

# Exploring the Role of Accreditation in Supporting Transfer and Student Mobility

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## Abstract

Student mobility and transfer between two-year and four-year institutions are critical issues when considering student success and degree completion. College and university administrators continually work to identify opportunities that align policy and practice with accreditation standards in an effort to facilitate self-study initiatives and meet requirements associated with national measures and expectations. To contribute to research about student mobility and transfer related to accreditation, this article considers two accrediting bodies and their potential in supporting student mobility and transfer. Findings identify several differences among institutional criteria highlighting a stark contrast between two accrediting bodies, North Central Association's Higher Learning Commission (HLC) and Middle States' Commission on Higher Education accreditation policies and practices. Through a comparison case study of mobility and student transfer data, findings highlight value in acknowledging the importance of facilitating mobility and student transfer in accreditation policies and practices. Findings should be considered for informational purposes and additional study is recommended for exploring implications for policy and practice.

**Keywords:** Accreditation, Student-mobility, Transfer

## 1. The Role of Accreditation in Supporting Transfer and Student Mobility

Higher education assessment and accountability measurement continue to be two of the foremost challenges in ensuring educational quality and affordability for students. While these challenges are often the focus of policymakers, researchers, and the media, the issues surrounding student mobility and the changing attendance patterns of students are also one of the principal challenges colleges and universities face today (Bardo, 2009; Ewell, 2008; Gaston, 2013). There has been tremendous skepticism about the scope of institutional support and encouragement of student transfer; particularly in community colleges (Blaylock & Bresciani, 2013). Institutional support is often scrutinized for facilitating barriers to student mobility in an effort to protect institutional autonomy, perhaps at the expense of student success (Eaton, 2009; Ewell, 2009). Yet, there is a dearth of literature focused on exploring the role of accreditation as it relates to transfer and student mobility. The primary goal of this work is to observe the differences in how transfer and student mobility are addressed in policies and practices between accreditors.

### 1.1 Student Transfer, Mobility and the Role of Accreditors

There is very little research focused on the role of accreditation in student transfer and mobility. Addressing student mobility presents a multifaceted challenge for accreditors, as it is no longer just about easing the transfer of credits, but also about how they assure quality outcomes by all institutions, including ensuring that necessary academic advising and support structures are present (Ewell, 2011). With one in five students changing institutions over the course of obtaining a degree, the role of accreditation in easing transfer is becoming more important, and gaining more attention (Shapiro et al., 2013). As Crow (2009) pointed out, this issue goes to the heart of accreditation, and because of growing student mobility accreditors are starting to address this issue more directly. For instance accreditation policy research focuses on how the self-study process, when done correctly, can have significant impact on institutional improvement (Aleste, 2004; Bardo, 2009; Gaston, 2013; Head & Johnson, 2011; Middle States Commission on Higher Education, 2011). The institutional approach to accrediting standards directly facilitates the drive for institutional improvement; in some cases moving from the quantitative approach to accreditation through

the measurement of library volumes, graduation rates, and self-assessment, to a qualitative approach that is more about the process, systems, and outcomes through which institutions assess themselves (Aleste, 2004). While this literature is important for understanding the nuances of accreditation methods, the research literature yields very little to assist in obtaining a better understanding the differences between the role of accreditors in the facilitation of transfer and student mobility.

To learn more about the role of accreditation in student transfer and mobility two accrediting bodies are explored guided by one major question: In what ways do accreditors address student transfer and mobility in their criteria and policies? An underlying goal of this work is enhance our understanding of the role of accreditation in supporting student transfer and mobility. These are the two questions this article will address through a comparative analysis between two regional associations' standards of accreditation, North Central Association's Higher Learning Commission (HLC) and Middle States' Commission on Higher Education (MSCHE), and the transfer and completion rates within those regions utilizing data from the National Student Clearinghouse, a nonprofit and nongovernmental organization that provides data exchange, as well as education research reporting and services for institutions of higher education. For illustration purposes, this comparative analysis explores the relationship between accreditation standards and the transfer and degree attainment of students who begin at two-year institutions and go on to complete a baccalaureate degree.

In addition to the findings of the comparative analysis, recommendations for the use of the results and implications for future research are explored. The selection criteria for the two accrediting bodies are based on size and transfer rates from two-year institutions to four-year institutions. Additional selection criteria will be discussed at a later point in the article.

## 2. Mode of Inquiry

In addressing the role of accreditors in facilitating transfer, we select two regions, North Central's Higher Learning Commission and Middle States' Commission on Higher Education. North Central accredits 1,012 institutions, generally in the Midwestern United States and Middle States accredits over 530 institutions in the Northeastern United States. We chose both of these accreditors because of clear statements in their accreditation policies related to student transfer.

As our mode of inquiry, we utilize the comparative case study method, which enables us to provide an illustrative structure for understanding the relationship between two accrediting bodies and their connection to student transfer and mobility. Comparative case study research has been discussed by Druckman (2005) and typically involves the following steps: 1) describe the core subject of comparative inquiry or the question *what* exactly is to be explained and how do we recognize a need for comparison, 2) develop a view on which *theoretical* concepts can travel comparatively and measure what is intended (internal validity); as well as possess a unifying capacity for *explaining* political and social processes in general (external validity), 3) discuss the logic of the comparative method as a *means* to a goal, rather than as an end. The core subject of this comparative case study is information focused on student transfer and mobility within two accrediting bodies. Very little is known about accreditors' transfer policies; therefore, observations about this information serve to illustrate the commonalities and differences in the accreditors' focus on student transfer and mobility.

