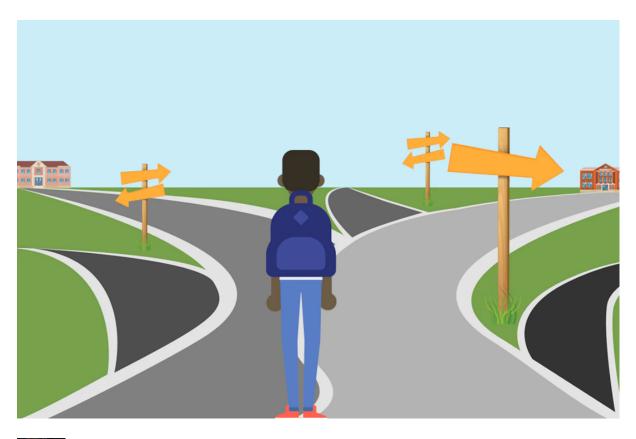


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College Transfer in the COVID-19 Era: Expectations vs. Reality





The COVID-19 pandemic has not only changed what college looks like—it's also impacted students' decisions about when, where, and whether to enroll in college. Some recent high school graduates are attending a different school than they originally planned, others have delayed higher education altogether, and some college students have transferred to an institution that costs less or is closer to home. Uncertainty about college enrollment plans will likely linger for the foreseeable future, but if there's one thing we can expect, it's more student movement *between* colleges. That makes this a critical moment to tackle a longstanding pain point in US higher education: fixing inefficient and inequitable transfer pathways to improve student outcomes.

A recent national poll of college students from Third Way and New America revealed that among students who said they were unlikely to return to their previous school for the fall 2020 semester, nearly a quarter intended to transfer, while 10% of all students surveyed said they planned to transfer schools for the 2021–2022 academic year. ¹ Most of these students had a positive outlook about their prospects: 42% of those intending to transfer felt confident that their new school would accept credits from their previous one, including 45% of Latinx students and 50% of Black students. Over a third (36%) were confident that their credits would be accepted even if they took classes somewhere else and then transferred back to their original school, among them 59% of students who are caregivers.

But are these expectations realistic? Unfortunately, data on the nearly 4 in 10 students who do transfer schools paint a very different picture of the landscape. For example, of the 80% of entering community college students who intend to transfer and get a bachelors' degree, less than 15% do so within six years, and students who transfer lose a significant chunk of their earned credits—over 40% on average. ² Even worse, studies show that transfer students can end up spending tens of thousands of dollars more on higher education to make up for those lost credits. ³

From information gaps about school options and having to navigate the application process all over again, to credits that aren't accepted and the challenges of adapting to a new campus culture, the reality is that transfer students face a number of barriers when they move between colleges that can collectively lower their chances of reaching their educational goals. And because low-income students and students of color are more likely to begin at a two-year school, these barriers to transfer magnify entrenched inequities in college access and attainment.

COVID-19 will likely contribute to even higher rates of student transfer between institutions in the current academic year and for the duration of the pandemic. What follows are three (of many) hypothetical scenarios that show the complicated transfer traps students may face while moving between colleges in the COVID-19 era. While these challenges are not new, policymakers have a prime opportunity to use the current moment to make permanent improvements to the way transfer works. Congress must take action to increase transparency and efficiency in the transfer process by ensuring that students have access to clear and useful information on transfer options and building on existing quality control systems to facilitate smoother transfer of credit. These changes are necessary to help students earn the degrees they want and make the right enrollment decisions for their goals, both during this period of crisis and beyond.

Transfer Trap #1: "My credits will definitely transfer."

Scenario: After learning that her private four-year college would be entirely online for the fall semester, a rising junior decides to transfer and complete her degree at a public four-year university within commuting distance of her family's home. As a first-generation student and Pell Grant recipient who has already taken on nearly \$25,000 in student loans to pay for her first two years of college, she decides this is the best move to save money and be closer to family during the pandemic.

Expectation: Because both her original and new schools are in the same state and are even approved by the same accreditor, the student assumes her credits will transfer easily without impacting the time it will take to complete her degree.

