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NOTICE OF PROPOSED RULEMAKING INCLUDING STATEMENT OF NEED & FISCAL IMPACT

CHAPTER 715 HIGHER EDUCATION COORDINATING COMMISSION

FILED

10/17/2025 2:12 PM
ARCHIVES DIVISION
SECRETARY OF STATE

FILING CAPTION: Transfer Measures of Success Institutional Reporting, Metrics, Implementation, Timeline, and Compliance

LAST DAY AND TIME TO OFFER COMMENT TO AGENCY: 11/25/2025 5:00 PM

The Agency requests public comment on whether other options should be considered for achieving the rule's substantive goals while reducing negative economic impact of the rule on business.

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Filed By:
Guthrie Stafford
Rules Coordinator

HEARING(S)

Auxiliary aids for persons with disabilities are available upon advance request. Notify the contact listed above.

DATE: 11/18/2025

TIME: 9:30 AM - 10:00 AM

OFFICER: Guthrie Stafford

REMOTE HEARING DETAILS

MEETING URL: Click here to join the meeting

PHONE NUMBER: 1-503-446-4951

SPECIAL INSTRUCTIONS:

Conference ID Code: 735343553#

NEED FOR THE RULE(S)

The rules are needed to implement statutory direction from ORS 350.429, and related statutes requiring institutions report on transfer student success and compliance. These rules establish uniform measures of success, reporting requirements, implementation monitoring, and enforcement tools to ensure statewide alignment of transfer pathways.

DOCUMENTS RELIED UPON, AND WHERE THEY ARE AVAILABLE

2024 Transfer Council Final Report (available at HECC, 3225 25th Street SE, Salem, OR, and on the HECC website).

Link: [https://www.oregon.gov/highered/about/transfer/Documents/Transfer-](https://www.oregon.gov/highered/about/transfer/Documents/Transfer-Council/2025%20docs/June%202025/3.0%20Final%20Measures%20of%20Success%20Subcommittee%20Recommendations%205.16.2025%20-%20Copy%20(1).pdf)

[Council/2025%20docs/June%202025/3.0%20Final%20Measures%20of%20Success%20Subcommittee%20Recommendations%205.16.2025%20-%20Copy%20\(1\).pdf](https://www.oregon.gov/highered/about/transfer/Documents/Transfer-Council/2025%20docs/June%202025/3.0%20Final%20Measures%20of%20Success%20Subcommittee%20Recommendations%205.16.2025%20-%20Copy%20(1).pdf)

Fishman, R., Kurzweil, M., & O'Sullivan, R. (2021, September 9). Stranded credits: A matter of equity. Ithaka S+R. <https://sr.ithaka.org/publications/stranded-credits-a-matter-of-equity/>

STATEMENT IDENTIFYING HOW ADOPTION OF RULE(S) WILL AFFECT RACIAL EQUITY IN THIS STATE

The rules are expected to have a positive impact on racial equity. National research shows that underrepresented students disproportionately lose credits when transferring and are less likely to graduate on time. By requiring institutions to report disaggregated data on transfer measures and tool utilization, the rules will increase transparency and accountability in reducing credit loss and inequities. This data will allow HECC and institutions to identify racial disparities in transfer outcomes and target interventions to support equitable student success.

Fishman, R., Kurzweil, M., & O'Sullivan, R. (2021, September 9). Stranded credits: A matter of equity. Ithaka S+R. <https://sr.ithaka.org/publications/stranded-credits-a-matter-of-equity/>

FISCAL AND ECONOMIC IMPACT:

The rules are expected to have a modest fiscal impact on the state. HECC will incur administrative costs to collect, analyze, and publish the new reporting requirements, which will be absorbed within existing Transfer and Research and Data staff. Institutions may incur administrative costs to compile and submit data; however, these are expected to be moderate and offset by the long-term benefits of improved transfer efficiency. Economic impacts on communities are expected to be positive, as reducing excess credits and time to degree lowers student costs and improves workforce readiness.

COST OF COMPLIANCE:

(1) Identify any state agencies, units of local government, and members of the public likely to be economically affected by the rule(s). (2) Effect on Small Businesses: (a) Estimate the number and type of small businesses subject to the rule(s); (b) Describe the expected reporting, recordkeeping and administrative activities and cost required to comply with the rule(s); (c) Estimate the cost of professional services, equipment supplies, labor and increased administration required to comply with the rule(s).

(1) State Agencies: HECC for administrative implementation and reporting, Public Universities and Community Colleges for requirements to report data and implementation measures, and students and families for indirect positive economic effect through reduced tuition costs and loan debt.

(2)(a) None.

(b) No direct reporting or recordkeeping burden on small businesses.

(c) None expected.

DESCRIBE HOW SMALL BUSINESSES WERE INVOLVED IN THE DEVELOPMENT OF THESE RULE(S):

Small businesses were not directly involved, as these rules apply to public institutions of higher education.

