



April 28, 2023  
Office of Internal Auditing

---

## Transfer Pathways Audit Assurance Project

MINNESOTA STATE

Reference Number: 2023-04  
Report Classification: Public



MINNESOTA STATE

30 East 7th Street, Suite 350  
St. Paul, MN 55101-7804

651-201-1800  
888-667-2848

April 28, 2023

Members of the Minnesota State Board of Trustees  
Devinder Malhotra, Chancellor  
Satasha Green-Stephen, Senior Vice Chancellor for Academic and Student Affairs  
Jesse Mason, Associate Vice Chancellor of Academic and Student Affairs

In June 2022, the Audit Committee approved an audit of the Minnesota State Transfer Pathways program. The attached report presents the summary results of our Transfer Pathways audit.

We have identified observations and provided recommendations to support Transfer Pathways across Minnesota State, including the colleges, universities, and system office. Attached is an executive summary of our results as well as a detailed report providing specific results and recommendations.

On March 30<sup>th</sup> and April 11<sup>th</sup>, we met with system office leadership to discuss the project results. We also met with leaders at the universities we reviewed to discuss project themes and testing results.

This project was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing.

We appreciate the excellent cooperation and assistance we received from system office staff and university employees.

Sincerely,

Amy Jorgenson, CPA  
Chief Audit Officer, Office of Internal Auditing

C: Melissa Primus, Deputy Director, Office of Internal Auditing



# TRANSFER PATHWAYS AUDIT

## Table of Contents

<b>Executive Summary</b> .....	<b>1</b>
<b>Detailed Report</b> .....	<b>3</b>
<b>Background</b> .....	<b>3</b>
Diagram 1: Transfer Pathways Overview (Fiscal Years 2020 to 2022) .....	3
Diagram 2: Transfer Pathways Programs .....	4
Diagram 3: Transfer Pathways Retention Totals (Fiscal Years 2020 to 2022) .....	5
<b>Audit Objectives</b> .....	<b>5</b>
<b>Scope and Methodology</b> .....	<b>6</b>
<b>Conclusion</b> .....	<b>6</b>
<b>Observations and Recommendations</b> .....	<b>7</b>
<b>Observation #1: Process for Establishing Course Equivalencies</b> .....	<b>7</b>
Table 1: Minnesota State Transfer Pathways Graduates .....	9
<b>Observation #2: Accountability, Roles, and Responsibilities</b> .....	<b>10</b>
<b>Observation #3: Data Quality and Completeness</b> .....	<b>12</b>
Diagram 4: Year-Over-Year Increase in Transfer Pathways Graduates .....	14
<b>Observation #4: Communication</b> .....	<b>14</b>
<b>Observation #5: Collaboration</b> .....	<b>16</b>
Diagram 5: Transfer Pathways Programs for Retained Students (Fiscal Years 2020-2022) .....	17
<b>Appendices</b> .....	<b>19</b>
<b>Appendix A: Documentation Reviewed</b> .....	<b>19</b>
<b>Appendix B: Student Testing Sample Additional Demographics</b> .....	<b>20</b>
Table B-1: Student Testing Population by Transfer Pathways Program .....	20
Table B-2: Student Testing Population by Race and Ethnicity .....	21
Table B-3: Student Testing Population by Gender .....	21
Table B-4: Student Testing Population by Birth Year .....	21
<b>Appendix C: Benchmarking</b> .....	<b>22</b>

## Executive Summary

In June 2022, the Board of Trustees Audit Committee approved an assurance project for Transfer Pathways associate degree programs within Minnesota State. Below, we provide a summary and overall project conclusion. We also provide specific observations and recommendations in the attached Detailed Report.

Executive Summary	
<p><b>Scope</b> <i>What did we do?</i></p>	<p>The objective of this audit was to assess the impacts and needed enhancements to the Transfer Pathways associate degree programs (Transfer Pathways), including corresponding transferring and transfer pathway credit acceptance at four-year institutions, at Minnesota State. We requested and reviewed documentation, performed information gathering interviews, analyzed data, and completed sample testing to understand the goals of Transfer Pathways.</p> <p>We selected a sample of three universities for detailed review, analysis, and sample testing. We identified instances of non-compliance with system policies, and identified obstacles to success of Transfer Pathways. We developed recommendations and assigned priority levels for each observation identified in the audit to assist the Academic and Student Affairs (ASA) Division, in collaboration with two and four-year institutions, in evolving Transfer Pathways.</p>
<p><b>Conclusion</b> <i>What did we find?</i></p>	<p>Minnesota State has developed the Transfer Pathways program, including 27 academic programs, to facilitate transferring from its two-year institutions into one of Minnesota State’s seven universities. In alignment with key strategic initiatives, including Equity 2030, and overall goals related to maintaining strong enrollment, Transfer Pathways was designed to enhance access to education and support student success within Minnesota State. While the Transfer Pathways programs have numerous participants, retention within the system after pathway completion remains low. Minnesota State’s continuation rate for those graduating in years 2019-2022 was approximately 22%, while an industry peer had a much higher rate<sup>1</sup>.</p> <p>There have been challenges with the implementation of the program. These include:</p> <ul style="list-style-type: none"> <li>• Process for establishing course equivalencies</li> </ul>

<sup>1</sup> The University of Illinois System had a published retention rate between 65-70% for system-sponsored transfer programs.

<b>Executive Summary</b>	
	<ul style="list-style-type: none"> <li>Accountability, roles, and responsibilities</li> <li>Data quality and completeness</li> <li>Communication</li> <li>Collaboration</li> </ul> <p>The ASA Division does not have adequate oversight and mechanisms to fully support the success of Transfer Pathways. Without target metrics, there is limited ability for the ASA Division to monitor the progress and success of Transfer Pathways. Finally, the current level of communication and collaboration between the ASA Division, colleges, and universities is not sufficient to facilitate the success and growth of Transfer Pathways.</p>
<b>Risk</b> <i>Why does it matter?</i>	<p>Without increased oversight, improved procedures, and target metrics for Transfer Pathways, there is increased risk of declining enrollment within Minnesota State. Declining enrollment can lead to negative tuition revenue impacts. Further, nationwide transfer trends show a decrease in transfer enrollment of 7% between 2020 and 2022, and rates have decreased at a higher percentage for both females (9%) and non-traditional students (up to 20%).<sup>2</sup> This further emphasizes the importance of retaining transfer students within Minnesota State. Additionally, Minnesota State’s Equity 2030 goal aims to close the educational equity gap, and challenges with Transfer Pathways may disproportionately impact women and students of color.</p>
<b>Recommendation</b> <i>How can we fix?</i>	<p>To evolve Transfer Pathways and improve the transfer experience for Minnesota State students, the ASA Division should prioritize:</p> <ul style="list-style-type: none"> <li>Increasing oversight and guidance to promote consistency of course evaluation processes, such as course competencies, at colleges</li> <li>Establishing an accountability framework to increase compliance with board policies related to Transfer Pathways</li> <li>Defining metrics to monitor the success of Transfer Pathways</li> <li>Improving communication of critical Transfer Pathways requirements</li> <li>Facilitating collaboration of faculty across the system to support developing and reviewing Transfer Pathways</li> </ul>

<sup>2</sup> [5 charts breaking down demographic trends in college transfer enrollment | Higher Ed Dive](#) [5 charts breaking down demographic trends in college transfer enrollment | Higher Ed Dive](#)

# Detailed Report

## Background

In June 2022, the Board of Trustees Audit Committee approved an assurance project for Transfer Pathways associate degree programs within Minnesota State. Our objective was to assess the impacts of and needed enhancements for Transfer Pathways, including evaluating processes for establishing and accepting Transfer Pathway course credits at four-year institutions. The goal of the Transfer Pathway program is to facilitate completion of a specific associate degree at a Minnesota State college and transfer to a Minnesota State university to earn a bachelor's degree without losing credits or taking extra courses<sup>3</sup>.

