

To: Illinois Community College Board
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From: Aimee Galvin, Government Affairs Director

Date: 8 May 2026

Re: Public Comments for proposed rules for Dual Credit (Subpart C, Section 1501.313)

Thank you for the opportunity to offer public comment on Section 1501.313 (Dual Credit) of the Illinois Community College Board (ICCB) Administrative Rules. With the recent updates to the Dual Credit Quality Act (DCQA), these updates to the ICCB rules are timely and will provide additional clarity to secondary and postsecondary districts engaged in dual credit programming. Stand for Children Illinois would suggest the following changes to the proposed rules to ensure dual credit partnerships adhere to the DCQA while also facilitating strong, lasting partnerships rooted in mutual respect and commitment to expanding opportunities for Illinois' students.

Note: Stand's recommended changes are in **green** to differentiate between the **red** and **blue** used by the ICCB to track changes in the proposed rules.

Section 1501.313.b.2

We are encouraged that Section 1501.313.b2 of the ICCB rules outlines the instructor requirements for career and technical education (CTE) dual credit courses. The suggested definition builds on the State Board of Education's requirement of 2,000 work hours for CTE instructors and adds the requirement that CTE dual credit instructors have the appropriate recognizable credentials and demonstrated teaching competencies. We would suggest the definition be amended to read:

*For instructors teaching career and technical education (1.2 PCS) courses, these qualifications shall include 2,000 hours of work experience, appropriate **industry-recognized credentials**, and demonstrated teaching competencies. As the **entity with approval authority**, the community college shall provide guidance to partner*

secondary districts by supplying a list of industry-recognized credentials held by its current CTE faculty.

We believe requiring “industry-recognized” credentials adds specificity to the instructor’s requirements, giving clarity to both secondary and postsecondary dual credit partners and, most importantly, ensuring only highly qualified, industry-recognized individuals may serve as CTE dual credit instructors. The inclusion of “industry-recognized” in the definition ensures that the appropriate credentials are specific to the industry to be taught and that the credentials are valued by the industry’s practitioners.

Additionally, we believe that requiring community colleges to provide their secondary partners with a comprehensive list of their CTE faculty’s industry-recognized credentials will aid secondary districts in identifying qualified CTE instructors and prevent unnecessary instructor qualification disputes. This is also in keeping with the DCQA’s requirement that dual credit courses are equivalent in quality and rigor to courses offered by the community college and the HLC’s [guidance on faculty qualifications](#) that “the rigor and quality of each educational program is consistent regardless of modality, location, or other differentiating factors”.

Section 1501.313.b.3E

We applaud the ICCB’s decision to add an appeals process and a clear criteria for reviewing the Professional Development Plan (PDP). We believe this will aid partners in both designing and approving PDPs and allay local disputes regarding instructor qualifications. To further strengthen this section we recommend adding some reporting around PDP appeals to complement the DCQA’s current reporting requirements around PDPs generally. For example, information on how many appeals the ICCB received, the number of appeals that resulted in the community college’s decision being upheld, and the number of appeals that resulted in the community college’s decision being reversed. Each datapoint should be disaggregated by community college and subject area to help the agency identify trends and offer additional guidance to the field around reoccurring areas of debate.

Section 1501.313.c

Section 110 ILCS 27/16.b3 of the DCQA requires all dual credit partnership agreements to establish an academic criteria for dual credit course eligibility that is “evidence-based and shall include multiple appropriate measures”. Section c of the ICCB rules currently has no mention of multiple eligibility measures, nor does it reference the [Accelerated Placement Policy](#) that requires the automatic enrollment of high school students into the next most

rigorous level of advanced coursework if the student meets or exceeds state standards in ELA, mathematics, or science on the state assessment.

While the current language does not preclude either multiple eligibility measures or automatic acceleration, the section would be both more accurate and better aligned to current state law with the inclusion of the following language:

Qualification of Students. Students accepted for enrollment in college-level courses must have appropriate academic qualifications, a high level of motivation, and adequate time to devote to studying a college-level course. The students' course selections shall be made in consultation with high school counselors and/or principals and are restricted to students who are able to demonstrate readiness for college-level work, as determined by placement procedures consistent with those that would be used with college level students. The students shall meet all college criteria and follow all college procedures for enrolling in courses. *The academic criteria shall be evidence-based and shall include multiple appropriate measures to determine whether a student is prepared for any dual credit coursework in which the student enrolls. Secondary districts and community college partners shall annually review the secondary district's statutorily required academic acceleration policy to establish which cut scores would qualify a student for accelerated placement into dual credit courses under the community college's current placement scores. Credit hours generated by freshman and sophomore students for dual credit courses are not eligible for reimbursement.*