Reality: Even though they share an accreditor, there is no articulation agreement—a partnership guaranteeing that some or all courses taken at one school will be accepted for credit at another—in place between this student's original school and her new one. The credit evaluation process is opaque and nearly half of her credits are not ultimately approved for transfer, but by the time she is notified nearly a month later, it's too late for her to go back to her old school. ⁴ Now, she'll have to retake several classes (including some 101-level courses that she passed freshman year) and earning her degree will take both more time and more money than expected.

Steps policymakers can take:

Use the accreditation process to change how college credits are counted for transfer. Colleges under the same accreditor participate in a peer review process in which they sign off on each other's quality and worthiness of maintaining accreditation. If an institution is willing to vouch that another college meets the standards to share its own accreditor's seal of approval, shouldn't it follow that it would also be willing to accept transfer credits from that school? Unfortunately, that's not always the case. Transfer credit evaluation is left up to the receiving institution, and even when schools share an accreditor, they may not accept one another's credits. ⁵ There are a number of reasons why this happens, including a lack of articulation agreements, differences in how faculty members evaluate classes taken elsewhere, or lack of adequate advising (often due to extremely high caseloads). And it's worth noting that denying requests can also drive revenue for the receiving institution by forcing transfer students to take—and pay for—more credits.

Congress can help make more transfer credits count by requiring that all colleges under the same accreditor fully accept, at a minimum, general education credits from other member institutions. ⁶ This wouldn't solve every problem. Students don't always transfer between schools that share an accreditor, and even if all their gen ed classes count, lost credits from upper-level courses in their major can still pose a big challenge to on-time degree completion. But better aligning credit transfer with the accreditation process is a logical and clear approach to streamlining the transfer of lower-level course credits—not to mention encouraging schools to be even more thorough in assessing the quality of education provided by their peer institutions.

Incentivize the development of statewide articulation agreements. What articulation agreements look like and how many schools participate in them varies widely across states. Some states have articulation agreements that cover all public colleges and universities, linking two-year and four-year schools and making credit transfer smoother for students moving within the state system. At least 30 states guarantee that if you earn an associate degree at a public community college, those credits will be accepted at a public four-year university. ⁷ Others have no state legislation on the issue and largely leave these decisions up to the colleges themselves. When robust articulation agreements are in place, they can improve the likelihood of successful transfer. But when they don't exist or are poorly designed, students may end up facing hurdles in the transfer process. This can be a particularly big risk for students like the one in this scenario who transfer between public and private institutions, which are less likely to have established articulation agreements (regardless of whether they share an accreditor). ⁸ And students who transfer from a private for-profit to a public college face the worst overall outcomes, losing an average of 94% of their credits in the process. ⁹

Just as many state legislatures have required the development of statewide systems for transfer credit articulation, the federal government can use its power of the purse to embed incentives for states and institutions to participate in articulation agreements. For example, Congress could tie federal funding access to mandates to develop or strengthen articulation agreements at the state level, which would benefit both students and taxpayers. A 2017 Government Accountability Office (GAO) analysis of students who transferred between 2004 and 2009 showed that nearly half were Pell Grant recipients (often used as a proxy for low-income students) and nearly two in three borrowed to pay for school through the Federal Direct Loan program. ¹⁰ Because transfer can increase time-to-degree, it can also increase the amount of financial aid students need and the expenses they have to cover out-of-pocket if they use up their aid eligibility. Incentivizing the expansion of statewide articulation agreements would therefore not only improve degree efficiency, but also introduce cost

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Transfer Trap #2: "It's just a gap year."

Scenario: During their senior year of high school, a student aspiring to earn a bachelor's degree receives acceptance letters from several four-year schools and puts a deposit down at their top choice. But after becoming the primary caregiver for an immunocompromised parent due to COVID-19, leaving home and paying high tuition at a four-year school seems impossible. They decide to enroll at their local community college instead, with the goal of transferring to pursue a bachelor's degree down the line.

Expectation: The student anticipates that the process of transferring earned credits from a community college to a four-year institution will be simple, even if they decide to later enroll in a private university or attend school in another state.

Reality: While this student is among the vast majority (about 80%) of entering community college students for whom a bachelor's degree is their long-term goal, less than a third (31.5%) of bachelor's-seeking students ultimately transfer and fewer than one in six (13.3%) earn a bachelor's degree within six years. ¹¹ All signs point to the likelihood that this student will face various hurdles ahead, not only in getting their credits counted but also in accessing and interpreting the information they need to transfer and complete their degree.

