



February 10, 2014

Dr. Barbara E. Brittingham  
President/Director, Commission on Institutions of Higher Education  
3 Burlington Woods Drive, Suite 100  
Burlington, MA 01803-4531

Re: **DRAFT Policy on Dual Enrollment Programs**

Dr. Brittingham:

Thank you for the opportunity to comment on the Commission's draft policy. The National Alliance of Concurrent Enrollment Partnerships (NACEP) strongly encourages all institutions of higher education to adhere to high standards for dual and concurrent enrollment programs and appreciates the recognition of our role as a program accreditor in the introduction. Since 2004 NACEP has served as the only national accrediting body for concurrent enrollment – which we define as a subset of dual enrollment: 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 15 states' program standards and quality assurance mechanisms, and endorsed by professional associations of college faculty in English and Composition.

NEASC's draft policy effectively communicates to colleges and universities that dual enrollment is firmly included within NEASC Standard 4.2 (The Academic Program); that they must assure academic quality wherever and however (and to whomever) these courses are offered. We support this premise and believe that NEASC's engagement in this area can result in improved dual and concurrent enrollment practice in New England, yet have the following concerns and comments to share with the Commission as it considers revisions to the draft policy:

- **The Commission should primarily review dual enrollment programs during the decennial self-study and the fifth-year interim report**, except for the federal requirement for substantive change applications for additional instructional locations where dual enrollment enables students to earn 50% or more of a

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certificate or degree program. None of the other regional institutional accreditation commissions have mandated prior approval via substantive change requirements for dual enrollment programs, nor have any included dual enrollment within the scope of contractual arrangements policies. Dual enrollment courses are, by their definition, the college courses "owned" by the NEASC-accredited institution of higher education not by secondary school districts. NEASC's dual enrollment policy ought to send a message to colleges and universities that they must take ownership of dual enrollment courses; instead this proposed requirement sends the opposite message – that they are contracting another entity who has primary responsibility for the academic content of the courses. In addition we believe this requirement will have a chilling effect on the development of new programs, particularly if the proposed definition of which programs fall under the scope of the requirement is maintained. It will be very difficult for a new program to develop contracts and provide evidence to the Commission of conformity with NEASC's accreditation standards if it has no prior experience with dual enrollment.

If the Commission proceeds with a substantive change requirement, NACEP believes that existing programs ought to be grandfathered and reviewed during the decennial self-study and the fifth-year interim report. We estimate that there are over 100 dual enrollment programs offered by higher education institutions in the NEASC region, with over 50 that utilize high school faculty to deliver the college courses and thus would fall under the proposed substantive change requirement. Attempting to review all these programs on a short timeframe would involve a significant allocation of resources by institutions and the Commission.

- **The Commission's proposed definition of the types of programs requiring substantive change approval unnecessarily focuses on one model of dual enrollment.** For most programs there is a clear distinction between "faculty employed by the institution" and "high school faculty who are not hired as adjuncts by the institution", but not all. Some dual enrollment programs call high school faculty adjuncts and pay them a small stipend, but others do not. There are other situations where an institution might have an instructor who isn't receiving a salary (e.g. professors on sabbatical from another institution, state government employees who can't draw additional salary from the state, etc.); the Commission does not

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impose added scrutiny on such arrangements solely because these instructors are not on payroll. The Commission's interest in dual enrollment programs is not solely limited to faculty credentials, NEASC's other 10 accreditation standards apply equally to all models of dual enrollment (student eligibility for example). Singling out one model for added scrutiny will distort the market as programs look for ways to define programs so that they aren't subject to added review.

- **The Commission's draft guidelines for preparing proposals raise more questions than they answer.** The guidelines should instead give institutions a better understanding of the Commission's expectations, instead of outlining the format of a substantive change proposal. As written now they ask the institution to describe certain situations, for which institutions and reviewers do not know whether their response will meet with the Commission's approval. For example, the Faculty section states: "Note any instances in which a dual enrollment faculty member does not meet the institution's usual criteria for faculty qualifications". Is it acceptable for an institution to have different faculty criteria for high school instructors, and if so under what circumstances? The same section also mentions "faculty of record" arrangements. "Faculty of record" arrangements would appear to be excluded from the substantive change requirement, if indeed a campus faculty member is primarily responsible for the delivery of instruction and determining the final grade. The common use of the term faculty of record is for graduate teaching assistants who teach a portion of the instruction (e.g. a recitation session or lab) and are responsible for grading some assessments under the oversight of the faculty of record. Including the term implies that NEASC might accept "faculty of record" arrangements where a campus faculty member is an instructor of record "on paper only" while the high school instructor is primarily responsible for the delivery of instruction and assessment – unlike a typical graduate teaching assistant.

In the listening sessions NEASC staff very clearly articulated their expectations of institutional control over faculty, stating that an institution must:

- Set criteria for who is eligible to teach a particular course;
- Decide who to hire to teach the course;
- Supervise and evaluate their performance;
- Rehire them (or not) to teach the course in the future based on performance.

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These are the types of guidelines that institutions need, rather than raising questions that institutions must answer and reviewers must evaluate without clear knowledge of what is acceptable practice.

- **Clarify that articulated credit falls outside this policy and that institutions must not confuse the two types of partnership arrangements with high schools.** During the listening sessions, a few speakers referenced these programs which historically were quite common in the career/technical area. It is appropriately described as credit for prior learning (falling under NEASC Standard 4.35). Institutions should be careful to distinguish in their marketing to students and parents between the two types of credit, concurrent vs. retroactive. Articulated credit is a high school course for which college credit is offered retroactively after a student matriculates to that institution and, usually, succeeds in subsequent courses in the program of study. For articulated credit colleges have limited control over faculty credentials, faculty selection, curriculum, assessment methods, etc. Articulated credit is based on course competency alignment and is held in escrow. Clarification on this matter by the Commission would help further clarify practice in New England.

We are prepared to support the Commission as it works with New England institutions to adhere to the highest standards in order to maintain the academic integrity of dual enrollment courses regardless of their location, delivery method, or instructor. We hope the Commission will continue to learn from our decade of experience conducting concurrent enrollment program reviews, training peer reviewers, and offering professional development and technical assistance. We welcome the opportunity to work together on events and resources to further our shared interest in dual and concurrent enrollment quality improvement.

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

Yours truly,



Adam I. Lowe, Executive Director