

Thank you for the opportunity to provide public comment on the Higher Learning Commission's (HLC) proposed policy change to Faculty Qualifications. As proponents of expansion of high-quality dual credit, we believe that the HLC's proposed policy changes will benefit students throughout Illinois by granting greater flexibility to institutions to evaluate faculty criteria while maintaining high standards of instruction.

Understanding the unique opportunities and benefits that dual credit courses confer to students, Illinois institutions for higher learning, high school districts, and state policymakers have worked for over a decade to expand access and opportunities for dual credit. To this end, Illinois has embedded dual credit enrollment in our statewide goals, passed policies to expand access and ease implementation, and, most recently, provided state funds to the Illinois Community College Board (ICCB) to support dual credit partnerships. Thanks to these steps and significant efforts by secondary and postsecondary institutions, dual credit enrollments continue to grow. In the 2021 school year, one in six students enrolled in Illinois community college was a high school dual credit student.¹ The work is not without its challenges and balancing student demand with enough qualified instructors continues to be an area of focus for policymakers and educators throughout the state.

The comments below draw from existing Illinois law which relied on experts, practitioners, available research, and tested best practice.

Academic Credentials & Equivalent Experience

A 2023 survey published by the Illinois Association of Regional Superintendents of Schools found that 79% of school districts were experiencing a teacher shortage and that many applicants are unqualified to fill open positions.² Data from the Illinois State Board of Education shows that unfilled teaching positions have doubled since 2017 which presents an ongoing challenge for districts looking to scale up dual credit offerings.³ The HLC's proposed rule change to recognize equivalent experience would provide much needed flexibility to institutions for determining qualified faculty. While a college may reduce the achievement of academic credentials required for faculty under the proposed guidelines, they should not require any credentials beyond a master's degree in any content plus 18 graduate credit hours in the discipline or subfield being taught and we hope this updated guidance encourages colleges to approach faculty qualification criteria with an eye towards expanding access to postsecondary study and recognizing the significant value equivalent experience brings to classroom instruction.

¹ Illinois Community College Board, "Dual Credit in the Illinois Community College System FY 2021", http://www2.iccb.org/iccb/wp-content/pdfs/reports/2021_Dual_Credit_Report_Final.pdf.

² "Educator Shortage Survey Fall 2022 Administration for the 2022-2023 Academic Year", Illinois Association of Regional Superintendents of Schools, <https://iarss.org/wp-content/uploads/2023/01/IARSS-Educator-Shortage-AY23-230123.pdf>

³ Unfilled Positions 2017-2022, Illinois State Board of Education, <https://www.isbe.net/Pages/Unfilled-Positions-Archive.aspx>

Illinois already provides guidance to community colleges on how to approve faculty based on tested experience. The System Rules Manual of the Illinois Community College Board states the following in regards to how institutions may approve faculty based on tested experience (i.e., equivalent experience):

Section 1050.30(3)(C)

Exceptions may be made by the Board for professional experience, equivalent training and other qualifications; however, except in extraordinary circumstances, these should prove the exception and not the rule in meeting faculty qualification requirements.

Further, it states that the academic preparation and experience of faculty and staff shall be consistent with Section 1501.303(f) (emphasis added):

Section 1501.303(f)

*Preparation of Professional Staff. Professional staff **shall be educated and prepared in accordance with generally accepted standards and practices for teaching, supervising, counseling and administering the curriculum** or supporting system to which they are assigned. **This preparation may include collegiate study and professional experience. Graduate work through the master's degree in the assigned field or area of responsibility is expected, except in those areas in which the work experience and related training is the principal learning medium.***

The Illinois Community College Board does not provide additional guidance beyond Section 1050.30(3)(C) for determining qualified faculty based on tested experience (i.e., equivalent experience). Therefore, dual credit programs are limited in terms of how to evaluate the professional experiences of high school instructors that do not:

1. (General Education Coursework) Possess, at a minimum, a master's degree with 18 graduate hours appropriate to the academic field or discipline in which they are teaching.
2. (Career and Technical Coursework) Possess, at a minimum, at least 2,000 hours of work experience and the appropriate recognized credential depending on the specific field.

Within the context of dual credit, institutions would benefit from examining the experience and knowledge that high school teachers possess. The available research on how earning a higher credential (i.e., master's degree) leads to higher academic outcomes for students or improves teacher's teaching and instruction is limited.^{4,5} Nonetheless, the HLC's proposed policy changes would pave the way for dual credit partners to strongly consider and develop policies that incorporate an individual's years of teaching experience along with their knowledge and skills in the discipline. For example, a model could include a similar approach to the work that has been

⁴ Aaron S. Horn, Sung Tae Jang, "The Impact of Graduate Education on Teacher Effectiveness: Does a Master's Degree Matter," Midwest Higher Education Compact, (2017). https://www.mhec.org/sites/default/files/resources/teacherprep1_20170301_3.pdf.