Steps policymakers can take:

Strengthen institutional transparency requirements for transfer policies. The federal government requires that schools receiving Title IV aid disclose their transfer credit policies on their websites, and a GAO study of a nationally representative sample of colleges found that 99% comply with this mandate. ¹² Schools are also required to disclose a list of the colleges with which they have articulation agreements, but they have options for how to go about that beyond their websites, like printing the list in relevant publications or mailings. The same GAO study found that 29% of institutions did not publish such a list on their websites, while 4% said they didn't have any articulation agreements at all. ¹³

Even with these baseline transparency requirements in place, navigating information on the transfer process can be a complicated, time-consuming task. Students may need to consult several sources—including websites, course catalogs, student handbooks, academic advisers, and faculty members—at both their current institution and any institution they are considering as a potential transfer destination to get the full picture of what courses they need to take, which credits will transfer, how long it will take them to fulfill degree requirements, and what it will cost them.

Student retention within the higher education system as a whole must remain a critical goal for policymakers given the enrollment and financial instability created by COVID-19. With a likely long-term uptick in transfer activity ahead, the federal government should strengthen public disclosure requirements related to institutional credit policies for schools receiving Title IV aid and future pandemic relief funding. In addition to enhancing website transparency guidance, Congress could stipulate that to be eligible to accept new federal dollars, schools must provide all students who are currently enrolled or who apply to transfer into the institution with direct mail and email disclosures that detail existing articulation agreements, credit evaluation processes, and any specific courses under a common course numbering system that are pre-approved for full transfer credit. To be even more effective, schools could be required to disseminate updated information by mail and email on an annual basis to each returning student and to students who have exited the institution without completing a degree within the past five years. ¹⁴ Such proactive outreach would provide valuable information to stopped-out students with some earned credits who may reenroll in college during economic downturns like the current recession.

Transfer Trap #3: "I can just pick up where I left off."

Scenario: Recently laid off from his job due to the pandemic, a worker in his mid-forties decides to go back to school to gain new skills that will make him more competitive in the labor force. Two decades ago, he had come close to completing an associate degree at a community college. Rather than returning to a two-year school, he decides to enroll directly in a broad-access four-year university, transfer his old credits, and work toward a bachelor's degree to maximize his earning potential.

Expectation: Since he had been only a few courses away from attaining an associate degree and most of his earned credits were standard general education requirements, the student expects that his new school will accept most of them, which would set him up to complete a

Reality: As it turns out, when this student left community college decades ago, he had an overdue balance of a little over \$500 on his account. And that college—like 98% of institutions of higher education—engages in a practice called transcript withholding as a strategy for recouping that lost revenue. ¹⁵ This means that until his balance is paid off, the student will be unable to obtain his official transcript, which he needs to share with his new college to receive credit for completed coursework. He has a few options, but none of them are ideal. He could continue at the four-year institution as planned, but without transferring his credits—meaning he'd need to take a full four-year bachelor's degree course of study. He could pay off the outstanding balance so his old school will release his transcripts—but that's not immediately feasible, especially given his recent job loss. Or he could abandon his plans to return to college altogether.

Steps policymakers can take:

Address transcript withholding and other hidden transfer traps that prevent students from reenrolling. A recent report from Ithaka S+R revealed that transcript withholding is an extremely prevalent practice, with survey data showing that nearly all institutions (98%) employ it in some form. ¹⁶ The report estimates that over 6 million students across the country may have "stranded" credits due to transcript withholding for unpaid balances of about \$2,000 on average. ¹⁷ The amount owed varies by institution type, with community college students owing an average of \$631 and students at small private institutions owing an average of over \$5,000, but across the board they can be prohibitive for students looking to go back to school and complete a degree. ¹⁸