The comparative case study approach provides guidance for explorations of aggregate systems-like units, referred to also as holistic systems (similar to the structures within higher education accrediting bodies) (Druckman, 2005). Aggregate systems-like units refer to the regional accrediting organizations representing multiple state higher education institutions responsible for facilitating, monitoring and ensuring education opportunities for students and constituents within states. While there are many factors that enter into a student's ability to successfully transfer from a two-year institution to a four-year institution and complete a baccalaureate degree, this paper is concerned with identifying differences in accreditation standards to strengthen our understanding of institutional policy and transfer.

### 2.1 Selection Criteria

North Central's accrediting association, the Higher Learning Commission (HLC), is by far the largest of the 6 regions, with over 6.7 million students attending institutions accredited by the commission (Council on Higher Education Accreditation, 2011). Because of its size, its previous leadership in changing to address the needs of the time period, and a significant percentage in many of its states' four-year graduates beginning at two-year institutions, North Central was chosen for the analysis. We argue that using two highly different regional accreditors to highlight any discovered similarities that might reveal commonalities could illustrate connections between accreditation, student transfer and mobility.

The second region, Middle States and its accrediting association, the Middle States Commission on Higher Education (MSCHE), is the third largest accrediting agency, with about 3.6 million students attending their accredited institutions (Council on Higher Education Accreditation, 2011). Middle States was chosen because unlike North Central, many of the students within the region's states who graduate from 4-year institutions did not begin their studies at 2-year institutions, according to an analysis done of data from the National Student Clearinghouse (2012).

The state-by-state results of the National Student Clearinghouse Research Center's Snapshot Report (2012) were categorized by accrediting region, noting the number of states within a region where over 50% of the completing students previously enrolled at two-year institutions. From there, a percentage of the states within a region that reached the 50% or above mark was taken. In that analysis, North Central (HLC) led the six regions with 42% of states reaching or surpassing 50% (National Student Clearinghouse Research Center, 2012). Only two regions – New England and Middle States had no states that reached the 50% mark. Because of the large size differential in the number and type of institutions, as well as the number of students enrolled in institutions between the New England and North Central regions, Middle States was chosen for the comparative analysis to limit the impact that these differences could have on standards for accreditation.

To conduct the analysis, we followed steps one and two of the comparison method to provide descriptions of accreditation for the two organizations and to establish internal validity to illuminate the processes of mobility and transfer. First, the criteria for accreditation for North Central's Higher Learning Commission were examined. HLC recently underwent a thorough review and change of their standards, and the standards that went into effect in January 2013 were analyzed along with the standards that sunsetted in December of 2012. These criteria both current and recent past, along with the following: commission policy; assumed practices; and other communications available on their websites, were examined for relevance and any reference to transfer, student mobility, and completion. Since HLC just completed the process of transforming its criteria for accreditation the most recent criteria and the new criteria were also compared and examined for changes related transfer, completion, and student mobility. The information obtained for this analysis was limited to what was publicly accessible on the HLC website.

The second step in the analysis involved performing a similar study of MSCHE's *Characteristics of Excellence* (2011), the commission's standards for accreditation. MSCHE's *Characteristics of Excellence* (2011) study and the standards, context, fundamental elements and optional analysis contained in the document were examined for relevance and any reference to transfer, student mobility, and completion. Similarly, MSCHE's policies, guidelines and other communications publicly available on the MSCHE website were reviewed. MSCHE's standards were most recently updated in 2002, and therefore there was not a comprehensive review of previous and current standards, as most of MSCHE's institutions have been accredited or re-accredited based on the current standards.

As the federal data available on completion rates remain limited to first-time, full-time students, there have been limited opportunities to obtain a national picture of the ability of students to successfully transfer from two-year institutions and complete their education at a 4-year institution. This made it difficult to understand the role that accreditation might be performing in hindering or helping the transfer process. However, this changed with the release of data over the past year by the National Student Clearinghouse. Their student-level record data has allowed the Clearinghouse to provide several reports on national completion and transfer rates, including state-by state breakdowns of student completions and transfers looking at a number of factors, including the institutional type of the students' starting institution. This comparative case study not only identifies which regions to compare, but also demonstrates which states in the regions were graduating students that transferred from two-year institutions to four-year institutions at a higher rate.

While the Clearinghouse Snapshot Report (2012) was useful in the process of identifying regions to analyze, it provided limited information about the number of students who began at two-year institutions who did or did not transfer to 4-year institutions. Therefore, a region or state level measure of completion and transfer rates was needed in order to get an indication of whether a certain accrediting region was more successful at transferring students from two-year to four-year institutions and those students then successfully completing. The recently released National Student Clearinghouse Research Center's report, *Completing College: A State-Level View of Student Attainment Rates* (Shapiro, et. al, 2013) provided the needed indicators on outcomes of students who began at two-year institutions. For this analysis, because the majority of two-year students enroll at public two-year institutions, the transfer and completion data from two-year public institutions table with the Clearinghouse report was utilized (Appendix, Table 1). Although not all states in each of the regions were included in the study because of lack of long-term data collection in those states, similar percentages of states in both North Central and Middle States had

transfer and completion data available in the Clearinghouse report (See Table 1). Each state's total four-year completion rate, which included a first or subsequent completion at a 4-year institution and was sorted by those who started at a two-year or four-year institution, was then categorized by accrediting region. The data from the National Student Clearinghouse reports were then taken together with the analysis of HLC's and MSCHE's standards for accreditation to get a representation of how each region not only addresses transfer and completion in their standards, but attempts to draw a correlation to the attention, or lack thereof, to transfer and completion in accreditation standards to transfer student completion rates in that region.

