



---

TO: Sen. Dembrow, Chair, Senate Education Committee  
FROM: Kyle Thomas, Director, Legislative and Policy Affairs  
Patrick Crane, Director, Community Colleges and Workforce Development  
Veronica Dujon, Director, Academic Policy and Authorization  
DATE: January 26, 2021  
SUBJECT: Common Course Numbering/Transfer Legislation

---

This memo is in response to a request for suggestions for amendments to LC 1427 (now SB 233), establishing a common course numbering system. HECC has met with institutional representatives by sector and collectively to discuss potential legislative language and a structure for continuing transfer work, though this memo represents the opinion of HECC staff only.

HECC has, since the passage of HB 2998 in 2017, played a central role in coordinating and setting policy for work to develop a core transfer map and major transfer maps for commonly enrolled majors. It is in this capacity that we have made several observations regarding the omissions in HB 2998 that, if corrected, could lead to greater alignment between colleges and universities that results in more seamless transfer experiences for students.

This memo also addresses the relationship between the proposed legislation, and the ongoing work under HB 2998.

Over the course of the last month HECC has engaged with institutions around finding a common path forward for this work. Both college and university representatives have approached the conversation energetically and constructively, and we believe that recommendations in this memo may be further shaped or made unnecessary by continued engagement with institutional representatives.

### **Transfer Council – A Process for Doing the Work**

The work to establish a common course numbering system is complex, requiring an oversight/policymaking entity, and the work of dedicated faculty across multiple institutions. The current bill does not specify the mechanism for accomplishing this work. To accomplish work under HB 2998, HECC established representative committees to set initial parameters for the work, and eventually to review transfer maps and respond to implementation issues. Subsequent to these initial bodies, an 'empowered administrator' group was established to correct for the fact that technical experts and practitioners are not sufficiently empowered to commit institutions to specific actions.

HECC recognizes that under the current higher education governance structure, there is no single point of authority to implement mandates or bind institutions to action. HECC further recognizes that in any structure, and in particular a structure that has been established to respect individual institutions' prerogative for governance, institutional ownership and buy-in is a necessary precursor for change, and the idea that a process is 'HECC-mandated' or 'HECC-led' can shade perceptions of the work. HECC therefore, concurs with the idea that a high-level, institutionally led transfer council can provide policy leadership for common course numbering and transfer work, however only in the context of adequate expectations, incentives/disincentives, trigger mechanisms, and accountability.

While an institutionally led transfer process may produce buy-in and ownership, an institutionally dominated process may result in decisions being made that are more convenient to institutions than in the best interest of students. This concern can be mitigated through appropriate expectations, incentives and disincentives, triggers, and through the structure of the council itself.

**RECOMMENDATION:** Establish a Transfer Council. Balance council membership between public institution sectors, with faculty representation included. Require that institutional members be chief academic officers or designees. Empower the sectors to determine their members. Establish co-chairs of the Council, one college academic officer and one university academic officer shall be selected by institutional sectors and serve for one year. Require that HECC staff be granted equal access to all Council materials, deliberations, and meetings. Allow the Council to form subgroups as necessary. Require that work to develop recommendations for course alignment or transfer maps be conducted with faculty, but allow the Transfer Council authority to modify proposals received, or return a proposal to a workgroup with instructions to modify in a specific way. Empower HECC to call a meeting if it deems one necessary and such meeting is not called by the Chair or chairs. Allow observer status for K-12 and private institution representatives. Require that Council decisions are binding on institutions.

Charge the Council to develop and adopt a common course numbering system, continue developing major transfer maps, and maintain alignment of the common course numbering system and transfer maps.

**Missing Elements/Lessons Learned from HB 2998.**

Accepting a common course numbering system as the primary goal of the legislation and that the work may be best performed by institutions, staff believe additional elements are required to produce a result that has the effect of reducing student barriers to transfer, and ultimately reducing final credit amount and time to degree disparities that persist between native university students and their transfer student counterparts. These areas are: expectations for level of alignment, incentive/disincentive mechanisms to encourage robust institutional participation and leadership buy-in, and mechanisms that ensure a transfer/common course numbering system is implemented even in the event that all institutions do not agree on all aspects of the system. Each of these elements is absent in HB 2998.

### *Expectations for Alignment and Articulation*

A common course numbering system alone does not result in academic alignment, rather, it is evidence of the achievement of academic alignment. For courses to be numbered the same, be transferred in the manner most favorable for the student, and for the student to benefit from having the opportunity to achieve learning outcomes and competencies necessary for success in subsequent coursework, institutions must agree on aligning course outcomes. These aligned courses benefit students by assuring they can progress without worry if they transfer, and may also benefit major transfer map alignment work by providing assurance to faculty that courses across institutions are equivalent enough to provide the basis of knowledge required for a specific academic major or general education requirement.

Lack of language stating expectations for alignment has caused aspects of the HB 2998 work to struggle. Because institutions were not required or expected to align lower division major curriculum, the number of variances and decision points that students must navigate remains, in HECC's opinion, in excess of what lawmakers envisioned on passage of the bill.

