



Department of  
Higher Education



# Proprietary Credit Transferability Strategy Plan

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*A report to the Governor, President and Minority Leader of the Senate,  
and Speaker and Minority Leader of the House of Representatives  
in response to HB 49 and Ohio Revised Code 3333.166*

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December 31, 2018



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## Introduction and Charge of Committee

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Ohio Revised Code section 3333.166 (below) charged the Chancellor of the Ohio Department of Higher Education to assemble a group of stakeholders (Appendix A) to assist in the preparation of a transferability strategy plan to allow students who attended a for-profit private college to transfer credits to Ohio public institution of higher education without unnecessary duplication or institutional barriers. The stakeholder group adopted a purpose statement placing helping students at the foundation of this work. Monthly meetings of the stakeholder group were used to identify and discuss key issues regarding the development of a transferability strategy plan (Plan). Those meetings, starting in January 2018, included discussion and exploration of a variety of topics (Appendix B) important to the strategies being developed.

### **3333.166 Transfer of credits**

(A) As used in this section:

(1) “For-profit private college” means a career college in this state that holds a certificate of registration from the chancellor of higher education under Chapter 3332. of the Revised Code or a private institution exempt from regulation under Chapter 3332. of the Revised Code as prescribed in section 3333.046 of the Revised Code.

(2) “State institution of higher education” has the same meaning as in section 3345.011 of the Revised Code.

(B) The chancellor shall prepare a transferability strategy plan that defines criteria, policies, procedures, and timelines that would enable students to transfer agreed upon courses completed through a for-profit private college to a state institution of higher education without unnecessary duplication or institutional barriers. Where applicable, the policies and procedures in the strategy plan shall build upon the articulation agreement and transfer initiative course equivalency system required by section 3333.16 of the Revised Code.

(C) The chancellor shall convene the necessary stakeholders to assist in the preparation of the strategy plan. The chancellor shall complete and deliver to the governor, president and minority leader of the senate, and speaker and minority leader of the house of representatives an interim strategy plan on or before July 1, 2018, and the final strategy plan on or before January 1, 2019.

*Added by 132nd General Assembly File No. TBD, HB 49, §101.01, eff. 9/29/2017.*

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## Principles for Designing a Strategy Plan

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The stakeholders were guided by the following principles in designing and developing the plan, which is inclusive of students transferring from a for-profit private college (proprietary institution) to a public institution and from a public institution to a for-profit private college (proprietary institution).

1. Strategies should promote academic rigor and quality.
2. Strategies should promote student choice and success.
3. Strategies should allow students to complete a degree, without undue time and cost, by reducing unnecessary duplication and institutional barriers.
4. The plan should establish a regular pattern of collaborative interaction among the participating sectors of higher education.

The Proprietary Credit Stakeholder Committee convened in monthly meetings from January through December 2018 (Appendix C). Over the course of these meetings, special guests (Appendix D) were invited to speak to the committee about key issues requiring consideration by the committee.

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## Key Issues Discussed

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### **Transfer Trends between the Types of Institutions** *(Appendix E)*

On average, nearly 1,000 students annually transfer from proprietary colleges and universities to Ohio public colleges and universities, with more than 80% of the students transferring into two-year public colleges. Most of the students transferred into majors in health, arts & humanities, or business at Ohio public institutions. Only 10%-15% of students transferring from proprietary institutions received transfer credit at the public institution. However, students who did receive transfer credit averaged 30 semester hours of credit, and those credit recipients came mostly from regionally accredited institutions rather than institutions with national accreditation.

### **Accreditation Processes and Standards**

Early in the committee discussions, it was evident that there was a need to further examine the similarities and differences between regional and national accreditation to address concerns about equivalency between accreditation standards and the ability of regionally accredited institutions to accept transfer credit from nationally accredited institutions. At the March 2018 meeting, a representative from the Higher Learning Commission (HLC), the regional accrediting body that covers the State of Ohio, confirmed that HLC accreditation does not prohibit the award of credit from non-regionally accredited institutions. This information also prompted conversation regarding the need to change the Ohio Articulation and Transfer Network's (OATN) Transfer and Articulation Policy (Appendix F), which does not align with the Higher Learning Commission policy. The OATN policy will be discussed and updated at the next Ohio Articulation and Transfer Network Oversight Board Meeting.