### 3. Comparative Case Study

#### 3.1 North Central Association's Higher Learning Commission

The North Central Association's Higher Learning Commission (HLC) is the largest of the six regional accreditors, both in terms of numbers of institutions accredited and in the number of students attending HLC accrediting institutions. According to the Council on Higher Education Accreditation (2011) in 2011 1,012 institutions were accredited in the North Central region, which were educating 6,787,901 students. It also covers the largest area of any of the accrediting agencies. The association, which was founded in 1895, accredits institutions in Arkansas, Arizona, Colorado, Iowa, Illinois, Indiana, Kansas, Michigan, Minnesota, Missouri, North Dakota, Nebraska, Ohio, Oklahoma, New Mexico, South Dakota, Wisconsin, West Virginia, Wyoming (Higher Learning Commission, 2013).

North Central has often played a leading role in accreditation's evolution and was the first of the regional associations to set standards for accreditation. North Central was also the first to adopt the general, mission-based standards in the 1950's, which remained mostly intact and in effect until the end of 2012 (Ewell, 2008; Higher Learning Commission, 2013b). In 2009, HLC began the process of surveying their members in order ascertain information on whether members thought that the commission's criteria for accreditation were effective. While the Commission's board determined that the criteria was sufficient in late 2009, it encouraged the HLC staff to begin to create additional documentation that would overlay with the criteria to create a coherent and clear stipulation of basic requirements for accreditation (Higher Learning Commission, 2010). That process continued until the commission was required to hasten it when the Department of Education's Office of Postsecondary Education required HLC to create and document minimum standards for accreditation. In July of 2010, HLC's general mission-centered approach included a document titled, "Minimum Expectations within the Criteria for Accreditation" and while the commission declared these were commonly in practice but not "formally recorded," (pg 1) it became the first phase in multi-year process to transform HLC's criteria for accreditation.

The Higher Learning Commission's criteria for accreditation that was in effect until December 31, 2012, centered around five criteria, each which included a criterion statement that briefly explained in one sentence the purpose of the standard, and was then followed by core components of the criteria and examples of evidence of meeting those criteria. These criteria were in the areas of: mission and integrity; preparing for the future; student learning and effective teaching; acquisition, discovery and application of knowledge; and engagement and service (Higher Learning Commission, 2013a). These criteria and core components were in the same general theme developed by the commission in the 1950's, had little specificity and were focused on the institution's ability to meet the needs of those they served. Because of the lack of specificity in terms of educational outcomes, there was no mention of student completion in the old criteria.

Student mobility was addressed in the fifth criterion – engagement and service, and only in an example of evidence of meeting the core component that requires intuitions to "demonstrate its responsiveness to those constituencies that depend on it for service" (Higher Learning Commission, 2013a). One of nine examples of evidence of meeting that core component was "the organization's transfer policies and practices create an environment supportive of the mobility of learners" (Higher Learning Commission, 2013a). Criterion three, student learning and effective teaching, did require that institutions clearly state their goal for student learning outcomes, and effectively assess those programs, as well as support effective teaching and create effective learning environments, but the word completion or attainment was absent.

After nearly four years of surveying its members, public notices and consultation with its members, in February of 2012 HLC's Board of Directors adopted a new Criteria for Accreditation. In addition to the new criteria, the minimum expectations document that had been required by the Department of Education was transformed into the commission's new "Assumed Practices," which was a conceptual framework for assumed practices at institutions (Higher Learning Commission, 2012c). The new standards retained the same number of criteria, but little else remained. However, the new standards included detailed explanations of what was expected of institutions.

The new criteria also have a stronger focus on assessment, which instead of being a core component of a criterion, is now a separate criterion. In terms of attention to transfer and completion, unlike the old criteria, the new one does address the issues of completion and student success, requiring that the institution “demonstrate a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its degree and certificate programs” (Higher Learning Commission, 2012c). This new requirement includes additional responsibilities for institutions including defining goals as well as collecting and analyzing data related to retention, persistence and completion. In addition, the previous criterion under which institutions were held to a standard of engagement and service was not included in the new criteria, including the provisions relating to student mobility. Under the new criteria, the only reference to student transfer is the requirement that institutions “assure the quality of credit it accepts in transfer” (Higher Learning Commission, 2012c).

The revised criteria for accreditation were also accompanied with by the Higher Learning Commission’s Assumed Practices, which replaced the Minimum Expectations that were set in 2010 at the request of the Department of Education. These practices are assumed by HLC to be present at all institutions, and whether or not an institution meets the standards is not a matter of professional judgment, because it is assumed they will not vary from institution to institution (Higher Learning Commission, 2012a). Highlighting the factual nature of the practices, HLC states these practices in a worksheet form, with check boxes for review teams to note whether or not the institution engages in that practice.

Several of these Assumed Practices relate to student mobility, completion, and transfer. They include items on ensuring that students are provided information on how transfer credits are accepted and how they apply to degree requirements, as well as defines the number of credits that a student must be required to obtain at the institution where they will receive the degree. For a bachelor’s degree, HLC requires that 30 of the last 60 credits are awarded at the institution in their assumed practices. Regarding completion, in the Assumed Practices institutions are required to have and follow policies on students’ academic load per term, and those policies should “reflect reasonable expectations for successful learning and course completion” (Higher Learning Commission, 2012a).

