Policy 209: Assignment of Credit Hours

I. Introduction
2010, the U.S. Department of Education (USDOE) published the final regulations on program integrity issues; one such issue was the definition of a credit hour. The 2010 regulations included a definition of a credit hour under the Code of Federal Regulations (CFR) for purposes of Federal programs along with provisions related to accrediting agencies’ assessment of institutions’ determination of credit hours. The Pennsylvania Department of Education (PDE), through the PA Code, also has an established definition of a credit hour. As a result, it is up to the institution to establish a policy on the assignment of credit hours that meets the federal and state guidelines and be able to produce evidence as to the application and periodic review of the policy to accrediting bodies as requested. To assist with compliance in this area, the Middle States Commission on Higher Education (MSCHE) has provided additional guidance as to what information/evidence should be included in an institution’s Credit Hour Policy through its publications.

In the fall of 2020, the Department of Education published a final rule altering various regulations issued under the Higher Education Act of 1965. Effective as of July 1, 2021, the series of changes included an amendment that modifies the Clock-to-Credit Conversion formula. This significant update determines the number of Title IV credit hours that can be applied to each class program as well as whether the program meets minimum length requirements for Federal Student Aid (FSA) eligibility.

Under the new rule, institutions are no longer required to consider out-of-class work hours as part of the clock-to-credit conversion. This is a departure from the previous formula, which, according to Federal Student Aid (FSA) authorities “could include work outside of class (out of class hours) as long as the in-class hours met a lower ratio – 30 clock hours to one semester hour or 20 clock hours to one quarter hour – and the institution’s accrediting agency had not identified any problems with the institution’s establishment of credit hours.”

II. Responsible Party
Office of Academic Affairs
III. Purpose
Central Penn College complies with federal, state, and accreditation standards and regulations pertaining to the assignment of credit hours.

IV. Definitions
U.S. Department of Education defines “credit hour as:
“…An amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than:
1. One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter credit hour of credit, or the equivalent amount of work over a different amount of time; or,
2. At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution, including laboratory work, internship, practica, studio work, and other academic work leading to the award of credit hours”
Pennsylvania Department of Education (22 Pa. Code, Section 31.21(b)) states:
“…a semester credit hour represents a unit of curricular material that normally can be taught in a minimum of 14 hours of classroom instruction, plus appropriate outside preparation or the equivalent as determined by faculty.”

Middle States Commission on Higher Education (Verification of Compliance with Accreditation-Relevant Federal Regulations, 2017) states:
“…In accordance with the Commission policy, Credit Hour, and 34 CFR 602.24(f), the Commission ‘must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours.’ Specifically, the Commission must review the institution's policies and procedures for determining the credit hours awarded as well as the institution's policies and procedures to its programs and coursework and make a ‘reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.”

Code of Federal Regulations (668.8 (k)(2)(l)(i)) states:
“…for purposes of determining whether a program described in paragraph (k) (undergraduate programs in credit hours) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section and determining the number of credit hours in that educational program with regard to title IV, HEA programs: A semester hour must include at least 37.5 clock hours of instruction.”

Section 668.9 Relationship between clock hours and semester, trimester, or quarter hours in calculating Title IV, HEA program assistance.
(a) In determining the amount of Title IV, HEA program assistance that a student who is enrolled in a program described in Sec. 668.8(k) is eligible to receive, the institution shall apply the formula contained in Sec. 668.8(l) to determine the number of semester, trimester, or quarter hours in that program, if the institution measures academic progress in that program in semester, trimester, or quarter hours. Formula: A semester or trimester hour must include at
least 30 clock hours of instruction; and a quarter hour must include at least 20 clock hours of instruction.

V. Policy

The college complies with federal (USDOE; CFR), state (PDE), and accreditation (MSCHE) standards and regulations pertaining to the assignment of credit hours. In all courses, the college complies with the PDE regulation of 14 hours of classroom instruction per semester credit and interprets the USDOE's guidance of “…or the equivalent amount of work over a different amount of time…” to equal a total of 2,250 minutes of instruction per semester credit hour awarded; this also conforms to the CFR definition where, “A semester hour must include at least 37.5 clock hours of instruction.”

The college follows a term system. There are four terms a year, and the terms are defined as Winter, Spring, Summer, and Fall. Each term consists of 11 weeks, without a finals week. There is a 2-3 week break between terms. All terms are equal in length; therefore, the college does not have accelerated terms or courses that are shorter in duration than the regularly scheduled terms. All courses offered at the college must comply with the college's Credit Hour Policy regardless of delivery method (on-ground, online, or blended) or designation (internship, independent study, clinical, etc.).

Program Directors are responsible for developing, maintaining, and evaluating the curriculum within an academic program. The assignment of credit hours for new courses are determined by faculty and program directors, vetted through the curriculum review committee, and ultimately approved/denied by the Vice President of Academic Affairs before implementation. To ensure overall consistency and compliance with the Credit Hour Policy and Scheduling Guidelines, a random sample of course syllabi from the previous year will be reviewed during the winter term. This process will be handled by the Associate Provost through the Office of Academic Affairs. The Office of Academic Affairs will document the sampling, contact the appropriate instructors, and follow-up to ensure compliance. The cycle of review will occur from winter term to winter term to allow for any adjustments to the course syllabi template and/or the course catalog.

Revision: Updated from version 07 with changes in Department of Education ruling in 2020.