### **Faculty Role in Curriculum and Institutional Governance**

Concerns about faculty control of the curriculum and faculty involvement in institutional governance were identified as potential barriers to transferring credit from nationally accredited institutions to Ohio's regionally accredited public institutions. Over the course of the meetings, committee members were able to learn about the similarities and differences between regionally and nationally accredited institutions and gain a better understanding of the cultures and norms of faculty involvement at the different types of institutions. Conversations focused on faculty involvement in curriculum development and approval, course assessments and evaluation, and program review processes. Discussion also was held regarding the differing governance structures at for-profit and non-profit public institutions.

## **Courses**

There was early consensus among stakeholders that an initial focus on general education coursework would be appropriate, because almost all degree seeking students take these courses early in their college careers. This conclusion was supported by overall research on transfer courses — the vast majority of courses that are transferred fall within the general education areas noted below:

- English composition
- Mathematics
- Social & behavioral sciences
- Natural sciences

## **Transfer Credit Evaluation Processes**

The stakeholder group discussed numerous approaches for how transfer of credit between proprietary and public institutions currently works and could work in the future. It is important to note that all transfer credit approaches have associated costs that are borne by the state, the institution, or the student. The cost evaluations sought to provide an estimate of the relative costs associated with the three approaches and the entity that would bear those costs (i.e., the state, the institution, or the student). The committee selected three approaches for a cost analysis to help determine which approach or approaches would be viable for further discussion and implementation:

1. Institutional transfer review;
2. College Level Examination Program (CLEP) exams; and
3. The statewide Ohio Articulation and Transfer Course Equivalency Management System (CEMS) that is used to guarantee transfer between Ohio's public institutions.

Each of these options was examined to approximate the amount of time needed for transfer evaluations and other possible effects on staff at college campuses and at the Ohio Department of Higher Education.

## **Costs (Including Human Resources and Technology Resources)**

As expected, implementation costs varied between the approaches evaluated for transfer of agreed-upon coursework.

The use of the statewide Ohio Articulation and Transfer CEMS process would be, by far, the most costly, both in terms of human resources and technology resources. The costs for this process are born by the state (technology and staff resources) and by the institutions that provide the faculty to make the process work. This approach did not seem to make sense to evaluate further, given the high cost and the relatively small number of students transferring between Ohio's proprietary and public institutions. The institutional transfer review process costs far less than the statewide review, even when accounting for the time required by campus faculty and staff, and does appear to be a viable option. The use of CLEP exams could be done for the lowest cost per transfer; however, as currently structured, the cost burden is placed on the student (approximately \$87 per exam).

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## Strategy Plan

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The committee has determined that there are existing, viable options for transferring credit between Ohio's public and proprietary colleges and universities. The options are reflective of statewide and institutional policies that are already in place to allow credit evaluation and award. These approaches meet standards for academic rigor and quality, promote student choice and success, and allow students to progress toward a degree without unnecessary duplication or institutional barriers.

Even though there are existing options for students, transfer of credits between Ohio's public and proprietary institutions has been hindered by a lack of understanding of the sectors, an inconsistent use of available approaches by the institutions and, importantly, OATN Articulation and Transfer Policy.

Therefore, the stakeholder committee recommends a three-part strategy for improving credit transfer between the sectors: 1) Communicate the existing approaches for credit transfer and encourage institutions to use the methods that fit best with their student population and institutional mission; 2) Make necessary changes to state policy and institutional policy to facilitate credit transfer between the sectors; and 3) Suggestions for future action.

### **1. Communication of existing approaches for credit transfer**

Communicating the array of approaches that can be used to evaluate transfer credit requests is an important first step. Although institutions may currently use some or all of the approaches described below, encouraging institutions to use a broader array of approaches, regardless of the sector from which the student is transferring, will decrease barriers to transfer and facilitate credit awards between sectors.