The Higher Learning Commission also provides additional information to its member institutions through the Commission’s Policy Book. These policies had several updates in order to conform with new the criteria for accreditation. Several of HLC’s policies relate to the issues of transfer and completion. Regarding student transfer, HLC allows each institution to determine its own policy and procedures relating to the acceptance of credits from another institution, which could be accredited, non-accredited, or a foreign institution. Also noted in the Policy Book is that institutions are required to govern their policies and procedures of the acceptance of transfer of credit from institutions that grant credit for experiential learning and for “non-traditional adult learner programs,” while noting that these policies must be in line with commission’s assumed practices. The policy book also notes that institutions should perform “periodic review” of their transfer of credit policies and procedures, which should include an examination of the “clarity” of the policies and procedures to students as well as the faculty and staff who administer them. The commission’s policy requires that institutional policies should be consistent throughout the institution, as well as be “responsive to new types of learning opportunities outside institutions of higher education” (Higher Learning Commission, 2012b). Finally, HLC’s policies were recently amended to include a provision on the “review of student outcome data.” The policy requires institutions to take into account various forms of student outcome data when assessing the success of their programs and students at the institution. This data can include course completion, job placement and licensing examination (Higher Learning Commission, 2012b).

Student attainment and success within the North Central region does vary significantly by state. However, when looking at the region’s completion data from the National Student Clearinghouse several trends become obvious. In the National Student Clearinghouse’s Snapshot report (2012), the fundamental role that two-year institutions play in the attainment rate at four-year institutions in the North Central region is substantial. More than 50% of states within the North Central region are above the national average of 45% of students that completed degrees at four-year institutions who previously enrolled at two-year institutions (National Student Clearinghouse Research Center, 2012). Many North Central states surpassed the national average, including states like Arizona (52%), Illinois (54%), Iowa (56%), Kansas (65%), Wyoming (71%), Oklahoma (58%), Missouri (56%) and Nebraska (57%). In these states, more than half of the students completing at four-year institutions enrolled at two-year institutions at some point in their undergraduate studies (National Student Clearinghouse Research Center, 2012). Perhaps surpassing the national average could be linked to institutional efforts aligned with the implementation and facilitation of statewide transfer and articulation agreement policies designed to reinforce ease in the transfer of credit (Mullins, 2012). Mullins suggests that such policies play an important role in college affordability and credit mobility.

While a significant number of students in a majority of North Central states begin their studies at 2-year institutions, unfortunately there are also a significant number of students at two-year institutions in the region who do not successfully complete a four-year degree. While this process involves both students who transfer into four-year schools and those who begin in four-year schools, the larger point of this notion is to emphasize the distinction between these student experiences within the process of accreditation. “Policy, institutional or otherwise, needs to determine a threshold of credits earned for institutional ‘ownership’ of a completer” (Mullins, 2012, p. 11). When the National Student Clearinghouse (2013) recently released completion rates by state, a majority of states in the region were included. However, some states within the region were included in the two-year public breakdown because of lack of data. When looking at six-year graduation rates for students who began their studies at two-year public institutions, many North Central states are below the national average of a 14.99% completion rate at a four-year institution, including several states which were above the national average in terms of percentage of baccalaureate graduates who previously enrolled in a two-year institution (students who started at a two-year institution or enrolled at a two-year institution at some point). Arkansas, Missouri and Nebraska all were below the national average of completion at a four-year institution, for those students who started at a 2-year institution (Shapiro et al., 2013). Of the 13 states that were included in the report, eight states had completion rates at four-year institutions that were less than the national average. Included in these are several states that had rates significantly lower than the national average, such as South Dakota whose total completion rate at four-year institutions was 3.26 % and Indiana, whose completion rate was 7.74% (Shapiro et al., 2013).

Table 1. Completion Rates at 4-Year Institutions for Students Who Started at Two-Year Public Institutions

<b>North Central – Higher Learning Commission**</b>	<b>Total 4-year Completion Rate</b>	<b>Middle States Commission on Higher Education**</b>	<b>Total 4-year Completion Rate</b>
<i>National Average</i>	14.99%	<i>National Average</i>	14.99%
<b>Colorado</b>	11.04%	New Jersey	17.18%
<b>Illinois</b>	18.51%	New York	16.71%
<b>Indiana</b>	7.74%	Pennsylvania	14.92%
<b>Minnesota</b>	15%	Maryland	17.91%
<b>North Dakota</b>	18.64%		
<b>Ohio</b>	12.14%		
<b>Wyoming</b>	15.3%		
<b>Nebraska</b>	12.85%		
<b>South Dakota</b>	4.7%		
<b>Arkansas</b>	10.99%		
<b>Michigan</b>	13.97%		
<b>Missouri</b>	13.87%		

Source: Shapiro, et. al (2013) *Completing College: A State-Level View of Student Attainment Rates*

\*\*Only states, not territories, were chosen for comparison.

#### 4. Middle States Commission on Higher Education

Middle States Commission on Higher Education is the third largest regional accreditor in both number of institutions and in student attendance. In 2011, according to the CHEA Almanac 532 institutions were accredited by MSCHE and those institutions educated over 3 million students. The states that MSCHE serves are also some of the most densely populated in the nation. MSCHE accredits institutions in Delaware, District of Columbia, Maryland, New Jersey, New York and Pennsylvania (Puerto Rico and the Virgin Islands were not considered in this comparison).

