



Transferring between Public Institutions of Higher Education

Draft New COMAR Regulations and Amendments to COMAR

Presentation to the Maryland Higher Education Commission
February 22, 2022

Dr. Emily A. A. Dow, Assistant Secretary for Academic Affairs

Background

Transfer with Success Act (HB460/SB886)

- Legislation passed in 2021
- Created a new requirement for public institutions to *jointly review credits or courses that are denied* when a student transfers from one public institution to another.
- Created a new annual reporting requirement: institutions are now obligated to submit to the Commission a report listing all denials over the course of each year, including the reasons for each denial.

Transfer Workgroup

Members

Jeffrey J. Byrd, Ph.D.	Interim Vice President for Academic Affairs, St. Mary's College of Maryland
Antoinette Coleman, Ph.D.	Associate Vice Chancellor for Academic Affairs, University System of Maryland
Katie Grocki, M.A.	Campus Registrar-Germantown, Montgomery College (MOCCRAO President)
Rosalie Mince, Ph.D.	Provost, Carroll Community College (M4CAO President)
Brad Phillips, Ed.D.	Executive Director, Maryland Association of Community Colleges
Angela R. Sherman, Ph.D.	Vice President for Academic Affairs, Maryland Independent College and University Association
Rhonda Shields, M.S.	Associate Registrar, Morgan State University
Soma Kedia, Esq.	Assistant Attorney General

Meeting Dates

August 17, 2021
September 9, 2021
October 18, 2021
November 4, 2021
November 23, 2021
December 9, 2021
January 10, 2022
March 3, 2022



Transferring between Public Institutions of Higher Education

Highlights of Draft Regulations

Public Institutions in Maryland

Community Colleges

Allegheny College of Maryland
Anne Arundel Community College
Baltimore City Community College
Carroll Community College
Cecil College
Chesapeake College
College of Southern Maryland
Community College of Baltimore County
Frederick Community College
Garrett College
Hagerstown Community College
Harford Community College
Howard Community College
Montgomery Community College
Prince George's Community College
Wor-Wic Community College

Public 4-year Institutions

Bowie State University
Coppin State University
Frostburg State University
Salisbury University
Towson University
University of Baltimore
University of Maryland, Baltimore
University of Maryland, Baltimore County
University of Maryland, College Park
University of Maryland Eastern Shore
University of Maryland Global Campus

