

special report

issue-specific reviews for BC post-secondary partners

Transfer Credit Appeals in BC Post-Secondary Institutions

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Introduction

The ability of students to appeal credit transfer decisions in BC Transfer System institutions has been on the agenda of the British Columbia Council on Admissions and Transfer (BCCAT) for some time. Although appeals policy is exclusively within the purview of autonomous institutions, system partners have identified issues in this area that impact student planning and access. In 1997, the report to Council of the *BCCAT Task Force on Standards and Processes*, with representation from a range of institutions, identified the following issues relating to credit transfer appeals:

“Currently some institutions provide information on transfer appeals processes to students and others do not. Some incorporate transfer appeals into their general academic appeals policies. Other institutions have not formulated a formal transfer appeals process or do not have any policy in this area. In many institutions students have either no right of appeal where they feel that their transfer credit has been unfairly or erroneously assessed, or no knowledge of their rights in this regard.” [p. 14]

The ability of students to appeal institutional decisions with which they do not agree is found in provincial higher education legislation. The various university acts give the power and responsibility of university senates to set policies and

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procedures for appeals by students on academic matters and to establish final appeal tribunals or standing committees for these appeals.

Similarly the *College and Institute Act*¹ gives education councils of the colleges and institutes the responsibility for setting policies and procedures for student appeals on academic matters and a final tribunal for these appeals. The revised (May 2010) *Principles and Guidelines for Transfer* document notes that students can expect to be treated equitably by all member institutions. Students should have access to avenues of appeal for transfer credit decisions (bccat.ca/system/principles/).

In 2010-2011, BCCAT, under the auspices of its Transfer and Articulation Committee, conducted a survey of institutional appeals policies and processes and formed the Transfer Credit Appeals Working Group to prepare this Special Report.

¹ *Universities Act*, (5). j.(6). j. ,(37). 1. v., (61). 1., 3, (63). c. and *Colleges and Institutes Act*, 23. (1) j. 24. (1), (2), e. 37. (1-4).

Credit transfer consists of the granting of credit by one institution for equivalent courses completed at another. Once transfer credit is granted, the course is accepted in lieu of an internal course and can be applied in the same way as the internal course to fulfill general or specific credential requirements.

An informal review of institutional web pages conducted in the spring of 2011 by the Working Group suggests that institutional information regarding appeals in general and transfer credit appeals in particular is not readily available to students. This paper presents the key observations of the Working Group and its constituent groups and suggests possible process and policy steps that would improve students' ability to access a transfer credit appeal process.

The paper is organized by those elements that seem most useful for institutions preparing or reviewing policy in the area of transfer credit appeals: principles in appeals policy; process improvements; the informal appeal process; the formal process; and communication to students. The general conclusions of the Working Group are that good processing of policy decisions generally reduces the likelihood of appeals; effective communication to students ensures smooth processing of questions, complaints, and appeals; and the informal process, if handled well, reduces the number and seriousness of formal appeals.

Guiding Principles and Useful Practices

The following are general principles that might guide institutions in setting transfer credit appeals policy and procedures. They could be used as an informal checklist of ideas to take into account when creating or reviewing policy in the area of transfer credit appeal.

- Institutional appeals policy should adhere to the principles of judicial fairness and natural justice. A principle of natural justice and of effective appeals is that any review of a decision should be conducted independent of the original decision-maker;
- The more transparent the process, the less likely appeals will go to the next level;
- Procedures and criteria for making transfer credit decisions should be consistent over time within a department;
- Institutions need to be clear and precise in rendering a transfer credit decision. There should be clear parameters for review by faculty, and reasons for decisions, including the criteria used, should be documented. Students need clear reasons for denial of credit so that they can make decisions as to what to do next, i.e., whether to accept the decision or to appeal it;
- There should be clear lines of communication between the administrative office responsible for transfer credit and the faculty/department;
- Staff and faculty who deal with appeals and adjudication should have access to training in administrative fairness in order to increase consistency and transparency within the institution;
- The academic program, as much as any group, is responsible for ensuring the academic integrity of its graduates' transcripts, and program administration should ensure that students and faculty understand the implications of decisions made regarding transfer credit;
- Appeals should be processed and decided within a reasonable period of time. Students should be encouraged to plan ahead and understand the time constraints on making and adjudicating appeals;
- Information to students should be communicated in plain language.