The current standards for accreditation for Middle States institutions have been in place since 2002. While minor changes were made in later years, the revisions made in 2002 were the most recent extensive changes to the accreditor’s standards. That process, like the one that occurred at HLC, was a multi-year process that involved

wide-ranging engagement and consultation with MSCHE members. MSCHE's revision from beginning to end took six years to complete, and "emphasized the importance of institutional and student learning outcomes" (Middle States Commission on Higher Education, 2009, pg. 7). This was done not only through the inclusion of a separate standard solely focused on student learning but new assessment provisions were also added to each of the commission's 14 standards of accreditation (Middle States Commission on Higher Education, 2009).

These standards were meant to address the changing nature of higher education, while also upholding the commission's "fundamental values," and included provisions relating to non-traditional education delivery, such as distance education (Middle States Commission on Higher Education, 2009). The new standards also provided the clarity requested by members through a new format where, in addition to the standards themselves, the commission's *Characteristics of Excellence* included specific components of each standard that are usually present when the standard is being met. Also included in the standards are examples of evidence that institutions can utilize to meet the standard (Middle States Commission on Education, 2009). These additional components to the commission's standards for accreditation provided information to institutions as they attempted to meet the new evidence and assessment based standards (Middle States Commission on Higher Education, 2009).

Middle States Commission on Higher Education's *Characteristics of Excellence* (2011) specifies 14 standards that accredited institutions are expected to meet. The standards are meant to recognize the great diversity among institutions, and thus do not require a specific structure, but instead accentuate the functions of how standards might be met. When examining the 14 standards, two of them – Standards eight and eleven – relate directly to transfer, completion and student success. Standard eight, titled "Student Admission and Retention" is focused on an institution's ability to not only admit students who are able to meet the institution's mission and share its goals but also "retain them through the pursuit of the students' educational goals" (Middle States Commission on Higher Education, 2011, p. 31). This is not to suggest that student success is the same as transferability, retention, and graduation rates. Rather, this speaks to the role of transferability, retention and graduation as essential standards for considering an institution's ability to support students in pursuing their educational goals.

The commission, in the context provided for this standard, stipulates that students at MSCHE member institutions should have a "reasonable opportunity for success" (pg. 31). The commission utilizes the context of standard eight to point out that institutions must assist all types of students in meeting their educational goals, including transfer, part-time, and adult students, and recognizes that additional student support services may be necessary to not only retain the student, but ensure their success (Middle States Commission on Higher Education, 2011). Within this standard there are eight fundamental elements that institutions are expected to demonstrate, which include an "ongoing assessment of student success" and transfer of credit policies and procedures that are not only published but also implemented (Middle States Commission on Higher Education, 2011, pg.32). In the optional analysis and evidence for this standard, institutions are also encouraged but not required to be able to produce evidence that it utilizes retention, persistence, and attrition information to assess whether their outcomes in these areas are consistent with the expectations of institutions and students (Middle States Commission on Higher Education, 2011).

In the Commission's eleventh standard on educational offerings, institutions are required to have the appropriate academic rigor for their mission. As explained in the context section of this standard, this standard places the responsibility on the institution to assist students and ensure that they have the necessary opportunities achieve success at that institution (Middle States Commission on Higher Education, 2011). It is in this standard that MSCHE acknowledges the importance of student mobility, and the necessity of institutions to acknowledge that the "recognition of college-level learning from other institutions may facilitate a student's progress without compromising an institution's integrity or quality of its degrees" (Middle States Commission on Higher Education, 2011, pg. 43). An institution's policies on accepting credits from other institutions should not only provide for the appropriate consideration of learning from other institutions, but judge solely the outcomes and not the method of educational delivery, according to standard's context (Middle States Commission on Higher Education, 2011).

Within Standard 11, the commission lists similar requirements to those in standard eight regarding transfer of credit policies, however takes it an additional step forward by noting the requirement that the acceptance or rejection of credit from another institution cannot be done based solely on the type of accreditation of the sending institution, but instead requires that the course equivalences and expected outcomes of the sending institution's courses be evaluated against the standards and curricula of the receiving institution (Middle States Commission on Higher Education, 2011). Institutions can demonstrate their attention to this standard through reviewing and analyzing trends and patterns in transfers both into and out of the institution, as well as examine the impact and effectiveness of articulation agreements that an institution may hold. In addition, institutions may also assess the impact that transfer

agreements, including those that are mandated, have on the “coherence and integrity” of degree programs (Middle States Commission on Higher Education, 2011, pg. 46).

In addition to the standards described in the MSCHE’s *Characteristics of Excellence*, MSCHE accreditation also includes verification of compliance with several federal regulations related to accreditation, a recent change that just went into effect within the region. These requirements are noted in the MSCHE’s *Verification of Compliance with Accreditation-Relevant Federal Regulations (2012)* publication and are met by institutions providing documentation that they have the required policies, including transfer of credit policies, which must be written, publicly disclosed, and in which it must be noted which offices are responsible for making the final determination. In determining whether an institution has met these federal regulations, peer reviewers are encouraged to consider whether transfer of credit policies are formally documented, take into account all methods of educational delivery, have a statement of criteria, and whether these policies are easily accessible either through a website or other institutional publications. MSCHE also has a separate “Transfer Credit, Prior Learning and Articulation Policy.” The policy, which reiterates of many of the provisions relating to transfer of credit in the commission’s accreditation standards, consists of general principles that encourage a student centered, balanced, and flexible approach that is clearly and effectively communicated to students (Middle States Commission on Higher Education, 2011).