The Transfer Pathways program includes 27 separate pathways, across 23 two-year institutions<sup>4</sup> with the goal to facilitate transfer between Minnesota State two and four year institutions. Approximately 4,000 students have enrolled in Transfer Pathways since academic year 2019-2020, and the number of students enrolled in the program continues to increase each year.

Diagram 1 provides an overview of Transfer Pathways from fiscal years 2020 to 2022 across Minnesota State<sup>5</sup>. The diagram represents the number of Transfer Pathways available at the two-year community colleges and the Transfer Pathways concentrations at universities.

**Diagram 1: Transfer Pathways Overview (Fiscal Years 2020 to 2022)**

<b>23</b>	<b>27</b>	<b>7</b>	<b>76</b>
Community colleges gave awards in the Transfer Pathways program	Transfer Pathways programs available at community colleges	Minnesota State universities with students from Transfer Pathways programs	Transfer Pathways concentrations at the universities

In addition, Diagrams 2 and 3 illustrate data related to the students enrolled in the various Transfer Pathways and the retention of students after they graduate from their two-year program. Diagram 2 shows the various Transfer Pathways available at Minnesota State. The font size in Diagram 2 indicates the program popularity or enrollment level. Therefore, the

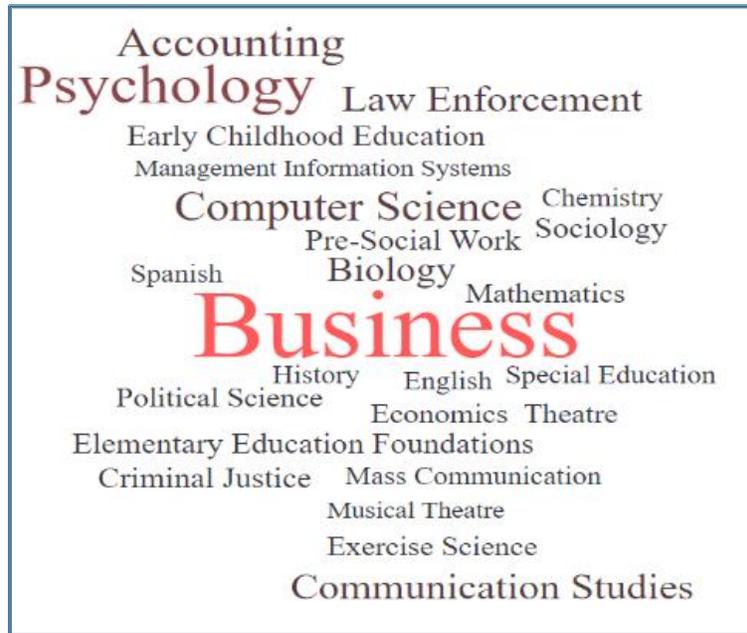
<sup>3</sup> <https://www.minnstate.edu/admissions/transfer/transfer-pathways.html>

<sup>4</sup> Anoka Technical College, Fond du Lac Tribal and Community College, and Minnesota West Community and Technical College did not have any Transfer Pathways program graduates during our review period.

<sup>5</sup> Data is revised to reflect the recent Minnesota North merger.

larger the font of the program listed, the more students enrolled in the program. We also provide additional program enrollment data in Appendix B.

