

ACADEMIC AFFAIRS COUNCIL

AGENDA ITEM: 5 – L

DATE: March 31, 2016

SUBJECT: HLC Faculty Qualification Requirements

In early October, the Higher Learning Commission began communicating with affiliative institutions regarding their desire to require that high school teachers in dual-credit courses (as well as all other instructional college faculty) must have a master’s degree or 18 graduate level credit hours in the discipline in which they are teaching (see Attachment I). While the Regental system has previously implemented this credential requirement for institutional coursework, the current concurrent credit guidelines specifies that 15 credit hours of graduate coursework in the discipline is required. Based on the pending accreditation requirement modification, it was envisioned that concurrent credit guidelines would need to be updated to comply, as well as ensuring that partner institutions also are meeting this requirement before we accept student concurrent credits in the future. However, in late November the Higher Learning Commission’s Board of Trustees voted to provide institutions more time to comply with the requirement. Specifically, HLC noted that “If a college or university believes its dual-credit program is not able to be in compliance by Sept. 1, 2017, it may submit an application for an extension by September 2016. A state higher education entity may also apply for the extension on behalf of accredited colleges and universities under its jurisdiction.”

AAC representatives should be prepared to discuss whether administrative guidelines should be updated to comply with this HLC requirement beginning September 2017, or whether a system level extension request should be coordinated.

RECOMMENDED ACTION

Discussion and Recommendation.



GUIDELINES

Determining Qualified Faculty through HLC's Criteria for Accreditation and Assumed Practices

Guidelines for Institutions and Peer Reviewers

These guidelines were updated October 1, 2015, due to the adoption of a policy revision to Assumed Practice B.2. by HLC's Board of Trustees on June 26, 2015. This revision clarified HLC's longstanding expectations regarding the qualifications of faculty and the importance of faculty members having appropriate expertise in the subjects they teach.

Introduction

The following information provides guidance to institutions and peer reviewers in determining and evaluating minimal faculty qualifications at institutions accredited by the Higher Learning Commission (HLC). These guidelines serve to amplify the Criteria for Accreditation and Assumed Practices that speak to the importance of institutions employing qualified faculty for the varied and essential roles faculty members perform. HLC's requirements related to qualified faculty seek to ensure that students have access to faculty members who are experts in the subject matter they teach and who can communicate knowledge in that subject to their students. A qualified faculty member helps position students for success not only in a particular class, but in their academic programs and their careers after they have completed their program.

The following guidelines apply to all faculty members whose primary responsibility is teaching, including part-time, adjunct, dual credit, temporary and/or non-tenure-track faculty. Although some institutions place a heavy reliance on adjunct faculty, or give graduate teaching

assistants the responsibility for instruction in many course sections, an institution committed to effective teaching and learning will be able to demonstrate consistent procedures and careful consideration of qualifications for all instructional faculty.

Background on HLC's Qualified Faculty Requirements

During 2010-2011, HLC began developing new Criteria for Accreditation and Assumed Practices. Together, the Criteria for Accreditation and the Assumed Practices, both of which became effective in January 2013, define the quality standards that all member institutions must satisfy to achieve and maintain HLC accreditation.

In June 2015, HLC revised Assumed Practice B.2. to elevate academic quality by ensuring that faculty members who deliver college content are appropriately qualified to do so and to clarify HLC's expectations. Also, the revisions to Assumed Practice B.2. reflected longstanding HLC expectations that had appeared in various written forms in previous years. Through this revision process, HLC supports its mission of assuring and advancing the quality of higher learning.

When HLC's Board of Trustees approved the revisions to Assumed Practice B.2. in June 2015, it also extended the date of compliance to September 1, 2017, to allow institutions time to work through the details of the revised requirement. With these guidelines, HLC seeks to convey

both its expectations and timeline for compliance, along with strategies for institutional success in the best interest of key stakeholders, including students, parents, employers and other institutions of higher education.

Relevant Criteria and Assumed Practices

Criterion Three speaks to faculty qualifications, specifically Core Component 3.C, subcomponents 3.C.1., 3.C.2., and 3.C.4. Assumed Practice B.2.a. and B.2.b. are central to this topic and are presented below in revised form in accordance with the effective date of September 1, 2017.

