



June 3, 2016

Mr. Neil Bryant
Chair, Oregon Higher Education Coordinating Commission
775 Court Street NE
Salem OR 97301-3827

Re: **Additional Accelerated Learning Standards**

Mr. Bryant:

Thank you for the opportunity to comment on the Commission's draft standards and oversight proposal. The National Alliance of Concurrent Enrollment Partnerships (NACEP) strongly encourages all institutions of higher education to adhere to high standards of academic quality and practice when engaging in high school partnerships, and this proposal makes an important contribution by establishing, for the first time, standards for two of the emerging innovations in the dual credit field. We have seen the positive impact that upholding standards has had on raising the reputation of "traditional" dual credit, and it is critical to set minimal standards to uphold academic integrity any time a new innovation appears on the higher education landscape. Such standards should not be used to overregulate and stifle innovation, but rather should be used to establish a level playing field among all providers and to prevent abuses – whether intentional or unintentional. I commend the Accelerated Learning Workgroup for its diligence in crafting these standards for two emerging models and encourage the Higher Education Coordinating Commission to adopt high standards for these models. Doing so will help ensure that high school students receive a high quality collegiate learning experience and that programs adhere to commonly accepted academic practice in higher education.

NACEP firmly believes in the value of non-governmental, third-party peer review as a means of program improvement and quality assurance. Our Accreditation Commission offers an accreditation service to institutions that wish to demonstrate to their peers that they have policies and practices in place that lead to a high degree of academic integrity whenever a high school instructor is approved by a college to teach a credit-bearing college

course (the model that NACEP defines as concurrent enrollment). Portland State University's Challenge Program, and 97 other concurrent enrollment programs across the country currently hold our national accreditation. Our standards were developed over many years, have proven adaptable to a wide range of institutions, have been incorporated into 17 states' program standards and quality assurance mechanisms, and endorsed by professional associations of college faculty in English, Composition, and History.

While our accreditation service is non-governmental and voluntary, NACEP also believes that all programs must uphold basic standards of academic quality for dual credit coursework – whether they meet NACEP's definition of concurrent enrollment or utilize differing models. We are committed to cooperating with government agencies to raise the quality of offerings of all dual credit programs. Our standards were adapted in 2010 as the basis for the program reviews conducted by Oregon Dual Credit Committee. NACEP also provided advice to the state in establishing the procedures for the program reviews, conducting research on other states with similar oversight procedures.

The proposed additional accelerated learning standards establish important minimum expectations for two models that are emerging in Oregon and in other regions across the country, for which there are yet few guidelines and do not have widespread acceptance. From my perspective, there are a few key components to the draft standards that I think are critical and which I want to highlight for your attention:

Sponsored Dual Credit. The preface suggests that this arrangement may be utilized in situations where a high school instructor does not have the necessary academic credentials to be the instructor of record for the college. These models, where I have seen them, are essentially a college course that is co-taught, co-graded, or taught by a high school instructor and graded by a college faculty member.

Standard F2 is a key component to maintaining academic integrity of this model – by requiring a *Sponsoring Faculty Member* from campus who has the qualifications necessary to be the instructor of record. What will be critical as programs utilize this model is that this faculty member be more than an instructor of record in name only. This individual should have a substantive role in either the delivery of instruction and/or assessment of student learning, and ought to have responsibility for assigning student's grades.

Assessment-Based Learning Credit. This approach essentially enables colleges and universities to award credit-by-exam for institutionally-designed assessments, rather than the more well-known third-party assessments such as CLEP, Dantes, Excelsior College Exams, Advanced Placement, Cambridge Exams, and International Baccalaureate Exams. In addition, many colleges already utilize industry-established assessments to award credit in career and technical fields. Transcript and Transferability Standard TR1 will be a key component to maintaining transcript integrity – by requiring a notation that the credit is awarded based on assessment, rather than course completion. This is standard practice for credit-by-exam, as those credits transfer between institutions differently than college credits awarded based on course grades. I believe regularizing this model will be of particular benefit to career and technical pathway programs, for which dual credit is a key component to transitioning high school students into postsecondary degree programs.

The development of standards for these two models, while specific to the Oregon context, represent an important development in the field nationally. We have seen increased interest by colleges and universities in establishing such programs, yet to date there are no comprehensive quality standards specific to these models. Other states and NACEP will benefit greatly from the foundational work you have completed, and will look to Oregon to learn from your experiences with these emerging models.

It is of vital importance that these programs be designed with the highest degree of academic integrity. High school students are a unique population of students served by colleges and universities, and are best served when their first college experience is one that is of high quality and broadly accepted regardless of where they matriculate to college.

We welcome the opportunity to continue to work with the Oregon academic leadership to further our shared interest in dual credit quality improvement.

Yours truly,



Adam I. Lowe, Executive Director