Section 1501.313.i8

The rules governing the course request and approval process should be as explicit as possible to facilitate a smooth process that strengthens partnerships rather than test them. As such, we recommend ICCB add the following specificity to the proposed rules:

[Course Requests Under An Established Partnership Agreement. A community college district with an established partnership agreement with a school district has 30 calendar days from the electronic timestamp of the initial written course request to notify the school district of the community college district's disapproval of the course request, instructor, or course documentation or the community college district's withdraw of course or instructor approval. The school district may appeal the disapproval or withdrawal in accordance with subsection \(j\). \[110 ILCS 27/22\]](#)

As this section only applies to established partnerships ICCB should provide additional guidance on avenues for dispute resolution for new partnerships. Such an avenue would encourage more local partnerships and prevent early disputes from resulting in private and

university partnerships.

Section 1501.313.j

Similar to the section above, we recommend the ICCB to be explicit in the rules governing the appeals process.

Appeal Process. A school district wishing to appeal the decision of a community college to disapprove a course request, instructor, or course documentation or the withdrawal of course or instructor approval may do so by sending a written appeal to ICCB within 14 calendar working days of receiving the electronic timestamp of written notice of the community college's decision.

Furthermore, we believe all deadlines should be working days (opposed to calendar days) when not specified by statute. This allows districts ample time to meet statutory deadlines as institutional closures for holidays or other functions may make compliance with calendar day deadlines less feasible.

Section 1501.313.k-l1

The newly created appeals process only applies to existing dual credit partnerships. Prior to the most recent DCQA changes new dual credit partners had 180 days to negotiate before defaulting to the MPA or being allowed to seek out another dual credit provider. Under the new DCQA, community colleges have the right of first refusal, limiting secondary districts from partnering with other postsecondary institutions, but there is no longer a timeline for negotiating a new partnership. The DCQA is unclear on when or how the right of first refusal conditions would be met to allow the secondary district to enter a partnership with another postsecondary institution. Theoretically, once a secondary district initiates a request with their local community college to establish a partnership, the two partners could negotiate indefinitely. ICCB should consider adding deadlines to the process of entering a new partnership agreement to ensure timely compliance by all partners.

k) Dual Credit Coursework With Any Other Postsecondary Institution. Prior to offering dual credit coursework with any postsecondary institution, as defined in the Higher Education Student Assistance Act, other than a community college, a school district shall first negotiate with the designated liaison of the school district's local community college to seek a new partnership agreement or amend an existing partnership agreement with the community college. The initial request from the school district shall be in writing. The school district and community college district must designate a liaison and begin negotiations to reach a partnership agreement no later than 60 calendar days after the initial request. Negotiations must be

conducted in good faith and include at least one joint meeting or demonstrated documentation of good-faith efforts to schedule such a meeting. Good-faith negotiation includes, but is not limited to, timely response to communications, participation by individuals authorized to discuss proposed terms, and willingness to consider reasonable proposals related to the partnership. The community college president, or their designee, and the school district superintendent or their designee, shall have final authority to enter into the partnership agreement. [If the school district and community college cannot agree to a new partnership agreement within 180 working days of the initial written request pursuant to subsection \(i\), or the expansion of an existing agreement to add new coursework, the school district may enter into or expand a partnership agreement with an alternative postsecondary institution. \[110 ILCS 27/16.10\]](#)

[l\) Out-of-State Dual Credit Contracts. On or after January 1, 2019, a school district may not enter into a new contract with an out-of-state postsecondary institution to provide a dual credit course until after all of the following conditions have been met:](#)

[1\) The school district must first offer the community college district in the district in which the school district is located the opportunity to provide the course. The initial request from the school district shall be in writing. The school district and community college district must designate a liaison and begin negotiations to reach a partnership agreement no later than 60 calendar days after the initial request. Negotiations must be conducted in good faith and include at least one joint meeting or demonstrated documentation of good-faith efforts to schedule such a meeting. Good-faith negotiation includes, but is not limited to, timely response to communications, participation by individuals authorized to discuss proposed terms, and willingness to consider reasonable proposals related to the partnership. The community college president, or their designee, and the school district superintendent or their designee, shall have final authority to enter into the partnership agreement. If the school district and community college cannot agree to a new partnership agreement within 180 working days of the initial written request pursuant to subsection \(i\), or the expansion of an existing agreement to add new coursework, the school district may enter into or expand a partnership agreement with an out-of-state postsecondary institution.](#)

Offering Resources and Guidance

Dual credit programs are inherently complicated and recent updates to the DCQA and the HLC's guidance on faculty qualifications could compromise secondary and postsecondary partnership as many sections remain open to local interpretation. The ICCB is uniquely positioned to provide additional guidance and demonstrate the importance of consulting both the DCQA, ICCB rules, and HLC guidance when establishing a dual credit program. We suggest the following resources be created and housed on the ICCB Dual Credit Webpage:

- 1) Key deadlines governing each DCQA process. The DCQA now has deadlines for entering into a new partnership, approving PDPs, submitted appeals to ICCB, and submitting or approving/denying a course, instructor, and documentation. Having a clear understanding of each process's deadlines could expediate agreements between partners and result in more seamless partnerships. A guidance document would be particularly helpful to districts that are new to dual credit offerings and/or districts without a designated dual credit coordinator. This will also help secondary districts better time their requests to allow time for the new appeals process.
- 2) While no longer the default agreement, the Model Partnership Agreement (MPA), can continue to serve as a resource for districts as they create and amend partnership agreements. We encourage the ICCB to update the MPA to reflect changes to the DCQA and HLC guidance.

Working vs Calendar Day Deadlines

The updated DCQA establishes several deadlines for approval process and requests. In some instances, the law specifies calendar or working days. In instances where the DCQA does not specify calendar or working days, we propose these deadlines use working days. This would uphold the spirit of the DCQA in requiring both secondary and postsecondary partners to be working in good faith while also balancing the realities of the workplace like seasonal or holiday closures. The following sections reference deadlines unspecified by the DCQA:

Section 1501.313.C

*The ~~community college-college~~ shall have 30 **working** days to review the plan and approve an instructor professional development plan that is in line with the credentials set forth in this subsection (b) ~~appropriate to the discipline being taught~~.*

Section 1501.313.E

A high school instructor whose professional development plan is not approved by the community college may appeal the decision by submitting a written request to the ICCB via regular mail to 401 East Capitol Avenue, Springfield, IL 62701 or by electronic means as

[provided by the Board on its official website. The written appeal must be submitted within 30 ~~calendar~~ working days of the community college's decision to deny approval of the plan and shall include a copy of the instructor's proposed professional development plan and denial decision received from the community college. Upon receipt of the official appeal and supporting documentation, the Executive Director shall make a determination on the appeal within 30 ~~calendar~~ working days. The high school and community college will be notified of the Executive Director's decision. \[110 ILCS 27/20\]](#)

Section 1501.313.j

[Appeal Process. A school district wishing to appeal the decision of a community college to disapprove a course request, instructor, or course documentation or the withdrawal of course or instructor approval may do so by sending a written appeal to ICCB within 14 ~~calendar~~ working days of receiving notice of the community college's decision.](#)

Section 1501.313.j3

[Upon receiving the official appeal and supporting documentation, the Executive Director will make a determination on the appeal within 45 ~~calendar~~ working days. The Executive Director will review all materials submitted by the school district as part of their written appeal along with any additional documentation that may be requested by the Executive Director from the community college district. Upon review of all submitted materials, the Executive Director will make a determination on the appeal based upon these submissions as well as the course offering, faculty qualifications, existing partnerships agreements, classroom or laboratory space requirements, class textbooks, supplies, and materials, related professional development plans, or any other criteria as appropriate to determine appeal decisions.](#)

Section 1501.313.j5

[The school district or the community college district may appeal the decision of the Executive Director by sending a written request for reconsideration to the ICCB chair within 30 ~~calendar~~ working days after receipt of the Executive Director's decision. If no appeal is submitted the Executive Director's decision shall be final and binding.](#)

Section 1501.313.j9

[If the Executive Director or the Board find in favor of the school district's appeal and the community college district chooses not to offer the dual credit course or approve the instructor or course documentation, the school district may seek the dual credit course through an alternative postsecondary institution. The school district shall have up to 14 ~~calendar~~ working days after the appeal determination to notify the community college](#)

district and provide a rationale for seeking the course through an alternative postsecondary institution.

Section 1501.313.l2

The school district shall notify the ICCB in writing of its intent to enter into an agreement with an out-of-state postsecondary institution. The notification shall detail the dual credit course the high school seeks to provide and notice that the community college with the jurisdiction of the school district has elected not to offer the course. Within ~~calendar~~ working days, the ICCB shall provide the school district with a list of in-state postsecondary institutions that can provide the school district an equivalent dual credit opportunity.

Section 1501.313.m

Faculty Notification. Within 15 ~~calendar~~ working days after entering into or renewing a partnership agreement, the community college institution shall notify its faculty of the agreement, including access to copies of the agreement if requested.

Section 1501.313.n

Submission of Dual Credit Agreements. Each community college district shall submit, by electronic means as provided by the Board, a copy of any dual credit agreement entered into, amended, or renewed on or after June 30, 2025, within 30 ~~calendar~~ working days of execution. These agreements shall be approved by the ICCB pursuant to Section 1501.307. pursuant to Section 1501.307.