Development of policy can be looked at from the reactive or proactive point of view. If the process involved in accumulating credits towards a credential, including transfer credit, is clearly communicated by institutions and well understood by students, the number of questions, complaints, and appeals can be reduced. It may be helpful for institutional staff to think in terms of what happens when things do not go as well as planned or advertised, e.g., are there well-trained people ready to address student concerns and questions?

Good processing of policy decisions generally reduces the likelihood of appeals.

Process Improvements

The following describes ways in which transfer appeals processes within institutions might be improved.

Anticipating Problems

It might be helpful for administrators and staff to reflect on the points at which students could run into problems. Some institutions may review students' transcripts for transfer credit only upon request. Not all of the courses that a student needs for completion of a program may be on the incoming transcript or submitted by the student. Hence the student may not appeal transfer credit decisions during the admissions process. Instead a student might appeal a transfer credit decision that affects his or her ability to graduate shortly before completing a program, *i.e.*, at the point at which the student discovers that the courses required for graduation are not completed. Other institutions review all of the student's previous courses and grades in the admission/registration process and make decisions about transfer credit. It is at this point that the student questions the decision and lodges an appeal if he or she feels that the process was not fair.

Students may not think of appealing a decision until they become aware of a problem that would cause them to have to repeat a course, incur more expense, or delay gradua-

tion. Hence, one way to plan for effective appeal processes is to determine the likely issues for students in progressing through their program, and to ensure that the processing involved is well understood by students and is as smooth as possible. Students may not wish to formally dispute a decision, just get the additional credit they need to graduate or move on.

Faculty need to be aware of the broader implications of their decisions when it comes to transfer credit. For example, where a student has been denied specific transfer credit for a course, faculty may override registration processes and let a student into a course at the next level without the prerequisite. However, they may not be aware that the lack of this prerequisite may jeopardize the student's graduation. If this lack is brought to the student's attention, he or she may appeal the original decision to deny credit for the prerequisite.

It may be useful for institutions to have a means of identifying problems with their current procedures and policies. The volume of questions, complaints, or appeals should alert the admissions office or appeals committee that there are issues with processing of transfer credit. If a number of appeals are moving to the formal committee stage, the committee might suggest policy or policy application changes thereby limiting the number of appeals that need to be formalized.

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Professional Development

Professional development for faculty and administration in policy and procedure application, and the resulting improvement in transparency and consistency, are likely to cut down on appeals of decisions. Decisions that are ad hoc, based on personal considerations, or management of student numbers are more likely to occasion student appeals if, for no other reason, that they are likely to be inconsistent and not transparent. The process might improve if faculty knew that their decisions were appealable and that they need to provide adequate reasons for transfer credit denials. Institutional appeals policy should adhere to the principles of fairness and natural justice and it may be worthwhile to encourage faculty and administration to be familiar with these principles.

Consistency

Within institutions there is a need for consistency of implementation of policy by chairs and coordinators when it comes to materials, process, content, and documentation as departments may have different criteria for decision-making when it comes to credit transfer. Appeals could succeed based on inconsistency of policy application within a department. Students are more likely to understand and accept a denial of credit if the reasons are clearly referenced to a set of fair criteria. For example, if a student has taken a course for which equivalency exists in the BC Transfer Guide but has taken it over 10 years ago, a department may deny credit based on the time limit. However, there should be an explanation as to why other departments or even faculty within the department may waive the requirement. Institutions should be consistent internally on such issues.

Grounds for Appeal

Information for students on appropriate grounds for appeal of transfer credit decisions is crucial and institutions should specify the grounds on which they will accept an appeal. They should be explicit, limited, and specific and this information should be readily available to students. For example, appeals should not be allowed for courses that have been considered for formal articulation and rejected and this rationale should be provided to students. An appeal is usually based on the institution not properly following the published policy and procedures. Students may be advised that, if the policy has been followed as laid out, there is no basis for appeal. The fact that a student did not agree with or like an institutional decision or policy is not sufficient grounds for appeal. Students who disagree with policy are lodging a complaint and there is unlikely to be a formal process for proceeding.

