



May 15, 2015

Dr. Barbara Gellman-Danley
President, Higher Learning Commission
230 S LaSalle Street, Suite 7-500
Chicago, IL 60604

Re: **Proposed Changes to the Assumed Practices on Faculty Qualifications**

Dr. Gellman-Danley:

Thank you for the opportunity to comment on the Commission's proposed changes to the *Faculty Roles and Qualifications* section of the *Assumed Practices*. The National Alliance of Concurrent Enrollment Partnerships (NACEP) strongly encourages all institutions of higher education to adhere to high standards for concurrent enrollment programs, especially faculty credentials. Since 2004 NACEP has served as the only national accrediting body for concurrent enrollment – which we define as a subset of dual credit arrangements: college-credit bearing courses taught to high school students by college-approved high school teachers. Our national standards and accreditation process have been incorporated into 16 states' program standards and quality assurance mechanisms, and endorsed by professional associations of college faculty in English and Composition as well as college faculty unions in two states. Two-thirds (66 of 97) of the NACEP-accredited concurrent enrollment programs are within the HLC region, and we have supported many additional programs in the HLC region to put in place academic policies and procedures to exceed the Commission's criteria related to dual credit that came into effect in 2013.

NACEP supports the Commission's efforts to increase consistency across the region by establishing high minimum standards for college and university faculty, yet we have the following concerns and comments to share with the Commission as it considers revisions to the proposed policy, particularly regarding the timeline for programs to come into compliance.

The proposed increase in minimum academic qualifications for faculty will have a disproportionate impact on concurrent enrollment programs, because these programs represent a significant percent (and often majority) of the adjunct instructor pool for many colleges and universities. Many concurrent enrollment instructors teach only one or two entry-level courses. Thus any changes to minimum qualifications that apply to all instructor types has an even greater impact on these programs than on-campus instruction.

NACEP's Approach to Faculty Roles and Qualifications

At the core of NACEP's standards is the principle of faculty ownership and oversight over academic matters. Our standards thus necessitate extensive policies and procedures for campus faculty to take responsibility for ensuring concurrent enrollment courses adhere to the institution's expectations regarding academic qualifications for instructors, curriculum, academic consistency, and assessment of student learning. This principle is mirrored in the Commission's Assumed Practices B.2.D - including that of setting academic qualifications for instructional personnel.

NACEP's relevant standard on this matter - Faculty Standard 1 - establishes an expectation for our accredited programs that concurrent enrollment instructors meet the same credentialing requirement as instructors on campus: "*CEP instructors are approved by the respective college/university academic department and meet the academic department's requirements for teaching the college/university courses.*" This standard is similar to HLC's Criterion Three, Core Component 3.C.2 "*All instructors are appropriately credentialed, including those in dual credit, contractual, and consortial programs.*" NACEP's standard leaves decisions regarding appropriate academic qualifications to the academic departments, but necessitates that institutions apply the same standards to concurrent enrollment instructors as they would for instructors teaching on campus. While some states and statewide systems of postsecondary institutions in the HLC region have previously set guidelines for this (either for all instructors or specifically for concurrent enrollment), many have not. In many places across the HLC region, the Assumed Practices serve as the minimum standards and thus any changes have significant impact.

Recommendation - Extend the Timeline for Compliance

The March 2015 notice to institutions announcing the proposed policy changes indicated an expectation that institutions would be in full compliance with the new faculty qualifications requirements by January 1, 2016. Less than an academic year is insufficient time for institutions to conduct an audit of their entire instructor pool, identify those who meet the higher standards or not, and develop a plan for those instructors who do not meet the higher standards to either obtain additional graduate coursework or be replaced.

