

BOARD OF HIGHER EDUCATION

REQUEST FOR BOARD ACTION

NO.: BHE 24-49

BOARD DATE: June 11, 2024

APPROVAL OF CRIMINAL JUSTICE PROGRAMS UNDER THE GUIDELINES FOR CRIMINAL JUSTICE AND LAW ENFORCEMENT ACADEMIC PROGRAMS

MOVED: That the Board of Higher Education approve the application by **American International College for the Degree of Master of Science in Criminal Justice** under the *Guidelines for Criminal Justice and Law Enforcement Academic Programs*. The program has been found to meet or exceed all quality standards established by the *Guidelines* making it eligible for police career incentive pay increases under the Police Career Incentive Pay Program (PCIPP), formally known as the Quinn Bill.

Provided further that AIC will provide a report at the conclusion of academic year 2024 – 2025, in a form and manner to be determined by Department staff, which adequately documents the progress made in establishing a plan to ensure the formal credentials and experience of the faculty assigned to teach in the approved program remain in compliance with the requirements of the PCIPP *Guidelines*.

ACTION: Motion approved and advanced to the full BHE by the Executive Committee on 6/3/2024; and adopted by the BHE on 6/11/2024.

Authority: Chapter 41, Section 108L (as amended)

Contact: Richard Riccardi, Sc.D., Deputy Commissioner for Academic Affairs & Student Success

Background

The Police Career Incentive Pay Program (PCIPP), formerly known as the “Quinn Bill,” was enacted by the Legislature in 1970 for the purpose of encouraging police officers in participating municipalities to earn degrees in law enforcement and criminal justice and to provide educational incentives through salary increases. The Quinn Bill was amended in June 2002 to give the Board of Higher Education (BHE or Board) authority to, among other things, develop and implement quality guidelines (*e.g.*, program standards and a review process) for programs seeking to participate in the PCIPP, and periodically review programs for compliance with the standards (M.G.L. c. 41, §108L). The Board approved the *Guidelines for Criminal Justice and Law Enforcement Programs* in February 2003 for implementation on January 1, 2004, and approved a subsequent amendment to the [Guidelines](#) at its June 19, 2018, meeting. The *Guidelines* include quality standards and the process to be followed for new programs and program review.

On May 1, 2023, American International College (AIC) sent a letter of intent (LOI) dated April 25, 2023 to the Commissioner of the Department of Higher Education seeking approval of its existing, BHE-approved Master of Science in Criminal Justice program to be certified for the Police Career Incentive Pay Program. The LOI identified July 7, 2023, as the date when AIC planned to submit its PCIPP application, with September 29, 2023 as its actual submission date. The initial application was revised and resubmitted on November 10, 2023, and was deemed complete by December 7, 2023. The required external evaluators were notified and received their charge on January 10, 2024.

Upon initial review the evaluators found the application did not present sufficient information in several areas in order for them to complete their work. They returned an unsigned assessment report (evaluation checklist) to the Department on February 2, 2024 and offered to allow AIC to amend its application with additional information and to then reassess the application with any new information provided. The evaluators included comments with the unsigned assessment in order to provide guidance as to their concerns and where they sought additional information.

AIC elected to provide additional information and did so on February 16, 2024. This information was relayed promptly to the evaluators. The evaluators reassessed and presented their final, signed report on February 23, 2024. The evaluation checklist reflected an overall rating of “not approved.” As per the application process, the evaluation was conveyed to AIC on February 26, 2024, with notice that any final institutional response (if pursued) would be due on April 5, 2024.

The institutional response was received on the due date and was acknowledged on April 10, 2024. At that time Department staff had 30 business days to evaluate and make a recommendation to the Board (May 20, 2024). The recommendation could be for “deferral, approval, or disapproval.” Note that these statuses, as discussed in the evaluation form, refer specifically to dates associated with the original PCIPP approval process in 2005 – 2006 and have not been updated. Staff are adhering to the timelines associated with the process and not these fixed dates in order to continue to use the prescribed form until and unless revisions can be made to it.