#### **a) Institutional Evaluation**

Ohio's colleges and universities currently perform institutional evaluations of academic credit from other higher education institutions, using their credit evaluation policies. These evaluations typically involve staff members in the admissions office and may also include faculty in particular disciplines. Because of current OATN policy and misunderstandings regarding HLC policy, some institutions believe that they are not able to perform institutional evaluation of credit from proprietary institutions. With a change in OATN policy and better understanding of HLC policy, institutions will be encouraged to use their evaluation processes.

**b) CLEP Examinations**

The Ohio Department of Higher Education implemented a statewide policy regarding awarding college credit for College-Level Examination Program (CLEP) exams in 2017. This process had statewide faculty panels make CLEP alignment recommendations for 33 exams. The statewide CLEP Alignment Policy can be found at [www.ohiohighered.org/transfer/clep](http://www.ohiohighered.org/transfer/clep). Students from proprietary institutions are eligible to take these exams, at their cost, and if passing scores are achieved and submitted to Ohio public institutions, they will be awarded equivalent credit. CLEP exams may be especially useful for students seeking credit transfer as a result of a proprietary school closure. The State Board of Career Colleges and Schools plans to seek legislative approval to use funds from its student tuition recovery fund to assist students with CLEP fees when a school closes.

**c) Prior Learning Assessment through Portfolio Review**

Prior Learning Assessment (PLA) measures student learning that has occurred outside the college classroom to determine whether it is appropriate for college credit. PLA does not award credit for “life experience.” Rather, it awards credit for college-level learning (knowledge, skills, and competencies) that students have obtained as a result of their prior learning experiences which can be documented.

CLEP examinations, institutional challenge exams, and ACE recommendations are forms of PLA. Another mechanism for awarding credit for prior learning is through Portfolio Review. Numerous resources for faculty regarding the portfolio creation and review process can be found on ODHE’s website at: <https://www.ohiohighered.org/PLA/resources#blank>

**d) Institutional Challenge Examinations**

Ohio institutions maintain individual policies that allow students to earn college credit by successfully completing challenge examinations in allowable subject areas. These tests measure a student’s knowledge for the subject area and are administered in a variety of ways.

**e) ACE Recommendations**

The American Council on Education (ACE) currently has a credit review process that is often utilized and accepted by most public colleges and universities in Ohio. Proprietary institutions could utilize ACE to review their coursework and make credit recommendations. Since ACE is a national organization, those recommendations could be utilized not just in Ohio, but nationally. More information about the cost of the ACE review process can be found at <https://www.acenet.edu/news-room/Pages/Fees-for-ACE-CREDIT-course-reviews.aspx>.

**2. Necessary changes to state policy and institutional policy to facilitate credit transfer between the sectors**

The stakeholder committee recommends making an immediate change to OATN Articulation and Transfer Policy to explicitly indicate that colleges and universities with regional accreditation can evaluate transfer credits from institutions with national accreditation, as allowed by the Higher Learning Commission. This recommended change to the OATN policy will be presented at the winter, 2019 meeting of the OATN Oversight Board; approval of the recommendation is expected. After approval by the Oversight Board, the Chancellor will post a directive regarding the new policy for the standard ten day public comment period. Implementation of the policy will be handled by the OATN and the Oversight Board.

The stakeholder committee further recommends that the OATN Articulation and Transfer Policy make clear that all of Ohio's public colleges and universities must have an explicit and transparent policy regarding the evaluation of credits from nationally accredited institutions. Although the policy itself is up to the discretion of the institution, this committee and ODHE strongly recommend that credit evaluations for all students, whether transferring from a regionally or nationally accredited institution that holds a Certificate of Authorization from the Chancellor, be completed in a similar fashion.

These policy updates will have an immediate positive impact on the ability of students to transfer credit between proprietary institutions and Ohio's public colleges and universities.

**3. Suggestions for future action**

The committee believes that future action can be taken to further facilitate credit transfer between the sectors.

**a) Research Study**

The committee believes that a research study, as outlined in Appendix G, should be conducted to gain further information on institutional review processes at colleges, universities, and proprietary colleges. The research will focus on the costs associated with conducting the reviews, course equivalencies, and potential biases. The Ohio State Board of Career Colleges and Schools has agreed to seek approval to fund the research, which, if funded, could begin as early as spring, 2019.

