



INDIANA COMMISSION *for*
HIGHER EDUCATION

June 10, 2015

Dr. Barbara Gellman-Danley
President
The Higher Learning Commission
230 South LaSalle Street, Suite 7-500
Chicago, Illinois 60604

Dear Dr. Gellman-Danley :

I write to offer comments on the “Assumed Practices: Policy Changes Proposed on First Reading” (Policy CRRT.B.10.020), upon which the Board of the Higher Learning Commission (HLC) is scheduled to take final action at its June 25-26, 2015 meeting. More specifically, my remarks relate to the new language added to Section 2, “Faculty Roles and Qualifications.” My comments are also informed by two sets of guidelines issued last year by HLC, which include references to faculty qualifications: “Dual Credit for Institutions and Peer Reviewers,” issued in April 2014, and “Determining Qualified Faculty: Guidelines for Institutions and Peer Reviewers,” issued in May 2014.

The recent publication of “Assumed Practices,” along with the implementation deadline and the presentations on this topic made during the HLC Annual Meeting at the end of March, have generated much discussion and anxiety in Indiana, and as I gather, in other states and among various stakeholders. The concerns expressed to me, including those articulated in a statewide conference call last month with academic leaders, dual credit coordinators, and HLC Accreditation Liaison Officers (ALOs), have largely centered around what potentially could be a significant negative impact on the sizable dual credit offerings in our state. (Some concerns have also been expressed about adjunct faculty, but thus far, not nearly to the extent around dual credit.) These concerns stem from the date these Practices become effective, the alleged inconsistency among HLC spokespersons on this topic that some have reported, how uniformly these Practices would be applied in the field, and questions raised by the wording of the Assumed Practices themselves.

From a state agency perspective, I would add that we acutely feel the anxiety expressed by superintendents, institutions, lawmakers, and other stakeholders about the negative impact these Practices may have on our dual credit program. We have spent much time and effort building a review process aimed at promoting strong dual credit instruction, so that dual credit could be part of our strategy for ensuring equitable access to quality postsecondary certificates and degrees. We are concerned that much damage could be done in a very short time to a strategy that has taken a decade to build, if these Assumed Practices are implemented poorly and in haste. I would add that damage could also be done to the ability of high schools to meet state-mandated accountability standards and of students to earn honors diplomas.

What follows is a detailed examination of our areas of concern. I conclude with an affirmation of the Higher Learning Commission’s and the Indiana Commission for Higher Education’s (ICHE’s) shared agenda to ensure quality of instruction, as well as some suggestions about how we might address these concerns.

Deadline for Implementation

It is my understanding that the Assumed Practices need to be fully implemented by January 1, 2016. Given that this deadline falls in the middle of the academic year and that most dual credit classes for the 2015-16 academic year were probably scheduled six months ago, wouldn't it make more sense to choose an implementation date that falls at the end of the next or, even better, some later academic year?

I also wonder about how this implementation date affects younger faculty who are on a plan of study to obtain the requisite number of completed courses in their field. What was the rationale for excluding any reference to teachers on a plan of study in the Assumed Practices? It would seem that making allowance for teachers to be on a plan of study would permit our colleges and universities to ensure sufficient courses are being offered -- allowing teachers to complete their plans of study.

I wonder too about teachers who are toward the end of their careers, especially those who earned master's degrees in education, consistent with prevailing teacher education requirements at the time they pursued graduate studies. How does implementation of the Assumed Practices affect these teachers, given there is no consideration given to "grandfathering"?

Reliance on Degree Credentials

The Assumed Practices indicate that "qualified faculty members are identified primarily by credentials;" however, an exception to this requirement is made for "teaching assistants enrolled in a graduate program and supervised by faculty." Is this true for all teaching assistants, irrespective of their enrollment status? Does this exception apply only to teaching assistants who have actually completed 18 hours in their discipline?

I wonder too if it may have been wise to premise the teaching assistant exception on a presumption about the quality and extent of faculty supervision and support, given the frequent lament that our graduate programs in subject matter disciplines are so often deficient in pedagogy. I mention this because the blanket exclusion of teaching assistants is in sharp contrast to the approach toward dual credit teachers, especially those who are, in some institutions and states, quite closely "supervised by faculty." In Indiana, the state specifically appropriates funds for this purpose based on the number of dual credits generated. Shouldn't there be some consistency in policies between teaching assistants and dual credit teachers who are closely supervised?

It is worth noting that the highly regarded Advanced Placement (AP) and International Baccalaureate programs do not have any faculty qualifications based on specific expectations about credentials or degrees. The College Board no longer even requires faculty to attend their AP teacher workshops, which are now highly recommended rather than mandatory.

General Education Courses and Courses That Transfer

The Assumed Practices indicate that the master's/18 hours in the discipline qualification applies to "faculty teaching general education courses, or other courses that transfer." There is reasonableness to approaching the general education or liberal arts courses in a manner different from courses in career, technical, or professional fields of study. However, the Assumed Practices don't refer to career, technical, or professional fields of study; instead, they say "and other courses that transfer." Does the wording mean that career, technical, and professional courses, which also transfer, are meant to be covered by the master's/18 hours in the discipline requirement too? And how is HLC interpreting "transfer": to one institution or to some minimum number of institutions? Does "transfer" mean transferring a course only as a one-for-one course equivalent or does it include transferring as a departmental elective, a general elective, or a component of block transfer?

