



Crisis at the

# Boiling Point:

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## A Documentary Look at Adjunct Workplace Abuse and Recommendations for Federal Policy Change

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**The crisis in higher education is about to boil over.**

Once a middle class job, the majority of college and university faculty are now working part-time for very low pay, isolated from colleagues, without job security, benefits or even office space. Students are increasingly saddled with crushing debt that could take a lifetime to get out from under. Parents are struggling to stay afloat in the face of skyrocketing tuition bills. At the same time, for-profit colleges and universities continue to prey on low-income students, delivering poor quality at outrageously high costs that have fueled the growing student debt crisis.

This dramatic shift away from investment in educators and affordable, accessible higher education for students has been accompanied by a move toward a big-business model where corporate boards and their administrators—many of whom have never set foot in a classroom—determine how to spend precious tuition revenue.

*This report tells an important story of what's happening in academic labor by documenting and analyzing just how much work part-time faculty are doing, when they are doing it for free and how federal employment laws often fail to protect the contingent workforce. This report also offers recommendations and actions that faculty, students and concerned members of the community can take to begin to reclaim our higher education system.*

Colleges and universities are increasingly relying upon contingent academic labor. Sixty-seven percent of all employees with faculty status at institutions of higher education in the United States are professors who work outside the tenure system, hired on a class-by-class or semester-to-semester basis, often with low pay and no benefits.<sup>i</sup> College professor—once the quintessential middle-class profession—has become one of the many precarious part-time positions typical of our modern economy.

It's an unsustainable situation made worse by the sad fact that contingent faculty often lack basic benefits and legal protections. Institutions of higher education can and do take advantage of contingent faculty's precarious status under current employment laws and dedication to their profession to get long hours of teaching work for little—and at times delayed—payment in return.

Despite their long work hours and dedication, adjuncts rarely earn compensation equivalent to a livable wage. And too often contingent faculty do not benefit from federal laws designed to both protect workers from abuse and exploitation by employers and set minimum standards for compensation and benefits. For example, the Fair Labor Standards Act (FLSA), the federal law setting minimum wage, overtime, and timely pay standards for both hourly and salaried workers, currently does not cover contingent faculty—regardless of how poorly or how infrequently they are paid—simply because they are teachers.<sup>ii</sup> In addition, eligibility for important federal programs under the Family and Medical Leave Act<sup>iii</sup> and Public Service Loan Forgiveness Program<sup>iv</sup> depends in part on the number of hours worked, limiting or complicating adjuncts' access to those benefits. The long hours contingent faculty work outside of the classroom often outnumber the hours worked in the classroom, but laws and regulations often fail to set accurate standards to account for all hours worked. Too much adjunct work is invisible and undervalued.

It is time for accountability on campus and renewed focus on what matters: providing a high quality education to all students. *Adjunct Action* launched the Campus Accountability Project in 2014 to begin to tell the full story of what's happening in academic labor, releasing a series of reports, beginning with *Adjunct Living: Boston* and most recently *Adjunct Living: Vermont*, that highlight the disparity between what adjuncts make and how much it costs to live in many cities. SEIU has begun documenting and analyzing how much work contingent faculty are doing by administering a national survey and interviewing faculty across the United States about their working conditions.

This report will focus the findings from a recent national survey on workplace conditions.



The survey was distributed by email to faculty at colleges and universities across the country. An initial pilot survey was released in Greater Boston in July 2014 and a longer survey was released nationally in September and October 2014.

Hundreds of instructors took part in the project this year; 160 Boston-area adjuncts completed an initial survey in July and over 300 faculty members teaching at a combined 238 colleges and universities completed the national survey in the fall. Respondents include faculty teaching at every type of degree-granting institution: non-profit, state universities, community colleges and for-profit colleges and universities, both faculty teaching on physical campuses and at on-line institutions. Faculty responded to the national survey from 32 states with the highest percentages coming from Massachusetts (20 percent), New York (14 percent), and California (14 percent). In addition, to date, over 40 in-depth interviews have been completed with faculty to gather detailed data on working conditions. This analysis will focus on responses from the national survey unless otherwise indicated.<sup>v</sup>



