Introduction

A number of higher education institutions in the Higher Learning Commission’s (HLC’s) region award credit to students for academic work completed abroad in programs not operated by their home institutions. Students may take courses at overseas institutions not accredited by U.S. accreditors—though they may be accredited locally—or may participate in programs offered by independent providers that are not accredited. Students then often need to transfer that coursework to their home institutions in the United States to earn credit toward their major or degree. Such transfer is often facilitated by what is termed a “School of Record.”

A School of Record is an institution accredited in the United States that documents and awards credits for courses or programs taken by students at non-U.S.-accredited institutions or through independent program providers who collaborate with U.S.-accredited institutions to transcript coursework taken abroad. The accredited institution which transcripts such coursework acts as a School of Record. As an example, if the University of ABC, a U.S.-accredited institution, transcripts and awards credits to students for courses or programs taken abroad via the Danish Institute for Study Abroad, a non-accredited program provider, the University of ABC acts as a School of Record.

(Most students who study abroad participate in programs operated by their home institutions, with credit allotted and transcripted by those institutions. HLC does not see such programs as applicable to the guidelines on School of Record.)

It is incumbent upon the School of Record to verify the academic integrity of these courses or programs to validate their quality before awarding credit. The guidelines are based upon HLC’s Criteria for Accreditation and Assumed Practices. They are intended to ensure academic integrity and transparency at institutions that act as Schools of Record in the transcription of coursework taken abroad by students. They are also intended to ensure that institutions that act as Schools of Record have appropriately trained personnel for evaluating such courses or programs, do so in conformity with high academic standards, and have established processes for evaluation that are applied in a consistent fashion.
Relevant Criteria and Assumed Practices

Criterion 2. Integrity: Ethical and Responsible Conduct
The institution acts with integrity; its conduct is ethical and responsible.

Core Component 2.A. The institution establishes and follows policies and processes to ensure fair and ethical behavior on the part of its governing board, administration, faculty and staff.

2. The institution operates with integrity in its financial, academic, human resources and auxiliary functions.

Core Component 2.B. The institution presents itself clearly and completely to its students and to the public.

2. The institution ensures the accuracy of any representations it makes regarding academic offerings, requirements, faculty and staff, costs to students, governance structure and accreditation relationships.

Criterion 4. Teaching and Learning: Evaluation and Improvement
The institution demonstrates responsibility for the quality of its educational programs, learning environments, and support services, and it evaluates their effectiveness for student learning through processes designed to promote continuous improvement.

Core Component 4.A. The institution ensures the quality of its educational offerings.

1. The institution evaluates all the credit that it transcripts, including what it awards for experiential learning or other forms of prior learning, or relies on the evaluation of responsible third parties.

2. The institution has policies that ensure the quality of the credit it accepts in transfer.

Assumed Practice A. Integrity: Ethical and Responsible Conduct

A.5. The institution makes readily available to students and to the general public clear and complete information including:

d. Policies on acceptance of transfer credit, including how credit is applied to degree requirements.

Assumed Practice B. Teaching and Learning: Quality, Resources, and Support

B.1. Programs, Courses, and Credits

f. The institution has a process for ensuring that all courses transferred and applied toward degree requirements demonstrate equivalence with its own courses required for that degree or are of equivalent rigor.

B.3. Support Services

b. The institution maintains timely and accurate transcript and records services.

Assumed Practice C. Teaching and Learning: Evaluation and Improvement

C.2. The institution refrains from the transcription of credit from other institutions or providers that it will not apply to its own programs.

Quality Assurance
In light of the aforementioned Criteria and Assumed Practices, HLC views the following five elements as critical in the evaluation and acceptance of credit by an accredited institution acting as a School of Record:

1. Academic Standards
The institution acting as a School of Record ensures that the coursework it intends to transcript meets its own academic standards. This expectation includes any standards that sub-units of the institution, such as departments, may have regarding their courses in addition to or independent of institutional standards.

2. Faculty and Staff Qualifications and Evaluations
The institution acting as a School of Record ensures that the faculty and staff who evaluate courses taken abroad are qualified to evaluate such courses and are appropriately trained in international curricula and faculty credentials to conduct the evaluations. In their evaluations to award appropriate credit, faculty and staff pay attention to such matters as course or program objectives, course outlines and syllabi, contact or credit hours, assignments and outcomes, among others. The School of Record assesses the quality of academic resources at the program site (such as instructional facility, library, databases, technological capacity, etc.) in the evaluation process.
3. Academic Programs
The coursework transcripted at the School of Record is in an academic discipline offered at that institution. An institution acting as a School of Record should either refrain from transcripting coursework in disciplines not offered at the institution or use a legitimate external evaluator for evaluating such coursework. Additionally, an institution acting as a School of Record has policies ensuring academic integrity if it records courses or programs that include internships, independent study, directed research, service learning, credit based on prior learning, etc.

4. Transcripts
The institution acting as a School of Record has clear protocols for the transcripting of such coursework. The transcripts include notations as to the source of recorded coursework and specific designations of titles, grades, credits, etc. of the courses.

5. Transparency
The institution acting as a School of Record performs its responsibility in a transparent fashion. The transparency responsibility carries within it, but is not limited to, the obligation to ensure that credit transcription policies and processes are clearly and publicly articulated to students before they commence the courses or programs. These policies include any fees, timeframe for such transcription work, any limitations whereby all or part of the coursework would not be accepted, and any other matters that might be of concern to students and institutions receiving these transcripts. Finally, the School of Record identifies its current partners (non-U.S.-accredited institutions or independent program providers) with whom it collaborates in this relationship on its public webpage(s) dedicated to the School of Record information.

HLC expects that accredited institutions acting as a School of Record will follow these guidelines.

When School of Record Activities Are Reviewed
If an accredited institution is acting as a School of Record, evaluation of the institution’s School of Record activities will occur at least at the time of an institution's comprehensive evaluation but may also be a subject of examination at other times if the School of Record activities become a matter of concern.