries can also expose if there is a long-standing interpretation that has influenced decisions but is not based in actual policy or if accreditation is being used as a rationale for not making change (see Appendix A for more details on accreditor policies and how to reach accreditors).

**“What I tell institutions and others asking about incremental credentialing is, ‘I hope you did not hear me say no.’ I remind them that they should not believe the myth that ‘accreditors won’t let us make changes,’ which is a common misperception. Accreditors have gotten a bad rap... for creating barriers to innovation and maintaining the status quo, which is not the case.”<sup>33</sup>**

– Dr. Christy Faison, MSCHE

## **6** *Develop a Healthy Culture of Data Use that Elevates the Critical Nature of Transfer and Credit Mobility*

During accreditation evaluations, institutions must demonstrate they are meeting the policies and standards of their accreditors. Institutions choose *how* they demonstrate they are doing so; accreditors do not dictate the evidence shared, or the conversations held, but the accreditation process requires institutions to reflect and conduct a self-study.

There may be very little conversation about transfer and credit mobility during a self-study. However, equity cannot be achieved without more attention to the inequities within the structure of current transfer and credit mobility policies and practices. Most institutions need to grapple with transfer more intentionally.

The guidance provided here focuses on which data to analyze and the types of questions to reflect upon to support the self-study (see Appendix B). The guidance serves as a resource for institutions to develop a healthy culture of data use and meaning-making conversations around transfer and credit mobility and as a resource for accreditors to deepen their analysis during site visits. One accreditor noted that enhancing the approach to the self-study could be quite influential because “when accreditors ask questions, it is received by institutions as a form of pressure.” Another reflected that encouraging a culture of inquiry via the self-study makes sense because “self-study is one of the ways that institutions pause and reflect.” As for willingness to receive this guidance, one accreditor noted: “We train our peer evaluators....We can use prompts to get them to think about how to analyze the standards.”<sup>34</sup>

An inquiry guide alone will not result in a healthy culture of data use. The research and engagement with institutions that supported this effort surfaced that some individuals and departments are not comfortable using or sharing data on student outcomes. This discomfort can stem from several places: a legacy of not having good data that is trusted; a lack of understanding about why data is being requested; and concerns about how data will be used, potentially against those supplying the data. Truly building a culture of meaningful data use involves establishing the capacity for good data work at the institution, trust in the quality of the data, and shared understanding of why it is important to look at student outcomes data.<sup>35</sup>

We hope that the inquiry guide offered here (see Appendix B) can be useful to institutions in a variety of contexts. Accreditation is one way of developing a healthy culture of data use because it has enormous influence over institutions. However, this tool can also be used to equip individual transfer advocates to interrogate their institution's approaches and outcomes or to enhance professional development for institutional researchers.

Some may perceive this inquiry guide as additional effort tied to accreditation. However, these questions are absolutely central to equity, particularly for institutions serving a large number of students who transfer. For some institutions, the questions provided in this inquiry guide may replace other questions or data inquiries to ensure that the institution is best serving its mission. As President Studley of WSCUC observed:

**Transfer and credit mobility...get to the heart of an institution's achievement of its goals for equity, completion, and student success. These subjects can be excellent ways to deepen and refresh the institution's inquiry into its successes and areas for improvement.**

### **For Federal Policymakers: Improvements to IPEDS**

Multiple interviewees noted that IPEDS is inadequate for providing good data on outcomes for students who transfer and are mobile. IPEDS cannot differentiate between types of transfer, draw distinctions between two-year and four-year students who transfer, or follow an individual student's transfer journey.<sup>36</sup> One accreditor observed, "We have a system that is still broken at the federal level, and that is problematic for our institutions."<sup>37</sup> Improving IPEDS would greatly facilitate both accreditors' and institutions' ability to conduct a sophisticated analysis of outcomes for students who transfer and are mobile.

## Conclusion

Accrediting bodies have the potential to raise the bar and deepen accreditation's influence on equity for students who transfer and would benefit from credit mobility. Accreditors are already reaching out to engage the PAB in additional discussions, suggesting productive and robust collaboration ahead. However, accreditation alone cannot solve the challenges faced in transfer and credit mobility. Accreditors' efforts need to be buttressed by the work of institutions, policymakers, and many others collectively advancing a combination of changes needed on many fronts. Necessary changes include improved student supports, new technologies, accountability for student outcomes, and improvements to financial incentives for institutions to do this hard work.