Evaluation and Discussion

Of the nine standards used to evaluate the program, the evaluators found that AIC's revised application met seven. The evaluators' non-approval of the AIC program was based on the fact that they found the application showed **partial compliance** with Standard B, Graduate Program Structure and Curriculum, and that the application did not provide sufficient credible evidence it could be in compliance by a date certain; and **non-compliance** with Standard C, Faculty, and that the application did not provide sufficient credible evidence it could be in compliance by a date certain. The remainder of this discussion therefore focuses on Standards B and C.

The evaluators provided several comments regarding those sub-standards that they determined were either in partial compliance or non-compliance. Based on these comments, the institution provided responses to the partially met or unmet standards, together with additional evidence including a program curriculum map with a Systematic Evaluation Plan (SEP), and four revised syllabi. Embedded in the narrative response to the evaluation assessment was additional material such as a table of faculty and their academic degrees, and a staffing plan for the Summer 2024 term.

Standard B

In the professional judgment of staff, the additional material addresses the concerns raised by the evaluators regarding the presence and clarity of program level outcomes (Standard B.1) appropriate to the level of the degree (Standard B.2 – Program Design). The institution presented revised program outcomes, as well as a revised SEP and narrative describing the program's operation and learning modalities and the application of higher order skills in mastering content and analysis.

The new material also addressed concerns with how dynamic program courses are (Standard B.2 – Dynamic and Responsive), and whether prescribed activities advanced students' knowledge beyond the baccalaureate level (Standard B.11 – Beyond the Baccalaureate). AIC has revised several courses to include textbooks which present more comprehensive material at the appropriate level. The program has also added assignments reflecting this new material. Revised syllabi were provided.

AIC has addressed another standard, regarding the breadth of curriculum in terms of providing materials about the legal framework of the field as well as of criminal justice administration (Standard B.11 – Cohesive Curriculum) by adding content, readings, and assessments throughout the program's core courses.

The changes, additions and explanations, together with the evidence of same provided, adequately address the concerns of the evaluators regarding Standard B and its sub standards.

Standard C

The evaluators identified two categories of concern about the compliance of the AIC program with Standard C: Whether there were sufficient faculty by credential and employment status (full-time vs. part-time) assigned to the program; and whether faculty hiring, induction and evaluation processes met the standards.

AIC has presented evidence that indicates that the staffing ratio of full-time faculty was bolstered for the Summer 2024 term, and now exceeds the threshold. There was no staffing plan presented for academic year 2024-2025 to show how the program would continue to meet this standard.

Shortly after indicating it would apply, on April 4, 2023, key AIC staff had a meeting with Department staff and presented their case for allowing a combination of terminal degree as well as both formal training and experience in criminal justice to substitute for an earned doctorate (Ph.D.) in Criminal Justice. This opportunity is available to institutions per the PCIPP program [FAQs](#) available on the Department's website:

"Q. Is an Ed.D. or a J.D. with a Master's in Criminal Justice the same as a Ph.D. in Criminal Justice?

A. Generally, for the purposes of meeting Standard C, an Ed.D. or a J.D. with a Master's in Criminal Justice is not considered the equivalent of a Ph.D. in Criminal Justice.

Institutions have the opportunity in their applications to make the case for specific individuals who have credentials other than the Ph.D." [emphasis added]

At that meeting Department staff heard the case for a specific faculty member, the second hired into the program, who has an earned doctorate (Ed.D.) in leadership, two decades of corrections experience with increasing rank and responsibilities, and almost 15 years of college teaching experience in criminal justice. Staff accepted this presentation and encouraged AIC to move ahead with submitting its application.

Subsequent to this meeting, the program hired another (the program's third) fulltime faculty member with an earned doctorate – though not a Ph.D. in Criminal Justice – and both police/public safety experience as well as higher education experience. Finally, subsequent to the PCIPP evaluation process, the program added two doctorally-qualified faculty to teach statistics. Note that the 3rd fulltime faculty hired was not presented to Department staff in terms of the case-making opportunity utilized in the case of the 2nd program faculty member.

The evaluators did not accept that the faculty member presented to staff in April 2023 had the required academic credentials, stating that "The conversation notes provided by AIC have not been reflected in written policy changes" by the Department. It should be noted that the evaluators did not challenge the legitimacy of the April 2023 meeting or the contemporaneous notes about it that the program provided. Staff advise that the process to present "specific individuals" does NOT require written followup or another process.