When utilizing data from the National Student Clearinghouse’s 2012 Snapshot report, it is obvious that within the Middle States region, students who began their studies at a two-year institution are not a significant component of the population of graduates from four-year institutions. None of the six states in the region were at or above the national average of 45% of students, with several of the states more than 20 percentage points below the national average. For instance, in Delaware only 22% of students who graduate from a four-year institution previously enrolled at a two-year institution (National Student Clearinghouse Research Center, 2012). Maryland and New Jersey were both at the other end of the range, with 40% and 38% respectively, of students who completed a baccalaureate degree who previously enrolled in two-year institutions (National Student Clearinghouse Research Center, 2012).

While the overall percentage of students who graduate from a four-year institution that previously enrolled at a two-year institution is less than the national average in the Middle States region, most states in the region have a higher than average completion rate at a 4-year institution. The National Student Clearinghouse (2013) recently released completion rates by state, four of the region’s six states, New Jersey, New York, Pennsylvania, and Maryland, were included. The other states, Delaware and the District of Columbia were not included in the two-year public breakdown because of the lack of data. When looking at six-year completion rates for students who began their studies at two-year public institutions, three of the four states in the Middle States region included in the Clearinghouse report, New Jersey, New York, and Maryland, are above the national average of 14.99% of completion at a 4-year institution.

Only Pennsylvania was below the national average, but only by .06, a statistically insignificant amount (Shapiro et al., 2013). Maryland, which had the greatest percentage in the region of students who complete at a 4-year institution that previously enrolled at 2-year institution, also had the highest completion rate in the 2013 National Student Clearinghouse report with 22.42 % of students who started at a public two-year institution completing at a 4-year institution (Shapiro et al., 2013).

## 5. Findings

The comparative case study yielded several interesting findings to consider regarding accreditation standards and student mobility and transfer between two-year and four-year institutions. North Central’s Higher Learning Commission and Middle States’ Commission on Higher Education standards vary not only in structure but also significantly in substance, especially in regards to the transfer and completion (Table 2 – See Appendix). HLC’s previous accreditation standards not only were general and mission driven, but lacked even a mention of the word completion. The new criteria, however, changed that with one of the new criteria focused on institutional commitment to retention, persistence and completion.



Table 2. Comparison of Accreditation Standards Relevant to Student Transfer

	Middle States Commission on Higher Education	North Central – Higher Learning Commission
<b>Transfer of Credit</b>	<p data-bbox="375 365 899 596"><u>Standard 8</u> Fundamental Elements: published and implemented policies and procedures regarding transfer credit and credit for extra-institutional college level learning that state the criteria established by the institution regarding transfer of credit.</p> <p data-bbox="375 617 899 1121"><u>Standard 11</u> Context: Recognition of college-level learning from other institutions may facilitate a student's progress without compromising an institution's integrity or the quality of its degrees. An institution's articulation and transfer policies and procedures should provide appropriate consideration, consistent with good educational practice, for the individual student who has changed institutions or objectives. In such policies, the institution should judge courses, programs, degrees and other learning experiences, not on their modes of delivery, but on their learning outcomes and the existence of valid evaluation measures, including third-party expert review</p> <p data-bbox="375 1142 899 1604">Fundamental Elements: published and implemented policies and procedures regarding transfer credit that describe the criteria established by the institution regarding the transfer of credits earned at another institution. The consideration of transfer credit or recognition of degrees will not be determined exclusively on the basis of the accreditation of the sending institution or the mode of delivery but, rather, will consider course equivalencies, including expected learning outcomes, with those of the receiving institution's curricula and standards. Such criteria will be fair, consistently applied, and publicly communicated</p> <p data-bbox="375 1625 899 1856">Optional Analysis: analysis of transfer trends and patterns, both to and from the institution; review of articulation agreements and analysis of their impact and effectiveness; or review of the impact of transfer agreements or transfer acceptance mandates on the coherence and integrity of the institution's degree programs.</p>	<p data-bbox="899 365 1411 533"><u>OLD: Criterion 5</u> Core Component 5C, Examples of Evidence: The organization's transfer policies and practices create an environment supportive of the mobility of learners.</p> <p data-bbox="899 554 1411 722"><u>NEW: Criterion 4</u> 4.A.2: The institution evaluates all the credit that it transcripts, including what it awards for experiential learning or other forms of prior learning</p> <p data-bbox="899 743 1411 785">4.A.3: The institution has policies that assure the quality of the credit it accepts in transfer</p>

<b>Completion</b>	<u>Standard 8</u>	<u>NEW: Criterion 4</u>
	Optional Analysis: evidence of the utilization of information appropriate to the review of student retention, persistence, and attrition, to reflect whether these are consistent with student and institutional expectations.	4.C. The institution demonstrates a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its degree and certificate programs
	<u>Standard 12</u>	
	Fundamental Elements: institutional requirements assuring that, upon degree completion, students are proficient in oral and written communication, scientific and quantitative reasoning, and technological competency appropriate to the discipline	
<b>Transfer Student Support</b>	<u>Standard 8</u>	No comparable provision
	Context: Every institution's admission practices should ensure that students have a reasonable opportunity for success in meeting their educational goals, including transfer, graduate, part-time, adult, and non-degree students, and all others matriculating at the institution. In some institutions, additional support services may be required in order to ensure the retention and success of its students	

**Sources: Middle States Commission on Higher Education (2011). *Characteristics of Excellence in Higher Education: Standards for Accreditation*; Higher Learning Commission (2012c). *The New Criteria for Accreditation, and Higher Learning Commission, Criteria for Accreditation (sunset December 31, 2012)*.**

