

May 4, 2026

Illinois Community College Board
Attn: Matt Berry
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Springfield IL 62701-1711
Matt.Berry@illinois.gov

Dear Mr. Berry,

We appreciate the opportunity to review and provide input into the [proposed rules](#) for Dual Credit (Subpart C, Section 1501.313). As an organization, Education Systems Center at Northern Illinois University (EdSystems) has been deeply involved in the implementation of the Dual Credit Quality Act and aligned policy and supports, including the State Perkins Plan, the Postsecondary and Workforce Readiness (PWR) Act, and the College and Career Readiness Indicator of the State's Every Student Succeeds Act Plan. Our work has included facilitating the development of the original Dual Credit Quality Act Model Partnership Agreement, as well as the State of Illinois Model Programs of Study Guides, which highlight strategic opportunities for dual credit across key pathways.

Furthermore, our team has engaged in deep partnerships with communities across Illinois to implement strategic and quality dual credit opportunities that accelerate students toward postsecondary success. Our comments are informed by our extensive experience in State policy and local implementation, as well as extensive partnership and conversations with colleagues at the College in High School Alliance (CHSA), the National Alliance of Concurrent Enrollment Partnerships (NACEP), and the Illinois Alliance of Concurrent Enrollment Partnerships (ILACEP), including the seminal qualitative [Illinois Dual Credit Survey](#) that provided deep insight into the value of dual credit for various stakeholders.

First, we applaud ICCB for drafting rules that affirm the spirit of the Dual Credit Quality Act Amendment passed in 2025. Our comments that follow are intended to support the ICCB in implementing [Public Act 104-0012](#) with fidelity to the spirit of the legislation and an eye toward scaling equitable access and ensuring quality outcomes for Illinois students. We celebrate the opportunity to support the implementation of this Act in such a way that builds from the extensive work in Illinois to emphasize scaling of quality and strategic dual credit that accelerates student progressions into and through postsecondary education.

To that end, we highlight several areas where ongoing leadership and guidance from the ICCB will ensure that the potential of this legislation is fully realized, particularly in instructor qualifications, course requests, and appeals processes.

Instructor Qualifications (Section b)

We appreciate ICCB's effort to bring administrative rules into alignment with both legislative and accreditation policy as well as how hiring takes place in practice in communities across the state. We also celebrate ICCB's inclusion of an appeals process for Professional Development Plan disapprovals; this will give districts and colleges valuable opportunities to collaborate and



right-size instructor qualifications, particularly for courses that have been most challenging to staff, such as Career and Technical Education (CTE) courses.

Recommendations:

- 1) In (b)(2), update language to read “appropriate *industry*-recognizable credentials” and include expectations of how colleges should communicate what would qualify as appropriate.
- 2) Provide clarity in the timeline for colleges to review proposed Professional Development Plans. As written, it is unclear if the 30-day period coincides with the timeline for colleges and high schools to appoint their liaisons under 110 ILCS 27/16.
- 3) Analyze patterns in Professional Development Plans to share with the Dual Credit Committee for future discussions to enhance policy and guidance, considering the following questions:
 - a. Which subjects/courses are most frequently represented in Professional Development Plans?
 - b. Are there patterns in types of qualifications that are or are not approved by colleges?
 - c. Are there patterns for Professional Development Plan disapprovals that are ultimately reversed on appeal to ICCB?
- 4) Consider a future opportunity to add a pathway for high school instructors without master’s degrees to use a Professional Development Plan to become qualified dual credit instructors, which can help address particularly acute shortages for CTE dual credit courses.

Course Requests (Section i)

The most critical changes made to the DCQA are to the course request process, which will reshape how high school and community college partners negotiate with one another to establish their partnership agreements. We appreciate ICCB’s thoughtful approach to incorporating the legislative updates into this section with an eye toward balancing the interests and challenges facing both high school and college partners.

Recommendations:

- 1) In section (i), explicitly define “written” request to include “via regular mail or by electronic means” to align to other areas of the rules that specify means of written requests.
- 2) In (i)(1):
 - a. Provide guidance on how to address potential issues if “calendar days” fall over extended periods of business holidays (e.g., a winter break).
 - b. Provide guidance on how colleges and high schools are expected to communicate their selected liaison.
 - c. Provide greater specificity for “timely response to communications” tied to business days (e.g., “within two business days”) to ensure colleges and high schools have a clear understanding of what constitutes good faith negotiations.
 - d. Include an approximate timeline for when colleges should render a decision for approval or disapproval in alignment with the legislative language (110 ILCS 27/16.10 “After mutually agreeing that a partnership with the community college



- district is not feasible”) to ensure that high schools have a clear understanding of when they can expect a decision and, if necessary, pursue the appeals process.
- 3) In (i)(8), update to read “...30 calendar days from the initial *written* request...” and “via regular mail or by electronic means” to align to other areas of the rules that specify means of written requests.
 - 4) In the core partnership components enumerated in (i)(3)(A-M):
 - a. K: Bring grammatically into alignment with the others for clarity. Could read “the establishment by the community college of a mechanism...” and use “students” rather than “student”.
 - b. L: Include a reference to the section about mixed enrollment (e.g. “pursuant to subsection (i)(6) on mixed enrollment).
 - c. M: Provide guidance to high schools and colleges for how such data reviews can take place. In our experience, cross-partner data engagement works best when partners are equipped with the tools, resources, and facilitation to build a shared understanding of their data and to use it to drive continuous improvement processes. This is particularly important for making sense of how to identify and address the needs of different subgroups of students.

Appeals Process (Section j)

Again, we appreciate the thoughtful approach with which ICCB has defined this new appeals process. Building from our recommendations above, we believe there are several opportunities for enhancing this section for clarity and realistic expectations.

Recommendations:

- 1) Use “business days” in lieu of “calendar days” to minimize issues when actions are taken near extended holiday breaks for institutions.
- 2) Enumerate what qualifies as a new course request vs. an existing partnership, as this shapes what timelines the request is subject to. Example scenarios:
 - a. School District A has a partnership agreement to deliver a dual credit math course with Community College A. Would they be able to submit an appeal if the college declines an English course request?
 - b. School District B has a partnership agreement to deliver a dual credit math course with Community College B. Would they be able to submit an appeal if the college declines a new instructor for the dual credit math course?
- 3) Establish a process for high schools and colleges to revisit existing agreements to ensure they reflect the spirit of the updated legislation.
- 4) Analyze patterns in appeals to share with the Dual Credit Committee for future discussions to enhance policy and guidance, considering the following questions:
 - a. Are there patterns in which types of disapprovals are most frequently appealed (e.g., course types and subjects, instructor qualifications, etc.)?
 - b. Are there patterns for disapprovals that are ultimately reversed on appeal to ICCB?

Model Partnership Agreement

In creating the appeals process, Public Act 104-0012 transforms the Model Partnership Agreement (MPA) from the default agreement into a resource. Our extensive experience in



collaborating with partners across Illinois, as well as in conversation with state leaders nationally, we know that the MPA has served as an invaluable policy lever to support effective negotiations. To that end, we encourage ICCB to undertake updates to the MPA that reflect the current legislative and accreditation policy context, incorporate templates and resources that empower high school districts and partners to effectively negotiate, and uplift best practices that have evolved across Illinois since its creation. We further recommend that ICCB provide workshops and other means of socializing the updated MPA with the field to ensure it is both understood and utilized as an effective resource.

Thank you again for your work and for the opportunity to offer public comment on these draft rules. We look forward to supporting our partners across Illinois as this critical work moves forward.

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