The Beyond Transfer PAB seeks to start a discussion via the No Easy Answers series. We welcome your ideas and suggestions. Join us on social media with #BeyondTransfer and reach out with questions to [lara.couturier@sova.org](mailto:lara.couturier@sova.org).

## Notes

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# Appendix A

## Historically Regional Institutional Accreditors and Their Relevant Policies

Name	URL for Accreditation Standards	URL for Policy and Additional Information on Credit Transfer	URL for Policy and Additional Information on Credit for Prior Learning	URL for Third Party Comments
Accrediting Commission for Community and Junior Colleges (ACCJC) Western Association of Schools and Colleges	<a href="https://accjc.org/eligibility-requirements-standards-policies/">https://accjc.org/eligibility-requirements-standards-policies/</a>	<a href="https://accjc.org/wp-content/uploads/Policy-on-Transfer-of-Credit.pdf">https://accjc.org/wp-content/uploads/Policy-on-Transfer-of-Credit.pdf</a>	<a href="https://accjc.org/wp-content/uploads/Policy-on-Credit-for-Prior-Learning.pdf">https://accjc.org/wp-content/uploads/Policy-on-Credit-for-Prior-Learning.pdf</a>	<a href="https://accjc.org/forms/third-party-comments/">https://accjc.org/forms/third-party-comments/</a>
Higher Learning Commission (HLC)	<a href="https://www.hlcommission.org/Policies/criteria-and-core-components.html">https://www.hlcommission.org/Policies/criteria-and-core-components.html</a>	<a href="https://www.hlcommission.org/Policies/assumed-practices.html">https://www.hlcommission.org/Policies/assumed-practices.html</a> <a href="https://www.hlcommission.org/Policies/publication-of-transfer-policies.html">https://www.hlcommission.org/Policies/publication-of-transfer-policies.html</a>	<a href="https://www.hlcommission.org/Policies/assumed-practices.html">https://www.hlcommission.org/Policies/assumed-practices.html</a>	<a href="https://www.hlcommission.org/Students-Communities/submit-comments.html">https://www.hlcommission.org/Students-Communities/submit-comments.html</a>
Middle States Commission on Higher Education (MSCHE)	<a href="https://www.msche.org/standards/">https://www.msche.org/standards/</a>	<a href="https://www.msche.org/policies-guidelines/page/7/">https://www.msche.org/policies-guidelines/page/7/</a>	<a href="https://www.msche.org/policies-guidelines/page/7/">https://www.msche.org/policies-guidelines/page/7/</a>	<a href="https://www.msche.org/complaints/">https://www.msche.org/complaints/</a>
New England Commission of Higher Education (NECHE)	<a href="https://www.neche.org/resources/standards-for-accreditation">https://www.neche.org/resources/standards-for-accreditation</a>	<a href="https://www.neche.org/wp-content/uploads/2018/12/Pp75-Transfer-and-Award-of-Academic-Credit.pdf">https://www.neche.org/wp-content/uploads/2018/12/Pp75-Transfer and Award of Academic Credit.pdf</a> <a href="https://www.neche.org/wp-content/uploads/2018/12/Pp95-Student-Verification-and-Transfer-of-Credit.pdf">https://www.neche.org/wp-content/uploads/2018/12/Pp95-Student-Verification-and-Transfer-of-Credit.pdf</a>	<a href="https://www.neche.org/wp-content/uploads/2018/12/Pp75-Transfer-and-Award-of-Academic-Credit.pdf">https://www.neche.org/wp-content/uploads/2018/12/Pp75-Transfer and Award of Academic Credit.pdf</a>	<a href="https://www.neche.org/forum-the-public-comments-complaints/">https://www.neche.org/forum-the-public-comments-complaints/</a>
Northwest Commission on Colleges and Universities (NWCCU)	<a href="https://nwccu.org/accreditation/standards-policies/standards/">https://nwccu.org/accreditation/standards-policies/standards/</a>	<a href="https://nwccu.app.box.com/s/jn1xz3lz2oknw1a7fljmok3ul1ud7oOe">https://nwccu.app.box.com/s/jn1xz3lz2oknw1a7fljmok3ul1ud7oOe</a>	<a href="https://nwccu.app.box.com/s/jn1xz3lz2oknw1a7fljmok3ul1ud7oOe">https://nwccu.app.box.com/s/jn1xz3lz2oknw1a7fljmok3ul1ud7oOe</a>	<a href="https://nwccu.org/tools-resources/complaints/">https://nwccu.org/tools-resources/complaints/</a>
Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)	<a href="https://sacscoc.org/accrediting-standards/">https://sacscoc.org/accrediting-standards/</a>	<a href="https://sacscoc.org/app/uploads/2019/08/transfer-credit.pdf">https://sacscoc.org/app/uploads/2019/08/transfer-credit.pdf</a> <a href="https://sacscoc.org/app/uploads/2019/08/2018-POA-Resource-Manual.pdf">https://sacscoc.org/app/uploads/2019/08/2018-POA-Resource-Manual.pdf</a>	<a href="https://sacscoc.org/app/uploads/2019/08/2018-POA-Resource-Manual.pdf">https://sacscoc.org/app/uploads/2019/08/2018-POA-Resource-Manual.pdf</a>	<a href="https://sacscoc.org/institutions/third-party-comments/">https://sacscoc.org/institutions/third-party-comments/</a>
WASC Senior College and University Commission (WSCUC)	<a href="https://www.wscuc.org/handbook/">https://www.wscuc.org/handbook/</a>	<a href="https://wascsenior.app.box.com/s/jsn2e5fl64uequzrmdp2">https://wascsenior.app.box.com/s/jsn2e5fl64uequzrmdp2</a>	<a href="https://wascsenior.app.box.com/s/O5cvtmcsdii6lsmhqqgl">https://wascsenior.app.box.com/s/O5cvtmcsdii6lsmhqqgl</a>	<a href="https://www.wscuc.org/resources/comments/">https://www.wscuc.org/resources/comments/</a>

