

TO: Montana Board of Regents

FROM: Roger Barber
Deputy Commissioner for Academic & Student Affairs

RE: A Report on Policy 301.5.1, System of Controls

DATE: May 29 – 30, 2008

Policy 301.5.1, System of Controls, is another of the package of policies that the Montana Board of Regents adopted in 2005, in response to the Transfer of Credits performance audit undertaken by the Legislative Audit Division. In its introductory paragraph, the purposes of the Policy are described as follows:

- make timely decisions about transfer credits and their applicability to program expectations at the new campus;
- document its decisions about transfer credits and identify the individuals responsible for those decisions; and
- maintain records concerning transfer credits in a central, safe location.

The Policy is very detailed. It also creates a variety of expectations on the part of the campuses in the Montana University System. Because of that complexity, the Montana Board of Regents asked the Office of the Commissioner of Higher Education to visit each of the campuses to review their implementation procedures. The Board made that request in 2005, at the time the Policy was adopted. I decided to give the campuses a couple of years to fully comply with the expectations of the Policy, however, so I didn't begin the review process until the 2007- 2008 academic year.

I have completed a review of nine (9) campuses. I will finish the last two (2) in June. I have prepared a written report for each of the campuses, which includes a summary of my findings and recommendations on procedures that may be out-of-compliance with the Policy. One of those summaries is included with this memorandum as part of your meeting materials. I have also included the checklist that I developed for each visit, since that checklist sets out all of the details established by the Policy.

In general:

--the campuses of the Montana University System have done a remarkable job in implementing this Policy.

--the most common noncompliance issue is a failure to establish the appeals process for transfer credit decisions, as outlined by the Board of Regents in Policy 301.5.

--a handful of campuses still have some work to do on the *Banner* Transfer Equivalency Guide. The Policy says that "(t)he Montana University System units will utilize

the *Banner* transfer module to record campus-based equivalencies and to document student transfer decisions.”

--a handful of campuses have also established a decentralized review process for transfer credits, with the responsibility for storage, documentation and evaluation of degree-specific course equivalencies jointly shared with academic units like departments or schools. While the evaluation responsibility is almost certainly appropriate, the storage, documentation and assessment expectations are more problematic, under the provisions of Policy 301.5.1.

When I asked campus personnel to share their thoughts about the Policy, almost all of the feedback was positive. I was told, repeatedly, that the Policy

- formalized procedures that many campuses already had in place.
- brought structure and focus to the review process for transfer credits, and insured that any decisions were carefully documented and preserved.
- insured that transfer credits were reviewed in a timely manner, and reminded campus personnel to do that work quickly rather than putting it off to a more convenient time.
- made the preparation and review of graduation papers much easier, since all of the documentation of transfer credits was completed by the appropriate evaluators and assembled in one place.

A handful of campus personnel told me that the timelines in the policy were too onerous, and the Policy was an overreaction to a handful of problems uncovered by the Legislative Auditor's Office.

If you have any questions about the visits I have conducted, and the reports I have prepared, I would be happy to try and answer them.