WAS AN ADMINISTRATIVE RULE ADVISORY COMMITTEE CONSULTED? NO IF NOT, WHY NOT?

The HECC Transfer Council and its subcommittees, which include institutional, faculty, and student representatives, reviewed and advised on the development of these rules. This consultation is required by statute.

ADOPT: 715-025-0200

RULE SUMMARY: 715-025-0200 Annual Institutional Reporting Requirements requires each community college and public university to submit an annual report to HECC, including data on statewide transfer tools (CCN, CTMs, MTMs). Reports must be disaggregated by institution, pathway completion, and student equity characteristics.

Transfer Success Measures

Defines the measures institutions must report, including graduation rates, credits at graduation, transfer rates,

utilization of transfer tools, federal loan participation, and student debt levels.

Institutional Implementation Measures

Requires institutions to report on the adoption and implementation of transfer policies, catalog listings, teach-out plans, advising tools, and barriers to implementation.

Implementation Timeline

Sets reporting deadlines. First institutional reports are due September 1, 2026 ; HECC must publish the first statewide transfer report by December 15, 2026.

CHANGES TO RULE:

715-025-0200

TRANSFER SUCCESS MEASURES: INSTITUTIONAL REPORTING

(1) Each community college and public university listed in ORS 352.002 shall submit an annual report to the Higher Education Coordinating Commission that shall allow the Commission to evaluate the effectiveness and implementation of statewide transfer tools, including:

(a) Common Course Numbering (CCN);

(b) Core Transfer Maps (CTMs); and

(c) Major Transfer Maps (MTMs).

(2) For each required measure, institutions must provide data disaggregated by at least the following:

(a) Whether students completed CCN, CTM, or MTM pathways; and

(b) Individual student characteristics specified by the Commission.

(3) Reports shall include the following measures:

(a) Graduation Rate. Percentage of transfer students completing a bachelor's degree, compared to first-time freshmen.

(b) Credits at Graduation. Number of earned credits at bachelor's degree completion, for transfer students and first-time freshmen, disaggregated by major and other characteristics.

(c) Transfer Rate. The percentage of students who are new to a community college in fall term, who complete at least 18 collegiate credits within their first two years, for whom a plurality of credits are in lower-division collegiate coursework, and who subsequently transfer to an Oregon public university within four years of initial enrollment.

(d) Utilization Rate of Transfer Tools, including:

(A) The percentage of students earning an associate's degree or transcript notation with the guarantees of an MTM, among all associate degree earners;

(B) The percentage of students who transfer with a CTM, among all students who transfer with 30-89 credits; including students with an MTM; and

(C) The percentage of students, as defined in subsection (c) of this rule, who complete at least one CCN course.

(e) Federal Loan Participation. Percentage of current undergraduates with federal loans.

(f) Average Debt of Bachelor's Graduates. Average dollar amount of debt among students completing a bachelor's degree.

(4) Each institution shall also provide information regarding the adoption and implementation of legislatively mandated transfer policies, including MTMs, CTMs, and CCN, including:

(a) Catalog listings, including confirmation that approved CCN courses are published in the institution's annual catalog and schedule beginning with the catalog year following Transfer Council or Commission approval of the course;

(b) Confirmation that approved MTM programs are implemented with the rights and guarantees provided for in ORS 350.400 and OAR 715-025-0040;

(c) whether the institution scheduled or offered courses that are subject to an approved CCNAP but not listed with the required CCN designation in the catalog, and if so, whether such courses were offered solely as part of an approved teach-out plan; and

(d) Course removals, including whether a course similar in course description and course learning outcomes but that is not subject to a CCNAP remain listed or offered, and, if so, whether such offerings are limited to an approved teach-out plan as specified in 715-025-0100.

(5) Each institution shall also provide information regarding:

(a) Institutional support and resources for transfer, including faculty and staff training and advising tools; and

(b) Challenges and barriers to implementation of transfer policies.

(6) The Commission shall have final authority to resolve disputes regarding the interpretation or application of definitions in this rule.¶

(7) Institutions shall submit annual reports in the form specified by the Commission. ¶

(8) The Commission may require institutions to report additional information related to transfer effectiveness, implementation, and student success as determined by the Commission.¶

(9) The Commission may make publicly assessable, in a manner compliant with relevant student data privacy laws, any elements of institutional reporting.¶

(10) Institutions shall submit their first reports under these rules to the Commission by September 1, 2026.¶

(11) The Commission shall compile and publish the first statewide transfer report based on these measures by December 15, 2026.

Statutory/Other Authority: ORS 350.395, ORS 350.429, ORS 350.423

Statutes/Other Implemented: ORS 350.395, ORS 350.429, ORS 350.404, ORS 350.412