

BOARD OF REGENTS

BRIEFING PAPER

Handbook Revision, Elimination of the Excess Credit Fee

BACKGROUND & POLICY CONTEXT OF ISSUE:

In November 2012, the Board adopted an Excess Credit Fee policy effective Fall 2014. Specifically, the policy provides that a 50 percent excess credit fee on the per-credit registration fee shall be charged to a student who accrued attempted credits equal to 150 percent of the credits required for the student's program of study. The excess credit fee is imposed on registration fees charged in the current semester and in subsequent semesters, including summer terms, where a student's cumulative credit hour total exceeds 150 percent of the credits required for the student's program of study.

Since adoption, the policy has been revised on occasion to provide clarity in terms of its application (December 2013) and to address matters raised by internal audit (March 2018). Through the life of the policy NSHE institutions have expressed ongoing concerns regarding the fee, questioning its efficacy in supporting student success. In 2017, a [report](#) published by the American Educational Research Association in the *Educational Evaluation and Policy Analysis* journal found that state-adopted "excess credit hour" policies show little evidence of promoting completion and do more to increase median student debt. Additionally, the report finds that students from marginalized backgrounds appear to be most adversely affected by excess credit policies.

The System office recommends eliminating the Excess Credit Fee (*Title 4, Chapter 17, Section 4*). In addition, it is recommended to add language requiring institutions to periodically report on students' accumulation of excess credit hours and steps being taken to mitigate such excess credit accumulation. The Student Affairs Council and Academic Affairs Council support the recommendation to eliminate the Excess Credit Fee.

SPECIFIC ACTIONS BEING RECOMMENDED OR REQUESTED:

Amend *Title 4, Chapter 17, Section 4*, to eliminate the Excess Credit Fee and add new language requiring institutions to periodically or upon request of the Board report on the accumulation of excess credits by students and steps being taken to mitigate such excess credit accumulation. Remove other miscellaneous references to the Excess Credit Fee in *Title 4, Chapter 14, Section 21* (Military Transcript Evaluation) and *Title 4, Chapter 10, Section 19* (Fee Account Balances).

Require institutions to expend Excess Credit Fee balances in accordance with policy by the end of FY2023 on student advising and counseling services, including salary and wages, operating, and equipment expenses.

IMPETUS (WHY NOW?):

This recommendation is brought forward at the recommendation of the System Office with the support of the Student Affairs Council and Academic Affairs Council.

CHECK THE NSHE STRATEGIC PLAN GOAL THAT IS SUPPORTED BY THIS REQUEST:

- Access (Increase participation in post-secondary education)
- Success (Increase student success)
- Close the Achievement Gap (Close the achievement gap among underserved student populations)
- Workforce (Collaboratively address the challenges of the workforce and industry education needs of Nevada)
- Research (Co-develop solutions to the critical issues facing 21st century Nevada and raise the overall research profile)
- Not Applicable to NSHE Strategic Plan Goals

INDICATE HOW THE PROPOSAL SUPPORTS THE SPECIFIC STRATEGIC PLAN GOAL

- The unintended consequence of implementing an Excess Credit Fee policy, as examined by the 2017 American Educational Research Association study, is the increase in student debt being largest for low-income students, including Pell Grant recipients and first-generation students.
- Essentially, by removing the Excess Credit Fee policy the System will be removing one more potential barrier for students already faced with inequalities in successfully completing a degree.
- The Excess Credit Fee policy is a punitive policy toward degree completion. Removing the policy allows for more supportive models aimed at student completion and closing the achievement gap.

BULLET POINTS TO SUPPORT REQUEST/RECOMMENDATION

- Excess Credit Fees affect students once they cross a predetermined threshold and at a point too late for significant modifications to course plans. Students already unable to finance a degree may be dissuaded from completing a degree due to the additional expense of Excess Credit Fees.

POTENTIAL ARGUMENTS AGAINST THE REQUEST/RECOMMENDATION

None have been presented at this time.

ALTERNATIVE(S) TO WHAT IS BEING REQUESTED/RECOMMENDED

Alternatively, the Board may consider retaining the excess credit fee.

