

SYSTEM COUNCIL OF CHIEF ACADEMIC OFFICERS AGENDA

**December 12, 2018
8:15 am – 9:15 am**

The System Council of Chief Academic Officers will meet in the Board Room located at 1000 SW Jackson, Suite 520, Topeka, KS 66612. SCOCAO is co-chaired by Todd Carter, Seward County CC, and Lynette Olson, PSU.

- I. Welcome and Introductions** Todd Carter, Co-Chair
 - A. *Introductions*
 - B. *Approve Meeting Minutes from November 7, 2018* p. 2

- II. Transfer and Articulation Council Update** Jon Marshall, Allen CC

- III. Other Matters**
 - A. *Proposed Changes to the State Authorization Reciprocity Agreement (SARA) Guidelines* Jean Redeker, KBOR p. 5
 - *Kansas Independent College Association* p. 8
 - B. *Proposed Changes to KBOR Policy Ch. III.A.9, Definition of Baccalaureate Degree* David Cook, KU p. 11
 - *Institutional Feedback* Michael McCloud, JCCC p. 13
 - C. *Concurrent Enrollment Partnership Report* Karla Wiscombe, KBOR p. 20
Due January 31, 2019, [KBOR Policy Ch. III.A.13](#)

- IV. Adjournment**

<i>SCOCAO Academic Year 2019 Meeting Dates</i>		
<i>Meeting Dates</i>	<i>Location</i>	<i>Agenda Materials Due</i>
January 16, 2019	Topeka	December 28, 2018
February 20, 2019	Topeka	February 1, 2019
March 20, 2019	Topeka	March 1, 2019
April 17, 2019	Lawrence	March 29, 2019
May 15, 2019	Topeka	April 26, 2019
June 19, 2019	Topeka	May 31, 2019

System Council of Chief Academic Officers

MINUTES Wednesday November 7, 2018

The November 7, 2018, meeting of the System Council of Chief Academic Officers was called to order by Co-Chair Lynette Olson at 8:30 a.m. The meeting was held on the Emporia State University campus.

In Attendance:

Members:	Lynette Olson, PSU	Jeff Briggs, FHSU	Brad Bennett, Colby CC
	David Cordle, ESU	Carl Lejuez, KU	Kim Hansen, Pratt CC
	Charles Taber, KSU	Steve Loewen, FHTC	JuliAnn Mazachek, Washburn
	Rick Muma, WSU		
Staff:	Jean Redeker	Karla Wiscombe	Sam Christy-Dangermond
	Tim Peterson	Max Fridell	
Others:	Jon Marshall, Allen CC	Willow Dean, Butler CC	Kim Krull, Butler CC
	Steven Lovett, ESU	Michelle Schoon, Cowley CC	Lori Winningham, Butler CC
	Rob Catlett, ESU	Adam Borth, Fort Scott CC	Marlon Thornburg, Coffeyville CC
	Erin Shaw, Highland CC	Steve Lovett, ESU	Ed Kremer, KCKCC
	Michael McCloud, JCCC	Brian Niehoff, KSU	Suzu Auten, KSU
	Matt Lindsey, KICA	Gina Crabtree, WSU	Betty Smith-Campbell, WSU
	Robert Klein, KUMC	Cliff Morris, PSU	Nancy Zenga-Beneda, Cloud CC
	David Cook, KU	Linnea GlenMaye, WSU	Scott Lucas, WSU Tech
	Matt Pounds, NWKTC	Sarah Carpenter, ESU Bulletin	Jimmy Clark, HMS Strategists, LLC

Co-Chair Lynette Olson welcomed everyone and started the introductions.

APPROVAL OF MINUTES

Steve Loewen moved that the minutes of the September 19, 2018, meeting be approved. Following the second of Rick Muma, the motion carried.

UPDATES

- A. Transfer and Articulation Council (TAAC) update was provided by Jon Marshall, Allen Community College. The 2018 Kansas Core Outcome Group (KCOG) conference was hosted by KU at the Edwards Campus on October 12th. On October 31st, TAAC met to review and approved the core outcomes articulated for the five new disciplines. TAAC will continue to review core outcomes at the next meeting for the remaining disciplines. The 2019 KCOG conference will be hosted by KU, and WSU will host the 2020 and 2021 KCOG conferences.

Eric Ketchum, Highland CC and Mike Williams, KU were named as the new co-chairs for TAAC.

- B. Get Ahead Initiative update was provided by Tim Peterson, KBOR. Tim Peterson introduced Jimmy Clarke, HCM Strategists, LLC. The Get Ahead Initiative has been completed under budget, and an updated website analysis handout was distributed. Discussion was held, and a thank you goes to Lori Winningham and the KS Council of Instructional Administrators (KCIA) for gathering the information on online certificates and associate programs. All institutions are doing great work and continue to make adult students aware of the continuing education possibilities.
- C. Sam Christy-Dangermond, KBOR, discussed the Reverse Transfer data and the Reverse Transfer Communication Plan. She asked that SCOCAO members review the Communication Plan and send feedback by November 21st. Matt Keith is working on obtaining all institution Reverse Transfer logos. Each university has selected at least one

community college to partner with to focus on improving their communication and Reverse Transfer procedures to increase the number of students opting in.

Reverse Transfer Best Practices Presentation

Gina Crabtree presented the process that is used at Wichita State University.

- WSU processes the information at the end of the term.
- The system automatically identifies students with at least 45 transfer credit hours and at least 1 credit hour at WSU.
- All students identified receive an e-mail informing them of the opportunity for Reverse Transfer and they are encouraged to “Opt In.”
- The e-mails are sent from Gina’s account, so she will receive replies and give the students personal responses.
- If students do not complete the “Opt In” step, reminder e-mails are sent.
- When students check the “Opt In” box through their WSU portal, the processing team is notified.
- The processing team will collect all individual transcripts and forward them to the appropriate community college for degree audits via the National Student Clearinghouse.
- The team will also monitor progress from the community colleges.
- If students fail to respond to the e-mails, they will continue to receive e-mails at the end of each semester until they choose to “Opt In or Opt Out.”
- The Registrar’s Office is continuously communicating with faculty on reverse transfer opportunities.