RECOMMENDATION: 1) Add language to indicate that courses commonly numbered shall be based on common learning outcomes. 2) Add language to existing law to create the expectation that major transfer maps seek to reduce misalignment between institutions for lower division major coursework absent a significant need driven by workforce demand or pedagogy. 3) Empower a transfer council to determine where significant need exists and prioritize the CCN work. 4) Add language protecting accelerated learning coursework. Accelerated learning coursework offered by higher education institutions should be articulated as if the coursework were taken on that college campus. 5) Develop guidance for determining what courses would be considered for common course numbering.

Comprehensive language from the state of Florida requires a body to “develop, coordinate, and maintain a statewide course numbering system for postsecondary and dual enrollment education in school districts, public postsecondary educational institutions, and participating nonpublic postsecondary educational institutions that will improve program planning, increase communication among all delivery systems, and facilitate student acceleration and the transfer of students and credits between public school districts, public postsecondary educational institutions, and participating nonpublic educational institutions. The continuing maintenance of the system shall be accomplished with the assistance of appropriate faculty committees representing public and participating nonpublic educational institutions.”

Additional language that requires an articulation matrix to which commonly numbered courses can be mapped provides additional clarity and mechanisms toward achieving the goal of having clear and direct transfer routes for students.

### *Accountability for Doing the Work*

Another lesson learned from HB 2998, where reporting served as the only mechanism of incentive and accountability, is the importance of clearly identifying both a timeline for work, measureable outcomes, and a system of accountability.

RECOMMENDATIONS: 1) Identify both stages and deadlines for the work, such as an initial deadline for the formation and first meeting of a transfer council, a one-year deadline for establishing both a list of recommended courses and a process for identifying future courses, and a further one-year deadline for the establishment of an articulation matrix of common course numbering of initial courses (an example of common course numbering deadlines be seen in Colo. Rev. Stat. Ann. § 23-1-108.5). 2) Add language that addresses the maintenance of the system. 3) Identify measureable metrics of a successful common course numbering system. 4) Require the Commission, as an observer of council activities to report on the activities of the council to the legislature.

### *Statutory Backstop*

While we hope that clear legislative expectations, a schedule, and accountability measures lead to the production of a common course numbering system, it is possible that an institutionally led process will fail to reach agreement, or that one or more institutions will not adopt an agreement that the majority of Oregon institutions agree to. It is also possible for work to break down prior to the point when a final common course numbering and major transfer map issues are resolved. The result of such an impasse should not be that a system is not enacted or adopted by institutions as the law requires.

RECOMMENDATION: 1) Adopt the transfer council developed common course numbering system in rule. 2) Establish a mechanism that relates institutional program approval requests to common course numbering and major transfer map progress, and suspend the approval authority of institutions deemed to be non-compliant.

### *Accountability to Implement the Transfer System*

Once a system is successfully established, and binding on institutions, the State should rightfully expect that it is faithfully and fully implemented by institutions. Students must earn credits as the system requires, and owing to the impact not implementing the system has on students via time lost, credits lost, and additional cost, institutions should expect that poor implementation of a system, or a drift between campus requirements and transfer system requirements over time, has a tangible consequence, such that institutions are encouraged to act to apply every credit in the most student-beneficial manner possible.

RECOMMENDATIONS: 1) Require annual reporting on metrics of success, including a randomized transcript evaluation where half of the institutions must audit a random sample of transcripts on even years, and the other half of on odd years, to ensure courses are articulating in accordance with the articulation matrix. 2) Determine a consequence for a poor audit as conducted in the prior recommendation. Examples: Institutions with multiple poor audits can face a suspension of program approval, institutions are publicly identified as good or poor at accepting transfer credit. 3) Publish audit results. 4) Identify a student appeals process that includes the requirement that the complainant's institution attempts to resolve the issue, requires the Transfer Council to be

alerted to all appeals, and requires the Transfer Council to make recommendations when the appeal is not resolvable by the institution.

### **The Relationship between HB 2998 and New Legislation**

In our discussion with you, you expressed that it was not your expectation that a common course numbering system force alignment of all lower division major coursework. For this reason, HECC recommends that the central piece of ongoing work from HB 2998, the development of major transfer maps, not be paused at this time, but continued under the structure of the Transfer Council, reduced to one major per year.

Language like that proposed above from the state of Florida expresses a sense of alignment between institutions, but doesn't similarly implicate the major transfer map work. The ongoing existence, in some cases, of significant variance in major transfer maps in which courses are recommended based on the student's university of choice has led HECC to describe the current work as a balance between writing a roadmap and building a straighter road. Emphasis should be placed on building a straighter road where possible.

**RECOMMENDATIONS:** Amend ORS 350.404 such that the Transfer Council is the venue for ongoing work. Require institutions to align learning outcomes for lower division coursework forming the major transfer maps when such alignment does not impede upon the ability of an institution to offer differentiated content in the upper division.

### **Other Needs**

In 2019 and 2020, HECC proposed additional language (most recently as a portion of SB 1521 (2020)). This language improves reporting requirements and establishes a transfer portal, shorthand terminology for a method of communicating transfer paths to students and linking institutions together in whatever technological methods are required to support smooth transfer. These elements are still relevant.

**RECOMMENDATION:** Amend sections 2, and 4 of SB 1521 (2020) into the bill, as amended to conform to principles described in other portions of this memo.