RECOMMENDATION FROM THE CHANCELLOR'S OFFICE

The System Office recommends elimination of the fee.

COMPLIANCE WITH BOARD POLICY

- Consistent With Current Board Policy: Title # _____ Chapter # _____ Section # _____
- Amends Current Board Policy: Title 4, Chapter 17, Section 4 and other misc. references to excess credit fee
- Amends Current Procedures & Guidelines Manual: Chapter # _____ Section # _____
- Other: _____
- Fiscal Impact: Yes No
Explain: Repealing the Excess Credit Fee will eliminate that stream of revenue for the institutions that have been used to support student advising and counseling services.

POLICY PROPOSAL
Title 4, Chapter 17, Section 4
Excess Credit Fee

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

Section 4. Excess Credit Fee

1. [A 50 percent Excess Credit Fee on the per-credit registration fee shall be charged to a degree-seeking undergraduate student (resident and non-resident) who has accrued attempted credits equal to 150 percent of the credits required for the student's program of study. The Excess Credit Fee shall be imposed on registration fees charged in subsequent semesters, including summer terms, where a student's cumulative credit hour total exceeds 150 percent of the credits required for the student's program of study.] *Effective Fall 2021, institutions will no longer charge students an "excess credit fee" for the accumulation of credits in excess of those required for a student's program of study. Periodically or upon the request of the Board, institutions will report on the accumulation of excess credits by students and steps taken to mitigate such credit accumulation.*
2. ~~Except as otherwise provided in this Subsection, credits from previously earned degrees or certificates shall be excluded from the 150 percent credit calculation. For a student seeking:~~
 - a. ~~A first bachelor's degree who has previously earned a certificate or associate's degree, attempted credits from those previously earned awards will be included in the Excess Credit Fee threshold calculation.~~
 - b. ~~A bachelor's degree who has previously earned a bachelor's degree or a higher award, attempted credits from those previously earned awards will not be included in the Excess Credit Fee threshold calculation.~~
 - c. ~~An associate's degree who has previously earned an associate's degree, or a higher award, attempted credits from those previously earned awards will not be included in the Excess Credit Fee threshold calculation.~~
 - d. ~~A certificate of at least 30 hours who has previously earned a certificate of at least 30 hours or a higher award, attempted credits from those previously earned awards will not be included in the Excess Credit Fee threshold calculation.~~
 - e. ~~A certificate of less than 30 credit hours who has previously earned a certificate of less than 30 hours or a higher award, attempted credits from those previously earned awards will not be included in the Excess Credit Fee threshold calculation.~~
3. ~~Institutions shall exclude from the 150 percent calculation the following:~~
 - a. ~~Credits earned for prior learning as authorized in Title 4, Chapter 14;~~
 - b. ~~Credits attempted while enrolled as a high school student if those credits do not meet the degree requirements for the student's program of study;~~
 - c. ~~Credits attempted at an institution outside NSHE if those credits do not meet the degree requirements for the student's program of study;~~
 - d. ~~Credits attempted for remedial courses;~~
 - e. ~~Credits from previously earned degrees or certificates, as provided in Subsection 2 of this Section;~~
 - f. ~~Credits not accepted for transfer at the receiving institution;~~
 - g. ~~Credits associated with courses taken for audit or for which an audit grade is received;~~

- ~~h. Credits associated with community service and non-credit bearing continuing education courses; and~~
 - ~~i. Credits for post-baccalaureate and post-masters certification courses.~~
- ~~4. Institutions shall establish a process through which a student subject to the Excess Credit Fee may file an appeal requesting a review of the credits included in the 150 percent credit calculation. Through the appeals process, the institution may exclude other credits determined by the institution as inappropriate for the 150 percent credit calculation, in addition to the credits that must be excluded pursuant to Subsections 2 and 3 of this Section.~~
 - ~~5. The revenue generated from the Excess Credit Fee shall supplement student advising and counseling services, including salary and wages, operating, and equipment expenses.~~
 - ~~6. Institutions shall publicize the Excess Credit Fee policy set forth in this Section in such a manner to ensure that students have adequate notification of the fee. Institutions shall establish a procedure for notifying students who are approaching the 150 percent credit threshold.]~~