**Diagram 2: Transfer Pathways Programs**

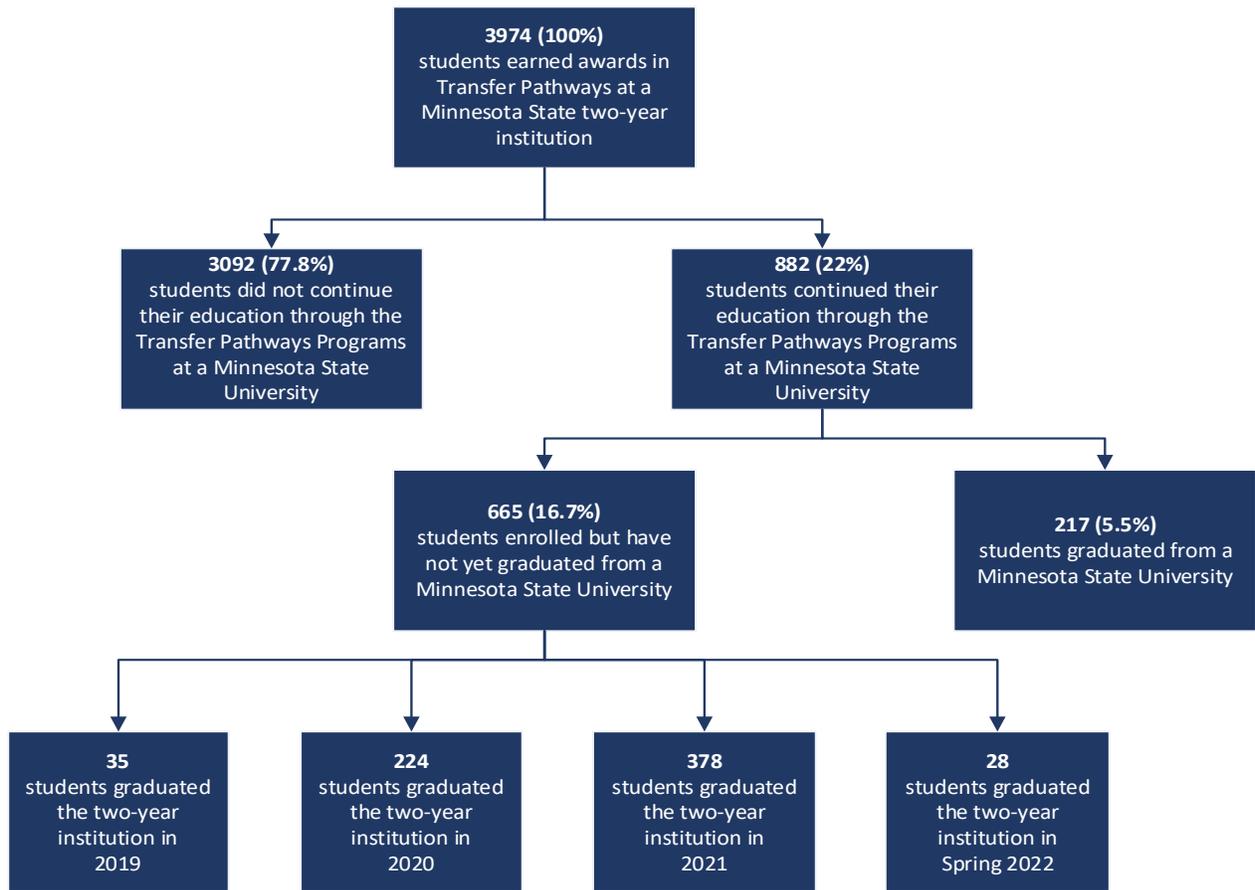


On the following page, Diagram 3<sup>6</sup> shows a breakdown of student progress after they earned an award at a Minnesota State two-year institution. This data is across fiscal years 2020 to 2022. Of the 3,974 students who graduated in Transfer Pathways, 882 continued within Minnesota State. Of the 882 who continued, 217 (approximately 25%) graduated from a Minnesota State university<sup>7</sup>. There is an opportunity to increase persistence within the system; however, it is not possible to achieve 100% retention as some students may never intend to transfer to a four-year institution and instead enter the workforce. Additionally, a student may complete the Transfer Pathways program but not intend to transfer to a Minnesota State university, as their goal may be to attend a university outside Minnesota State, such as the University of Minnesota or a private college.

<sup>6</sup> The system office provided data for Transfer Pathway students who graduated in fiscal years 2020, 2021 and 2022. FY2020 includes awards earned between July 1, 2019 through June 30, 2020 (corresponding academic year 19-20); FY2021 includes awards earned between July 1, 2020 through June 30, 2021 (corresponding academic year 20-21); and FY2022 includes awards earned between July 1, 2021 through June 30, 2022 (corresponding academic year 21-22).

<sup>7</sup> Data supporting next steps for students who did not transfer to a Minnesota State university, for example, if the student transferred outside the system or entered the workforce, is not currently tracked.

**Diagram 3: Transfer Pathways Retention Totals (Fiscal Years 2020 to 2022)**



## Audit Objectives

Our audit objectives included addressing the following questions:

- What are the similarities and differences regarding how the Transfer Pathways program is administered across the different universities at Minnesota State? (*Refer to Observation #1 Process for Establishing Course Equivalencies*)
- What data and metrics do the system office and universities maintain for the Transfer Pathways (*Refer to Observation #3 Data Quality and Completeness*)
- Is the overall monitoring structure for the Transfer Pathways program sufficient to determine how well the program is working across the system? If not, how can it be improved? (*Refer to Observation #4 Communication and Observation #5 Collaboration*)
- What is the volume and impact of noncompliance within the Transfer Pathways program? (*Refer to Observation #2 Accountability, Roles, and Responsibilities*)

## Scope and Methodology

We performed our work using a variety of audit procedures, including a combination of interviews, document review, analysis of college and university data, testing of student samples, and benchmarking procedures.

- We requested and reviewed data and documentation collected by the system office regarding Transfer Pathways, such as the Isabella Presentation, Transfer Pathways Report, and Transfer Issues Analysis (see Appendix A for additional documentation reviewed).
- We met with system office and university employees who work with Transfer Pathways programs to understand current state, challenges, and work performed to date.
- We selected three universities, based on volume of Transfer Pathways students and discussion with ASA Division leadership, to focus interviews and testing.
- We requested, reviewed, and analyzed system Transfer Pathways data from our Integrated Statewide Records System (ISRS) to determine activity regarding retention of students within the system after graduating from Transfer Pathways. We also worked with the ASA Research unit to request and review Transfer Pathways applicant and admissions data.
- We evaluated a sample of 60 applicants to test compliance with Transfer Pathways policies, requirements, and guidance, including:
  - Board Policy 3.21 Undergraduate Course and Credit Transfer and the Minnesota Transfer Curriculum
  - Board Policy 3.39 Transfer Rights and Responsibilities
  - System procedure 3.21.1 Transfer of Undergraduate Courses, Credit, Associate Degrees, and the Minnesota Transfer Curriculum
- We benchmarked current practices against leading practices for transfer to identify opportunities for improvement.

## Conclusion

Minnesota State has developed Transfer Pathways, including 27 academic programs, to facilitate transferring from two-year institutions into one of Minnesota State's seven four-year institutions. There is an opportunity to better support the success of Transfer Pathways by:

- Increasing oversight of course equivalency procedures by the ASA Division
- Establishing an accountability framework to increase compliance with Board policies related to Transfer Pathways
- Improving communication of critical Transfer Pathways requirements
- Facilitating collaboration of faculty across the system in developing and reviewing Transfer Pathways
- Defining metrics to monitor the success of Transfer Pathways

## Observations and Recommendations

The following tables include detailed observations and recommendations. The observations are presented to address risks and improve or strengthen the operation of Transfer Pathways.

### Observation #1: Process for Establishing Course Equivalencies

Minnesota State Board Policy 3.21 Undergraduate Course and Credit Transfer and the Minnesota Transfer Curriculum states each college or university should implement a policy to address the transfer of courses and credit in compliance with the requirements outlined in this policy. Specific to course equivalencies, part 4 of the policy states faculty at receiving institutions should determine course equivalencies and are encouraged to collaborate. If requested, faculty must provide rationale to explain why a course is not deemed equivalent. Individual program leadership, such as the department chair or other faculty at each university, reviews and establishes course equivalencies for Transfer Pathways. We noted it varies by institution and by program whether there is a single point of contact for each Transfer Pathways program. Of the three universities we tested, only one had a documented process for reviewing and establishing course equivalencies.

During our testing, we noted the following programs have one or more missing equivalencies across one or more universities:

- Early childhood education<sup>8</sup>
- English
- Theatre
- Law enforcement<sup>9</sup>
- Exercise science

We identified the following inconsistencies in the course evaluation and equivalency determination process:

- **Admissions process.** Equivalencies may be reviewed and determined during the admissions process if the applicant has taken a course at a two-year institution that has not yet been reviewed for equivalency, as opposed to establishing equivalencies upon creation of a new Transfer Pathways program.
- **Inconsistent or ad-hoc review of existing equivalencies.** Some academic programs review all equivalencies on a schedule, while others either do not review or review on

---

<sup>8</sup> The Early Childhood Education Transfer Pathway is currently under review to finalize the Transfer Pathway standards and curriculum.

<sup>9</sup> Missing equivalency is due to student transferring to a different major (criminal justice) at the four-year institution.

an ad-hoc basis, such as when a two-year institution communicates a change in curriculum.

- **Inconsistent documentation to support equivalencies.** Some universities had a documented workflow within the Transfer Evaluation System, while others are done via email, with varying detail for justifications.