**b) Funding for CLEP Examinations**

As noted earlier, the State Board of Career Colleges and Schools plans to seek legislative approval to use funds from its student tuition recovery fund to assist students with CLEP fees when a school closes. Because of ODHE's recent adoption of a statewide CLEP policy, the use of CLEP examinations is a cost-effective way to award credit to students transferring between sectors. However, the cost associated with the exam can discourage a student from using the approach. This committee would like to explore other mechanisms for paying for CLEP examinations.

**c) Continued Cross Sector Meetings**

The committee has found enormous value in getting together to better understand the similarities and differences between the sectors, and to discuss options for facilitating transfer between the sectors. Ongoing meetings will be key to examining the effects of changes to state and institutional policy, designing and evaluating the results from the research study, and exploring payment options for the CLEP exam. It is suggested that ongoing meetings should include representation similar to that of the current stakeholder group.

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## Conclusion

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The stakeholder committee made great progress in understanding the issues surrounding student transfer between proprietary institutions and Ohio's public institutions. The committee believes that immediate improvements in credit transfer can be achieved by a) making appropriate revisions to the OATN policy; b) communicating the broad range of credit evaluation approaches that can be used when students transfer; and c) encouraging greater use of those existing credit evaluation approaches. The committee also believes further improvements can occur with continued communication between ODHE, public college and university representatives, and representatives of the for-profit sector.

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## Appendix A: Stakeholder Committee List

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## Appendix B: Surveys Completed to Inform Discussion

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### May 4, 2018:

- Distributed to committee members from both public and proprietary institutions seeking feedback related to policies of the Higher Learning Commission and the awarding of college credit from proprietary institutions and polices related to national accreditation and the awarding of college credit. Additional questions gathered feedback related to unforeseen consequences of awarding credit to proprietary institutions, feedback on specific courses that should be considered, how course evaluations may take place within the statewide model of course evaluation, and if Prior Learning Assessment could help address credit transfer for students from proprietary institutions.

### August 1, 2018:

- Distributed to registrars at 36 Ohio public institutions to help the committee understand institutional polices related to the acceptance of transfer credit from non-regionally accredited institutions.

### September 28, 2018:

- Distributed to committee members from proprietary institutions regarding the established statewide College Level Examination Program (CLEP) policy. Institutions were asked if they agree with the policy, agree with the proposed alignments and cutoff scores, and if the institution would support the statewide CLEP policy.

### October 3, 2018:

- Distributed to committee participants from public and proprietary institutions to help the stakeholder committee determine which general education courses could be considered should a pilot project proposal be implemented. Courses utilized were from the established Ohio Transfer Module (OTM) or the Transfer Assurance Guide (TAG); proprietary institutions were asked to select appropriate courses based on established learning outcomes. Public institutions and proprietary institutions were asked to agree or disagree with the listed course as well as list their equivalent course. Courses listed were: English Composition (TME 001 First Writing Course), Mathematics (TMM 001 College Algebra), Arts & Humanities (OAH 045 Introduction to Philosophy), Social & Behavioral Sciences (OSS 015 Introduction to Psychology), and Natural Sciences (OSC 003 Biology I).

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## Appendix C: Meeting Dates

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- **January 22, 2018:** Introduction and Discussion of Goals and Issues to be Addressed
- **February 12, 2018:** Review of Certificate of Authorization Process and Data
- **March 12, 2018:** National and Regional Accreditation Discussion
- **April 16, 2018:** OATN Credit Review Process and Mission Statement
- **May 14, 2018:** Mission Statement Review and Policy Survey Results
- **July 25, 2018:** Course Data and Overall Next Steps
- **September 19, 2018:** Survey Results Review (CLEP & Policies) and Cost Estimate Forecast
- **October 31, 2018:** Discussion of Transfer Strategies and Approaches
- **November 28, 2018:** Review of Final Draft Report

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## Appendix D: Speakers Invited to Meetings to Inform Discussion

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### February 12, 2018:

- Ohio Certificate of Authorization Process Discussion: Mr. Matt Exline, Assistant Director for Program Approval Operations, Ohio Department of Higher Education

### March 12, 2018:

- Regional Accreditation Discussion: Dr. Tom Bordenkircher, Vice President for Accreditation Relations, Higher Learning Commission (HLC)
- National Accreditation Discussion: Mr. John Ware, Executive Director, Ohio State Board of Career Colleges and Schools
- National Accreditation Discussion: Mr. Greg Shields, President, Daymar College