Transfer students and institutional policies surrounding transfer of credit are not a part of the HLC criteria for accreditation, but are mentioned in HLC's assumed practices. This is in direct contrast to Middle States, where within the context for two Middle State's standards student transfer is not only mentioned, but transfer policies are considered fundamental elements of meeting standard eight. Middle States goes as far as to state that institutional admissions practices should ensure that transfer students who are admitted have a "reasonable opportunity for success" (Middle States Commission on Higher Education, 2011 p. 31). The second MSCHE standard that addresses transfer, standard 11 on Educational Offerings, continues their student-centric approach by stating that institutions "should provide appropriate consideration" for students who transfer, and mandating that the acceptance of credits be a process that is not only fair but also consistent in its application (Middle States Commission on Higher Education, 2011, p. 31).

Both regional accreditors have policies relating to institutional transfer of credit policies, and do so to be in compliance with federal regulations. However, even when comparing these two policies and the verification procedures of them – HLC's Assumed Practices and MSCHE's Verification of Compliance – the level of detail in MSCHE's policies and verification procedures far outweighs HLC's. In the HLC's process, it is matter of a checklist, while within MSCHE's process there is a list of suggested considerations for peer-reviewers to follow when determining an institution's compliance (Higher Learning Commission, 2012a; Middle States Commission on Higher Education).

There is also a significant difference in completion rates when the data from the two National Student Clearinghouse reports are compared (Table 3 – See Appendix). Within the Middle States region, there are significantly fewer graduates from four-year institutions who previously enrolled in two-year institutions. Unlike states within the North Central region, none of the Middle States region states had more than 50% of its students who completed a degree at a four-year institution that had previously enrolled at two-year institution, and none of the states even reached the national average of 45 percent. In comparison, over half of states in the North Central region were above the national average, and eight of them surpassed that average with more than half of graduates from four-year institutions that had previously enrolled in a two-year institution (National Student Clearinghouse Research Center, 2012). While

transfer and completion rates do vary state by state, generally within the two regions there are very different roles for two-year institutions in students' completion of a baccalaureate degree. Students who graduate from a four-year institution in the North Central region are significantly more likely than students in the Middle States region to have previously enrolled in a two-year institution.

Table 3. Comparison of Completion Rates

	Middle States Commission on Higher Education	North Central – Higher Learning Commission
<b>% of 4-year institution graduates that started at a 2-year</b>		
<b># of states over national average (45%)</b>	0	10
<b># of states over 50%</b>	0	8
<b>Completion Rates at 4-Year Institutions for Students Who Started at Two-Year Public Institutions*</b>		
<b># of states above the national average (14.99%)</b>	3	5
<b># of states below the national average (14.99%)</b>	1	8
<b>State with highest completion rate in the region</b>	Maryland – 17.91%	North Dakota – 18.64%
<b>State with lowest completion rate in the region</b>	Pennsylvania – 14.92%	South Dakota – 4.7%

\* Note: Not all states were included in the data source

**Sources:** National Student Clearinghouse Research Center (2012). *Snapshot Report: The role of two-year institutions in four-year success*, and Shapiro, et. al (2013) *Completing College: A State-Level View of Student Attainment Rates*

While students in North Central are more likely to have enrolled in a two-year institution, they are unfortunately less likely to graduate with a baccalaureate degree. More than half of the 13 North Central states that were included in the report had degree completion rates at four-year institutions below the national average for those students who started their studies at a public two-year institution (Shapiro et al., 2013). This included two states, South Dakota and Indiana, which had completion rates significantly below the nation average of 14.99 percent for this student population. In contrast, the four states in the Middle States region that were included in the National Student Clearinghouse Report were either above the national average or just hundredths of a percentage point below (Shapiro et al., 2013). Even though within the Middle States region two-year institutions do not educate the majority of students who eventually graduate from a four-year institution, in this region students who begin at a two-year institution are completing at a better rate overall than students in most North Central states. However, in North Central states, students are more likely to have previously enrolled in a two-year institution.

When looking at these two regions – Middle States and North Central – there are significant differences in the role that student transfer has in the accreditation process and opportunities for transfer student success. Two-year institutions in many of the states within the North Central region are critical components and significant feeder institutions into four-year colleges and universities, but these students who transfer are less likely to complete a four-year degree. North Central's Higher Learning Commission's previous accreditation standards did not address completion, and only minimally addressed student transfer. Its mission focused approach also had little emphasis on student success. HLC's new criteria for accreditation do make improvements in those areas, and perhaps that will encourage institutions to make transfer student success a priority. While we found Middle States standards to be student outcome centered, (i.e., paying attention to transfer students, completion and student success throughout their accreditation standards), it's important to consider why Middle States institutions emphasize and support transfer student success as well. The promulgation of accreditation standards belies deeper philosophies about the institutional support of student success, that, when illustrated, lend greater awareness to collective institutional and state priorities.

## 6. Recommendations

The accreditation process and accrediting commissions have evolved alongside the nation's higher education systems to meet the demands of a constantly changing student constituency. As higher education continues to evolve with increased student mobility and transfer rates between institutions, this comparison could serve to inform how changing and evolving accreditation standards could have an impact on transfer. Historically, the process of becoming accredited or re-accredited has not just been about accountability, but also a time of institutional self-reflection and improvement (Brittingham, 2009). Accreditation standards provide a guide for institutions to follow through that self-reflection and improvement process. If standards for accreditation, accrediting commission policies, and examples of evidence of meeting standards do not address transfer and completion, there is less of a chance that institutions will make that a priority during their self-study process and thus less likely to address any changes that need to be made.