Criterion Three. Teaching and Learning: Quality, Resources, and Support

The institution provides high quality education, wherever and however its offerings are delivered.

Core Component 3.C. The institution has the faculty and staff needed for effective, high-quality programs and student services.

3.C.1. The institution has sufficient numbers and continuity of faculty members to carry out both the classroom and the non-classroom roles of faculty, including oversight of the curriculum and expectations for student performance; establishment of academic credentials for instructional staff; involvement in assessment of student learning.

3.C.2. All instructors are appropriately qualified, including those in dual credit, contractual, and consortial programs.

3.C.4. The institution has processes and resources for assuring that instructors are current in their disciplines and adept in their teaching roles; it supports their professional development.

Assumed Practice B. Teaching and Learning: Quality, Resources, and Support

[Revised as written for the September 1, 2017 effective date.]

B.2. Faculty Roles and Qualifications

- a. Qualified faculty members are identified primarily by credentials, but other factors, including but not limited to equivalent experience, may be considered by the

institution in determining whether a faculty member is qualified. Instructors (excluding for this requirement teaching assistants enrolled in a graduate program and supervised by faculty) possess an academic degree relevant to what they are teaching and at least one level above the level at which they teach, except in programs for terminal degrees or when equivalent experience is established. In terminal degree programs, faculty members possess the same level of degree. When faculty members are employed based on equivalent experience, the institution defines a minimum threshold of experience and an evaluation process that is used in the appointment process. Faculty teaching general education courses, or other non-occupational courses, hold a master's degree or higher in the discipline or subfield. If a faculty member holds a master's degree or higher in a discipline or subfield other than that in which he or she is teaching, that faculty member should have completed a minimum of 18 graduate credit hours in the discipline or subfield in which they teach.

- b. Instructors teaching in graduate programs should hold the terminal degree determined by the discipline and have a record of research, scholarship or achievement appropriate for the graduate program.

The Importance of Qualified Faculty

Within a specific discipline or field of study in a collegiate environment, “the faculty and staff needed for effective, high-quality programs and student services,” as stated in Core Component 3.C., refers to a faculty member’s ability to understand and convey the essentials of the discipline that a student should master at various course and program levels. Beyond mere coverage of course material, qualified faculty should be able to engage professionally with colleagues in determining the learning objectives for all graduates of a program, as well as possess and demonstrate the full scope of knowledge, skills and dispositions appropriate to the credential awarded. More broadly, qualified faculty should know the learning objectives of the institution for all of its students. HLC expects that through the higher education curricula and learning contexts that faculty develop, the exercise of intellectual inquiry and the acquisition, application, and integration of broad learning and skills are integral to its educational programs. Qualified faculty should also be aware of whether and how much students learn through the ongoing collection and analysis

of appropriate data, because an institution should be able to demonstrate its commitment to educational achievement and improvement through ongoing assessment of student learning. It is important to note that none of these abilities are intended to substitute for content expertise or tested experience.

Note: See HLC's Criteria 3 and 4 (specifically 3.B. and 4.B.) for more information on expectations regarding teaching and learning.

Quality Assurance Expectations in Determining Minimally Qualified Faculty

HLC expects that credentials will be the primary mechanism used by institutions to ascertain minimal faculty qualifications. Yet HLC recognizes that *experience* may be considered in determining faculty qualifications, as overviewed on page four.

Using Credentials as a Basis for Determining Minimally Qualified Faculty

Faculty credentials generally refer to the degrees faculty have earned that establish their credibility as scholars and their competence in the classroom. **Common expectations for faculty credentials within the higher education community include the following.**

- Faculty teaching in higher education institutions should have **completed a program of study in the discipline or subfield in which they teach, and/or for which they develop curricula, with coursework at least**

one level above that of the courses being taught or developed. Successful completion of a coherent degree in a specific field enhances an instructor's depth of subject matter knowledge.