The process will work more smoothly if students are required to identify the grounds on which they are appealing, even at the informal stage. Students should know what documentation is required to substantiate their appeal (e.g., a course outline). For example, institutional policy might state that, for a transfer credit to be granted, there must be at least an 80% overlap in course content. A student would appeal denial of credit on the basis that there is a better than 80% overlap and would provide a course outline to substantiate the claim.

Many transfer credit decisions revolve around whether there is a formal agreement in the BC Transfer Guide or an established precedent in institutional transfer tables/student information systems. In these cases, rejection of transfer credit should not occur if course equivalency is requested. However, an appeal may be based on the student not being admitted to a program, i.e., being denied credit for use in a program. This commonly occurs with stale-dated courses. A course taken a long time ago may be granted “unspecified” credit, and the appeal may arise from the fact that (for example) a student may consider Psychology 101 to be equivalent ad-indefinitum; whereas the Psychology Department may take the view that, in such a rapidly-changing discipline, a credit more than ten years old is academically obsolete. Effective dates on transfer credit are not appealable because they are spelled out in the Academic Regulations. However, institutions may waive this restriction based on other considerations. The operational principles at play should be made explicit, such as when certain criteria are not universally applied.

Office Responsible

Students should be directed to one place/person in the institution to initiate an appeal process. The person responding to student concerns should have expertise with transfer credit processes, but perhaps more importantly with a range of student appeal processes. Typically the Registrar’s office is the place for receiving transfer credit appeals and it is the Registrar or delegate who would consult with the appropriate Committee Chair on the question of appealability. Such consultation might not be necessary in most cases if clear and incontestable guidelines are provided by the Appeal Committee.

Timeframes

Clearly specified timeframes are also important, and students often wait too long to question a decision. Informal reviews can be quick but formal reviews will take time, no matter what is stated in policy. It may be difficult for in-

stitutions to stick to narrow policy timelines for response to appeals, especially if faculty are requested to review transfer credit request decisions. Information to students should note that appeals should be made with enough lead time for the institution to respond in a timely way since the typical time limit for initiating an appeal begins with either the date that the decision is handed down or the date that it is received by the student (usually the former), and due consideration of the facts involved in a particular case require careful consideration.

The Informal Appeal Process

Often institutions are clearer on the formal processes to follow when students question decisions than on the informal processes. However, efficient handling of informal processes is likely to reduce the use of formal processes, benefiting both students and institutions. It reduces the work load for the institution, and the waiting time for and anxiety of the student, if transfer credit appeals can be resolved at the informal stage wherever possible.

First Response

It is important to give feedback to the student when questions regarding credit transfer are first raised. The first responder to a student inquiry might be a front counter clerk in the Registrar's office, an admissions advisor, or a transfer credit clerk. The clearer the response at this stage, the less likely a formal appeal will be launched. The message received from the first office the student goes to, whether in the admissions office or the faculty, should be consistent. If the issue that the student has is with the processing of transfer credit rather than the content, it is important that the person who is responding has an understanding of student appeal processes and provides the student with the right information about the appeals process including the stated grounds for appeals.

Documentation

Institutions should determine what documentation is required at each stage. The informal stage might not be documented. However, if decisions made at this stage are not fair and reasonable, the number of appeals moved on to the next stage might increase. A record of previous decisions, even if they are point form notes, would be useful. For example, notes regarding a decision from the articulation person or the chair that are easily available to the admissions office might make dealing with questions from students regarding credit transfer decisions easier.

The informal process, if handled well, reduces the number and seriousness of formal appeals.

Guidelines

From the student perspective, it may be that the student does not know where to go or whom to ask. Guidelines for students about what to expect, and for faculty as to how to deal with informal appeals within academic departments, would help to make decision making more consistent and transparent. In addition, in the information provided to students, it would enhance the informal process if students were required to clearly identify a) the decision that they are appealing (preferably with a copy of the decision), b) the reasons that the student thinks the decision was wrong or unfair, and c) the resolution that is sought.