Willow Dean presented the process that is used at Butler Community College.

- At the end of the term, Butler CC receives the transcripts from WSU via the National Student Clearinghouse.
- The transcripts are reviewed, and the information is entered into the system.
- A degree audit is conducted for each student to determine for which degree they may be eligible. This is not specific to a degree track.
- Staff look for any possible course substitutions and notify students what courses they are missing for completion.
- Butler may waive their 1-2 cr hr physical education course requirement for students who are missing this course to award the degree.
- If the student qualifies, a degree will be awarded to the student.
- The transcript will be printed and sent with a cover letter to the university.
- This is offered at no cost to the student (no transcript fee and no graduation fees).
- Suggestion has been made for a communication plan for outgoing students reminding them of future degree opportunities.

OTHER MATTERS

A. Jean Redeker presented the proposed changes to the State Authorization Reciprocity Agreement (SARA) Guidelines.

Discussion was held, and feedback has been received from KCIA. Suggested revisions from September have been incorporated in the current document. She reminded SCOCAO that SARA is to protect the student and not the institution. Some members were interested in an appeal process and KCIA is asking for some type of consideration before a decision is made to put an institution on provisional status with SARA. The Co-Chair suggested that language for such considerations or appeal, and any further suggested revisions be sent to Jean by November 20th.

B. Proposed changes to KBOR Policy Ch. III.A.9, Definition of Baccalaureate Degree were presented.

David Cook, KU, stated further discussions have occurred and a pilot program has been suggested by the Council of Faculty Senate Presidents (COFSP). The COFSP Chair affirmed the Council did not support the policy amendments and may support a pilot, but would need further information before doing so - including data to support the pilot. SCOCAO focused on the policy amendments and is requesting that all two- and four-year

institutions provide feedback about the proposed amendments (pros, cons, and comments). Universities will send their feedback to Carl Lejuez, and the two-year institutions will send feedback to the Board office by November 20th. The compiled information will be included with SCOCAO's next agenda.

ADJOURNMENT

Steve Loewen moved to adjourn the meeting. Following the second of Rick Muma, the motion passed. The Co-Chair adjourned the meeting at 9:40a.m.

Discuss Proposed Changes to State Authorization Reciprocity Agreement (SARA) Guidelines

Summary

SARA allows accredited degree-granting institutions to offer distance education in other member states without having to seek individual authorization from those states. The Board, serving as the State Portal Entity for Kansas, accepts applications from degree-granting institutions of all sectors and approves their participation in SARA. Staff recommends the Board establish guidelines that detail when it will limit or prohibit the distance education enrollments of institutions provisionally participating in SARA. Based on institutional feedback, staff has added an appeal procedure for those institutions that would no longer be a part of SARA. November 20, 2018

Background

The State Authorization Reciprocity Agreement (SARA) is a voluntary agreement among member states and U.S. territories that establishes comparable national standards for interstate offering of postsecondary distance education courses and programs. It is intended to make it easier for students to take online courses offered by institutions based in another state.

The Kansas Board of Regents (KBOR) serves as the State Portal Entity for all institutions domiciled in Kansas. KBOR accepts applications from degree-granting institutions of all sectors and approves their participation in SARA in compliance with policy established by the National Council for State Authorization Reciprocity Agreements (NC-SARA).

Institutions and Participation

The State Portal Entity determines whether an institution in its state is eligible for participation in SARA. Institutions participating in SARA must meet the following eligibility requirements:

1. Be a degree-granting institution, awarding associate degrees or higher;
2. Be physically located in the United States;
3. Hold proper authorization from Congress, a U.S. state or a federally recognized tribe to award degrees; and
4. Hold accreditation as a single entity from an accrediting association recognized by the U.S. Secretary of Education, and which has formal recognition to accredit distance education programs¹.

NC-SARA policy allows for the provisional admission or renewal of an institution in the following circumstances when an institution is:

1. On provisional status or the equivalent with its accrediting body;
2. Using a letter of credit or is operating with a cash management agreement with the U.S. Department of Education; or
3. Under investigation for issues related to its academic quality, financial stability, or student consumer protection².

Additional oversight measures may be added by the State Portal Entity to institutions participating in a provisional status to ensure SARA requirements are met regarding program quality, financial stability, and consumer protection.

On March 12, 2018, NC-SARA granted additional oversight mechanisms which included measures that allow a State Portal Entity to limit or prohibit distance education enrollments for institutions on provisional status.

¹ SARA Manual, Policy, Section 3.1

² SARA Manual, Policy, Section 3.2

Proposal

In response to the additional oversight mechanisms granted on March 12, 2018, staff seeks guidance from the Board as to when KBOR will limit or prohibit the distance education enrollments of institutions provisionally participating in SARA. During BAASC's June 20, 2018 meeting, staff recommended the Board adopt the following guidelines, and seeks institutional feedback on these recommendations.

- Institutions will not be allowed further enrollments under SARA if one the following conditions apply:
 - An institution is placed on probation, or its equivalent status, with its regional/national accrediting body.
 - An institution is under public investigation for issues related to its academic quality, financial stability, or student consumer protection.

An institution has three weeks from the date of notification by the Board Office to present new information and request the Board reconsider its decision.

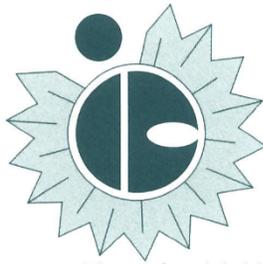
- Institutions will be allowed to continue enrollments under SARA if they are using a letter of credit or operating under a cash management agreement with the U.S. Department of Education and meet the following standard.

