Dear Members of the Higher Learning Commission (HLC) Board of Trustees,

The Illinois Community College Faculty Association (ICCFA) is writing to share our concerns about the HLC's proposed policy modifications to the assumed practices regarding institutional compliance with faculty qualifications.

Chartered by the State of Illinois in 1971 to advise the ICCB, the ICCFA draws on community college faculty voices from across the state of Illinois.

There are many laments and concerns about HLC walking back requirements that they themselves made us raise not that long ago, but we will limit our comments here to the areas around which our concerns revolve: **Definitions, Credentials, and Oversight.**

All of these issues work in tandem but because the largest concerns are those surrounding **credentialing** and **oversight**, we will start with these.

CREDENTIALING AND OVERSIGHT:

In the document outlining the HLC reasons or justifications for another change to the credentials of those teaching dual credit, Item 2 page two, quietly alleges that this move towards credentials "creates parity between teaching assistants and dual credit instructors who are similarly situation in this regard."

Rather than explain all of the reasons why this is a false equivalency, we offer comments from colleagues on why HS faculty with no credentials and TA's are not the same thing. The comments below address the fallacious reasoning of this idea but also point out that qualifications matter as does the oversight of them. If you only read one of these, be sure it is the last one which gets at the justified skepticism with which many view dual credit and those overseeing it. Some phrases have been italicized because they seem particularly relevant:

Comment 1: In history at UIC, we were TAs for the 100-, and 200-level classes. We usually handled the discussion sections and often could give a lecture or two. *After my coursework was done*, I also started adjuncting at area schools while working on the dissertation. One difference is TAs work with college students and teach to college expectations and rigor.

Comment 2: If a college wouldn't hire you to teach for them, then you are not qualified to teach their courses. Lowering standards isn't the solution to making people eligible to teach.

Comment 3: Having been a grad student who taught, and taught college level students after that, and taught high school for 9 years and am now teaching middle school... these are all very different types of teaching. If you do one successfully, the rules and techniques don't apply to others. For me, it's easier to have started out as a college teacher and gone progressively down in level. I can't imagine most of the high school teachers I work with being able to teach college students with the expectations of teaching technique and content that are expected in college.

Comment 4: I taught college French with a B.A. in French w/out 18 grad hours but wouldn't have been allowed to continue after the first semester (and yes supervision) if I hadn't been simultaneously earning 6 hours of graduate credit each semester.

This is the real problem: HS teacher and TA start out the same in terms of graduate hours but the HS teacher need never advance as long as it is alleged that they are working towards their hours, but no one checks.

In grad school you have constant accountability by being in classes you take. If you make no progress toward your degree, you get no classes the next semester because you are deemed unqualified.

Comment 5: When I was a TA it was for developmental math. I eas a math grad assistant so my professors knew my ability in that subject and courses i was assigned to teach were many years below the courses I was taking during grad school. To be a high school teacher you need an bachelors degree. However, I don't think the number of hours for me to teach high school was anywhere near the number of hours for me to be a math major. Math Ed is a very different degree than math.

The coursework that I needed to teach high school math was not enough for me to be an effective math teacher at the college level.

Comment 6 comes from a college professor working in a high school while a high school teacher sat in to make sure, well, to keep dual credit students from a college experience perhaps? These comments further highlight the false parity between TA's and HS teacher as well as the need for qualifications AND oversight. They also touch on the loss of college level rigor to accommodate non-college students. Further, this example points to other issues with dual credit as well: Where should it be done. How many teachers should be in the room? How does this kind of learning affects students themselves, their learning, and the student experience in the class. Are college standards maintained? Does dual credit have any role in preparing students for college level work? The comment:

Comment 6: I absolutely felt pressure to change my curriculum to meet the lower standards of what was a very checked out senior class. They weren't up to the baseline-level of our [community college] students. Also, the teacher felt protective of them, and served as a buffer between them and me (not in a good way) when I voiced my concerns that they weren't meeting the class standards.

The high school teacher felt like her hands were tied, and so did I. It was awkward all the way around, and I think it's fair to say neither of us enjoyed the experience. I don't think the students got much out of it, and they definitely didn't get the feeling of my normal (college-level) classes.

I remember rewriting some of my assignments in a desperate attempt to draw them in. I made one assignment about "prom" hoping it would pique their interest. I think me going to the HS class was a mistake. They didn't take me seriously. It was just like being a permanent substitute

When the students weren't doing their work, the implication was that I wasn't reminding them enough (H.S. teacher came from this perspective too), whereas I'm thinking, "this is college, folks...step it up!" But we were literally in a high school classroom, in their own high school...so the 'college' thing never seemed to sink in. If I were to do it again, I would not approach it as meekly as I did. I was worried about stepping on the teacher's toes. It was her students, her classroom, her school.