Recommendation - Recognize Different Expectations for Faculty in Technical Disciplines

The current proposal may be interpreted to require Bachelor's degrees for instructors of technical courses in terminal Associate's degrees and certificates. This is infrequently the case in many disciplines, where work experience, professional licensures, and industry credentials are generally more important factors than academic degrees in instructor credentialing policies. SACS's *Faculty Credentials Guidelines* provide much clearer guidance for these instructor types:

"Faculty teaching associate degree courses not designed for transfer to a baccalaureate degree: bachelor's degree in the teaching discipline, or associate's degree and demonstrated competencies in the teaching discipline."

The Commission's Assumed Practices ought to recognize the importance of these disciplines by separately describing instructor qualifications, and acknowledge different faculty credentialing needs by setting a standard similar to that of SACS.

Recommendation – Provide Greater Clarity on Tested Experience

The May 2014 Faculty Guidelines, and its predecessors, devote considerable space to *Tested Experience* as the alternate means by which faculty appointments may be made aside from academic credentials. The current draft Assumed Practices instead references *Equivalent Experience* and does so buried within a lengthy paragraph. The Commission ought to be consistent in its terminology, and the Assumed Practices should provide greater clarity on when and how institutions may appoint faculty using work experience, demonstrated competencies, professional licensures and industry certifications, discipline-specific professional development, or recognized achievements in the discipline. It should separately describe Tested Experience from determinations by credentials.

Recommendation – Set Differing Academic Credentials for Differing Course Levels

Some institutions currently set different standards for instructors' academic credentials for lower-division courses than for upper-division courses. The academic credentials necessary to teach entry-level courses in a subject may be lower in many disciplines than those necessary for teaching advanced coursework. Creating such a distinction allows institutions larger pools of individuals who can qualify as adjunct instructors, including those of concurrent enrollment courses, for lower-division courses. As the Assumed Practices represent minimum standards, the Commission should set the minimum academic qualifications for teaching entry-level courses at a lower threshold than for upper-division courses.

Recommendation – Provide Opportunities for Temporary Credentialing of Instructors on Developmental Pathways

Temporary or provisional appointments of instructors is one means by which some institutions with high standards for academic credentials have addressed the limited supply of instructors available to teach particular course subjects in particular locations. Individuals a few graduate credit hours shy of the institution's requirements are approved on a provisional basis, with added mentoring and academic oversight and conditioned on their completing the additional graduate coursework in the subject area within a set time limit. The Minnesota State Colleges and

Universities *Procedure 3.32.1 on College Faculty Credentialing* allows such individuals to be hired to teach for up to two semesters if they are close to meeting the academic credential requirements. Indiana Commission for Higher Education's *Policy on Dual Credit Opportunities in Indiana* explicitly allows and encourages developmental plans for faculty credentialing. The Commission should state in the Assumed Practices that provisional approval of instructors is allowed, and provide clarity on the conditions under which it is acceptable in the *Guidelines for Determining Qualified Faculty*.

Recommendation – Recognize that Institutions Define Discipline in Varied Ways

Instructors in small colleges, particularly in rural communities, often teach entry-level courses in related disciplines. While large institutions may consider Literature and Composition as two disciplines, others may consider them one. The same is true for a number of subject areas: Anthropology/Archeology, Music/Visual Arts, Accounting/Business, etc. In high school settings, particularly small and rural schools, instructors frequently have experience teaching courses in a few related fields. The Commission's policies ought to recognize that faculty with academic credentials in a related field may be qualified (perhaps with added Tested Experience and professional development) as instructors of a course.

We will continue to support the Commission by working with institutions in the HLC region to adhere to the highest standards in order to maintain the academic integrity of dual credit courses regardless of their location, delivery method, or instructor. The Commission's proposed policy on faculty qualifications represents a significant increase in expectations for some institutions. While we support the concept of high standards for faculty credentials, we believe the additional clarifications we have suggested along with a longer implementation time are critical to providing quality educational opportunities in many communities.

Thank you for your consideration of these suggestions. Please feel free to contact me at alowe@nacep.org or 919-593-5205 if I can be of any assistance.

Yours truly,



Adam I. Lowe, Executive Director