#1 Establishing Course Equivalencies	
<b>Observation</b>	The institutions we examined lack a consistent or formalized process for establishing course equivalencies for Transfer Pathways courses.
<b>Benchmarking</b>	<p>The University of Illinois System publishes its transfer policies and procedures on its <a href="#">website</a> and leverages Transferology<sup>10</sup> to document and share established course equivalencies. The information is readily available on the system’s website for students to access and includes university admission links for program specific requirements. While it is the responsibility of each university to establish its own transfer guidance, the system retains oversight for the transfer program, similar to Minnesota State, including establishing minimum requirements and noting additional degree requirements which may be necessary for certain programs.</p> <p>Additionally, the City University of New York (CUNY) developed a public resource called the Transfer Explorer, which provides course equivalencies for all courses offered within CUNY and is updated daily from official source systems. It shows how courses taken elsewhere will transfer, and how courses fit into majors and minors across campus. The tool can be used by CUNY students, prospective students, faculty, advisors, and staff.<sup>11</sup></p>
<b>Risk</b>  <i>Risk Prioritization</i> HIGH	<p>The lack of established equivalencies may affect students’ incentive to remain at Minnesota State upon completion of a Transfer Pathways program, increasing the risk of students not persisting. For example, a lack of established equivalencies can cause Minnesota State universities to be listed lower in the Transferology system compared to other universities, when a student looks up potential institutions to transfer their coursework. If equivalencies are not established, a Minnesota State university will not be listed as a 100% match, and therefore, any university that has established equivalencies will be listed above a Minnesota State university.</p> <p>As noted earlier in Diagram 3, based on data provided for students who earned awards in Transfer Pathways in fiscal years 2020, 2021, and 2022, only 22% of students continued their education at a system institution.</p>

<sup>10</sup> Minnesota State also uses Transferology to list course equivalencies at each institution.

<sup>11</sup> [How colleges can reduce credit friction for transfer students | Higher Ed Dive](#) [How colleges can reduce credit friction for transfer students | Higher Ed Dive](#)

**#1 Establishing Course Equivalencies**

Below, Table 1 compares the Transfer Pathways graduates to the total graduation population for the two-year community colleges, illustrating the gap between students that continue at a university and those that either transfer to a non-Minnesota State university or may not have intended to continue with a four-year degree.

**Table 1: Minnesota State Transfer Pathways Graduates**

Transfer Pathways Students	FY 2020	FY 2021	FY 2022	Total
# who graduated from community college	909	1,455	1,610	3,974
# who later graduated at a system university	19	95	103	217

**Recommendation**  
*Recommendation*  
*Prioritization*  
HIGH

- The ASA Division should work with colleges and universities to update Board Policy 3.21 Undergraduate Course and Credit Transfer and the Minnesota Transfer Curriculum to include protocols for oversight of establishing course equivalencies at the university level. It should include requirements for universities to document their procedures for establishing course equivalencies. For example, universities should:
  - Designate responsibility for establishing and reviewing equivalencies
  - Determine how equivalencies should be documented and tracked
  - Define who has the authority to review and provide exception to any established course equivalencies
  - Create deadlines or time parameters for establishing equivalencies
  - Publish relevant Transfer Pathways procedures online to ensure they are easily accessible so students can confirm course equivalencies, understand how to request evaluation, or appeal a course equivalency
- As part of its oversight role, ASA should:
  - Review university course equivalency procedures to ensure they are comprehensive and align with applicable board policies
  - Confirm faculty are complying with the definition of an equivalency as defined in system procedure 3.21.1 Transfer and Undergraduate

#1 Establishing Course Equivalencies	
	<p>Courses, Credit, Associate Degrees and the Minnesota Transfer Curriculum where “a course from a sending college or university which is at least 75% comparable in learning outcomes and content to a course at the receiving college or university”</p>
<p><b>Management Action Plan</b></p>	<p><b>Management intends to address issue and recommendations (FY24) lead by <i>Academic Programs, Planning, and Transfer</i>:</b></p> <ul style="list-style-type: none"> <li>• The Associate Vice Chancellor and designees (Director of Support and Program Review and Director of Academic Programs, Planning, and Transfer) will be responsible for reviewing pathway equivalencies and establish an audit schedule for compliance with the revised policies and procedures (below)</li> <li>• Revise system operating instruction 3.21.1.3 Transfer Pathways, Part 9 University to establish course equivalencies aligned with pathway outcomes and encode in degree audit system</li> <li>• Revise system procedure 3.21.1 Transfer of Undergraduate Courses, Credit, Associate Degrees, and the Minnesota Transfer Curriculum, Part 12. College and University Responsibility: Work with System Director for Policy &amp; Procedure and Intellectual Property to add review of these Operating Instructions to the Policy Council agenda for fall 2023</li> <li>• Based on recommendations from the Transfer Governance Team’s sub-committee on Common Course numbering, Academic Affairs will develop an implementation steering committee (fall 2023-spring 2025)</li> </ul>

## Observation #2: Accountability, Roles, and Responsibilities

The ASA Division created a Transfer Pathways Review Timeline, which illustrates plans to review specific pathways each semester. Accordingly, 12 programs have recently undergone review, 10 programs are currently under review, and four will be reviewed in early 2024. As part of this review, the system office sends each university a list of courses which are missing equivalencies. However, there is not an accountability framework to ensure universities establish missing equivalencies. For example, we noted the following observations during our testing.

- One out of two sampled English Transfer Pathways students had to repeat a course due to a missing equivalency.

- Five programs (Early Childhood Education, English, Theatre, Exercise Science, and Law Enforcement) were missing equivalencies at one or more university.
- Seven programs (Accounting, Psychology, Biology, Business, English, Law Enforcement, and Political Science) had manual exceptions where students had to appeal or request review of a specific completed course to have an equivalency established for it.

ASA has mapped courses defined as equivalencies by universities and identified similar courses at other two-year institutions; however, we noted university programs did not consistently utilize the mapped data to set equivalencies for the other colleges. There is not a procedure in place to escalate equivalency issues. Further, Board Policy 3.21 Undergraduate Course and Credit Transfer and the Minnesota Transfer Curriculum state each college or university should establish an appeal process, provide information about a student’s right to appeal, and display a direct link entitled “Transfer” on the college or university homepage. While procedures exist for students to appeal course equivalency decisions to the Senior Vice Chancellor for ASA, the procedures are not published on the system office website or linked to university procedures or sites for students to easily access and complete an appeal.