The Council on Higher Education Accreditors (CHEA) recognized this in their 2000 statement which addressed the roles that institutions, accreditors and national higher education associations have in ensuring both quality and fairness within the transfer process. By calling on accreditors to have institutions "develop and maintain clear transfer policy and practices" and documenting accreditors' responsibility for the communication necessary to meet transfer student needs, CHEA provided needed direction to their accrediting organizations (Council on Higher Education Accreditation, 2000).

Regional accrediting organizations, and their public and private non-profit institutional members, are often seen as impediments to student transfer success, as they have often focused on the need for institutional autonomy to control how and if the transfer of credit between institutions can be completed. However, striking a balance between assuring the quality of an institution's educational output – its graduates – and encouraging and supporting student transfer should be possible.

As Ewell (2008) points out, if accreditors and institutions give greater consideration to the learning experience as a whole, including those students who attend multiple institutions, and examine how both the sending and receiving institutions handle the transfer process, institutional autonomy could be retained while also providing for opportunities for institutional improvements. Middle States, with their student- and outcomes-centered accreditation standards might have reached that balance, as most of the region's states have above average completion rates at four-year institutions for students who started at two-year public colleges. North Central HLC's previous mission based standards did not comprehensively address student transfer, and that could be a component of the poor completion rates for many of its states. With so many students now transferring institutions at least once before completing their degree, it is vital that accreditors ensure that institutions pay attention to students' ability to succeed and not only for those that transfer in but also those who transfer out.

## 7. Limitations

There are many factors that influence a student's ability to successfully transfer and complete a degree at a 4-year institution, and an institution's capability to support that student's success. For instance, family college going history, socioeconomic status, and academic preparation are all significant factors that can influence a student's ability to pay for college and successfully attain a college education. These factors were not a part of this analysis. The analysis also did not take into account the size and type of higher education systems in all sectors within each state in the two regions, nor did it address state articulation policies and other state policies that might support or inhibit successful transfer and completion of a four-year degree. All of these elements have substantial impact on transfer and completion rates at an individual level and a state level. Therefore, the conclusions drawn from this analysis that standards for accreditation can have an impact on a region's overall transfer and completion rate are not meant to overshadow or replace these other factors which have a much greater impact on a student's ability to succeed.

## 8. Implications for Future Research

Accrediting standards, however, do play a role in institutional policy setting and in how an institution engages in self-reflection and improvement during the self-study process, therefore accreditor's attention to the issues of transfer and completion should continue to be explored. The analysis in this paper focused on two regional accrediting associations, North Central and Middle States, and focused simply on what was publically available on each commission's website, with an emphasis on the standards or criteria for accreditation. When making decisions on accreditation and reaccreditation, site visit teams and commissions take a myriad of factors into consideration including many factors that might not be discernible from public information on a website. Thus, conclusions drawn

from this comparative analysis is for informational purposes only and should not be used for changes in policy until a thorough review of how accreditors' standards are implemented in practice is performed.

## 9. Conclusion

Since its inception in the late 1800's, the accreditation system has evolved alongside higher education in the United States. Standards of accreditation and the role that accreditation has in assuring quality educational outcomes have changed as higher education expanded and government funding for postsecondary education grew. As higher education faces yet another evolution where many students transfer from one institution to another before completing their degree, it is apparent that accrediting standards will have to once again evolve along with institutions. Historically, the North Central Association and its Higher Learning Commission has been a leader in the evolution of standards alongside institutions, and is often the first to ensure that accreditation remains relevant in the changing landscape of postsecondary education (Ewell, 2008). However, it appears that this time they are behind the curve.

Through a comparative analysis of the standards for accreditation of two regions, North Central and Middle States, and an analysis of completion rates for students who started their education at public two-year institutions and completed a degree at a four-year institution, it was determined that North Central not only lacked attention to the issues of transfer and completion in their recently sunsetted standards, but even in the new standards there is little attention to the issues surrounding transfer. In direct contrast, Middle States accreditation standards addressed not only an institution's responsibility for the "appropriate consideration" for transfer students' needs, but that institutions provide the necessary opportunity for success of all students, including transfer students (Middle States Commission on Higher Education, 2011, pg 43). While it's unknown if these standards are a factor in the higher completion rates at four-year institutions for students who began at two-year institutions in states within the Middle States region, it cannot be ruled out.

The accreditation peer-review process is unique to the United States and many believe that it is responsible for the thriving diversity in types and missions of institutions of higher education (Brittingham, 2009). If accreditors and the accrediting agencies want to remain relevant in the current climate of higher education, they must address the issue of supporting student mobility. This includes considering the influence and nature of an increasingly diverse population of students in accreditation.

As Gaston (2013) notes, accreditation must evolve, and help institutions respond to this latest change in the delivery of higher education. Further examination of accreditation and its nuances will continue to be useful in facilitating awareness about student mobility, success, and transfer. There is tremendous opportunity to reshape institutional mission and capacity for knowledge and service innovation through the evolution of accreditation. To many today, accreditation is simply seen as a quality assurance tool, but its historical strength has been to also be a tool for institutional self-reflection, study and improvement. By acknowledging successful student transfer in some capacity in accreditation standards, accreditors are more equipped to improve institutional policy that support growing student populations.

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