The evaluators did not think the program had an "open and orderly process" for faculty recruitment, because the "recruitment plan does not appear to focus on criminal justice or criminology fields in general. They do not reach out to any of the criminal justice professional

associations that would lead to more qualified individuals with the education background needed.”

AIC cited that it has a centralized recruitment policy and stated that for future criminal justice faculty searches would include outreach to professional criminal justice organizations.

The evaluators stated that they did not see that fulltime faculty were teaching two-thirds or more of the courses as required in the PCIPP standards, and further noted that “the person teaching research methods and statistics does not have a Ph.D. in criminal justice or a closely related area. The full-time faculty do not have degrees related to this field.”

The program presented a schedule that shows fulltime faculty will teach all core courses in the program in Summer 2024. The program response rightly noted that “There is no stated criterion regarding the degree required to teach specific topics in this program,” before showing that the instructor scheduled to teach statistics during Summer 2024 does have a Ph.D. in psychology with more than 20 years of teaching and scholarship experience using statistics, and that the faculty member scheduled for the research and capstone courses had an earned doctorate.

The evaluators found that the program partially met the criteria regarding faculty hiring, development and evaluation. They did not see evidence that part-time faculty had “orientation, oversight, evaluation, and professional development opportunities.”

The program stated that there was informal evaluation of part-time faculty, and that there were check-ins for each course provided between the Graduate Coordinator and the school dean via the Canvas shells for all courses being offered. Further, with the hiring of an instructional designer at AIC, it is clearly the intent of the college to provide not only opportunities for professional development in online teaching, but also required instruction in best practices for all online faculty.

In the professional judgment of staff, the responses and additional information provided by AIC show they have met Standard C and/or are in process to demonstrate meeting it by virtue of real-time changes made to staffing and instructional support of faculty. Department staff note the following:

- 1) There are sufficient fulltime faculty teaching in the program in Summer 2024.
- 2) The qualifications of the fulltime faculty assigned – except in one case – are either appropriate in the case of the topics being taught (statistics taught by doctorally prepared faculty with statistical analysis backgrounds, for example), or were vetted through the case-making process, in the instance of the second fulltime program faculty. The program did not follow the case-making process in the instance of the 3rd fulltime faculty member.
- 3) The program is following the institution’s hiring practices and protocols and is following the school’s practices for evaluation of part-time faculty. The program has stated it will add more field-specific outreach in future faculty searches.

- 4) Additional required (in the case of online teaching) and optional faculty professional development opportunities are in place or on the way with the hiring of the institutional instructional designer.

To ensure that these changes and warrants regarding policies and practices are fully operationalized and that future hiring, induction, and staffing decisions are made such that the program continues in compliance with all PCIPP standards, staff recommend conditional approval of the program at this time, subject to a report to be submitted after the 2024-2025 academic year that demonstrates this ongoing compliance.

Recommendation

Board staff have thoroughly reviewed materials submitted by American International College and have found that the materials demonstrate full compliance with all standards found within the Guidelines for Criminal Justice and Law Enforcement Programs and recommend approval subject to the reporting condition noted in the cover motion.

Quality Standards for Associate, Bachelor's and Master's Degree Criminal Justice and Law Enforcement Programs

Throughout the standards, 'program' refers to criminal justice and law enforcement degree programs. Following each standard is a list of Indicators for how an institution may demonstrate that it meets the standard. Indicators are not limited to those listed in this document.

A. Program Mission and Purposes

- A.1 The program has a stated mission and set of purposes derived from and consistent with the overall mission and purposes of the institution of higher education.

B. Program Structure and Curriculum

- B.1 The program clearly specifies and publishes program objectives and requirements. Requirements for the program are based upon clearly defined and articulated learning objectives, including a mastery of the knowledge, methods of inquiry, and intellectual skills pertinent to the study of the causes, consequences, and responses to crime and its interrelatedness to other areas of inquiry.
- B.2 The program design is characterized by sufficient content, breadth, depth, coherence, and rigor appropriate to its higher education level. Individual courses and programs are dynamic and responsive to new developments in the field and modes of inquiry.
- B.3 The program and courses provide an opportunity for reflection and for analysis of the subject matter. Programs and courses offered on other than the usual semester/quarter hour basis or through distance learning modalities (internet, television, video-conferencing, or other means) or through different divisions of the institution (e.g., day division, evening division, continuing education division) demonstrate that students completing these programs or courses acquire levels of knowledge, understanding, and competencies comparable to those expected in similar programs offered in more traditional time periods and modalities.
- B.4 The methods of evaluation of student performance are appropriate and consistent with established institutional and academic standards and are comparable to other programs throughout the institution.