For the most recent fiscal or calendar year or for the two most recent fiscal or calendar years combined, an institution must demonstrate:

- A minimum ratio of current assets to current liabilities of at least 1:1;
 - A positive net worth in which the total assets exceed the total liabilities; or
 - A profit earned or positive change in net assets.
- Institutions will be allowed to continue enrollments under SARA if they are placed on notice, or its equivalent status, with their regional/national accrediting body.

2017-2018 SARA Enrollments (nc-sara.org/content/enrollment-reports)

SARA Members (KS)	Sector	SARA Enrollments
Grantham University	private, for-profit	8623
Baker University	private, not-for-profit	201
Barclay College	private, not-for-profit	45
Benedictine College	private, not-for-profit	0
Central Baptist Theological Seminary	private, not-for-profit	24
Friends University	private, not-for-profit	40
Kansas Christian College	private, not-for-profit	55
Kansas Wesleyan University	private, not-for-profit	22
MidAmerica Nazarene University	private, not-for-profit	169
Newman University	private, not-for-profit	23
Ottawa University	private, not-for-profit	1032
Saint Paul School of Theology	private, not-for-profit	0
Southwestern College	private, not-for-profit	334
Sterling College	private, not-for-profit	2
Tabor College	private, not-for-profit	29
University of Saint Mary	private, not-for-profit	249
Cleveland University-Kansas City	private, not-for-profit	3
subtotal		10851 57% of total enrollments
Allen Community College	public, coordinated	81
Barton Community College	public, coordinated	543
Butler Community College	public, coordinated	245
Cloud County Community College	public, coordinated	43
Colby Community College	public, coordinated	145
Cowley Community College	public, coordinated	92
Dodge City Community College	public, coordinated	185
Flint Hills Technical College	public, coordinated	6
Fort Scott Community College	public, coordinated	33
Garden City Community College	public, coordinated	43
Hutchinson Community College	public, coordinated	243
Independence Community College	public, coordinated	7
Johnson County Community College	public, coordinated	578
Kansas City Kansas Community College	public, coordinated	200
Labette Community College	public, coordinated	3
Neosho County Community College	public, coordinated	13
Pratt Community College	public, coordinated	78
Seward County Community College	public, coordinated	51
Washburn University	public, coordinated	156
subtotal		2745 14% of total enrollments
Emporia State University	public, governed	586
Fort Hays State University	public, governed	2721
Kansas State University	public, governed	889
Pittsburg State University	public, governed	194
University of Kansas	public, governed	892
Wichita State University	public, governed	155
subtotal		5437 29% of total enrollments
AY 2018 TOTAL Enrollments		19033



RECEIVED

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KANSAS BOARD OF REGENTS

Kansas Independent College Association

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www.kscolleges.org

November 16, 2018

Dr. Jean Redeker
Vice President of Academic Affairs
Kansas Board of Regents
1000 SW Jackson Street, Suite 520
Topeka, KS 66612

Dr. Redeker:

The System Council of Chief Academic Officers (SCOCAO) has been reviewing a proposed board policy to impose additional criteria for Kansas-based institutions to receive and maintain approval for participation in the State Authorization Reciprocity Agreement (SARA). These revised additional criteria were last discussed at the SCOCAO meeting on November 7, 2018. The Chief Academic Officers of the Kansas Independent College Association (KICA) have discussed the revised proposal and continue to have several serious concerns about its intent and impact. Due to these concerns, we share our opposition to it as currently written.

Before detailing those objections, I do note that KICA nor any of its members have neither a voting nor Association, nor its members, have a voting or advisory role within SCOCAO or any other committee of the Board of Regents. Nonetheless, by nature of KBOR serving as the portal agency for SARA access for all Kansas-domiciled institutions, we are regulated by the decisions made by those committees and the Board. Thus, we offer these objections in the hope that you will consider them despite our lack of official voice within the decision-making structures of KBOR and as a group desirous of cooperative action and with similar intent to continue to serve students and Kansas well.

Our principal objection to the proposal is with the first new criterion. The proposal states:

Institutions will not be allowed further enrollments under SARA if one of the following conditions apply:

- a. **An institution is placed on probation, or its equivalent status, with its regional/national accrediting body.**
- b. **An institution is under public investigation for issues related to its academic quality, financial stability, or student consumer protection.**

First, the proposal uses language that remains unspecific. In section (a), a “national accrediting body” could be interpreted as inclusive of national programmatic accreditors. Thus, if an institution was on probation with a national accreditor for a non-distance-based nursing program, the proposal could trigger loss of SARA eligibility for the entire institution. The language should be strengthened to read “regional/national institutional accrediting body.”

Member Colleges and Universities

Baker University 1858 • Benedictine College 1858 • Bethany College 1881 • Bethel College 1887 • Central Christian College of Kansas 1884
Cleveland University-Kansas City 1922 • Donnelly College 1949 • Friends University 1898 • Hesston College 1909 • Kansas Wesleyan University 1886
Manhattan Christian College 1927 • McPherson College 1887 • MidAmerica Nazarene University 1966 • Newman University 1933
Ottawa University 1865 • Southwestern College 1885 • Sterling College 1887 • Tabor College 1908 • University of Saint Mary 1923

In section (b), “public investigation” continues to be an amorphous term that is open to a wide breadth of interpretation. “Public” could be defined to mean covered by the media, but that itself is problematic as “media” is ill-defined and with web-based sources could include unscrupulous sources purposely intending to harm an institution without basis in fact. “Public” could be defined to be inclusive of social media posts, which would be further problematic. Alternatively, “public” could be defined to mean “by a federal, state, or local government agency and disclosed to the public.” This latter definition reduces the risk of unscrupulous individual private agendas jeopardizing institutional eligibility.