Here's the point: transfer is more complicated than the wording in the Assumed Practices implies. For example, in Indiana, all courses in an Associate of Applied Science (A.A.S.) program can transfer to our Bachelor of Applied Science (B.A.S.) programs, so does that mean that all faculty teaching A.A.S. courses have to meet the master's/18 hours in the discipline qualification? With respect to clarifying the term "transfer," the Guidelines published last May don't help: the term "transfer" appears in them only once, repeating the exact same wording as found in the Assumed Practices. In this instance, the Guidelines don't amplify the Assumed Practices.

Other Factors and Equivalent Experience

While the Assumed Practices speak of qualified faculty "primarily" in terms of credentials or degrees, they wisely allow for "other factors" and "equivalent experience" to be considered as well. My concern, however, is how consistently these allowances will be applied. Will some cap be subjectively applied to the number of times an institution can make the case for "other factors" or "equivalent experiences" to be taken into account?

As a case in point, some attending the HLC Annual Meeting were left with the impression that there would be no room for dual credit teachers whose qualifications would be something other than a formal credential or degree. I fret these misunderstandings could be greatly amplified in the training of site visit teams and in how site visit team members apply the Assumed Practices during an institution's comprehensive evaluation visit. What is the Higher Learning Commission's plan for ensuring that this element of the Assumed Practices will be applied in an appropriate manner?

On a related point, the 2014 "Determining Qualified Faculty" Guidelines do provide some examples of allowances for other factors that qualify faculty under the heading "tested experience." This is helpful, but I fear the examples given will be interpreted narrowly or as the only exceptions that will be permitted, unless HLC elaborates on this point.

The Assumed Practices talk about an institution defining "a minimum threshold of experience" for qualifying faculty other than through degrees. Does HLC have a plan for articulating the principles that an institution might use to establish a "minimum threshold," along with some examples of what an acceptable "minimum threshold" might look like? Having such a set of principles and examples of thresholds, augmented with sufficiently numerous illustrations of how they might be applied to particular hypothetical faculty with varied backgrounds, as was started in the 2014 Guidance, would help to allay genuine fears about subjectivity in this area.

Reliance on Data

An important part of the Assumed Practices that has been in place and that hasn't changed (what is presently 2.d.d) emphasizes the need for data analysis on the "assessment of student learning and program completion." We couldn't agree more on this point, and we in Indiana are very data-driven. At the state level, we are aggressively taking steps to improve our longitudinal data to better follow students, including dual credit students, as they make their way toward achieving their postsecondary degree-completion goals.

I raise this point in relationship to the discussion above about "other factors" and "equivalent experience" as qualifying factors. A great many of our schools and colleges can readily produce data on the success of students who enroll in dual credit courses taught by different faculty members. Couldn't a demonstrated track record of students who successfully go on to college be an important element in deciding whether or not a teacher is qualified to teach a dual credit course? If so, would it not be effort well spent for HLC to work with institutions and states to establish acceptable and best practices in this area? Examples of data-driven qualifications would provide helpful guidance to teams making site visits. After all, as much as we value credentials, isn't the bottom line how well a teacher helps a student, as measured by that student's success?

State Context

As you and your colleagues know from the many conversations we have had in recent years in the context of HLC-state agency convenings, also involving the Midwestern Higher Education Compact (MHEC) and the State Higher Education Executive Officers (SHEEO), a constant plea of mine has been for HLC recognition of unique state environments, within which institutions serve student needs and fulfill their missions. Here, too, this posture has relevance to the Assumed Practices.

In Indiana, we have placed great value on accreditation by the National Alliance of Concurrent Enrollment Partnerships (NACEP), which relies on institutional judgement for what qualifies someone to teach rather than on credential-based qualifications, and a NACEP-like state recognition process. To be a preferred provider of dual credit (required for the public institutions), you either have to be accredited by NACEP or successfully complete the state process. We believe this process provides a measure of quality assurance that should be acknowledged as a relevant feature of the postsecondary landscape in HLC-related reviews of dual credit offerings in Indiana. To what extent would landscape features such as I have described factor into HLC implementation of the Assumed Practices?

I would be remiss if I did not add that presentations on Indiana's approach to quality assurance for dual credit have been well received, and the HLC's own landmark 2013 study of dual credit state policy and quality assurance practices, which was cited in the April 2014 HLC Guidelines on dual credit, gave generally high marks to Indiana on quality metrics (see Displays 11 and 12, page 33). In addition, the Commission for Higher Education has a close working partnership on dual credit with the Center of Excellence in Leadership of Learning (CELL) at the University of Indianapolis, whose nationally recognized expertise has been especially valued in implementing early college models throughout the state.

Conclusions

This communication has outlined a number of issues related to the Assumed Practices that potentially could be detrimental to what we believe is a strong dual credit program here in Indiana. At the very least, the Higher Learning Commission should exercise exceptional caution in how the Assumed Practices might be interpreted and applied by HLC staff and peer reviewers on site visits.

For our part, the Indiana Commission for Higher Education, in concert with Indiana academic leaders, dual credit coordinators, and ALOs, would welcome an opportunity to work with HLC staff on the points raised and questions posed in this letter. An expressed interest on your part to engage in such a dialog would help to stanch the growing tide of anxiety around dual credit offerings that the proposed Assumed Practices has generated. Such an effort would also help to ensure HLC policies are being consistently applied and interpreted within our state.

Sincerely,



Ken Sauer, Ph.D.
Senior Associate Commissioner and Chief Academic Officer

CC: Commissioner Teresa Lubbers
Ms. Karen Solinski