- **Faculty teaching in undergraduate programs should hold a degree at least one level above that of the program in which they are teaching.** Those faculty members teaching general education courses, or other non-occupational courses (i.e., courses not designed to prepare people directly for a career), hold a master's degree or higher in the discipline or subfield. If a faculty member holds a master's degree or higher in a discipline or subfield other than that in which he or she is teaching, that faculty member should have completed a minimum of 18 graduate credit hours in the discipline or subfield in which they teach.
- **Faculty teaching in career and technical education college-level certificate and occupational associate's degree programs should hold a bachelor's degree in the field and/or a combination of education, training and tested experience.** (Note: See *Tested Experience* section on page four.)
- Faculty teaching in graduate programs should hold the terminal degree determined by the discipline and have a record of research, scholarship or achievement appropriate for the graduate program.
- Faculty guiding doctoral education should have a record of scholarship and preparation to teach at the doctoral level. Research and scholarship should be appropriate to the program and degree offered.

i What is an Academic Subfield?

An academic *subfield* refers to components of the discipline in which the instruction is delivered. The focus, in this instance, is on the courses being taught and the appropriateness of faculty qualifications with reference to such courses. The underlying issue is whether a degree in the field or a focus in the specialization held by a faculty member appropriately matches, in accordance with the conventions of the academic field, the courses the faculty member would teach.

Examples:

In political science, the subfields include American politics, comparative politics, international relations, and so forth. The most basic introductory course is in the subfield of American politics, often called Introduction to American Politics,

American National Government or American Politics. The instructor teaching this course would be expected to meet the qualifications for American politics.

In history, the two main subfields at the introductory level include American history and world civilization, again titled variously. The expectation is that the faculty will be qualified appropriately depending on whether the courses they teach are in American history or world civilization.

In business, the subfields include management, marketing, accounting, and finance. The introductory courses are often within these subfields, such as Principles of Accounting (frequently I and II), Principles of Marketing, and such. The faculty teaching these courses should have relevant qualifications in these areas.

Using Tested Experience as a Basis for Determining Minimally Qualified Faculty

Assumed Practice B.2 allows an institution to determine that a faculty member is qualified based on experience that the institution determines is equivalent to the degree it would otherwise require for a faculty position. This experience should be *tested experience* in that it includes a breadth and depth of experience outside of the classroom in real-world situations relevant to the discipline in which the faculty member would be teaching. An institution that intends to use tested experience as a basis for hiring faculty must have a well-defined policy and procedure for determining when such experience is sufficient to determine that the faculty member has the expertise necessary to teach students in that discipline.

The value of using tested experience to determine minimal faculty qualifications, as referenced in Assumed Practice B.2.a., depends upon the relevance of the experience both to the degree level and to the specific content of the courses for which the faculty member is responsible. In their policies on tested experience as a basis for hiring faculty members, institutions are encouraged to develop faculty hiring qualifications that outline a minimum threshold of experience and a system of evaluation which could include the skill sets, types of certifications or additional credentials, and experiences that would meet tested experience requirements for specific disciplines and programs. These stated qualifications would ensure consistency in hiring and provide transparency in hiring and human resources policies. The faculty hiring qualifications related to tested experience should be reviewed and approved through the faculty governance process at the institution.

Determining Minimally Qualified Faculty in the Context of Dual Credit

The subject of dual credit was the focus of HLC's national study completed in 2012. This research entailed the analysis

of dual credit activities across 48 states and revealed the dramatic expansion of dual credit offerings. Citing research conducted by the National Center for Education Statistics, HLC's study reported that by 2010-2011 dual credit enrollments had reached 2.04 million students from 1.16 million in 2002-2003, an increase of 75 percent. Even though the study was a descriptive analysis of dual credit and therefore by design did not advocate a position, it did report on both the benefits and the drawbacks of dual credit programs and prompted the accrediting agency to address some critical concerns. Inadequate instructor qualification was listed among the principal concerns. (See *Dual Credit for Institutions and Peer Reviewers* for additional information.)

Against the backdrop of rapid expansion of dual credit programs and growing concerns over minimal faculty qualifications for teaching dual credit courses, HLC determined that institutions that award college credit by means of dual credit arrangements must assure the quality and integrity of such programs and their comparability to the same programs offered on the institution's main campus or at the institution's other locations. These expectations extend to minimally qualified dual credit faculty, as stated in Criterion Three (3.A., 3.C.2.) and Criterion Four (4.A.4.). Assumed Practice B.2. is also applicable and subject to review in relation to dual credit offerings.