Second, KICA is strongly concerned that the proposal requires KBOR to withdraw SARA eligibility for reasons outside the scope of SARA and unrelated to the ability of an institution to continue to provide a high-quality academic program with satisfactory student outcomes. Because of pressure from the U.S. Department of Education and the public at large, accrediting bodies have greatly increased the scope of their evaluation of institutions and thereby increased the range of reasons why an institution might be placed on probation. For example, both Donnelly College (Kansas City) and Bethany College (Lindsborg) have recently been on probation with the Higher Learning Commission (HLC). In both cases, HLC’s concerns were not about academic quality but about financial management. By nature of being non-profit rather than state-funded, the smaller KICA institutions often have a higher threshold to prove financial viability. Consequently, under the revised proposal regarding KBOR’s SARA criteria, institutions facing probation for financial concerns (but no academic or consumer protection issues) would at that very moment find themselves facing the loss of revenue streams from online/distance programs or significantly increased costs for maintaining them. The choice would be no choice at all for many institutions, and the removal from SARA would result in additional financial harm to the institution and its students rather than serve to protect students.

Additionally, KICA has significant concerns that the proposed language is far too inclusive. The number of potential governmental entities that could be included under this section is immense. There are state-level entities – KBOR, the Kansas Department of Revenue, or the Attorney General’s consumer protection office – and federal entities – the US Department of Education, the Internal Revenue Service, or the U.S. Financial Services Product Safety Commission. These have a bright line connecting their mission to the language of the proposal.

However, there is a long list of other local, state, and federal entities whose oversight of higher education institutions could be interpreted as affecting “issues related to its academic quality, financial stability, or student consumer protection.” These might include the US Citizenship and Immigration Services, the U.S. Environmental Protection Agency, or the US Occupational Safety and Health Administration. The US Department of Agriculture provides loans and the National Science Foundation provides grants to some institutions and make their recipient lists public. The actions of either agency could be interpreted as “investigating” financial stability of an institution. Under the proposal, any of these could *automatically* trigger KBOR to withdraw the institution’s SARA eligibility, causing significant harm to otherwise effective and healthy institution.

Third, the proposal ignores substantial timeline considerations and thereby conditions of HLC probation or “public investigation” can last as long as three years. HLC probation can last up to three years and be contingent upon many uncontrollable factors such as site visit scheduling for review teams and the annual meeting schedule of the HLC Institutional Actions Council. However, NC-SARA guidelines (as of November 1) only allow an institution to maintain provisional status for two years. Thus, the KBOR proposal *automatically* undercuts NC-SARA’s purpose for allowing

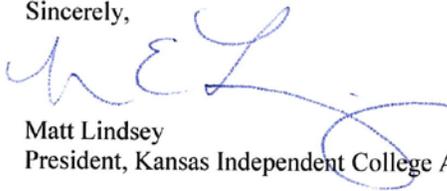
provisional status. Similarly, the timing of non-profit institutions' fiscal year end and annual financial audit completion likely creates situations where the proposal is effectively a 2-year penalty regardless of whether any financial issues are remedied quickly.

The three concerns identified are serious enough in the eyes of KICA to justify our opposition to the proposal as written. However, we feel that some of these issues could be remedied with the inclusion of a fair and transparent appeals process. Such a procedure would allow for more contextualized review of an institution's failure to meet the criteria and whether the intent of the proposal is indeed being met by its implementation in each instance.

However, because the Kansas Independent College Association, nor its members, have either a voting or advisory position on SCOCOA or the Board of Regents, we believe any such appeals process would be best served ensuring that voices from all sectors of Kansas higher education – public and non-profit, four-year, community college, and technical college – be included in some manner.

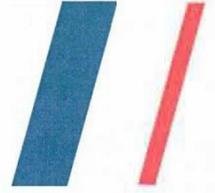
In closing, KICA requests that the Board of Regents, its staff, and the members of SCOCOA consider these concerns and recognize that distance education programs can be an essential component of the academic and financial health of many institutions. Any modifications to the SARA policy that could lead to automatic ineligibility, even those with the noblest intent, should be developed with extreme care and with an eye for specificity and account for the broad range of institutional contexts in Kansas so as not to cause unintentional and long-term damage to the ability of those institutions to serve the learning and professional goals of their students. KICA and its members welcome the opportunity to work with KBOR to address these issues.

Sincerely,

A handwritten signature in blue ink, appearing to read 'ML', with a large, stylized flourish extending from the end of the signature.

Matt Lindsey
President, Kansas Independent College Association

Cc: Dr. Todd Carter, Co-Chair, System Council of Chief Academic Officers
Dr. Lynette Olson, Co-Chair, System Council of Chief Academic Officers



Proposal to Enhance Student Transfer Pathways and Collaborations Between Johnson County Community College (JCCC) and the University of Kansas (KU)

JCCC and KU jointly seek to change KBOR Policy Manual Chapter 111.A.9 Degrees B. 2a-d.

Problem: Serving transfer learners is an essential practice for four-year institutions and warrants a fresh review of policy definitions. Currently KBOR Policy Manual Chapter III.A.9 statement (b) indicates bachelor degrees must include 60 credit hours from institutions with a majority of degree offerings that are at the baccalaureate level.

This measure is a common hurdle for transfer students who often end up having to retake courses they have already completed at a community college to stay in compliance with the policy. This update ensures KU students do not need to find work arounds for freshman and sophomore level courses when they are over their 60 credit hour limit. Removing the 60 hour language, and maintaining the 45 hours of upper division credit hours, also ensures that we maintain the rigor of our degree programs at KU.

- When the policy was updated to sum baccalaureate hours to 120 (see (2.a), it appears (2.b-d) were not adjusted.
- Current definitions are not competitive with Missouri four-year institutional policy.
- Transfer students currently experience credit loss or forced non-Kansas school enrollment options.
- Definition adjustment proposed below does not compromise degree rigor.