# Appendix B

## Inquiry Guide: Equitable Transfer and Credit Mobility

*Expectation:* All data must be disaggregated by at least race/ethnicity, income, age, and first-generation status. Ideally, data would also be analyzed by program.

*Note:* Some of these data points and questions will be harder for institutions to analyze, and might need to be implemented incrementally. Those items are indicated with an asterisk (\*).

Relevant data to prove meeting criteria or standards	Meaning-making conversations
<p><b>Mission and planning</b>            What percent of the institution's students transfer in or would benefit from credit mobility due to credits from work-based learning, dual enrollment in high school, etc.?             What percent of the institution's students transfer out?</p>	<p>How is the value of students who transfer or would benefit from credit mobility reflected in the institution's mission and strategic plan?             How is the value of students who transfer or would benefit from credit mobility communicated to faculty, staff, and students?             How are students who transfer or would benefit from credit mobility prioritized in the budget, financial aid allocations, and strategic enrollment management plans?</p>
<p><b>Student outcomes</b>            (As noted above, all data must be disaggregated by at least race/ethnicity, income, age and first-generation status. Ideally, data would also be analyzed by program.)             Graduation rates for students who transfer to the institution, in X years (e.g., 2, 3, 4 and 6 years).             Graduation rates for students who transfer from the institution, in X years (e.g., 2, 3, 4 and 6 years).             What is the average time to completion?             What is the average number of credits to completion?             Are the career outcomes of students who transfer comparable to the career outcomes of students who were first time in college at this institution?*</p>	<p>Are any student outcomes particularly concerning? If so, from which transfer partners? From which programs?*</p> <p>Are there particularly successful strategies that deserve to be expanded?</p> <p>Does "average credits to completion" make sense when examined alongside "average time to completion" (i.e., are students taking far longer than might be expected to complete a threshold of credits)?</p> <p>Are students who transfer acquiring the skills and knowledge they need for success after completion?*</p> <p><i>Add a qualitative lens:</i></p> <ul style="list-style-type: none"> <li>• Pull a random sample of 10–20 recent graduates who transferred;</li> <li>• As a team, analyze their transcripts and the paths the students took;</li> <li>• Engage in a team discussion:               <ul style="list-style-type: none"> <li>◦ What outcomes did the students achieve?</li> <li>◦ Where and when did students repeat courses?</li> <li>◦ What differences do we see by program? Transfer partner?</li> <li>◦ What might this mean about the institution's policies and practices?</li> </ul> </li> </ul>