Undergraduate Degree Programs

All undergraduate programs in criminal justice are part of a broadly-based degree program with a balance of general education, required and elective

courses in criminal justice and in related fields (cognates), and unrestricted electives wherever possible. While these criteria apply to all undergraduate programs, specific expectations for associate and bachelor's degree programs reflect program degree level. Distinctions made in such expectations may concern such matters as the level, scope, and dimension of degree requirements and expected outcomes.

- B.5 The purpose of undergraduate programs in criminal justice is to educate students to be critical thinkers who can communicate their thoughts effectively in oral and written form, as well as to instill a comprehensive knowledge of the causes, consequences, and responses to crime and its interrelatedness to other areas of inquiry. Programs should strive not only to familiarize students with facts and concepts but, more importantly, teach students to apply this knowledge to related problems and changing situations. Primary objectives of all criminal justice programs include the development of critical thinking; communication, technology and computing skills; quantitative reasoning; ethical decision-making; and an understanding of diversity.
- B.6 The undergraduate criminal justice program affords students the opportunity to develop knowledge and skills above the introductory level through a logically sequenced, coherent, rigorous body of course work. An Associate degree program in criminal justice requires no fewer than 18 semester hours or the equivalent in criminal justice and related cognates. A bachelor-level major in criminal justice requires a minimum of 30 semester hours or the equivalent in criminal justice and related cognates.
- B.7 The *broad scope* of the field of criminal justice is reflected in the undergraduate curriculum, as is a balanced presentation of the issues of the field. All bachelor degree programs can demonstrate that the content areas below are substantively addressed in the core curriculum. Most baccalaureate programs have multiple courses to represent these and other areas, but these substantive areas provide minimum coverage of the field. Associate degree programs will offer courses in some of these areas.

Course/Content Area	<i>Related Content Topics include but are not limited to:</i>
Administration of Justice	(Contemporary criminal justice system, major systems of social control and their policies and practices; victimology; juvenile justice)
Corrections	(History, theory, practice and legal environment, development of correctional philosophy, incarceration, diversions, community-based corrections, treatment of Offenders)
Criminology	(The nature and causes of crime, typologies, offenders, and victims)
Criminal Law	(Criminal law, criminal procedures, prosecution, defense, and court procedures and decision-making)
Ethics	(Issues of ethics in criminal justice)

Policing	(History, theory, practice and legal environment, police organization, discretion, and subculture)
Research and Analytic Methods	(Quantitative -including statistics- and qualitative, methods for conducting and analyzing criminal justice research)

- B.8 In addition to the content areas above, an undergraduate program in criminal justice includes a systematic examination of the issues of diversity in criminal justice through either specific required courses and/or the integration of these issues within the program’s curriculum.
- B.9 A variety of criminal justice electives are available consistent with faculty, resources, and program objectives. Some bachelor degree programs will offer concentrations in specific areas, depending upon the composition of the student body and faculty expertise.
- B.10 All programs have elective internship opportunities available to upper-level students. Measures are taken to ensure that internships are integrated into the academic component of the program and related to educational objectives.

Criminal Justice Graduate Degree Programs

The graduate program objectives reflect a high level of complexity, specialization, and generalization. The program has cohesive curricula and requires activities designed to advance the student substantially beyond the levels of knowledge, competence, and educational accomplishments of a baccalaureate degree program. In addition, all students completing graduate degrees in criminal justice have, at a minimum, graduate level courses in criminology, research methods, and statistics.

- B.11 A master’s level criminal justice program requires a minimum of 30 semester hours or the equivalent in graduate level criminal justice and related cognate credits.
- B.12 The graduate program is not offered unless resources and expectations exceed those required for an undergraduate program in criminal justice.