### April 16, 2018:

- OTM and TAG Review Process Discussion: Dr. Lori Zakel, Professor and TAG Lead, Sinclair Community College
- OTM and TAG Review Process Discussion: Dr. Randy Smith, Vice Provost for Academic Programs and OTM Faculty Sub-Committee Co-Chair, The Ohio State University
- OTM and TAG Review Process Discussion: Dr. Sherry Howard, Humanities Professor and OTM Faculty Sub-Committee Co-Chair, Northwest State Community College
- ITT Closing Respondent Discussion: Dr. Lori Zakel, Professor, Sinclair Community College
- ITT Closing Respondent Discussion: Ms. Nikki Pappas, Dean of Education, Fortis College
- ITT Closing Respondent Discussion: Dr. Hope Moon, Professor, Lorain County Community College
- ITT Closing Respondent Discussion: Dr. Martin Maliwesky, Associate Vice President, Columbus State Community College
- Mission Statement Discussion: Mr. Thomas Pappas, President, Tom Pappas and Associates

### July 25, 2018:

- Course Transferring Discussion: Dr. Shoumi Mustafa, Senior Research Analyst, Ohio Department of Higher Education

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**September 19, 2018:**

- Accreditation Policy for Awarding College Credit Discussion: Mr. Mark Cortez, Director for Articulation and Transfer Policy, Ohio Department of Higher Education
- Proprietary Institutions' Transfer Policies and Position on CLEP Discussion: Mr. John Ware, Executive Director, Ohio State Board of Career Colleges and Schools
- Course Evaluation and Cost Implementation Discussion: Mr. Mark Cortez, Director for Articulation and Transfer Policy, Ohio Department of Higher Education
- Course Evaluation and Cost Implementation Discussion: Mr. Jared Shank, Director for Military and Apprenticeship Initiatives and Special Projects, Ohio Department of Higher Education

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**Appendix E: Research**

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- **Selection of Courses to Transfer: From Proprietary Institutions to Ohio Public Institutions of Higher Education.** July 25, 2018. Dr. Shoumi Mustafa, Ohio Department of Higher Education. Accessible at [https://www.ohiohighered.org/sites/default/files/uploads/transfer/research/Selection-of-Courses-to-Transfer\\_From-Proprietary-to-Ohio-Public-Institutions.pptx](https://www.ohiohighered.org/sites/default/files/uploads/transfer/research/Selection-of-Courses-to-Transfer_From-Proprietary-to-Ohio-Public-Institutions.pptx).
- **Transfer Movements: Proprietary and Ohio Public Institutions of Higher Education.** March 12, 2018. Dr. Shoumi Mustafa, Ohio Department of Higher Education. Accessible at [https://www.ohiohighered.org/sites/default/files/uploads/transfer/research/Transfer-Movements\\_Proprietary-and-Ohio-Public-Institutions.pptx](https://www.ohiohighered.org/sites/default/files/uploads/transfer/research/Transfer-Movements_Proprietary-and-Ohio-Public-Institutions.pptx).

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## Appendix F: Policy Updates

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The following is the **current policy** statement from the Ohio Articulation and Transfer Policy manual. This policy statement will be reviewed, edited, and revised to reflect the knowledge that has been gained throughout the stakeholder meeting process. The intent of these changes is based on the Higher Learning Commission (HLC) allowance of the review and acceptance of credit from proprietary institutions, a primary change from the current policy statement and guidance. With this policy statement updated and encouraging institutions to update their specific policies and to use multiple methods to review and award credit, including institutional review, we believe students will benefit greatly.

### Current Policy Statement

#### 1. ACCEPTANCE OF TRANSFER AND ARTICULATED CREDIT

*Acceptance of credit* is the decision process performed by the receiving institution to determine which credit it will post to the student's official academic record (i.e., the transcript). Acceptance of transfer credit should not be confused with the application of credit to a specific program or degree, which is covered in Section D. 2., APPLICATION OF TRANSFER AND ARTICULATED CREDIT.