#2 Accountability, Roles, and Responsibilities	
<b>Observation</b>	There is not an established accountability framework to enforce compliance with Transfer Pathways. Additionally, roles and responsibilities for decision makers in the Transfer Pathways programs are not formally defined. The ASA Division has begun developing an accountability framework. However, it is still in draft form.
<b>Benchmarking</b>	The State University of New York (SUNY) publishes all course equivalencies on its <a href="#">website</a> . The website also states the campus registrar makes the final determination of credit acceptance. If a student does not agree with a university’s course equivalency determination, SUNY has a two-phase appeal process in which the student must first appeal to the receiving university, and if the decision is unchanged, the student may then appeal to the system. The system’s decision is final, and universities are required to comply.
<b>Risk</b> <i>Risk Prioritization</i> HIGH	The success of Transfer Pathways is at risk if there is not a mechanism in place to hold universities accountable for establishing course equivalencies in support of successful execution of Transfer Pathways.
<b>Recommendation</b> <i>Recommendation Prioritization</i> HIGH	The ASA Division should work with colleges and universities to complete the accountability framework and define roles and responsibilities of those involved in the processes of Transfer Pathways. The framework should include: <ul style="list-style-type: none"> <li>• A formal escalation process which designates authority when colleges and universities do not comply with requests or</li> </ul>

<b>#2 Accountability, Roles, and Responsibilities</b>	
	<p>requirements related to the Transfer Pathways Program, such as establishing missing course equivalencies identified during the Transfer Pathways program review process</p> <ul style="list-style-type: none"> <li>• Designation of specific leadership positions at the university, such as the dean or provost, to be the contacts for process owners to contact if there is non-compliance with system policies and procedures</li> <li>• Designation of authority to hold the colleges and universities accountable by defining the roles and responsibilities of those involved in making Transfer Pathways decisions</li> <li>• Formalization of an appeal process for students to easily access and utilize if a university does not establish a course equivalency for a course</li> </ul>
<b>Management Action Plan</b>	<p><b>Management intends to address issue and recommendations (FY24-FY25) lead by <i>Academic Programs, Planning, and Program Support/ Program Review</i>:</b></p> <ul style="list-style-type: none"> <li>• An internal workgroup will create a Transfer Accountability Framework for recommendation to the Senior Vice Chancellor for ASA</li> <li>• Along with the above planned audit schedule, a Transfer Accountability Framework will establish a process and procedure for escalation of non-compliance.</li> <li>• A Transfer Accountability Framework will establish a process and procedure for designation of authority for transfer pathway compliance.</li> <li>• A Transfer Accountability Framework will establish a process and procedure for the Academic Programs, Planning, and Program Support / Program Review that uses the current Transfer Evaluation System for all campuses to route course evaluations to decision makers (to be monitored by Academic Affairs).</li> </ul>

### Observation #3: Data Quality and Completeness

The ASA Division established data and target metrics for transfer as a whole; however, there is limited formal reporting available specific to the Transfer Pathways program at the system level.

Two of three universities reviewed do not distinguish Transfer Pathways students from the general transfer student population. The third university identified students as Transfer

Pathways on their degree audit reports; however, three of the 20 students we tested from that university had a different Transfer Pathways program listed on their degree audit report than program listed in the Transfer Pathway enrollment population data provided by the system office. There appears to be incomplete or inaccurate data available for universities to monitor and report on the success of the Transfer Pathways program.

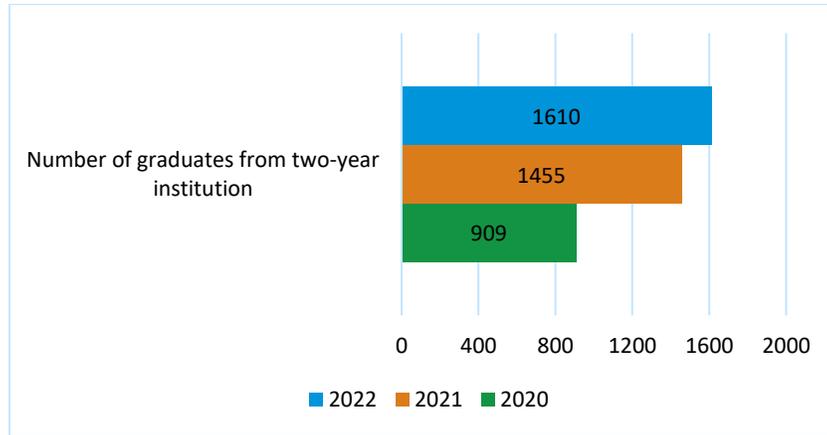
#3 Data Quality and Completeness	
<b>Observation</b>	Universities do not consistently identify students who have completed Transfer Pathways programs and the system office is not actively monitoring or reporting data for students who complete the program when graduating from a university. Therefore, there are limited formal reports to track and monitor the success of the program.
<b>Benchmarking</b>	The University of California system tracks data such as retention within the system to quantify and measure the success of its transfer program both at a system level and a university level. It is a leading practice for both the system and its institutions to define target data to monitor progress and success of its transfer program. <sup>12</sup>
<b>Risk</b> <i>Risk Prioritization</i> HIGH	Without established metrics and consistent reporting of data, there is a lack of insight into the success of the Transfer Pathways program.
<b>Recommendation</b> <i>Recommendation Prioritization</i> HIGH	The ASA Division, in consultation with colleges and universities, should establish more formal reporting of data specific to Transfer Pathways, such as enrollment targets, graduation rates, and retention rates within the system. Metrics should be communicated to the ASA Research unit to ensure data is tracked to analyze and document progress. Metrics could include: <ul style="list-style-type: none"> <li>• Demographic information to identify trends in support of Equity 2030</li> <li>• Community colleges attended before transfer</li> <li>• Credits completed at the community college before transfer</li> <li>• Percentage of students enrolled in an Associate of Arts, Associate of Fine Arts, Associate of Science, or specific Transfer Pathways program</li> <li>• Percentage of enrollment by program</li> <li>• Percentage of students who are transfers</li> <li>• Percentage of baccalaureate graduates who begin as Transfer Pathways students</li> </ul>

<sup>12</sup> [Transfer admit data | UC Admissions \(universityofcalifornia.edu\)](https://admission.universityofcalifornia.edu/transfer-admit-data/) [Transfer admit data | UC Admissions \(universityofcalifornia.edu\)](https://admission.universityofcalifornia.edu/transfer-admit-data/)

**#3 Data Quality and Completeness**

- Number and percentage of students transferring in the fall and spring
- Increase year-over-year of Transfer Pathways students (Diagram 4, below, illustrates 3,974 Transfer Pathways graduates discussed earlier in Diagram 3)

**Diagram 4: Year-Over-Year Increase in Transfer Pathways Graduates**



**Management Action Plan**

**Management intends to address issue and recommendations (TBD, depending on the capacity of our ASA Research unit and Data analytic system and its impact on Workday) lead by *Academic Programs, Planning, and Transfer, ASA Research, and Program Support and Program Review:***

- Academic Affairs, working with Research and the Executive Director of Center for Data Access & Analytics, to establish a formal and interactive data dashboard based on the recommendations above.

**Observation #4: Communication**

Board Policy 3.39 Transfer Rights and Responsibilities outlines college and university responsibilities related to transfer requirements. It specifies Minnesota State sending and receiving colleges and universities have the responsibility to update and publish specific transfer-related documents online. The policy requires the following information be published on a university’s website:

- Transfer policies and procedures, requirements, and course offerings

- Current Minnesota Transfer Curriculum, transfer agreements, and other transfer related agreements
- Transfer guides and course equivalencies

However, during testing, we noted one of the three universities we reviewed did not publish the required information on its website. In addition, we noted universities do not have a consistent method of communicating to community colleges about important information to be shared with prospective university students. For example, our data analysis noted students had, on average, between 12 and 27 excess credits when transferring to a university.