⁵ Helen F. Ladd, Lucy C. Sorensen, "Do Master's Degrees Matter? Advanced Degrees, Career Paths, and the Effectiveness of Teachers," National Center for Analysis of Longitudinal Data in Educator Research, (August 2015). https://caldercenter.org/sites/default/files/WP%20136_0.pdf.

done in the State of Minnesota whereby “Teachers would develop the portfolios to document their graduate-level expertise in a subject area, and graduate faculty at a specified university would review the portfolio and award graduate-level credit for prior learning in the corresponding content area.”⁶

Progress Toward Academic Credentials

In response to the ongoing teacher shortage, Illinois lawmakers amended the Illinois Dual Credit Act ([110 ILCS 21/1 et seq.](#)) in 2022 to stipulate that dual credit faculty who did not meet the HLC standards of minimally qualified faculty may teach a dual credit course if the instructor has a professional development plan, approved by the institution of higher learning, and shared with the Illinois State Board of Education. Faculty eligible for a professional development plan (PDP) must meet a set of criteria that was determined by postsecondary, secondary, and policy experts.

For transitional courses instructors that criteria includes:

- A master’s degree in any discipline
- Nine graduate hours in the discipline to be taught
- Demonstrated progress and completion of the credential within three years

For Career and Technical instructors that criteria includes:

- A full CTE instructor license
- Halfway towards meeting the postsecondary institution’s requirements for faculty in the discipline to be taught
- Demonstrated progress and completion of the credential within three years

The 2022 amendment also directed state agencies to begin collecting data on PDP enrollments and completions to help educators and policymakers measure the success of the program. While that data is being collected, anecdotally we know several institutions have acknowledged that PDPs have paved the way for long-term strategic expansion of programs and investments in faculty. Interim-qualified instructors have allowed programs to balance limited faculty resources with student demand and we commend the HLC for addressing this tension in dual credit delivery in the proposed policy change. Here are some initial findings from the data that has been collected:

- Community Colleges share varying levels of concern about this misalignment with the HLC’s current Assumed Practices and the Illinois Dual Credit Quality Act.
- Dual credit partnerships that have worked on developing PDPs have had overall success with teachers fulfilling their commitment (completion of graduate coursework) by the agreed upon deadline.
- PDPs have been approved mostly in core academic areas (i.e., English, Math).

⁶ Aaron S. Horn, Jennifer L. Parks, Jennifer Dounay Zinth, and Lauren Sisneros, “Increasing the Supply of Qualified High School Teachers for Dual Enrollment Programs: An Overview of State and Regional Accreditor Policies,” Midwest Higher Education Compact and Education Commission on the States, (June 2018), <https://files.eric.ed.gov/fulltext/ED585087.pdf>.

Periodic Evaluation of Faculty

Illinois statutorily requires that dual credit partnerships between secondary and postsecondary institutions explicitly include a collaborative process and criteria for recommending, reviewing, and approving high school instructors. This review process is decided upon by both partnering institutions, but the postsecondary institution maintains responsibility for evaluating course content, delivery, and rigor. The Dual Credit Quality Act stipulates that that evaluation must be conducted in a manner that is consistent with the community college district's review and evaluation policy and procedures for on-campus adjunct faculty. The evaluation is limited to the course and the ability of the instructor to deliver quality, rigorous, college credit coursework.

The Dual Credit Quality Act establishes a Model Partnership Agreement (MPA), which serves as the default agreement between secondary and postsecondary institutions to offer dual credit. The goal of the MPA is to ease the partnership process and provide "a model of recommended practice for communities to scale and ensure access to quality dual credit courses."⁷ The MPA is the product of extensive meetings between the Illinois State Board of Education, the Illinois Community College Board, and a committee of policymakers, educators, and other stakeholders. The MPA requires secondary districts to complete and submit the template [Instructor Qualification Review Form](#) to the postsecondary partner for review. The postsecondary institution is required to respond with a preliminary approval or disapproval within fourteen days.

Upon approval, the secondary district will submit the instructor's official transcripts and connect with the postsecondary partner to commence course planning and documentation. If the instructor request is not approved the postsecondary partner will identify the basis for disapproval in writing including why an instructor does not meet the required qualifications. Under Illinois law qualifications for a dual credit instructor must be consistent with the faculty requirements of the partnering postsecondary institution for the same course and may not exceed them. The postsecondary partner must make themselves available for a meeting to discuss the disapproval and upon disapproval the secondary district may pursue alternative postsecondary partners to offer dual credit. This evaluation process must be completed whenever a secondary district proposes a new instructor for an approved dual credit course.

Illinois' embedded dual credit faculty evaluation process elevates the necessary partnership between secondary and postsecondary institutions to offer dual credit while recognizing the postsecondary partner as the responsible party for maintaining college rigor. This process has worked for Illinois to provide high-quality early college credit to high school students and could serve as a model for other HLC states to expand college access.

The HLC's proposed policy change to Faculty Qualifications is a welcome update that will provide clarity to institutions on how to evaluate faculty qualifications and remain in compliance

⁷ "Model Partnership Agreement Under the Dual Credit Quality Act," Illinois State Board of Education and The Illinois Community College Board, <https://www.isbe.net/Documents/DCQA-Model-Partnership-Agreement-Form.pdf>.

with both the HLC policy and Illinois law. Expanding faculty qualifications to recognize progress towards academic credentials and equivalent experience provides necessary flexibility to institutions as they scale up their dual credit offerings while still preserving the expected rigor of a college course. We hope the HLC ultimately adopts the proposed changes to continue to expand access to rigorous college credit.