In addition to the above, Master’s degree programs provide:

- Program objectives reflecting a high level of complexity, specialization, and generalization that challenges students beyond the levels of knowledge and competence acquired at the

- baccalaureate level
- Indication of where objectives are taught in curriculum and how measured
- Comprehensive evaluation or capstone experience

C. Faculty

- C.1 Criminal Justice faculty credentials, number, diversity of educational and professional experience, time commitment and performance are sufficient to accomplish the program's mission and objectives. Faculty specializations are considered in recruitment and hiring decisions.
- C.2 Faculty holding terminal degrees in the field of criminal justice or fields appropriate to criminal justice are actively sought. Institutions do not have undue dependence on faculty who are graduates of their own programs.

- C.3 The institution employs an open and orderly process for recruiting and appointing faculty. Criminal Justice faculty participate in the search process for new members of the program faculty.
- C.4 Faculty hold a minimum of a graduate degree in criminal justice or a closely related discipline.
- C.5 Two-thirds of the faculty in Bachelor's and Master's degree programs hold an earned doctorate (Ph.D.) in criminal justice or a closely related discipline.
- C.6 Programs rely on full-time faculty to teach core courses and to deliver at least two-thirds of the teaching in each degree program. There should be no more than 30 FTE student majors for each full-time faculty member.
- C.7 Faculty assignments and workloads allow adequate time to provide effective instruction, advise and evaluate students, continue professional growth, and participate in scholarship, research, and service compatible with the mission and purposes of the institution and program.
- C.8 Graduate teaching assistants are qualified in terms of education, experience, and training and are usually engaged in teaching only at the undergraduate level. Where graduate teaching assistants are employed, the program carefully selects, trains, supervises and evaluates them.
- C.9 Faculty categories (e.g., full-time, part-time, adjunct) are clearly defined, as is the role of each category in fulfilling both the program's and the institution's mission and purposes. Orientation, oversight, evaluation, and professional development opportunities are provided for all faculty, including part-time and adjunct faculty. Faculty take advantage of these opportunities and take the initiative in ensuring their continued competence and growth as teachers and scholars.
- C.10 Faculty are demonstrably effective in carrying out their assigned responsibilities. The institution employs effective procedures for the regular evaluation of faculty appointments, performance, and retention.

D. Admission and Articulation

- D.1 The institution specifies and publishes requirements for admission into, continuation in, termination from, or re-admission to its criminal justice program(s), which are compatible with its educational purposes. Graduation requirements are clearly stated in appropriate publications and are consistently applied in the degree certification process. Degrees

awarded accurately reflect student attainments.

Criteria Specific to Undergraduate Programs

- D.2 Two-year and four-year colleges and universities enter into articulation and joint admission agreements whenever possible to clarify curricular requirements and academic expectations for both parties. Agreements should be based on a process of identifying and aligning equivalencies in course-level outcomes and competencies.

Institutions will provide clear guidelines regarding the awarding and acceptance of credits for the prior learning. These agreements should reflect discussion of how best to advise and prepare students at two-year schools who are considering four- year degrees.

- D.3 No credit toward graduation is awarded for pre-collegiate level or remedial work designed to prepare the student for collegiate study.
- D.4 Only credit from regionally accredited institutions of higher education is accepted for transfer into an undergraduate criminal justice program.

Academic credit for prior learning including military and police training including military and police training, can be awarded after a review and assessment of student competency of specific learning outcomes. Prior learning credit may be awarded as course-equivalent credit or as elective credit. Once posted, these credits cannot be removed from the student's transcript.

- D.5 No more than 10 percent of an Associate and/or Bachelor's degree is completed through knowledge-based examinations (e.g., CLEP, Dantes). All credit earned through examination is clearly documented on a student's official transcript by specific course designations and numbers, including the source of the credit. Block credits for criminal justice courses are not awarded.
- D.6 The institution awards degrees only to those students who have earned at least 25 percent of the credit hours toward the degree through instruction offered by that institution. The institution endorses only those candidates for PCIPP benefits
at the *60 plus level* who are enrolled in a baccalaureate degree criminal justice program at the institution and who have earned at least 25 percent of the *60 plus credit hours* through instruction offered by that institution.