We noted all three universities utilize liaisons in some capacity, but there is no defined mechanism for a feedback loop, as it is often based on prior relationships between institutions. The role of liaisons includes facilitating communication between community colleges and universities, assisting prospective students with the application process, and providing information on transfer requirements. There is not a formal mechanism in place to share feedback if a student was misadvised at a two-year institution, admission requirements were not communicated, or if credit hours vary.

#4 Communication	
<b>Observation</b>	There is not a consistent and formalized feedback loop between community colleges’ academic advisors and various university personnel, such as admissions counselors and academic advisors, limiting the ability to stay up-to-date on information. Also, changes to the Transfer Pathways programs and associated activities, such as establishing course equivalencies, are not consistently communicated. Further, universities do not consistently publish information online regarding Transfer Pathways such as course equivalencies, transfer guides, or the appeal process to request additional review related to equivalencies.
<b>Benchmarking</b>	The University of Illinois System has <a href="#">published guides</a> for community college counselors to help promote consistent, accurate, and comprehensive academic advising.
<b>Risk</b> <i>Risk Prioritization</i> MODERATE	Without a defined feedback loop, students at community colleges could be misadvised, which could lead to repeated coursework or excess courses, which do not count towards degree requirements. This increases risk of a student’s inability to successfully complete a Transfer Pathways program in a timely and cost-efficient manner.
<b>Recommendation</b> <i>Risk Prioritization</i> MODERATE	1. The ASA Division should work with universities to formalize the liaison role to promote more consistent and accurate advising for Transfer Pathways students at the two-year institutions, such as establishing a feedback loop to discuss:

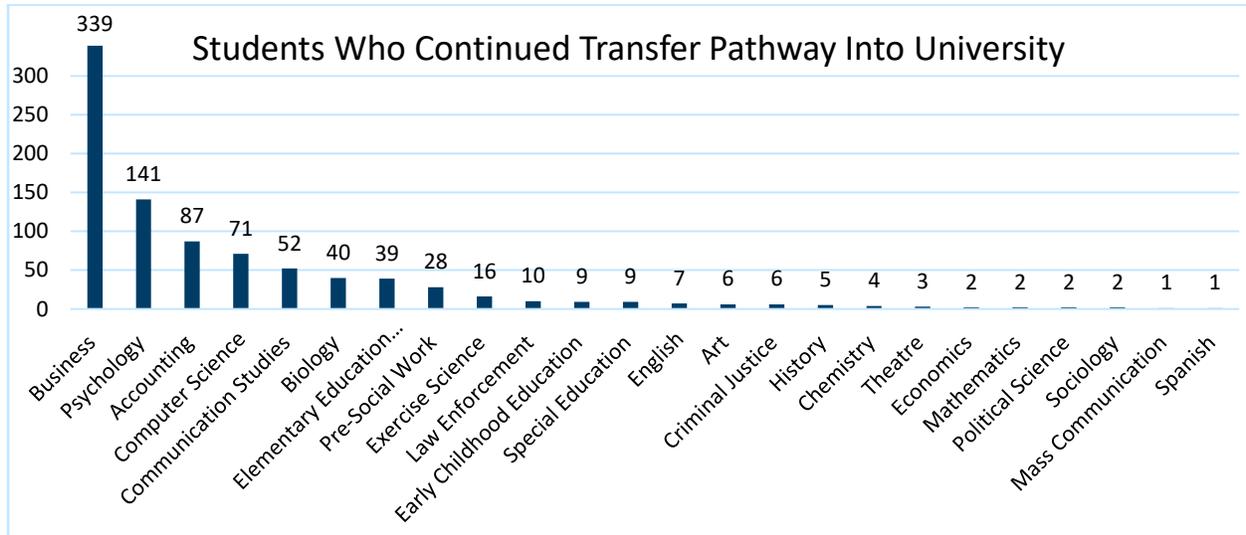
#4 Communication	
	<ul style="list-style-type: none"> <li>• Program requirements, including agreed-upon course equivalencies</li> <li>• Curriculum or course changes, including evaluation of and impact on course competencies</li> <li>• Connecting prospective students with university admissions or academic advisors to review transcripts and provide accurate information on program transfer</li> </ul> <p>2. The ASA Division should ensure proper oversight is in place to confirm institutions are complying with Board Policy 3.39 Transfer Rights and Responsibilities.</p>
<b>Management Action Plan</b>	<p><b>Management has begun to address and intends to address issues and recommendations with the establishment and maturity of a transfer accountability framework and annual audits FY24-FY26 (TBD, based on student Workday progress) lead by <i>Academic Programs, Planning, and Transfer and Program Support and Program Review</i>:</b></p> <ul style="list-style-type: none"> <li>• A Transfer Accountability Framework will establish processes and procedures for serving transfer students (including transfer pathways equivalencies/competencies), including Transfer Pathway students, and ensuring compliance with Board Policy 3.39 Transfer Rights and Responsibilities.</li> <li>• Working with Information Technology Service, Research, and the Center for Data Access and Analytics, we will establish a platform/dashboard, to provide a feedback loop, that list program requirements and course evaluations that is both student-facing and staff-facing.</li> </ul>

## Observation #5: Collaboration

Current Transfer Pathways program working sessions to establish or review curriculum take place on an ad-hoc basis, either as needed, or at least once every five years, and attendees are determined based on recommendations from the system office and university faculty and administration. As a result, there may be key faculty missing from decision-making processes. Further, faculty who are not included in the working sessions indicated they are more resistant to the Transfer Pathways program. Based on our review, programs with higher enrollment and more frequent engagement of faculty, such as the Business Transfer Pathways, have a more seamless transfer process compared to programs with lower enrollment. For example, one institution hosted a Business Transfer Pathways program workshop to facilitate collaboration with the other institutions.

Below, Diagram 5 shows the distribution of 882 retained Transfer Pathways graduates discussed earlier in Diagram 3. As noted, many of the programs have very few students compared to the top five programs. 15 programs have ten or less graduates. Based on feedback we received, those programs appear to have a higher chance of more inconsistencies related to the course equivalencies.

**Diagram 5: Transfer Pathways Programs for Retained Students (Fiscal Years 2020-2022)**



#5 Collaboration	
<b>Observation</b>	Minnesota State has a Transfer Governance Team, whose purpose is to improve student transfer experiences between Minnesota State colleges and universities and to support equitable education outcomes for Minnesota State students. There is an opportunity to formally define the role and charge the Transfer Governance Team to conduct working sessions for existing Transfer Pathways programs. Specifically, a committee has not been tasked with overseeing regular, such as at least annual, working sessions, where two and four-year faculty, department chairs, or deans come together to discuss curriculum, including challenges and potential solutions, as well as proposed curriculum changes for each active Transfer Pathways program.
<b>Benchmarking</b>	SUNY has developed the <a href="#">Student Mobility Steering Committee</a> to regularly review and make recommendations on their Transfer Path program. The committee’s charter includes who should be represented in the committee, reporting lines of the committee, as well as required activities.