Solution: JCCC and KU jointly seek to modify the definition of a baccalaureate degree (Ch. III.A.9) as follows:

(2) “Baccalaureate degree” means a degree:

(a) Requiring the equivalent of at least four academic years of full-time postsecondary study consisting of courses totaling a minimum of 120 semester credit hours in the liberal arts, sciences or professional fields.

(b) Incorporating in its program design ~~the equivalent of two or more academic years of full-time study consisting of courses totaling a minimum of 60 semester credit hours from institutions that have a majority of degree conferrals at or above the baccalaureate level, and a minimum of 45 semester credit hours in upper division courses from institutions that have a majority of degree conferrals at or above the baccalaureate level. Institutions are not permitted to make programmatic exceptions. Institutions may make a limited number of exceptions from the 60-hour requirement for individual students, up to a maximum of 6 hours.~~

(c) The degree shall require distinct specialization, i.e., a “major,” which should entail approximately the equivalent of one academic year of work in the main subject plus one academic year in related subjects, or two academic years in closely related subjects within a liberal arts interdisciplinary program.

(d) The equivalent of the first two academic years of full-time study (associate degree programs ~~ordinarily require 64, but in some cases may extend up to~~ may vary from 60-72, or more semester credit hours) may be from institutions that have a majority of degree conferrals below the baccalaureate level.

Review of the Board's Policy on the Baccalaureate Degree Definition

The University of Kansas and Johnson County Community College are requesting a change to the definition of Baccalaureate Degree that appears in the Degree Definitions and Standards Policy adopted by the Board in May 2002. At its September 2018 meeting, SCOCAO requested a history of the policy.

Background

At the September 2000 Council of Chief Academic Officers (COCAO) meeting, Washburn University announced a new 2+2 baccalaureate degree completion program in which students could transfer up to 84 credits hours from participating community colleges. There was no Board policy or standard at the time limiting the number of credit hours that could be transferred from a community college and counted toward completion of a baccalaureate degree at a public university.

The chief academic officers of the state universities, at their retreat in June 2001, proposed that no more than two academic years of instruction (i.e., 64 credit hours) should be from schools that do not offer baccalaureate degrees. After several months of discussion by the Council of Chief Academic Officers, the Council of Faculty Senate Presidents, and the Council of Presidents, the Board adopted a baccalaureate degree definition in November 2001 that stated, "at least 54 semester hours shall be in upper division courses."

At the April 2002 Board meeting, Dr. Amanda Goldbeck, the Board's Vice President for Academic Affairs, reported the "standard is implementable, but it would be a struggle and several councils have discussed alternatives." The Board directed staff to craft a final recommendation to replace the requirement that baccalaureate degrees have at least 54 upper division hours. COCAO recommended baccalaureate degrees have a minimum of 60 credit hours from institutions that have a majority of degree conferrals at the baccalaureate level and 45 upper division hours. The COCAO recommendation was adopted as policy by the Board in May 2002 with the "intent that institutions are encouraged to provide students maximum flexibility within the parameters of this policy to assure degree completion in a timely and economical manner."

Neighboring State Policies

The Missouri Coordinating Board for Higher Education policy on credit transfer states that "students may transfer more than 64 credit hours for lower division courses from either Missouri associate degree-granting or baccalaureate degree-granting institutions. Any additional lower division course credits above 64 credit hours will be accepted in transfer if the credits are applicable to the baccalaureate degree or are prerequisites for an upper division course in the major." A baccalaureate degree normally requires no more than 120 semester credit hours unless necessary for accreditation or licensure.

The Colorado Commission on Higher Education statewide transfer articulation agreements allow students to "complete the bachelor's degree in no more than 60 credits at the receiving four-year institution (for a total of 120 credits)," except where the degree program received a waiver from the Commission to exceed 120 credits.

The Oklahoma State Regents for Higher Education policy states that, "baccalaureate degrees shall be based upon a minimum of 60 hours, excluding physical education activity courses, at a baccalaureate degree-granting institution, 40 hours of which must be upper-division course work excluding physical education activity courses." A baccalaureate degree requires completion of at least 120 credit hours.

The Nebraska Coordinating Commission for Postsecondary Education has no statewide policy for baccalaureate degree standards. The University of Nebraska system does not have a systemwide policy, and allows individual campuses (Lincoln, Omaha, Kearney) to set their own policies. The Nebraska State College system will accept a total of 66 hours in transfer from a two-year college unless otherwise accepted by agreement, and their board policy limits baccalaureate degrees to 120 credit hours.

Proposed KBOR Policy Amendment: Pros, Cons, and Supplementary Information
(Document emailed to institutions on 11/16/18 with minor revisions 11/26/18)

Current Status

The current Kansas Board of Regents (KBOR) policy requires students earning a bachelor's degree to complete a minimum of 60 hours from baccalaureate granting institutions. Students transferring from an associate granting institution may count a maximum of 60 credit hours at the two-year institution toward a bachelor's degree at a state university, regardless of how many hours taken at the associates granting institution. This proposed KBOR Policy amendment reduces the number of hours that must be completed at a baccalaureate granting institution to 45 hours. Under the proposal students may transfer additional credits from approved courses taken at a 2-year institution.