Since the unpaid balances involved in transcript withholding are debts owed to the institution rather than the government (such as tuition bills, student fees, or Perkins loans owned by colleges), very little policy action has been taken to regulate the practice. ¹⁹ Some state laws sanction its use for students with unpaid institutional debts or defaulted state loans, and the federal government has largely left the issue up to states. ²⁰ However, the federal government has weighed in to validate transcript withholding over the past several years. In the late 1990s, the US Department of Education (Department) issued a Dear Colleague letter encouraging the practice for students who have defaulted on federal loans, writing that "withholding of academic transcripts is solely an institutional decision, but has resulted in numerous loan repayments." ²¹ And in 2017, the Department's student loan website was updated to emphasize that institutions maintain the right to withhold transcripts if students default on Title IV loans. ²²

Transcript withholding by institutions may be legal, but it poses a big challenge for transfer students—especially non-completers looking to finish their degrees and students whose colleges have closed, rendering their transcripts inaccessible. These students need an official transcript in order to go back to school and get a higher paying job, but without that higher paying job they may struggle to repay the sums owed and instead choose not to return to higher ed at all. So, while it's understandable that schools want to recoup debts they are owed, policymakers should consider whether the potential negative impacts of transcript withholding on state and national attainment goals are worth the tradeoffs. After all, it's not only in an individual student's best interest to complete their degree, but also in the national interest to have more degree holders in the workforce, which increases employment rates and tax revenue, and decreases reliance on public assistance programs. ²³ Federal policymakers may be best positioned to offset the incentives that lead to transcript withholding and help the more than 35 million students with some college credits but no degree—such as by permitting the use of emergency grant funds to pay off balances and free up transcripts, allowing unpaid debts to be converted into income-driven repayment plans, or ensuring that plans are in place to store transcripts and records in the event of sudden school closures. ²⁴

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Take action to smooth the process for awarding reverse transfer degrees.

Because the student in this scenario was already close to completing an associate degree, policies on reverse transfer—the retroactive granting of an associate degree when a student starts at a two-year institution but completes credit requirements after transferring to a fouryear institution—may be relevant to his circumstances in the near future. The "transfer" in "reverse transfer" refers to the movement of *credits* rather than students, and the process is relevant to the nearly 70% of community college transfer students who move to a four-year school prior to earning an associate degree. ²⁵ Data show that over two million "potential completers" may have more than 60 credits under their belts with no degree or credential to show for it—meaning they have likely fulfilled requirements for an associate degree that they do not currently possess. ²⁶ While students with a bachelor's degree experience larger earnings gains overall, associate degree holders are 7.2% more likely to participate in the workforce than those with some college but no degree and earn a median annual salary over \$4,000 more than those with some college but no degree. ²⁷ Especially in a tough economy, workers who have completed the requirements for an associate degree through combined credits from two-year and four-year schools should be able to reap the economic gains of having that credential on their resumes.

One speed bump in the reverse transfer process is the timely and consistent sharing of student records between institutions, which is necessary to facilitate the retroactive awarding of the associate degree. In both 2018 and 2019, bipartisan, bicameral legislation was introduced in Congress that would improve efficiency in reverse transfer by carving out an exemption in the *Family Educational Rights and Privacy Act* (FERPA) to allow for the disclosure of student credit information for the purposes of issuing earned associate degrees. ²⁸ Federal lawmakers should continue to pursue this issue to help students benefit from the degrees they've rightly earned.

Conclusion

Far from a smooth pathway, transfer students often face several hurdles when moving between institutions, and the pressures of the current moment are likely to further complicate the transfer process and impact even more students. In the wake of COVID-19, cash-strapped colleges have clear incentives to keep students enrolled or derive more revenue from transfer applicants by accepting fewer credits. That can be at odds with the needs of students, many of whom are facing a period of crisis and must be able to make the right enrollment decisions based on their unique circumstances.

Students need clear access to useful information to guide their college planning, and structural changes to transfer credit articulation processes and reverse transfer policies must be made to ensure that students can move between institutions smoothly to complete credentials, both during this time of emergency and beyond. Colleges, accreditors, states, and Congress all have a role to play in making this happen. Promisingly, a growing coalition of higher education stakeholders has in recent weeks publicly reinforced a commitment to improving transfer policies, among them the State Higher Education Executive Officers Association (SHEEO) and more than 20 advocacy, research, policy and institutional members of the Bill & Melinda Gates Foundation's Scaling Partners Network. ²⁹ With both urgency and momentum building, it's clear that the time to eliminate longstanding barriers to transfer and make the process work better for students is now.

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