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April 29, 2015

Dr. Bruce Leslie  
Chancellor  
Alamo Colleges  
201 West Sheridan, Bldg. A  
San Antonio, TX 78204-1429

Dear Dr Leslie:

I send this in response to your letter of April 10, 2015, and as a follow-up to the conversation you had with Dr. Michael Johnson, my Senior Vice President and Chief of Staff. I also repeat my reminder that decisions on interpretation of SACSCOC *Principles* and policies rest with our peer review committees and ultimately with the SACSCOC Board of Trustees; my remarks are simply advisory. Finally, let me add that many of your statements and concerns are quite granular compared to the wording within our standards. Our standards are designed to apply to a broad range of circumstances; however, the standards are also designed such that it is the member institution's responsibility to justify its policies, procedures, and actions. In the case of member institutions within the Alamo Colleges, this would be done in terms of professional judgement as to generally-accepted good practices for community and technical colleges. What follows may not address each individual point in your letter, but it should give some guidance and advice relative to the concerns raised.

### **Coherent Body of Coursework within a Degree Program**

Reference to a "coherent body of coursework within a degree program" is a paraphrase of Core Requirement (CR) 2.7.2 of the *Principles of Accreditation*, which states:

The institution offers degree programs that embody a coherent course of study that is compatible with its stated mission and is based upon fields of study appropriate to higher education. (Program content)

The *Resource Manual's* "Rationale" for this standard mentions: "increasing levels of integration of knowledge;" "coherence;" "appropriate sequencing or courses;" "learning is progressively more advanced in terms of assignments and scholarship;" and "progressive advancement in a field of study." In Texas, this has been modeled for transfer programs in the development of "field of study" curricula designed to provide the underpinnings of a four-year field of study that should be taken in the first two years of such a program. This is evident in Texas Administrative Code, Title 19, Part 1, Chapter 4, Subchapter B, §4.32(b), as found on the THECB website [emphasis added]:

If a student successfully completes a field of study curriculum developed by the Board, that block of courses may be transferred to a general academic teaching institution and must be substituted for that institution's lower-division requirements for the *degree program for the field of study into which the student transfers*, and the student shall receive full academic credit toward the degree program for the block of courses transferred.



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The emphasis points out that the “field of study” is what occurs in the bachelor’s program; the associate’s program offers the “lower-division requirements” of that field of study – not the full field of study. The coherence of the program spreads across all four years of the program.

We have sought to find a reference on the THECB website that defines “major.” There is a “Glossary of Terms” available through the “Report Search” link that defines a major in this way:

Major A subject-matter area in which a student may specialize by taking a specified number of courses as a part of the requirements for completion of a program of study. It is identified with a six- or eight-digit CIP code of the program in which the award is to be conferred. (CBM001, CBM009, CBM0E1)

Unfortunately, the definition does not identify the “specified number of courses,” but it does define the major as a “program of study.” Even by THECB definitions – which do not necessarily coincide with how our reviewers would define terms – a “major” is a “program of study.” So a major needs coherence and the other characteristics identified in CR 2.7.2. It would be up to your institutions to explain the sense in which their “majors” are “coherent” courses of study – but it would have to be based on the two-year degree, not the eventual four-year degree the student might earn.

### **Creating Flexibility to Advise Students**

The *Principles* create no barriers to creating flexibility in advising students as to the specific courses that should be taken to enhance transferability of coursework. Such a practice, in fact, is encouraged. Articulation agreements to enhance transferability of credits, for example, are explicitly designated as *not* being a substantive change (see item 3 on page 20 of the *Substantive Change for SACSCOC Accredited Institutions* policy statement). Similarly, in Comprehensive Standard 3.4.4 (Acceptance of Academic Credit), the *Resource Manual* mentions “articulation or transfer agreements ... between two-year and senior institutions which involve transcription or transferring of credits for coursework leading to a degree” as useful documentation. Our Position Statement on “Transfer of Academic Credit” states:

Many systems and institutions have taken positive action such as negotiating articulation agreements, common course listings, common core curricular, and automatic acceptance of credit arrangements to facilitate the transfer of academic credit. These kinds of proactive approaches, involving qualified faculty in the decisions, ease the way toward resolving transfer of credit problems while maintaining curricular coherence and academic and institutional integrity.

Obviously, the “field of study” curricula in Texas serve as advising tracks. That does not preclude developing advising check-sheets or articulation agreements with neighboring senior institutions in other senior-college majors as well. Further, selection of courses to enhance transferability can apply to the core curriculum as well as the available 18 hours outside the core. For example, there is nothing in our standards to preclude ensuring that the math courses and social science courses taken to fulfill the core curriculum are also the same courses needed at the senior college within a major in economics or psychology.



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It is important to note, however, that advising students in ways that enhance transferability is not the same thing as establishing a “major” within the AA or AS degree. If it is a “major” at the community college level, then the coherency of the program of study must be at the community college level as well. Otherwise, there is no major and the institution is simply following good practice in advising students by attempting to smooth the “pathway” into the next degree.

### **AA Majors that Lack Transferability**

Generally accepted practice is that the Associate of Arts and the Associate of Science degrees are designed primarily with transferability in mind. In fact, Texas Administrative Code, Title 19, Part 1, Chapter 4, Subchapter A, §4.3(2), as found on the THECB website, has this definition:

Associate of Science degree and the Associate of Arts degree--Collegiate degrees consisting of lower-division courses designed to prepare students for transfer to a bachelor's degree program.

If the primary intent of the degree is not transferability, it would seem that under Texas definitions, the institution should be offering an AAA or AAS degree, not an AA or AS degree. Thus, if a member institution's coursework within an AA or AS program is known to not transfer, there would be some concern whether that degree is fulfilling its intended role. SACSCOC does not dictate the degree requirements at the senior institution beyond the expectations of the *Principles*. It thus falls upon two-year institutions, working with senior institutions seeking transfer students, to develop the most efficient pathway possible. In the case of public institutions, this role might be played by coordinating bodies that endorse curricular arrangements, such as the field of study concept in Texas, that enhance the transferability of coursework into certain senior college majors.

With regard to the comment in my prior letter concerning moral and legal obligations, the moral obligation is to make the AA or AS as transferable as possible. Speaking as a non-lawyer, I see the legal issues as making promises that you cannot keep or presenting a program as something it is not. An example of the former would be setting up AA or AS degrees that do not transfer well because of your own requirements to force students to take nontransferable “major” courses. An example of the latter would be claiming to offer a “major” that has little or no coursework in the “major.” Consider, for example, that at one of the institutions in the Alamo Colleges, a student can earn an AA with a “concentration in economics” that can be earned by taking no economics beyond the principles course in macroeconomics and the principles course in microeconomics. Ironically, because of typical rules for course transfer, a student seeking to major in economics at a senior institution should probably be advised to take the minimum amount of economics within the AA concentration in economics at the two-year college. It is very hard to understand in what sense this set of courses represents a “concentration” in economics. In addition to the issues already discussed regarding CR 2.7.2, it is difficult to see in what sense this published set of course requirements “conform(s) to commonly accepted standards and practices for degree programs” as required by Comprehensive Standard 3.5.3 (Undergraduate program requirements).



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I appreciate the concern for students that you express in the close of your letter. That also is our chief concern. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Belle S. Wheelan".

Belle S. Wheelan, Ph.D.  
President

BSW/MSJ:rb

cc: Dr. Ricky N. Baser, President, Northwest Vista College  
Dr. Michael Flores, President, Palo Alto College  
Dr. Adena Williams Loston, President, Saint Philip's College  
Dr. Robert Vela, Jr., President, San Antonio College  
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