POLICY PROPOSAL
Title 4, Chapter 14, Section 21
Military Transcript Evaluation

Additions appear in *boldface italics*; deletions are [stricken and bracketed]

Section 21. Military Transcript Evaluation

1. In addition to credit awarded by examination under to Title 4, Chapter 14, Section 20, pursuant to Senate Bill 457 (Chapter 603, Statutes of Nevada 2017), each institution shall evaluate a Joint Services Transcript (JST), a transcript from Air University, and/or a transcript from the Community College of the Air Force (CCAF) submitted by a student for the purpose of identifying any military education, courses, training and/or occupational experience for which credit may be awarded.
 2. Based on its evaluation of a JST, a transcript from Air University, and/or a transcript from the CCAF, if the institution determines that any military education, courses, training and/or occupational experience is equivalent to a course that fulfills a general education, certificate, or degree requirement and does not duplicate other credit awarded to the student in fulfillment of those requirements, credit toward the applicable course requirement must be awarded to the student. The institution may award general elective credit for any other credit that does not fulfill a general education, certificate, or degree requirement. Faculty must be consulted in the transcript evaluation process.
 3. [~~Credit awarded pursuant to this Section is excluded from the Excess Credit Fee under Title 4, Chapter 17, Section 4.~~]
- [4.] Beginning with the 2017-2018 academic year, each institution shall maintain an inventory of the military education, courses, training and/or occupational experience evaluated by the institution for which credit was awarded to a student. The inventory must include the corresponding course; academic program; and general education, certificate, or degree requirement for which credit was awarded. By December 31, 2017, each institution shall post the inventory on its website in a location that is easily accessed by members of the military and veterans seeking information on course credit that may be available at that institution based on their military education, courses, training, occupational experience, and chosen program of study. The information on the website must be updated not less than each term.
- [5.] 4. In addition to the JST and the Air University or CCAF transcript, institutions may evaluate other assessments of prior learning pursuant to Title 4, Chapter 14, Section 20 for purposes of this Section.

POLICY PROPOSAL
Title 4, Chapter 10, Section 19
Excess Credit Fee

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

Section 19. Fee Account Balances

1. It is the intention of the Board of Regents that any fees collected from students be utilized for the direct benefit of the students from whom they are collected. Except as otherwise provided in Subsection 2, all fees, including but not limited to student fees, special course fees, differential program fees, health center fees, technology fees, [~~excess credit fees,~~] and registration fees (including student access, capital improvement, general improvement, and activities and programs fees) that remain unexpended as of June 30th of the fiscal year in which they are collected may be carried forward for up to one fiscal year.

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NSHE Procedures and Guidelines Manual
CHAPTER 7, new SECTION 2
Excess Credit Fee Procedures

Additions appear in ***boldface italics***; deletions are [~~stricken~~ and bracketed]

[Section 2. — Excess Credit Fee Procedures

1. ~~As required by Board policy (Title 4, Chapter 17, Section 4), a 50 percent Excess Credit Fee on the per credit registration fee shall be charged to a student who has accrued attempted credits equal to 150 percent of the credits required for the student's program of study. The Excess Credit Fee shall be imposed on the per credit registration fee charged:~~

- a. ~~To degree seeking undergraduate resident and non-resident students; and~~
- b. ~~At the beginning of any semester that follows an institution's determination that the Excess Credit Fee applies to a student. For example, a student whose program of study requires 120 credits (a standard bachelor's degree) who has accumulated 175 attempted credits prior to the Fall semester and then enrolls in six credits in the Fall semester will reach the 180 credit threshold in the Fall semester. The Excess Credit Fee must be imposed on the student starting in the following Spring semester or in any subsequent semesters.~~