The Formal Appeal Process

Each institution in the BC Transfer System has signed off on the *Principles and Guidelines for Transfer*, which include a section relating to transfer credit appeal. Therefore BC Transfer System institutions should indicate in their general information to students that appeal of transfer credit decisions is possible, and identify under what institution-specific policy. This information could include the bases on which decisions are made, grounds for appeal, and possible outcomes. If the ability to appeal transfer credit decisions is part of an existing policy, this should be made clear to students, and perhaps incorporated into existing procedural information such as the transfer credit request form. Information should also be placed in the institutional calendar or admissions section of the website. Policies on institutional websites can be legalistic and obtuse and student searches on institutional websites for information on how to appeal a decision should take them directly to pages that clearly and plainly explain the grounds and processes for lodging an appeal.

At the level of a student academic appeal, the appeal committee is interested in whether processes were followed, decisions are consistent with the principles of natural justice,

the student is treated fairly at every step, and the decision reached is not pernicious. An appeal committee should not be expected to reach an academic judgment on transferability of a credit. If the content needs to be re-evaluated, the question returns to the content expert, but not the same one that made the original decision.

Communication to Students

It is important for students to know that they can generally appeal academic decisions made by the institution that affect them and that there is a place where they can go to find out the specific process. Information needs to be readily available to students in a format that allows for easy searching through a website.

Providing information about the consequences of decisions as they are made will also help. For example, if students are required to request transfer credit when they are admitted or register at the institution for the first time, the form they complete should contain information regarding an appeal process and what is required and should suggest that students retain a copy for reference during the appeal process. If students' transcripts are automatically reviewed for transfer credit, some other form of notifying them of the ability to appeal a transfer credit decision should be made, perhaps as part of the admission or registration package.

The frequency of appeals might be lowered by providing better information to students on the transfer credit process in general. For example, students who gain unassigned credit for a course taken at a sending institution may not be aware that the course they took was a prerequisite for subsequent courses at the receiving institution or is a specific graduation

Information provided to students is more readily understood if it is in plain language.

requirement. If a department waives a pre-requisite, it should advise the student that he or she may need to find a way to meet the requirement or make up the credits waived.

As well, students may not understand that although a course may transfer from institution A to institution B, the reverse may not be true.

Institutions might provide information about transfer credit appeals in the registration package. This may be problematic for some institutions that do not, as a matter of course, assess transfer credit upon registration without a student request. If a student looks up transfer credit on an institutional website, the information should indicate that there is an appeal process available to them and how to access it. This information could be linked to the BC Transfer Guide site. Ideally, there could be a hub page on the institutional website that links policy on transfer credit including appeals, the admissions procedures, graduation requirements, calendar, ombudsperson page, and student advising.

All students wanting to pursue a transfer credit appeal could be given a document that sets out in clear language the process and the principles behind the process, perhaps as part of information about other types of possible appeals.

Effective communication to students ensures smooth processing of questions, complaints, and appeals.

Recommendations

The Working Group felt that processing of transfer credit requests at BC institutions generally works smoothly and students are well served by the BC Transfer Guide and institutional agreements. Although the actual number of students that appeal transfer credit decisions each year appears to be very low, there are examples of students not agreeing with the results of transfer credit requests and not knowing what to do next or who to go to for assistance. Hence the Working Group adopted a holistic view of appeals and offers the preceding comments regarding formal and informal appeal processes and communication. The following recommendations flow from the general advice and are the specific actions that institutions could adopt in order to support principles of fairness for students moving among institutions in the province.

- 1. That all members of the BC Transfer System make explicit to students their ability to appeal a transfer credit decision and the appropriate conditions and requirements that must be met in order to do so.*
- 2. That institutions identify the Registrar's office as the place where appeals of transfer credit can be received.*
- 3. That information regarding transfer credit appeal is linked to general information on transfer credit available to students on institutional websites.*
- 4. That information regarding transfer credit appeals should include the grounds permissible for appeals and the process to follow.*
- 5. That the BC Transfer Guide include a general statement indicating the ability of students to appeal transfer credit decisions.*

Transfer Credit Appeals Working Group Members

BCCAT would like to thank the Transfer Credit Appeals Working Group members for contributing their valuable time and expertise in the creation of this document.

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