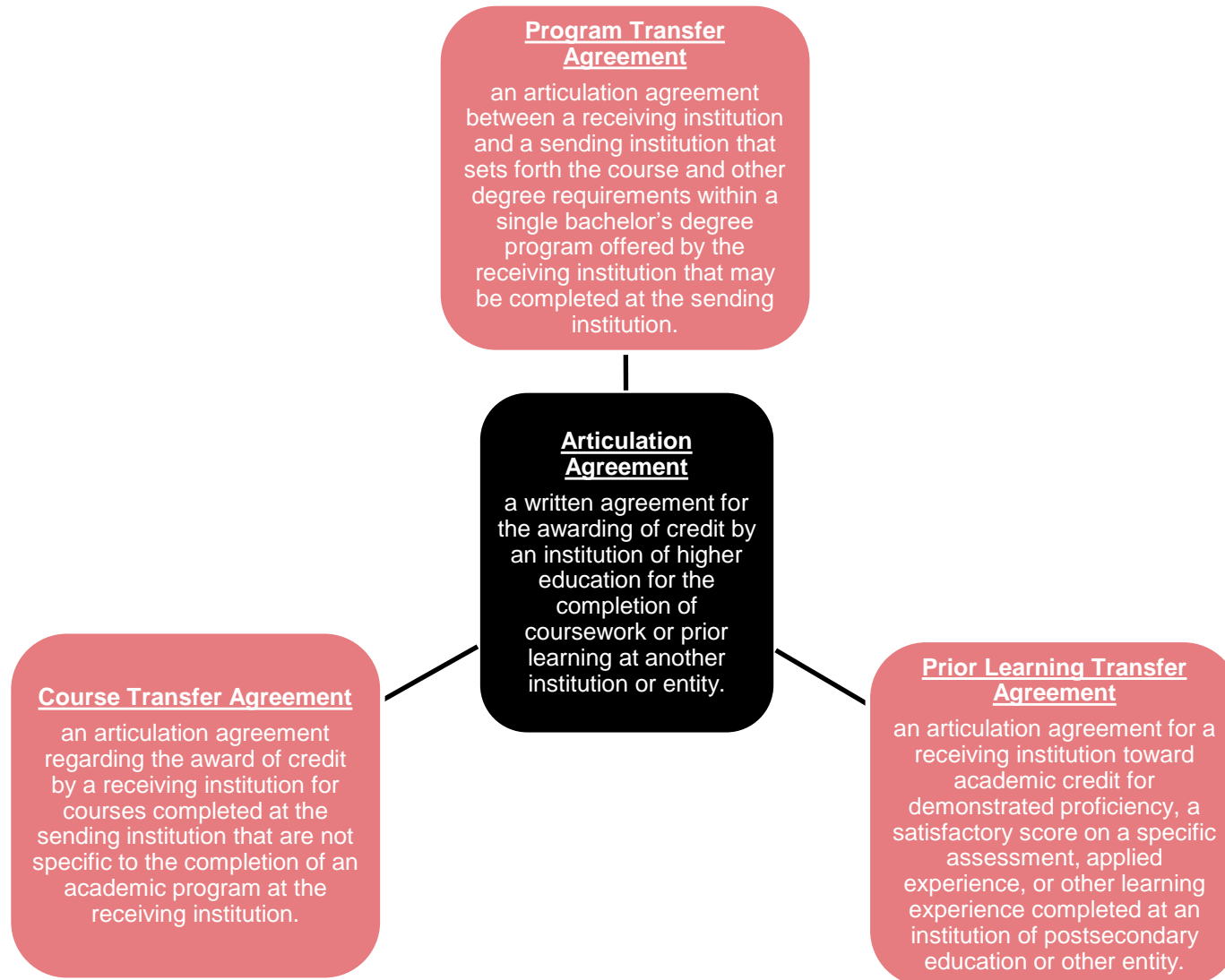
Morgan State University

St. Mary's College of Maryland

University System of Maryland

Articulation Agreements

Definition and Types



Articulation Agreements via Academic Program Review

Academic Program Proposals for undergraduate degrees will be required to include:

- A proposed articulation agreement
- Proposed revisions to existing articulation agreement(s)
- Justification for why an articulation agreement is not feasible or applicable

General Education

Now its own chapter!

Minor changes:

- Clarified required credit hours
- Changed “semester hours” to “credit hours”
- General reorganization

COMAR 13B.06.02

Brand new chapter!

Title 13B MARYLAND HIGHER EDUCATION COMMISSION

Subtitle 06 GENERAL EDUCATION AND TRANSFER

Chapter 02 Transfer Students and Transfer of Courses and Credits

Authority: Education Article, §§11-105 and 11-207, Annotated Code of Maryland

Contents

- .01 Purpose and Scope*
- .02 Definitions*
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- .07 Transfer of Courses and Credits Generally*
- .08 Number of Credits Accepted for Transfer*
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- .10 Evaluation of Individual Course Equivalencies*
- .11 Transfer of Previously Awarded Credit for Prior Learning*
- .12 Establishment of Transferability*
- .13 Program Transfer Agreements*
- .14 Evaluation and Review Process for Transfer of Courses and Credits*

New and *Revised* Definitions

- Academic Credit (or Credit)
- Credit for Prior Learning
- Course
- Learning Objective (or Learning Outcome)
- *Non-transfer Student*
- Program (or Academic Program)
- *Transfer Student*
- ~~Recommended Transfer Program~~

Transfer Coordinators

- Serves as a resource person to students seeking to transfer courses and credits.
- Is responsible for coordinating the application of the policies and procedures established.
- Is responsible for overseeing the process of the evaluation of student transfer requests.
- Is *not* responsible for determining course equivalencies or credit for prior learning (that lives with faculty who are subject matter experts).