Pros of the Proposed Policy Amendment

- The proposal allows for optimal utilization of all of the credit hours a student has earned at their 2-year institution resulting in a shorter and less expensive path to their baccalaureate degree. It should be noted that changing the policy will not impact students transferring from a 4-year institution or individual degree requirements for any transfer students. This change does not impede or seek to upend degree requirements as already set within any programs.
- Currently, there is a significant disparity in the requirement for transfers from another 4-year institution compared to transfers from a 2-year institution. Kansas 4-year institutions require only 30 hours in residence and accept additional credits if they transferred from a 4-year school. A 100 or 200 level course taken from a four-year institution may transfer and count toward a degree. The same course taken at a community college transfers but does not count toward the degree if student has already had 60 credit hours from a two-year institution applied to the bachelor's degree.
- This change could result in more students transferring into 4-year schools within Kansas. A student with more than 60 credit hours may choose an out-of-state 4-year school (or an online provider) as opposed to a Kansas 4-year school based on the cost and time associated with having to complete more hours in a Kansas school in order to graduate.
- This change has the potential to increase enrollment for 4-year Kansas schools by encouraging students from 2-year schools to stay in Kansas rather than seek degree completion at an out-of-state institution where more of their existing credit hours will be counted towards their degree. Thus, while there may be fewer credit hours acquired from any given student, the increase in enrollment could more than offset any credit-hour-per-person losses.
- The proposal could also lead to increased goodwill between the 4-year and 2-year institutions, which could lead to other fruitful collaborations that will benefit students.

Cons to Changing the Current Policy

- Leaving the 60 credit hour cap in place encourages students to complete two years at a single 4-year institution, leading to more exposure to the 4-year faculty and coursework. Reducing the cap to 45 hours would mean as few as 3 semesters at a 4-year institution. There are concerns that this simply isn't enough exposure – not just to coursework but to other opportunities, such as research, that are more available at 4-year institutions.
- Rather than focusing on the number of hours required from a 4-year institution, more attention may be focused on limiting the number of hours students are accruing (as close to 60 as possible) in the service of completing their 2-year degree. This would ensure students transfer to 4-year institutions in a timelier manner and are focused as they prepared to complete a bachelor's degree.
- The decrease in credit hours required at a 4-year institution could reduce the overall credit hours at these institutions as students may begin to take more credits at their 2-year institution knowing more hours will transfer over.

Information from Peer Institutions

KU contacted its Midwest comparison peer schools and asked each to share their relevant policy.

- Some institutions, such as the University of Iowa are exactly in line with current KBOR policy.
- For some schools, such as 4-year universities in the state of Colorado, there is no system-wide policy and the required credit hours varies across each of the schools within the state.
- Similar to Regents institutions, Wisconsin requires 30 hours in residence for transfers from a 4-year school. Somewhat different than the current KBOR policy, Wisconsin allows up to 72 transferred hours from a community college to apply to the degree thereby requiring 48 hours in residence.
- Iowa State falls in between Wisconsin and Iowa, requiring 32 hours in residence when transferring from a 4-year school, and allows up to 65 to count towards the degree for those transferring from a 2-year school (thereby requiring 55 hours in residence).
- Of note, Missouri appears to set an allowance of 64 hours for transfer from either 2 or 4-year institutions, but then also allows for the inclusion of any other credit hours that are consistent with the requirements of the major. Thus, depending on the courses taken by a student, the total number of hours that can be applied to the requirement of a major for students from a 2-year institution can exceed that allowed by Wisconsin as well as the current proposal under consideration.
- It is anticipated information about institutions in Texas or Indiana will be brought to the next discussion of this proposal.

Summary

Across Midwest comparison institutions and/or University systems, there is a considerable range in the number of credit hours that can be transferred from a 2-year institution. Thus, one could easily find support for the current KBOR policy, the proposed changes, or a compromise between the two.

Data Collection Ongoing that will be Shared as it is Available

- The number of students advised to not complete degrees at 2-year institutions before transfer because of duplication of credit hours or issues with acceptance of coursework.
- The average number of credit hours students take with them when they transfer from a 2-year institution (e.g., JCCC). The former could indicate a degree completion “problem” and the latter could indicate problems with the assumption that students are leaving community college with far above 60 hours (e.g., 80 or 90 credit hours).
- Additional number of credit hours that would have been accepted with this change in policy.
- Note: It would be helpful to know how many students with more than 60 hours from a 2-year institution transfer to 4-year institutions outside of Kansas to preserve their hours accrued, but this may be difficult to collect at this time.

Possible Data Collection Opportunities if a Change to the Policy is Approved

***as a full change or a pilot program**

- Track the number of students transferring more than 60 credit hours from 2-year institutions (and the number of hours beyond 60) to determine the magnitude of the impact of a policy change.
- Determine if students who transfer in more than 60 credit hours from 2-year institutions have different retention, progression, and/or graduation rates than non-transfer and/or students transferring from other 4-year institutions (what substantive impact does this have on our students).
- Evaluate outcomes for students transferring from a 2-year institution based on the number of hours completed in residence (e.g., 45 vs 60 hours), with a focus on retention, progression, and graduation comparison rates.

Input on Proposed KBOR Policy Amendment: Pros, Cons, and Comments
From Barton CC, Butler CC, Cowley CC, Hutchinson CC, Independence CC, and Neosho CC

Pros of the Proposed Policy Amendments:

Flexibility/Reduced Cost/Reduced Time to Degree

- Allowing more than 60 credit hours to transfer would allow more flexibility for students and decrease the overall cost of a bachelor's degree.
- Students will spend less time retaking coursework that they have already completed at the community college.
- Some students who have continued to complete transfer courses at a community college for economic reasons don't always realize they are compounding the issue by having to complete a minimum of 60 credit hours at the university. Allowing some flexibility here would benefit these students.
- Credit hours could be accrued at a lower cost (e.g., at a community college closer to home).
- These amendments would provide additional flexibility for students on their educational path that often requires transfer of credits from two-year colleges to four-year colleges. The proposal also provides additional flexibility between institutions who work together and articulate to make seamless transfer a possibility for certain programs. It builds on the work that KBOR has done with KCOG and provides more opportunity and access. It just makes sense.