The institution must assure that the faculty members teaching dual credit courses hold the same minimal qualifications as the faculty teaching on its own campus. This requirement is not intended to discount or in any way diminish the experience that the high school teacher brings into a dual credit classroom. Yet it is critical that the content of the dual credit course match the complexity and scholarly rigor of the same course delivered to the student population on the college campus. With millions of high school students now earning college credit through dual credit programs, the advancement of higher education and the value of student learning rely extensively on the adequacy of faculty preparation and demonstrated qualifications among dual credit instructors.

What is Dual Credit?

Dual credit refers to courses taught to high school students at the high school for which the students receive both high school credit and college credit. These courses or programs are

offered under a variety of names; HLC's Criteria on "dual credit" apply to all of them as they involve the accredited institution's responsibility for the quality of its offerings.

HLC's Review of Faculty Qualifications Related to the Revised Assumed Practice

Beginning on September 1, 2017, the revised Assumed Practice B.2., in addition to the Criteria and Core Components, will be used to inform peer reviewers' interpretation of HLC's expectations around faculty qualifications. Prior to September 1, 2017, the Assumed Practice dealing with minimal faculty qualifications as currently in effect will apply to all institutions. Peer reviewers will **not** be referencing the revised Assumed Practice in any written report prepared for HLC or using the revised version of the Assumed Practice to evaluate the extent of any institution's compliance with HLC's requirements in this area until the effective date of the revised policy. As a result, no institution will be subject to consequences arising from concerns related to the extent of its compliance with the revised Assumed Practice prior to the effective date of September 1, 2017.

The following section highlights routine and specific circumstances under which the revised Assumed Practice, once effective, will influence the review of an institution. These descriptors are intentionally brief.

Routine Circumstances

Institutions hosting comprehensive evaluations

Institutions in good standing hosting routine comprehensive evaluations, whether on the Standard, AQIP or Open Pathway, need not write specifically to the Assumed Practices as a general rule. However, all institutions preparing for a comprehensive evaluation must write specifically to Core Component 3.C. Peer review teams conducting comprehensive evaluations may randomly select a sample of faculty members and request to see their personnel records (i.e., curriculum vitae and transcripts) in conjunction with the list of courses to which said faculty members are assigned. Peer reviewers may also legitimately probe what process the institution uses to determine that its faculty members are appropriately credentialed to teach the courses to which they are assigned. Likewise, reviewers may evaluate the institution's policies and procedures for determining qualified faculty, particularly when equivalent experience is used as the measure of qualification.

Institutions subject to interim monitoring or on Notice related to Core Component 3.C.

As of September 1, 2017, those institutions identified as at-risk of non-compliance with Core Component 3.C. (i.e., placed on Notice) and those institutions subject to interim monitoring related to Core Component 3.C. should take the revised Assumed Practice on faculty qualifications into account in their Notice or Interim report (as applicable). This means that the revised Assumed Practice should inform the institution's interpretation of sufficiency of faculty for purposes of writing to Core Component 3.C. and for determining whether faculty members are "appropriately qualified."

Although institutions on Notice or subject to monitoring on the basis of Core Component 3.C. must write explicitly to that Core Component prior to September 1, 2017, institutions on Notice or subject to interim monitoring on that basis need not write explicitly to the revised Assumed Practice unless explicitly called upon to do so by an action letter issued by the Board or the Institutional Actions Council, as applicable. Peer review processes for evaluating faculty qualifications will mirror those described in the preceding section.

Institutions that receive complaints related to faculty

After September 1, 2017, HLC may inquire about conformity with the revised Assumed Practice if a complaint is received about the credentials of an institution's faculty members. Following HLC's complaint protocol, this inquiry may take place even though the institution has not yet hosted a comprehensive evaluation after the revised Assumed Practice became effective. In conjunction with that review, HLC may ask to review the institution's policy on faculty qualifications and the credentials of specific faculty members, as well as the courses they teach. The outcome of that complaint review may be a determination by HLC that the institution is not in conformity with the revised Assumed Practice, in which case HLC will follow the protocol explained on page six.