#5 Collaboration	
<p><b>Risk</b></p> <p><i>Risk Prioritization</i> MODERATE</p>	<p>Inconsistent or lack of established collaboration processes and practices regarding Transfer Pathways can lead to duplication of efforts as well as negatively impact faculty buy-in and willingness to support the success of the program.</p>
<p><b>Recommendation</b></p> <p><i>Recommendation Prioritization</i> MODERATE</p>	<ol style="list-style-type: none"> <li>1. The Transfer Governance Team and System Director of Academic Program and Transfer should coordinate with faculty committees to develop and document a calendar for program review workshops and identify rotating representatives from two and four-year institutions. Any information or outcomes from the sessions should be documented and disseminated to all program faculty.</li>   <li>2. The ASA Division should work with leaders in more established Transfer Pathways programs, such as the Business Pathway, to identify and disseminate positive practices, including:               <ul style="list-style-type: none"> <li>• Regular meetings of faculty and program chairs</li> <li>• Hosting transfer summits to discuss curriculum changes and program needs</li> <li>• Strong tone at the top, signifying leadership support of Transfer Pathways program implementation</li> <li>• Discussion of course competencies</li> </ul> </li> </ol>
<p><b>Management Action Plan</b></p>	<p><b>Management has begun to address and intends to address issues and recommendations with the establishment and maturity of a transfer accountability framework, annual audits, and convenings (as described below) (FY24-FY25) lead by <i>Academic Programs, Planning, and Transfer and Education Development Technology, and Program Support and Program Review:</i></b></p> <ul style="list-style-type: none"> <li>• Along with the audit schedule and proposed revisions to related policy, we will develop training, discipline specific Communities of Practice (based on lessons learned from the current Transfer Pathways reviews).</li> <li>• A Transfer Accountability Framework with expectations and compliance mechanism addressing course equivalencies / competencies will be established and reinforced at regional senior academic officers and academic deans meetings.</li> </ul>

## Appendices

### Appendix A: Documentation Reviewed

Below, we have listed various internal and external documentation we reviewed for this audit.

#### Internal Documentation

- 2007 Office of Internal Auditing Student Success Measures and Systems Report
- [System procedure 3.21.1 Transfer of the Undergraduate Courses, Credit, Associate Degrees, and the Minnesota Transfer Curriculum](#)
- [Board Policy 3.21 Undergraduate Course and Credit Transfer and the Minnesota Transfer Curriculum](#)
- [Board Policy 3.39 Transfer Rights and Responsibilities](#)
- ASA Division Pilot Transfer Pathways Community of Practice Approved Recommendations
- Campus Transfer Pathways Implementation Toolkit (November 2017)
- Equity 2030 and the Transfer Student Experience
- Transfer application data for selected universities
- Report of Survey Findings - Transfer Within System
- System Transfer Pathways Data
- FY2022 Transfer at Minnesota State Review
- FY2022 Transfer Pathways Report
- Transfer Pathways for Baccalaureate Completion
- Transfer Pathways Frequently Asked Questions (FAQs)
- Transfer Pathways History
- Transfer Pathways Review Timeline

#### External Documentation

- The City University of New York (CUNY) Series on Transfer
- The Effects of Structured Transfer Pathways in Community Colleges

## Appendix B: Student Testing Sample Additional Demographics

We have provided additional detail related to the sample of 60 Transfer Pathways students we tested. Below, Tables B-1 through B-4 provides additional demographic data related to our student sample population.

Table B-1 illustrates the Transfer Pathways programs associated with the 60 students we tested. The data also illustrates the overall distribution of Transfer Pathways programs the continuing 882 students graduated (discussed in Diagram 3).

**Table B-1: Student Testing Population by Transfer Pathways Program**

Name of Transfer Pathways Program	# of Student Samples Tested	Total Students Continuing Transfer Pathways into University
Business	20	339
Psychology	5	141
Accounting	7	87
Computer Science	3	71
Communication Studies	0	52
Biology	2	40
Elementary Education Foundations	0	39
Pre-Social Work	5	28
Exercise Science	1	16
Law Enforcement	2	10
Early Childhood Education	3	9
Special Education	0	9
English	3	7
Art	1	6
Criminal Justice	2	6
History	0	5
Chemistry	2	4
Theatre	1	3
Mathematics	0	2
Economics	0	2
Political Science	1	2
Sociology	1	2
Mass Communication	1	1
Spanish	0	1
<b>Total</b>	<b>60</b>	<b>882</b>

**Table B-2: Student Testing Population by Race and Ethnicity**

Race / Ethnicity	# of Student Samples Tested
White	37
Hispanic	9
Asian	5
Black	5
Two or more	3
International	1

**Table B-3: Student Testing Population by Gender**

Gender	# of Student Samples Tested
Female	37
Male	23

**Table B-4: Student Testing Population by Birth Year**

Student Birth Year	# of Student Samples Tested
Before 1990	7
Between 1990-1996	15
Between 1997-1999	21
2000 or after	17

## Appendix C: Benchmarking

We reviewed and analyzed data from similar universities with specific transfer programs to identify best practices, tracked information and metrics, and areas of opportunity within the Transfer Pathway programs at Minnesota State.

	Minnesota State	University of California (UC)	State University of New York (SUNY)	University of Illinois (U of I)
Name of Program	Transfer Pathways	Transfer Pathways and Transfer Admissions Guarantee (TAG)	Transfer Guarantee Program	Guaranteed Transfer Program (GTP)
General Information	<ul style="list-style-type: none"> <li>The framework permits students to transfer from any college to any university offering a parallel baccalaureate degree</li> <li>Application fees range from no charge to \$20</li> </ul>	<p>Specifically for California Community College (CCC) transfer students</p> <ul style="list-style-type: none"> <li>Suggested to apply for several campuses to improve chances of getting in</li> <li>Students can apply for a Transfer Admissions Guarantee (TAG) at one campus while preparing for other campuses</li> <li>Transfer Admission Guarantee (TAG): guaranteed admission into UC                             <ul style="list-style-type: none"> <li>Can do a TAG without doing Pathways+. If your major is not one of the Transfer Pathways, this might be the best option for</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>64 colleges and universities and over 7,000 academic programs</li> <li>SUNY application fee is waived for up to four campuses for all students who graduate from a SUNY community college with an A.A. or A.S. degree</li> <li>Transfer Guarantee Program: New York state residents who are graduates of a state university of New York two-year college or a city university two-year college, including university community colleges operating under the program of the university, and who possess an A.A. or A.S.</li> </ul>	<ul style="list-style-type: none"> <li>Students can transfer to Illinois Urbana-Champaign, University of Illinois Chicago, and University of Illinois Springfield</li> <li>Application fees                             <ul style="list-style-type: none"> <li>\$50 for domestic and \$75 for international</li> </ul> </li> <li>The University of Illinois Transfer Scholarship: awarded to high-achieving students transferring to the University of Illinois from an Illinois community college. The scholarship is geared towards first generation students and is based on academic performance at the community college. Consideration may be made of demonstrated financial need.</li> </ul>