2. ~~Administrative Review Before Charging the Excess Credit Fee: Before charging a student the Excess Credit Fee, the institution shall conduct an administrative review of the student's accrued credits and exclude credits from the 150 percent calculation as required by Title 4, Chapter 17, Section 4 and this section. The institution may designate staff or establish reports or both to conduct the administrative review.~~

~~Any credits excluded in the administrative review shall be excluded for all future terms unless the student changes his or her program of study or is no longer in good academic standing. In these circumstances, the institution may reevaluate the calculation and any excluded credits through an administrative review. If upon reevaluation the student exceeds the 150 percent credit threshold, the institution shall impose the Excess Credit Fee.~~

3. ~~The Excess Credit Fee calculation is based on the number of credits required for a student's program of study. The following procedures shall be used for the calculation, if applicable:~~

- a. ~~Program of Study Exceeds Standard Number of Credits — If the student's program of study exceeds the standard number of credits for the type of degree or certificate awarded, the calculation must be based on the actual number of credits required for that program of study. For example, if a student is pursuing a Bachelor of Science in Nursing that requires 124 credits, the student is not subject to the Excess Credit Fee until the student has accumulated 186 (150 percent of 124) or more attempted credits.~~
- b. ~~Multiple Programs of Study — If a student declared more than one program of study (e.g. double major), the calculation for the Excess Credit Fee must be based on the total unduplicated number of credits required for the programs of study.~~

4. ~~When attempted credits are reported or transferred after the beginning of the semester, these additional credits will not be considered in determining whether a student meets the Excess Credit Fee threshold until the following semester.~~

- ~~5. If a student is approved for a waiver of the Excess Credit Fee upon appeal pursuant to Subsection 8, the institution must issue a refund of any excess credit fee amounts already paid for the term approved for a waiver.~~
- ~~6. The procedures established by the institutions for notifying students who are approaching the 150 percent credit threshold shall also include procedures for notifying students who shall be charged the Excess Credit Fee prior to the start of each semester for which the Excess Credit Fee will be charged.~~
- ~~7. As required by Board policy, institutions shall publicize the Excess Credit Fee policy and must include the following statement in appropriate institutional materials, including course catalogs and websites:~~

~~An Excess Credit Fee shall be charged to a student who has attempted credits equal to 150 percent of the credits required for the student's program of study. The amount of this additional fee is equal to 50 percent of the per credit registration fee. Attempted credits include all graded courses on a student's transcript, including but not limited to the grades of F and W (withdrawal) and repeated courses. The fee will be charged, for example, after 90 credits have been attempted towards a 60-credit Associate's degree or 180 credits towards a 120-credit bachelor's degree. Exceptions may apply on a case-by-case basis. The fee will be charged in all terms after passing the threshold number of credits until a degree is awarded to the student. Appeal procedures and other exceptions to this fee are outlined in the catalog.~~

- ~~8. As required by Board policy, institutions shall establish an appeals process. Any student subject to the Excess Credit Fee may file an appeal. Within this process, institutions shall utilize the following and may issue a waiver from the Excess Credit Fee:~~
 - ~~a. Committee Review—If a student files an appeal, the institution shall utilize a committee to review the credits included in the 150 percent credit calculation and determine any credits that may be excluded from the 150 percent credit calculation, pursuant to Board policy and this section.~~
 - ~~b. Academic Standing—Academic standing/progress, including GPA, may be a criterion considered in approving a waiver from the Excess Credit Fee.~~
 - ~~c. Credits Excluded by Appeal—Any credits excluded in the committee review shall be excluded for all future terms unless the student changes his or her program of study, does not follow the academic plan reviewed as part of the student's appeal, or is no longer in good academic standing. In these circumstances, the institution may reevaluate the calculation and any excluded credits. If upon reevaluation the student exceeds the 150 percent credit threshold, the institution shall impose the Excess Credit Fee, and the student may submit a new appeal.~~
 - ~~d. Form for Appeal—Institutions shall utilize the common form developed by the Chancellor's Office for students to initiate the appeals process. That form shall include an academic plan.]~~

RENUMBER SECTIONS 3 THROUGH 22 AS SECTIONS 2 THROUGH 21.