



August 28, 2015

Dr. David Anderson, Chairperson  
Higher Learning Commission Board of Trustees  
230 S. LaSalle Street – Suite 7-500 Chicago, Illinois  
60404-1411

Dear Chair Anderson:

As Executive Director of the Minnesota Rural Education Association representing 200 Greater Minnesota School Districts, I am writing to express concerns regarding the Higher Learning Commission (HLC) intent to implement additional credentialing standards on high school faculty. MREA is part of a broad coalition of concerned educators, parents, civil rights, business and community groups.

Of concern is the following language:

*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, the faculty should have completed a minimum of 18 graduate credit hours in the discipline or subfield in which they teach.*

I write on behalf of the thousands of rural high school students who are getting started on their post-secondary education while in high school. Due to distances of rural high schools from college campuses, concurrent enrollment makes dual-credit courses available to all eligible students and is an explicit part of our schools' strategies to close racial, cultural and economic opportunity gaps.

The HLC proposed policy will negatively impact thirty years of development of and investment in concurrent enrollment programs for Minnesota schools. The new credentialing proposal will threaten the ability in many communities to offer these highly-successful research-based courses.

We suggest that HLC continue to approve the use of alternative, holistic qualifications for academic faculty. Alternatives to standard qualifications are used on campuses when a clear academic or professional need emerges, a sound rationale exists and there is support from stakeholders.

As a coalition, we are concerned that HLC adopted new standards without significant consultation with public policy makers, K-12 community, parents, business, and community groups. We believe that the HLC proposals will have a devastating impact on research based strategies that Minnesota and other states are using to help deal with several key issues:

- More students entering colleges and universities well prepared.
- Reduction of graduation gaps among students of different races and income levels.
- A higher percentage of students graduating from colleges and universities.
- Fewer students accumulating significant debt as they matriculate in colleges and universities.
- Preparing students for Minnesota's "World's Best Workforce" Initiative.

Additionally, coalition members are unclear what problems the new HLC standards are trying to solve, and what research supports the proposed new credentialing expectations. There is extensive research, some of which is cited below, to support Minnesota's legislatively approved and strongly supported approaches. For thirty years, Minnesota has offered students and families a variety of options to earn college credit while enrolled in high school. These include courses offered by high school educators, trained and supervised by higher education faculty. It also



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Includes a nationally recognized program in which 10-12<sup>th</sup> graders take courses on college campuses. We would welcome the opportunity to share research with you supporting the value and success of Minnesota's concurrent enrollment programs.

With encouragement from Congress, Minnesota policymakers have developed and supported concurrent enrollment programs to help many more students be well prepared for some form of higher education. We also seek to increase the likelihood that students will not only enter, but graduate from some form of higher education. We believe you share these goals.

It also has been the state's goal to attract and retain knowledgeable, highly effective concurrent enrollment teachers. Although many Minnesota teachers have master's degrees, but degrees usually emphasize curriculum, content and pedagogy. Knowledge in the particular academic discipline may be demonstrated through a holistic combination of relevant teaching experience, course work, professional development activities, curriculum development and practical experience. Minnesota high school teachers work with higher education faculty to insure that academic content and the methods of assessment are the same as those taught on college/university campuses. This is a partnership that has worked well, with excellent results, described below.

- In a paper presented at an American Education Research Association conference, University of Minnesota researchers found: "Students successfully completing advanced courses during their high school years are doing better in college than their peers who do not take advanced courses." They have higher grade point averages in the first semester and first year and are graduating at a faster rate. University of Minnesota researchers also found that, students in these courses who are Pell eligible are doing as well as more affluent students who have not taken these courses. This is closing the achievement gap.
- Research by the Minnesota Department of Education and Minnesota State College and University System found that while only about 58% of African American students graduated from high school overall in 2012-13, 87% of those who took a concurrent enrollment course in high school or a course of a college campus graduated. Similar differences were found among Hispanic, American Indian and students from low-income families.
- University of Minnesota research found that significantly higher percentages of students of color are succeeding in its well developed, research based "College in the Schools" courses, compared to students of color who take Advanced Placement courses. As you know, AP, which HLC policy will not impact, relies on the use of a single test, given one day, to determine whether students earn college credit.
- Research from Texas found that students participating in concurrent enrollment were twice as likely to graduate from high school, twice as likely to enter some form of higher education and almost twice as likely to graduate from some form of higher education as those who did not.

Taking into account the potential impact on education, students, and workforce development in Minnesota, there is a clear need to allow teachers to demonstrate competency through a holistic review of alternative qualifications. Postsecondary institutions currently are allowed to make academic appointments based on alternative qualifications, particularly where the appointment is for faculty who will be teaching part time, teaching a single course, and/or if the academic appointment does not include research, course development, or outreach responsibilities.



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We are not proposing an untested, exotic, or poorly understood method. As with all academic faculty, the postsecondary institution remains in control of the process used to select concurrent enrollment teachers and remains accountable for the quality of the instruction.

The University of Minnesota and the Minnesota State College and University Systems have worked with more than 2,000 Minnesota high school teachers in careful, thoughtful ways. The positive impact of this work is reflected in the research cited above affirming the concurrent enrollment's positive impact.

Because of the research, cited earlier, the 2015 Minnesota state legislature allocated more than \$4.6 million to encourage and expand the portion of concurrent enrollment that involves high school faculty working with, and offering college courses in high schools. We believe this allocation is a wise investment of public funds. MREA was an advocate for this funding increase in 2015.

We are deeply committed to helping more students enter colleges and universities well prepared. Civil rights, K-12 education, higher education, parent and community groups all have strong concerns about the HLC proposed new policies. The coalition also has requested an informational, joint House/Senate hearing on the new HLC credentialing policies.

We urgently request a pause in implementation until our conversations can begin, and hopefully, conclude with policies that more effectively serve our mutual goals. We look forward to your reply.

Sincerely,

A handwritten signature in black ink that reads 'Fred Nolan'. The signature is written in a cursive style with a large, sweeping initial 'F'.

Fred Nolan,  
MREA Executive Director