## Inquiry Guide, *continued*

Relevant data to prove meeting criteria or standards	Meaning-making conversations
<p><b>Transfer partners</b>            What are the institution's largest transfer partners?</p> <p>For sending: How do students perform when they move to another institution?</p> <p>For receiving: How do students from particular institutions perform once they arrive at this institution?</p>	<p>What trends do the student outcomes data suggest? Are there significant differences between transfer partners? By program?*</p> <p>If there are differences, what would help to understand why (avoid conjecture and collect data and student voice through surveys, focus groups, etc.)?</p> <p>How frequently do faculty meet with faculty from primary transfer partners to discuss learning outcomes and course comparability?</p> <p>What other relationships (e.g., between presidents, provosts, transfer specialists, co-advising, etc.) support the health of the transfer partnership?</p> <p>In what ways does the institution support those conversations (e.g., providing agendas, attending to logistics and food)?</p>
<p><b>Credit evaluation</b>            On average, how long does credit evaluation take?</p> <p>How soon and in what manner do students receive their credit evaluation information?</p> <p>How many credits does the institution accept for transfer?</p> <p>How many credits does the institution apply to program completion?</p> <p>Are there significant differences by program? By sending institution?*</p>	<p>Do students have to register for courses before they receive their credit evaluation information?</p> <p>Are course slots held for students who transfer? What happens if the courses students need are not available?</p> <p>Are decisions to require particular prerequisites or to not accept courses from particular institutions based in evidence related to student performance? Has the institution considered ways to bridge specific, identifiable gaps (e.g., accept credit while offering co-requisite supports to students)?</p> <p>Does the institution know why courses are not transferring and applying? Are those decisions based on a documented rationale?*</p> <p>Are the reasons for not transferring and applying credits documented and communicated back to students?</p>



## Inquiry Guide, *continued*

Relevant data to prove meeting criteria or standards	Meaning-making conversations
<p><b>Academic experience and student supports</b>            How many students who transfer are in capstone courses? Service learning? Learning communities? Internships?</p> <p>What student supports are in place for students who intend to transfer out and for students who transfer in?</p> <p>How many students participate in student supports (e.g., orientation, advising, etc.)? What are the characteristics of the students who participate?*</p>	<p>Do students who transfer have equal access to enriching learning experiences and high-impact practices, such as learning communities, capstone courses, service learning, internships, etc.?            (See <a href="https://www.aacu.org/trending-topics/high-impact">https://www.aacu.org/trending-topics/high-impact</a>)</p> <p>Do students who transfer have equitable access to student supports?</p> <p>Do students who transfer receive an equitable proportion of financial aid?</p> <p>Are slots for housing, allotments of financial aid, and other critical student supports held for students who transfer?</p> <p>What systems are in place to identify students who want to transfer and assist them in maximizing their likelihood of credit transfer and degree completion at their destination institution? What is the institution doing to support students' transfer planning early in the process? Is it mandatory?</p> <p>To what extent are students who wish to transfer out satisfied with the guidance and support they receive about their options?</p> <p>Does the institution know who takes advantage of advising? Orientation?</p> <p><i>Add a qualitative lens #1:</i>            As a team, adopt the persona of a student who intends to transfer to the institution. Work together to navigate the institution's website, trying to understand questions such as:</p> <ul style="list-style-type: none"> <li>• How many of the student's credits will transfer?</li> <li>• How many of the student's credits will apply to program completion?</li> <li>• How long will it take the student to complete the next degree?</li> <li>• What types of aid will the student be eligible for and how much work will be required to apply for aid?</li> <li>• What will the student's full bachelor's degree cost?</li> </ul> <p><i>Add a qualitative lens #2:</i></p> <ul style="list-style-type: none"> <li>• Pull data on students who are taking the top three transfer courses;</li> <li>• Compare students' course-taking patterns with the existing method of identifying students who intend to transfer;</li> <li>• Reach out to those students and offer transfer supports, track, and compare student outcomes; and</li> <li>• Discuss: Are course-taking patterns an effective way of identifying and supporting students who intend to transfer? What does that mean for current policies and practices?</li> </ul>



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