Special Circumstances

The following types of institutions are always expected to write explicitly to the Assumed Practice on Faculty Qualifications (whether as stated currently or as revised when

effective). Institutions seeking accreditation or on a Show-Cause order always write explicitly to *all* Assumed Practices.

- Institutions under Special Monitoring related to Faculty Qualifications.
- Institutions out of compliance with Core Component 3.C.
- Institutions seeking accreditation.
- Institutions on a Show-Cause Order.

Institutions Not in Conformity with the Revised Assumed Practice after September 1, 2017

Should an institution be found not to be in conformity with the revised Assumed Practice B.2. after September 1, 2017, HLC will require the institution to file an interim report no more than three months after final HLC action. The interim report shall describe the institution's plan to rectify the issue. Depending upon the extent and nature of the deficiency, the report will either demonstrate that the situation has been rectified, or it will indicate how the situation will be rectified within a period of no more than two years. The latter case will require additional follow-up in the form of an on-site evaluation to confirm the issue has been fully remedied and the institution is in full compliance. An institution determined by HLC to be acting in good faith to meet the revised Assumed Practice after September 1, 2017, will not be at risk of losing its accreditation solely related to its conformity with Assumed Practice B.2.

Limitations on the Application of HLC Requirements Related to Qualified Faculty

It is important that institutions review these limitations carefully in implementing HLC's requirements related to qualified faculty:

- HLC requirements related to qualified faculty, including recent revisions to Assumed Practice B.2., are in no way a mandate from HLC to terminate or no longer renew contracts with current faculty members. HLC fully expects that institutions will work with current faculty who are otherwise performing well to ensure that they meet HLC's requirements, including its recently revised Assumed Practice. HLC also expects that institutions will honor existing contracts with

individual faculty or collective bargaining units until such time as institutions have had an opportunity under the contract to renegotiate provisions that relate to faculty credentials if such revisions to the contract are necessary for the institution to meet HLC's requirements. HLC recognizes that in many cases such renegotiation or revision may not be able to take place until the contract expires or at the contract's next renewal date.

- As a part of its ongoing evaluation of faculty, institutions may determine that there need to be changes in faculty hiring requirements pursuant to best (and emerging) practices in higher education related to faculty (not necessarily related to HLC's requirements) and to new or existing institutional policies in this regard. Institutions may also determine that certain faculty members have not performed well according to the expectations of the institution related to faculty performance and should not be retained. Such decisions are within the institution's purview. They should not be handled differently than they would have been in the past, prior to the promulgation of the revised Assumed Practice B.2. Under no circumstances should institutions use HLC's requirements, including the revised Assumed Practice B.2., as a pretext to eliminate faculty members who have not performed well or do not meet institutional hiring requirements for faculty members and would otherwise have not been retained for these reasons.
- As stated throughout this document, the implementation date for the revised Assumed Practice B.2. is September 1, 2017. No institution will be held accountable for compliance with the revised Assumed Practice in any HLC evaluation prior to that date. Institutions are free to set a more aggressive timetable for compliance with this revised requirement, but must make clear to the institutional community that the more aggressive timetable is their timetable, not that of HLC.
- These requirements, including recent changes to Assumed Practice B.2., in no way apply to staff members at accredited institutions; **they apply to faculty only**. To understand HLC's requirements related to staff members, institutions should review subcomponent 3.C.6, that states "staff members providing student support services, such as tutoring, financial aid advising, academic advising, and co-

curricular activities, are appropriately qualified, trained, and supported in their professional development.” HLC has no further requirements identifying what the appropriate qualifications are for staff members; rather, it is up to each accredited institution to determine what appropriate qualifications are for such personnel.

Summary

A fundamental factor in quality assurance, the central tenet of HLC’s mission, is having appropriately qualified faculty for the instructional and other roles faculty perform. It is critical that faculty possess suitable

credentials with currency in their respective disciplines for the courses or programs in which they teach for the sake of students, so that they are exposed to pertinent knowledge and skills not only while in college but also for their success later in life; for the parents who invest a great deal in them; for other institutions of higher education where those students may transfer; and for the society in general. In these guidelines, HLC has set forth minimal expectations for the faculty at accredited institutions in order to comply with the relevant Criteria for Accreditation and Assumed Practices. 