Articulated credit for successfully completed college-level learning shall also be accepted as specified in this policy. The receiving institution will determine which courses are college-level on the basis of the provisions of this policy, the Guidelines and Procedures for Academic Program Review Manual<sup>1</sup>, and institutional processes that contravene neither. Three standards have offered useful guidance in the past: 1) The course is not remedial or developmental, 2) the course carries one or more credit hours, and 3) the credit hours of the course are eligible to count toward graduation at the sending and receiving institutions or should otherwise appear on the student's official academic record according to this Policy. How the receiving institution applies transfer credit to a program is covered in Section D. 2, APPLICATION OF TRANSFER AND ARTICULATED CREDIT.

The following guidelines and requirements shall govern the acceptance of transfer credit:

- a. Transfer credit will be accepted for successfully completed college-level courses and other college-level learning according to the requirements of the Policy and the Guidelines and Procedures for Academic Program Review. Credit shall be transferred for course credit awarded by Ohio public institutions of higher education which are accredited by the Higher Learning Commission or other regional accrediting commission that have been recognized by the Council on

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<sup>1</sup> [https://www.ohiohighered.org/content/directive\\_2015\\_016](https://www.ohiohighered.org/content/directive_2015_016)

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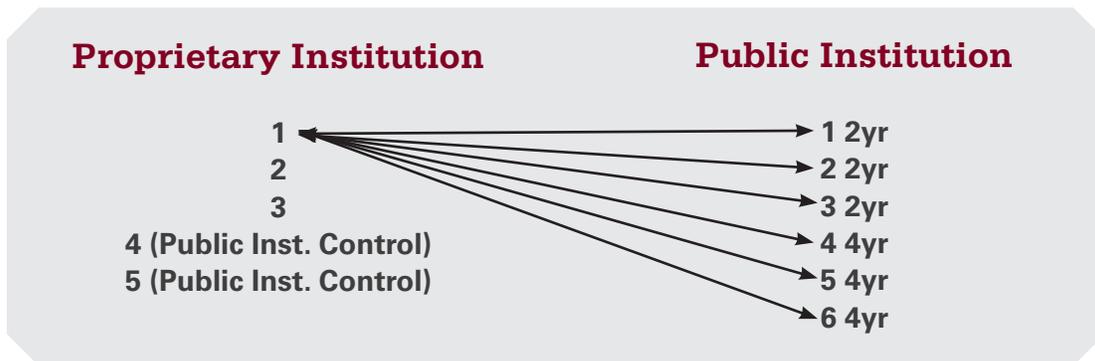
Higher Education Accreditation (CHEA).<sup>2</sup> For purposes of this Policy, institutions accredited by national or professional agencies which are recognized by CHEA, but not also accredited by a regional accrediting commission, will be considered non-accredited.

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## Appendix G: Proposed Research Study

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In order to gain more information about institutional review processes, the costs associated with such reviews, course equivalencies and potential biases, institutional evaluation process could be evaluated in a research project. This project would involve three proprietary institutions, three community colleges, and three universities. To each participating public institution (right column below) five courses from each school (left column below) will be submitted to be evaluated and aligned to a comparable general education course. For each public institution, two courses from each area (for a total of 10 courses) from already existing statewide approved courses will be included “blindly” into the courses from the proprietary institutions. Those course will act as a “control” to help evaluate any potential bias.



Other items to note in this project are that no students will be involved, just course evaluation will take place. Institutions will be asked to track all time involved in the evaluation of the courses and estimate costs and provide a report about their findings (public institutions evaluate 25 courses each and proprietary institutions evaluate 30 courses each, for a total of 240 evaluations).

It is being estimated that to implement this project, \$15,000 per institution be awarded and \$25,000 for Ohio Articulation and Transfer Network administration costs. A total estimated amount of \$160,000 would be needed for implementation of this research project.

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<sup>2</sup> <http://www.chea.org/Directories/regional.asp>

This pilot project would yield more accurate information as to time and cost for credit evaluation and transfer from proprietary institutions into the public colleges and universities (and vice versa). This would also indicate whether coursework from proprietary institutions is accepted or rejected. The results could then be utilized to influence institutions to create a more standardized process for accepting and awarding credit from proprietary institutions.