Finally, **comment 7** with humor and, perhaps justified, serious concerns about the motivations behind a dual credit push shores up the bigger picture of issues of oversight:

"I don't mean to sound negative, but my institution barely followed the current policy. The administration would allow the neighbor's dog to teach calculus as long as they could save some money doing so. Will the HLC or the ICCB actually listen to the concerns of faculty?"

QUESTIONS THAT ARISE FROM THESE COMMENTS FOR WHICH WE ASK ANSWERS:

Credentialing:

Whose responsibility is it to vet the credentials of those teaching dual credit? Is it the HLC's? ICCB's? That of each individual college? Who at each college does this fall to?

We are advocating that there be a still be strong faculty involvement in determining who teaches in their discipline since they who know it best. We wonder if administrators even have a say in this decision, and if so, does this mean dual credit instructors should be held to, rather than exempt from, the kinds of job interviews and class demos that full and part time faculty go through to get vetted before being hired.

What mechanisms are in place/will be in place that ask unqualified high school teachers to show their pedagogy and subject matter knowledge to those for whom they teach?

What is effective oversight and effective administration of Dual Credit Programs for faculty, administrators, ICCB, and HLC?

Are budget lines being developed to ensure that those levels of oversight are taken into account so that the oversight can actually take place?

DEFINITIONS:

As for definitions, these too get at the heart of many of the key concerns about lowering and essentially eliminating credentials and qualifications for those who teach dual credit.

Words matter. Thus, we note that the following words, through lack of explanation or definition, hang the weight of dual credit on a very thin reed. The words are vague, suggest a lack of clarity on HLC's part and hence a quick (and perhaps unnecessary) fix. Their lack of clarity further erodes trust in HLC's decision on a lowering of standards and continues to cast doubt on the motives for this change.

We recommend (more) for discussing these changes with faculty groups so that the following questions can be asked, answered, and perhaps reconsidered in different lights.

KNOWLEDGEABLE EXPERTS IN THE FIELD OF DUAL CREDIT OFFERINGS (1) $^{\boxed{11}}$.

How are "knowledgeable" and "expert" being defined?

Experts: Who are these experts and from what is their knowledge born? Are they practitioners of the craft of dual-credit or any kind of teaching? Does this expertise come from actual long-term, or recent (from the past three years) classroom experience?

From where were the knowledge experts drawn specifically? Were the faculty offering opinions vetted and chosen by faculty peers to represent the faculty voice from their schools or were they just tapped by an administrator, or was there some other way of identifying them?

Methodology: What in the HLC methodology and conclusions brought the HLC to propose these changes?

We believe it is imperative that faculty, the content experts, and current classroom practitioners, remain very fully involved in the decision of who can teach their courses. Thus, we again ask how was the information collected and from whom it was collected? For clearer understanding of the suggestion to lower qualifications, having the answer to these questions will allow us to more fully understand why HLC believe this change is needed. If the promise of a good college education by qualified faculty is on the table, such a change seems to border on the unethical because it seems that community college education is the only place where the HLC wants to lower standards.

Again, we ask what information would lead the HLC to determine that faculty needed no qualifications to teach a subject matter?

Motivation: Has there been a marked change in dual credit enrollments to led the HLC to support suspending dual credit teaching qualifications that are already maintained at a low bar?

We ask that the HLC make clear the evidence that current hiring guidelines has had **restrictive impacts** on dual credit programs? What factors were considered in the enrollment trends since dual-credit has begun? Eras? Economy? Pandemics? Lack of interest?

We appreciate the views of knowledge experts and believe they can provide scholarly and theoretical knowledge and numbers about dual credit courses but without recent (within the past three years) teaching experience, theoretical knowledge is just that. Theories always work in the ideal; classes and teaching do not. We therefore ask that the HLC consider the experience of practicing experts to learn from the widest swath possible what the real issues are with dual credit before determining what next steps are necessary.

UNDERSERVED AREA/RURAL AREA (1)

What criteria are used by the HLC to define both of these areas? Are these areas determined by geographic location, population, percentages of ethnic makeup, or some other combination of criteria? If there is no definition, does this mean that these changes to qualifications will be applied to any community college across the state who claims underserved and underrepresented populations?

Will those in dual credit classes be only students from those underserved and underrepresented populations? How will that be ensured? If students in these classes are not underrepresented or underserved, how does this designation actually help improve equity, diversity, inclusion, and justice (JEDI) if it is simply being used to lower the standards of a college education?

How is the status of underserved and underrepresented areas updated? Quarterly? Yearly? Only with each census every ten years?