Student Transfer Advisory Committee

(previously established by Statute but phases out June 30, 2022)

The Secretary shall convene a permanent Student Transfer Advisory Committee that meets regularly to review and provide recommendations on issues relating to student transfer and any matters referred by the Secretary.

Transfer of Courses & Credits

General Education

- General education courses transfer, no questions asked
 - The transfer should be applied to the same core area at the receiving institution
 - Transfer should happen regardless of whether an equivalent course exists at receiving institution
 - Each public institution shall designate on the student transcript those courses that have met a general education requirement, including the specific core area (from Gen Ed regulations)

Course Equivalencies

The New 70% Rule

A course at a sending institution is deemed equivalent when the receiving institution determines that **at least 70 percent of the course learning outcomes*** are the same for a course at the receiving institution.

- No other standard or method can be used to determine equivalency (e.g., textbook, assessments)
- Cannot consider the course numbers or levels to determine equivalency

*“Learning objective” or “learning outcome” means a description of the knowledge, skills, competencies, or expertise that a student is expected to obtain, exhibit, or meet upon the successful completion of a specific course or program.

Evaluation and Review Process



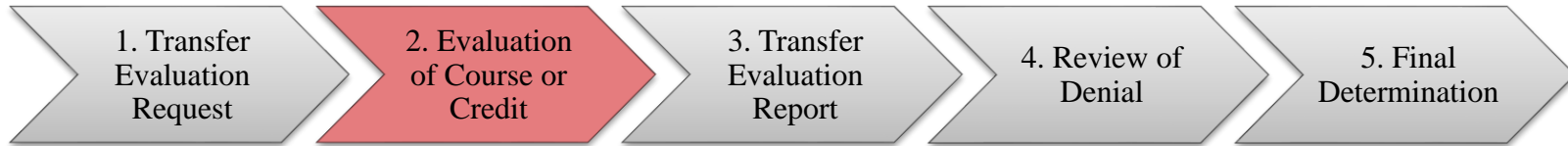
Evaluation and Review Process



Transfer Evaluation Request by Student

- Student submits a requests
- The request shall be in the form and manner required by the receiving institution
- Request shall identify each completed course and each credit awarded for prior learning that the student desires to transfer to the receiving institution.

Evaluation and Review Process



Evaluation of Course or Credit

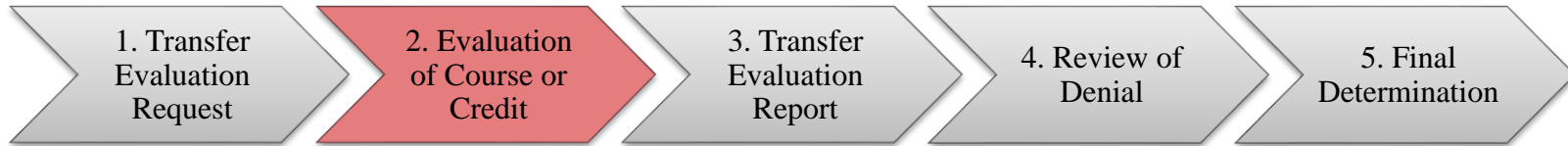
Part 1: Is it transferable?

- Is there a PTA, other transfer agreement, course equivalency list or other institutional publication specific to the course(s)/credits transfer?
- Does the course/credit fulfill a general education requirement?
- Is there a course equivalency?
- Is the credit equivalent for credit for prior learning?

If yes to at least one, move on to part 2. →

If no to *all*, then course or credit is denied for transfer.

Evaluation and Review Process



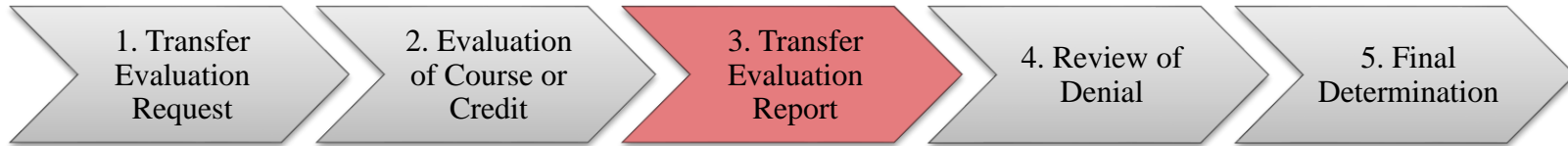
Evaluation of Course or Credit

Part 2: Application of Credit

- General education requirement
- Academic program requirement
- Elective requirement
- Any other institutional or program requirement
- Two or more of the above