Increase Enrollments at Universities/Increase Completion Rates at Two- and Four-Year Institutions

- The option for two-year students to take additional credit hours prior to transferring is a cost-effective measure that will likely increase the number of students choosing to transfer to universities and colleges to complete their bachelor's degree.
- Increase completion rates at the two-year institutions as currently students leave before completing 60 credit hours.
- Increase overall completion rates of degrees at the universities.
- Potential reduction in the number of students that complete their degrees at other institutions outside of the state.
- Our institution supports the increase in the number of credit hours that may be transferred to a four-year college or university. We have an agreement with an out-of-state institution who accepts up to 81 credits from our institution.

Other Benefits

- It could result in better articulation agreements across the state between all institutions as conversations would need to confirm what the overall degree requirements are. Could possibly result in more consistency from institution to institution on what degree requirements are.
- This change would seem to have a leveling effect of the transfer opportunity to take credits at either another four-year or a two-year institution—additional credit would be accepted.
- Our institution supports the policy change. While we have worked hard to reduce degree programs to 60 credit hours, there are a few instances where students are still required to get 64-65 hours to graduate.
- Because we are close to the Missouri border, we do have between 5-10 students who transfer to MSSU each year instead of the local state university because of the better transfer results they get with them compared to the state university. MSSU will take all their classes and put them at Junior status if they have completed their Associates degree (no matter the credits required in the Associates).
- We have students that are told by the state university if they are transferring into the Elementary Education program they are required to take a minor if they transfer in more than 60 hours in order to meet the current policy requirements. While the minor can be helpful in seeking some jobs, the fact that they MUST take it just to meet a policy requirement doesn't seem to be student friendly, especially since they don't have to do this for MSSU.
- Regent universities might be denying transfer of course work that has guaranteed transfer equivalency number. Example from a state university: "60 hours minimum must be completed at a 4-year institution. 45 hours of upper division course-work (300 level and above) at a 4-year institution. NOTE: Credit from a two-year institution cannot be used to satisfy this requirement, regardless of the transfer equivalency number."

- Students could get credit for prerequisite coursework taken at a community college that applies to programs at the four-year institution. Some universities reduced to 120 hours by not including any prerequisite courses, so students will end up with more than 120 actual credit hours although the program outlines only 120 hours needed.
- Prerequisite course work needs to be shown on the community college program guides in order for financial aid to pay for them, which might give the community college transcript additional hours.
- Remove barriers to some transfer students. For example, a student athlete who Red-Shirts a year and then competes for two years cannot avoid completing 70-80 credit hours in some cases.
- Would allow us to have a comparable policy to Wisconsin, Iowa and Missouri?

Cons of the Proposed Policy Amendments:

- Could mean universities would see a reduction in the number of credit hours generated if additional students are not drawn into the system.
- Would require that some universities consider courses they are not currently accepting such as introductory courses numbered at the 300 or 400 level.

Additional Comments:

- I am very much in favor of these amendments and appreciate the work that JCCC and KU Edwards has done on this!
- I appreciate the “good will” between institutions if this could happen.
- Currently some of the state universities don’t accept 60 credit hours from the two-year colleges for a number of reasons. If Kansas would establish a common set of general education requirements for the first 2 years of the degree this would help community colleges communicate requirements to students in those first 2 years. Currently we have to watch multiple transfer guides and if a student then switches schools in their last semester, they may not have all of the courses they need for the school they transfer to. Creates so much confusion for students.
- If Kansas would set degree requirements for the first 2 years by program, that would also address the problem stated in the above bullet even more. For example, if a student is going into Engineering, having the first 2 years consistent across the state would benefit the students, two-year institutions and make the transfer process so much easier than it currently is.
- There also needs to be a review of how universities assign course numbers. For example, an introductory course at the university could have a 300 or 400 level course number and for that reason alone, the university refuses to accept an introductory course that is almost identical to one taught at the community college. I have examples of this in several disciplines and have heard this reason for many years as to why they won’t accept it.
- If the proposed amendment moves forward, we advocate all universities and colleges accept the same number of transfer credit hours to avoid confusion as advisors and student navigate the transfer process.
- We would need some kind of agreement that transfer of these Kansas credits from Kansas community colleges and other four-year institutions could have some kind of guarantee (such as in Florida) particularly if a degree was awarded---rather than sifted through and rejected by programs within schools of a college/university.

Input on Proposed KBOR Policy Amendment: Pros, Cons, and Comments From ESU, FHSU, and WSU

Pros of the Proposed Policy Amendments:

- Well stated in the “Pros of the Proposed Policy Amendment.” (FHSU)

Cons of/Concerns with the Proposed Policy Amendments or Concerns:

- I have found little support for the proposed policy amendments at ESU for the reasons summarized in the “Cons to Changing the Current Policy”. One additional objection I have encountered is that we have seen no evidence that the current policy causes students to lose credits or retake courses as they transfer from two-year institutions to ESU.
- Students may be led to believe that additional courses taken at the 2-year institution will transfer, regardless of articulation, and take unnecessary courses relative to transfer alignment with baccalaureate program. (FHSU)
- Change in the current policy could lead to mission creep within the 2-year sector, leading to more traditionally upper-division courses being taught at the 2-year institution and limiting the number of courses students receive from a baccalaureate granting institution. (FHSU)
- Courses articulated from the 200 to the 300 or 400 level could feasibly cut into the upper-division requirement even more than the 45 hour limit currently in place. (FHSU)
- Students who spend less than two years at a 4-year institution to complete their degree may miss out on co-curricular, internship/practicum, and leadership opportunities that arise by participating in various aspects of student life on campus. They may arrive mid-year and thus have greater difficulty connecting, let alone more deeply engaging in these personal and professional development activities. Also, there may be less opportunity to take higher level, in depth courses in their fields, leading to less preparation for employment following graduation. (WSU)
- Reducing required 4-year credits does not allow for optimal utilization of credits—only accurate advising does this. There is no way to assure students that all 75 2-year credits will actually apply to their chosen degree. Again, good advising will do the most to make effective use of credits. Also, if all 2-year institutions in Kansas changed their degree requirements to 60 credits, the situation would be even more improved for transfer students. Sixty + sixty is the most efficient use of credits and provides two degrees for the student. Two-year degree attainment is positively related to 4-year completion according to most research. (WSU)
- The 30-credit residency requirement under the proposed policy would mean that only 15 credits of the 45 could be taken at other institutions, with the unintended effect of limiting the options of transfer students needing to add an online or externally-offered course because of schedule conflicts or unavailable sections at their home institution. This could lead to the unintended effect of increasing the time to completion at the 4-year. (WSU)
- While the policy change could encourage students to lengthen their stay at community colleges, it may actually increase the time to completion if transfer students discover that they need to complete additional required courses for major/degree requirements. (WSU)
- WSU (and we assume other Regent schools) currently accepts transfer credit from two-year schools overseas that are officially recognized or accredited by the appropriate authorities in those countries. However, in some countries, the accreditation process is often far less transparent than in the U.S. or the accreditation standards may not rise to the level of those at domestic institutions. Accepting lower-division credit from two-year schools in other countries is not particularly concerning to us. However, it would concern us if international students would be able to take a greater portion of, what could be, upper division course work at some two-year schools overseas. While syllabi tell us if the course content is similar to classes at WSU, the syllabi may not adequately portray the level of the content or the knowledge base required to pass a class. This coupled with uncertain accreditation requirements in some countries may increase the risk of students being ill-prepared to complete their remaining classes at WSU. As such, it's our recommendation that if KBOR moves to allow students to transfer up to 75 credit hours from two-year institutions, this be permitted for U.S. institutions only.

Additional Comments from WSU:

- Examples in the “Information from Peer Institutions” section reference the required hours “in residence.” That means the number of hours at the degree-granting university. That is different from the number of hours from a 4-year institution. A student can have a combination of 2-yr hours and 4-year hours. We require 60 hours from a 4-year school; a minimum of 30 of those must be in residence from WSU.
- Data collected should also compare students who earn the AA or AS at the 2-year to see how the number of credits earned at a 2-year college is related to the total number of credits transferred to a 4 -year college. These data are important to determine if graduation from the 2-year with 60 credits is actually beneficial to students going on to complete a 4-year degree. Also, if students at the 2-year have completed degree requirements for AA or AS, are they still eligible for financial aid at that 2-year institution? Would the proposed policy change have the effect of lengthening the time for degree attainment at the 2-year institution if students must remain in school without completing their degree in order to be financial aid eligible?
- Do we have data that shows KS CC students are going out of state due to the 60 hr policy? Are there not similar requirements for hours from a 4-year university in other states? It seems more likely that the impact would be student staying at the CC longer and more likely taking courses that do not meet degree requirements even though the hours will transfer.
- 2 + 2 articulations of 60 credits earned at each institution (with degree attainment at both institutions) would be the most effective tool and strategy for time and cost containment and would also lead to increased collaboration with mutual benefits to students and institutions.



Pittsburg State University

OFFICE OF THE PROVOST

November 20, 2018

Dr. Jean Redeker
Vice President of Academic Affairs
Kansas Board of Regents
1000 SW Jackson Street, Suite 520
Topeka, KS 66612

Dear Dr. Redeker:

Sent on behalf of Pittsburg State University Provost Leadership Council

In response to the proposed policy amendment to the KBOR definition of a bachelor's degree, as well as supplemental information provided, there have been discussions across our campus among faculty as well as administrators. While differences in perspective have been voiced, the overall assessment is that faculty and administrators are not supportive.

The pros and cons assessment developed by KU Interim Provost Carl Lejuez, as a follow up to the November 7, 2018 SCOCAO discussion, does a good job of highlighting relevant points. Much of this appears to be based on little or no supporting evidence. For example, while the assumption presented is that an increase in four-year enrollment will be realized to offset the decrease in credit hours, there is no data to support this. One of our greatest concerns is the challenge this might make to the development of a cohesive curriculum both across and within specific programs. In addition, pursuing coursework in the major in a compressed time frame could adversely impact professional development of the student for their chosen career.

At this time, faculty and administrators at Pittsburg State University believe that, while the pros and cons identified are good points for discussion, there is insufficient verifiable data to provide a foundation for prudent decision-making. Considering the long-term impact of this decision, we would recommend that key factors be identified and historical data presented as a foundation for an informed decision.

Sincerely,

A handwritten signature in cursive script, reading "Lynette J. Olson".

Lynette J. Olson, PhD, CFLE
Provost and Vice President for Academic Affairs

cc: Dr. Steven A. Scott
Mr. Cliff Morris

Policy Requirements for Institutional Reports of Concurrent Enrollment Partnerships (CEP)

ii. By January 31 of odd-numbered years, each public postsecondary institution shall provide to Board staff a list of high schools with which it has Concurrent Enrollment Partnership agreements. For each institution, Board staff will select no more than two high schools for reporting. For each high school selected, each institution will submit the following to the Board office:

- (1) Copy of the Concurrent Enrollment Partnership agreement that includes the criteria described in b.ii.;
- (2) Student Guide for Concurrent Enrollment Partnership students as described in b.v.(5); and
- (3) Report resulting from the annual review of Concurrent Enrollment Partnership courses by postsecondary partner institution, aggregated by discipline (as described in section b.iii.(5)).

iii. By January 31 of odd-numbered years, each institution shall forward to the Board office a copy of all reports resulting from the five-year institutional review of Concurrent Enrollment Partnerships (as described in b.ii.(8)).

iv. All reports shall be reviewed for compliance and the results will be reported to the Board President and Chief Executive Officer.