If these areas/community college districts aren't clearly defined by your document and by the HLC, and if these designated areas are only designations such once and then forever, is the entire state to be described as underserved and underrepresented? If this is the case, we must ask if this in a disingenuous way to push lowered standards and credentials across the entire state of Illinois. Won't justice, equity, diversity, and inclusion (JEDI) be done an inexcusable disservice serving on as a cynical means to justify the actions taken?

"RESTRICTIVE IMPACTS," AND IMPLIED TEACHER SHORTAGES AS A DRIVERS FOR THIS CHANGE.

Has dual credit been restricted? Or is there simply lack of interest in it by those qualified to teach it. What impact was expected or hoped for? Was it a reasonable or necessary impact? To what end? What has made the impacts restrictive?

Honestly, the term is not really followable, but we believe it means that the HLC feels that having qualified faculty teach dual credit means less dual credit gets done which leads to the claim that people in designated remote and underserved areas have to travel farther than is reasonable to take courses to become qualified/credentialed to teach dual credit. This is an argument most likely coming from pre-Covid days. Having been through COVID and having had faculty at all levels of education retool their classrooms for remote learning, we know that credible, quality, distance learning can be done across the state.

Further, we must ask: Is the "shortage" of qualified dual-credit faculty a shortage of qualified faculty or a shortage of qualified faculty unwilling to

spend their gas, additional time, change classroom delivery, work closely with a colleague who may or may not want faculty in their classes, possibly be undermine in their faculty relationship with the students?

This returns us to methodology and collection of information. We believe a state-wide survey of dual credit faculty be distributed and we would ask that these questions be asked and addressed in any survey sent out to dual credit faculty in every region and to every college in the state.

Possible solution/aid: Perhaps some seeking credentials may be unable to afford the technology needed to do remote learning. This would suggest a natural collaboration between HLC/ local organizations and schools to offer technology grants or scholarships and/or mileage reimbursements to those seeking to earn their credentials in order to teach dual credit college level classes.

We would also request that HLC seek the data or publish any data noting what specific reasons people are offering for lack of credentials in an official across the state survey asking HS teachers about their desire/lack of desire, ability/lack of ability to teach and their reasons for their responses. This would offer a more complete and honest view of whether or not the "Restrictive impact of HLC's requirements" are real, perceived, or simply politically expedient to invoke.

Are there, in fact, legions of high school teachers knocking at the doors of institutions asking to teach courses?

Dual credit courses are an innovative idea but they are not a right, a necessity, and should not drive down the quality of a college education.

Additionally, we hope the HLC and every governing body has asked and studied whether there are actual teacher shortages or whether there are fewer people willing to work for low pay, in unsupported conditions, with pedagogy, and educational initiatives that change quickly and seemingly without input from those doing the actual teaching.

While HLC may have done research we propose more information gathering: Colleges and high schools should have well maintained records of faculty who have taught dual credit courses from local high schools, community colleges, and four year institutions. We believe hearing the realities of what happens to the curriculum, how it is administered, and how the teaching of it is overseen can provide another window into how dual credit works on the ground level. We also wonder if an inquiry can be sent to every dual credit instructor after each class so the HLC can find out how dual credit is working on the ground so that the HLC can, in turn, commit to meaningful, long term changes without repeated upheaval. Flexibility and responsiveness are key to any solutions offer.

We then might suggests a restructuring of funds so that inquiries can be created, send, and read with regularity.

THE END, MERCIFULLY

Faculty have often expressed concerns about the push for dual credit for the wrong reasons, as well as oversight of those teaching dual credit courses. We agree that dual credit should be one tool in the toolbox of Illinois education, to be applied where useful and well supported, but it probably shouldn't be the allen wrench in the tool box—that tool that may or may not fit the futon AND the couch AND the bookcase, and the tool that you try to plug in because nothing else is handy, and it just might work. Dual credit should be a **response to a real need** for students who may have "outgrown" high school intellectually and who are capable—through maturity, curiosity, recommendations by at least 2 faculty—to be ready to take college classes and to measure up to the expectation and rigor of those classes.

Dual credit can, well used, be a great thing. However, it was never intended—should never have been intended—to fast-track students to get them through college faster, or to earn college credit while maintaining high school curriculum and expectations. The misuse and lack of oversight in dual credit does a disservice to all of the students and faculty and undermines the credibility of any of the schools or accrediting institutions involved who might wish to lower standards rather than maintain them.

We also believe it would be hard to convince and HLC board member that in the absence of a doctor s/he should visit a barber or butcher to have an appendectomy. Both have probably cut hair, body parts, used tools for over 18 hours and may have established reputations; nonetheless it would be a decision to be talked out of.