	Minnesota State	University of California (UC)	State University of New York (SUNY)	University of Illinois (U of I)
		<p>guaranteed admission to one of the six TAG campuses</p> <ul style="list-style-type: none"> <li>○ With Pathways+, students have a guaranteed spot at a one of the six UCs which offer TAG</li> </ul>	<p>degree, shall be guaranteed an opportunity to continue their education on a full-time basis at a baccalaureate campus of the university</p> <ul style="list-style-type: none"> <li>○ A.A. and A.S. graduates will be granted full credit transfer for general education courses taken and not be required to repeat successfully completed course with similar curricular content.</li> <li>● Apply 2 semesters before transfer and enroll 1 semester before transfer</li> </ul>	
<b>Statistics and Metrics</b>	<ul style="list-style-type: none"> <li>● Transfer students are 82.49% White, 6.42% Black/African American, 5.1% Asian</li> <li>● University attended: 14.37% Minnesota State University, Mankato, Minnesota State University, Moorhead,</li> </ul>	<ul style="list-style-type: none"> <li>● 92% of transfers come from a California community college</li> <li>● Almost one third of students are transfers</li> </ul>	<p>More than 45% of baccalaureate graduates begin as transfer students</p>	<ul style="list-style-type: none"> <li>● Total fall transfer to U of I <ul style="list-style-type: none"> <li>○ 426 students transfer from Springfield to U of I</li> <li>○ 2,244 students transfer from Springfield to U of I</li> <li>○ 1,266 students transfer from Springfield to U of I</li> </ul> </li> <li>● Fall transfer to the U of I by source type <ul style="list-style-type: none"> <li>○ 832 of the 1,266 (65.7%) fall transfers went from</li> </ul> </li> </ul>

	Minnesota State	University of California (UC)	State University of New York (SUNY)	University of Illinois (U of I)
	<p>7.02% Bemidji State University</p> <ul style="list-style-type: none"> <li>• 35% finished and 58.4% did not finish an associate degree at a community college before transferring</li> <li>• 42.4% of students completed 61-90 credits at the community college and 29.3% of students completed 31-60 credits</li> <li>• In FY2020, 84.5% were enrolled in an AA, AFA, or AS degree and 15.5% were enrolled in a Transfer Pathways Associates degree. In FY2022, 78.6% of students were enrolled in an AA, AFA, or AS degree and 21.4% were enrolled in a Transfers Pathways Associates degree</li> <li>• Top enrollment areas in years 2018 to 2022: Business, Psychology,</li> </ul>			<p>community college to U of I at Urbana-Champaign (UIUC)</p> <ul style="list-style-type: none"> <li>○ 1,654 of the 2,242 (73.8%) fall transfers went from community college to University of Illinois at Chicago (UIC)</li> <li>○ 305 of the 426 (71.6%) fall transfers went from community college to University of Illinois Springfield (UIS)</li> <li>• Of the fall transfers from community college to the U of I, the most come from city colleges of Chicago, College of Du Page, and William Rainey Harper College</li> </ul>

	Minnesota State	University of California (UC)	State University of New York (SUNY)	University of Illinois (U of I)
	Computer Science, Biology			
<b>Requirements for admission</b>	Guaranteed admission to Minnesota State university if students complete the Minnesota Transfer Curriculum and earn the minimum grade point average in an associate of arts degree	<ul style="list-style-type: none"> <li>Students have completed 30 or more semester units at California Community College (CCC), with a CCC as their most-recent institution of attendance</li> <li>Basic requirements to be considered include:                             <ul style="list-style-type: none"> <li>At least 60 credits completed</li> <li>Earn 2.4 GPA or higher</li> <li>TAG campuses have a requirement of 2.8 to 3.6</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>At least 30 credits of approved SUNY-GER courses (minimum of 7 of 10 areas listed on website)</li> <li>Guaranteed admission if:                             <ul style="list-style-type: none"> <li>Student graduates from a SUNY community college</li> <li>Student has an A.A. or A.S. degree at the time of the application</li> <li>The guarantee becomes effective if a student is denied admission at all of their SUNY four-year college choices (campus choice and academic program are not guaranteed)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Guaranteed admission if:                             <ul style="list-style-type: none"> <li>Enrolled only at an Illinois Community College after graduating from an Illinois high school</li> <li>Earned a minimum of 36 graded, transferable semester hours</li> <li>Attained a minimum grade point average of 3.0</li> <li>Satisfied the university's English language proficiency requirement</li> <li>Optional to submit ACT/SAT test scores</li> </ul> </li> </ul>
<b>Guidance and Technology Available for Students</b>	System website has links to each college and university with a list of requirements	System website has application deadlines and requirements	<ul style="list-style-type: none"> <li>Have transfer advisors for students</li> <li>Information available on System website about transfer policies, steps to transfer, transfer paths, planning coursework, course equivalencies,</li> </ul>	<ul style="list-style-type: none"> <li>System website has a Transfer Handbook</li> <li>Information is on the system website</li> <li>System website has a link to the Transfer Guide for Urbana-Champaign (explains requirements)</li> </ul>

Transfer Pathways Audit

	Minnesota State	University of California (UC)	State University of New York (SUNY)	University of Illinois (U of I)
			campus requirements, and a list of transfer offices	after student enters intended major, class level, enrollment term, and transferring college)
<b>Appeals system</b>	Appeals document on system website (note, appeal document is for general transfer and is not specific to Transfer Pathways)	Appeals can be submitted online from May 1 through May 15, does not guarantee a response by June 1st which is the date many institutions require transfer students to make a decision	<ul style="list-style-type: none"> <li>• Appeal process is done through the receiving campus</li> <li>• If the decision is unchanged or a student doesn't hear back in 15 business days, they can take their appeal to the SUNY System Provost by submitting this form</li> </ul>	Appeal process and links are at a campus level
<b>Is information on a system website or an institution website?</b>	Information is on the system website	Information is on the System website	<ul style="list-style-type: none"> <li>• Information is on System website</li> <li>• Specific information about each college's transfer requirements are on the specific college's website</li> </ul>	Information is on the System and campus websites as it relates to certain items
<b>How to apply?</b>	<ul style="list-style-type: none"> <li>• System website has a page with the application</li> <li>• Must contact the institutions to receive specific admissions requirements</li> </ul>	System website has a page with the application	System website has a page with the application	<ul style="list-style-type: none"> <li>• The application links are on the campus websites</li> <li>• Can apply via myillini or common app</li> </ul>

Minnesota State is an affirmative action, equal opportunity employer and educator.

*This page intentionally left blank.*

# Office of Internal Auditing



## MINNESOTA STATE

30 East 7th Street, Suite 350 | St. Paul, MN 55101-7804  
651-201-1808 | 888-667-2848

[www.MinnState.edu](http://www.MinnState.edu)

---

This document is available in alternative formats to individuals with disabilities. To request an alternate format, contact Human Resources at 651-201-1664. Individuals with hearing or speech disabilities may contact us via their preferred Telecommunications Relay Service.

Minnesota State is an affirmative action, equal opportunity employer and educator.