If more than 70 credits can be transferred, campuses should transfer the most valuable courses

Evaluation and Review Process



Transfer Evaluation Report – what is included:

- ✓ If the course or credit has been accepted for transfer or denied
- ✓ For each course and credit accepted for transfer, the basis for transferability and the program requirement(s) it fulfills
- ✓ For each course or credit denied because it is not transferable, a clear and detailed explanation
- ✓ For each course or credit denied because they're over the 70 credit limit, a clear and detailed explanation
- ✓ A statement that the sending institution will review, without further action on the part of the student
- ✓ Contact person and information

Goes to both student and sending institution(s).

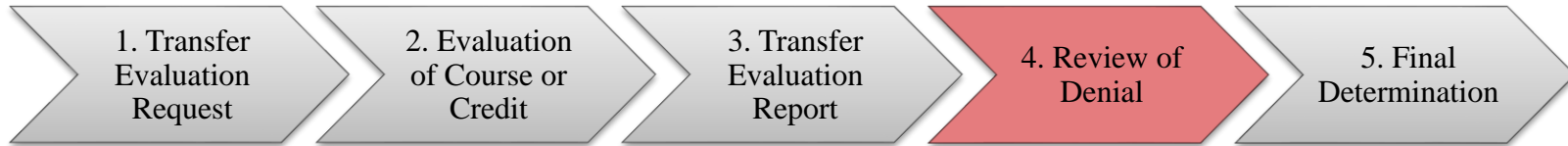
Evaluation and Review Process



Review of Denial

- Sending institution shall conduct an analysis
- Does the sending institution agree or disagree with the receiving institution's evaluation of denial?

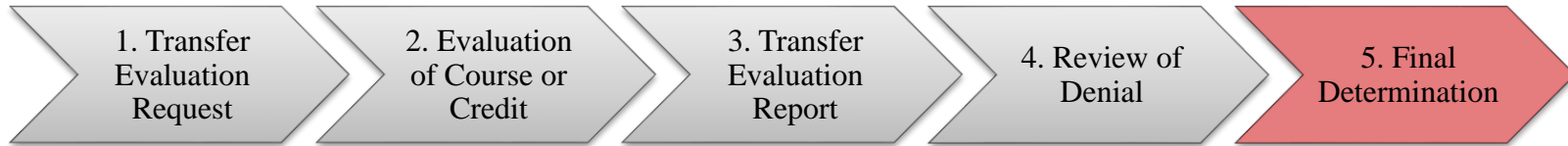
Evaluation and Review Process



Review of Denial: Meeting

- Institutions shall meet to discuss the analysis
- Waiver of meeting can be granted for good cause
- Sending institution will either revise the analysis or provide written notification that no revisions are necessary

Evaluation and Review Process



Final Determination

- The receiving institution shall provide to the student:
 - A Revised Transfer Evaluation Report, or
 - Written notification that the review process has not resulted in any changes to the Transfer Evaluation Report.
- The decision arising out of the review process constitutes the final decision of the receiving institution and is not subject to appeal.

Annual Report

Denial of Credit

...not a transfer collection...

“Each public institution of higher education to submit an annual report to the Commission listing any denials of the transfer of a credit or course and the reasons for the denials.”

Additional Notes

- Agreements, policies, rules, procedures, etc. should be publically available
- Institutions need to have policies
- Focus and emphasis on agreements, particularly Program Transfer Agreements
- Maximize transfer – reduce repeating courses means less time to degree and less cost

Next Steps

1. Circulate draft regulations to stakeholders
 - Community College Registrars (Feb 25)
 - Workgroup (March 3)
 - Education Policy Committee (March 14)
2. Proposed regulations presented to Commission on March 23, 2022
3. Finalize draft Guidance Document
 - Including annual report guidance
4. Develop Student-specific Guidance