Criteria Specific to Graduate Programs

Only credit from regionally accredited institutions of higher education is accepted for transfer into a graduate criminal justice program and only on a strictly limited basis. No more than six hours of acceptable transfer credit are awarded at the Master's degree level. There are no waivers of credit.

E. Resources

- E.1 The program has sufficient facilities, equipment (including classrooms, laboratories, information and computer technology), and budgetary resources to meet program objectives and the needs of faculty and

students.

- E.2 Students have access to library and information resources, collections and services that are sufficient in quality level, diversity, quantity, and currency to support and enrich the criminal justice program's offerings.
- E.3 Facilities are adequate to house the collection and equipment so as to foster an atmosphere conducive to inquiry, study, and learning among program students, faculty and staff.

F. Student Services

- F.1 The program provides an environment that fosters the intellectual and personal development of its students, consistent with its mission and purposes.
- F.2 All students in the criminal justice program have access to appropriate and effective orientation, academic advisement, career development and placement counseling.
- F.3 The institution systematically identifies the characteristics and learning needs of its criminal justice student population and makes provision for responding to them.

G. Integrity

- G.1 The criminal justice program exemplifies high ethical standards in the management of its affairs and in all of its dealings with students, faculty, staff, external agencies and organizations, and the general public.
- G.2 The program presents itself to students and other members of the interested public by providing information that is complete, accurate, and clear.
- G.3 Appropriate publications, print or electronic, contain;
 - Criminal Justice program's mission, objectives, and articulated learning outcomes;
 - Requirements and procedures and policies related to admissions;
 - Requirements and procedures for the awarding of all forms of credit, including credit for prior learning, the transfer of credit earned at other institutions, and through other approved methods;
 - Current student fees, charges and refund policies;
 - Rules and regulations for student conduct; other items related to attending or withdrawing from the program;
 - Courses currently offered;

- Aic policies, procedures, and requirements for the criminal justice degree or other relevant forms of academic recognition.
- G.4 Relevant publications, print or electronic, also include a list of current criminal justice faculty and others teaching in criminal justice, indicating departmental or program affiliation, distinguishing between those who have full- and part-time status, showing degrees held and the institutions granting them.
- G.5 The criminal justice program clearly indicates whether any offerings, courses, services, or personnel are not available during a given academic year. It does not list as current any courses not taught for two consecutive years which will not be taught during the third consecutive year.
- G.6 The criminal justice program has readily available valid documentation for any statements and promises regarding such matters as program excellence, learning outcomes, success in placement, and achievements of graduates or faculty.

In addition to the standards above, the following standards are applicable to courses and programs offered off-campus.

H. Branch Campuses, Additional Locations, and Other Instructional Sites

- H.1 Criminal justice courses and programs offered at branch campuses, additional locations, and other instructional sites are consistent with the educational objectives of the institution. Such activities are integral parts of the institution and maintain the same academic standards as courses and programs offered on campus or in more traditional formats.
- H.2 Students have ready access to appropriate learning resources. Sufficient library and information resources and services are readily accessible to students wherever the program is located or however it is delivered, and sufficient and appropriate orientation and training are provided for their use. The facilities foster an atmosphere conducive to inquiry, study, and learning among program students, faculty and staff.
- H.3 The institution maintains direct and sole responsibility for the academic quality of all aspects of the program. On-campus faculty has a substantive role in the design and implementation of off-campus programs.
- H.4 If there are programs available to students via distance technology or other means, off-site instruction is conducted in a manner that maximizes student- faculty interactions and ensures quality.

I. Program Quality and Effectiveness

- I.1 The program undergoes systematic evaluation of all program components and uses the results for program improvement.
- I.2 The program demonstrates that its graduates have acquired the knowledge and developed the skills that are identified as the program's objectives and student learning outcomes.
- I.3 The program demonstrates that students completing courses in non-traditional time periods and modalities, in different divisions, and at satellite or branch campuses acquire levels of knowledge, understanding, and competencies comparable to those expected in similar programs offered in more traditional time periods, modalities and locations.
- I.4 The institution periodically reviews the program under established, clearly defined institutional policies and uses the results to improve student learning and program effectiveness. The review includes an assessment of effectiveness, currency, and continued need.