## Long Days and Nights, Often Unpaid – And Without Normal Labor Protections

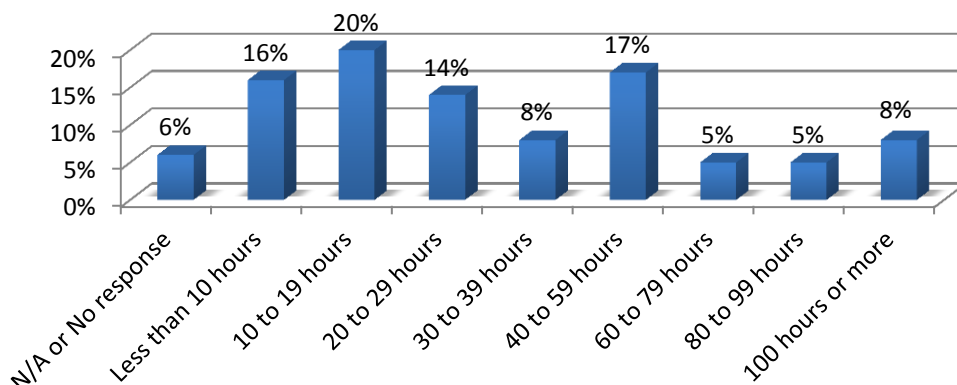
Sixty-eight percent of respondents taught two or more classes per semester. Forty-four percent of survey respondents are teaching three or more classes this term and four percent are teaching seven or eight classes this term alone.

### Prep by the Midnight Oil

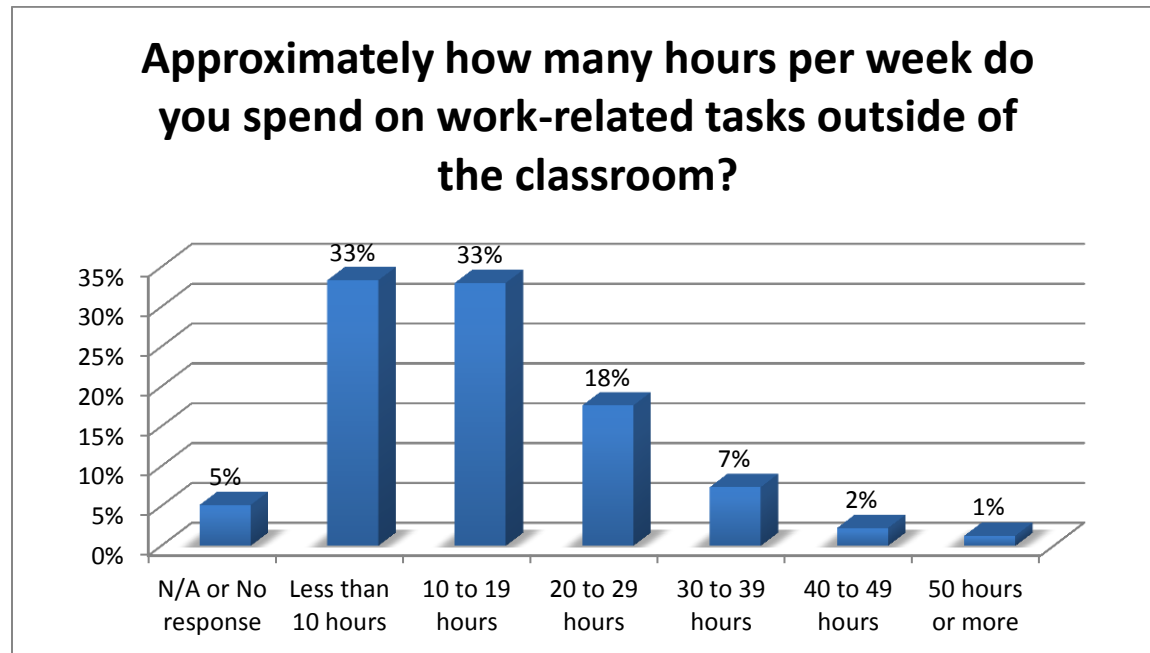
Contingent professors rarely receive any payment for the time spent preparing a course if their course is canceled. This may represent a significant amount of unpaid work, as course preparation is a laborious process, especially when the adjunct is teaching the course for the first time. Eight percent of respondents indicated that they spent more than 100 hours preparing for the courses they are teaching in Fall 2014. Thirty-five percent of respondents spent more than 40 hours preparing for their Fall 2014 courses and 57 percent dedicated 20 hours or more to preparation.

“I teach literature for one class, so it is expected for me to be up to date on publishing trends, classroom trends, awards buzz, etc. I also do research and wrote an article this summer. Office hours and prep (including library visits to get materials and revising the syllabus) are uncompensated. For the online course that I teach, I am expected to continue to work with any student who completes half the coursework but needs additional time.”

### In total, how many hours did you spend preparing for your class(es) before the first day of the term?



Unsurprisingly, a large percentage of contingent faculty work is performed outside of the classroom. Ninety-seven percent of respondents to the pilot and national surveys answered that they are asked or expected to perform work outside of the classroom. In fact, 28 percent of respondents indicated that they spend more than 20 hours a week on work-related tasks outside of the classroom.



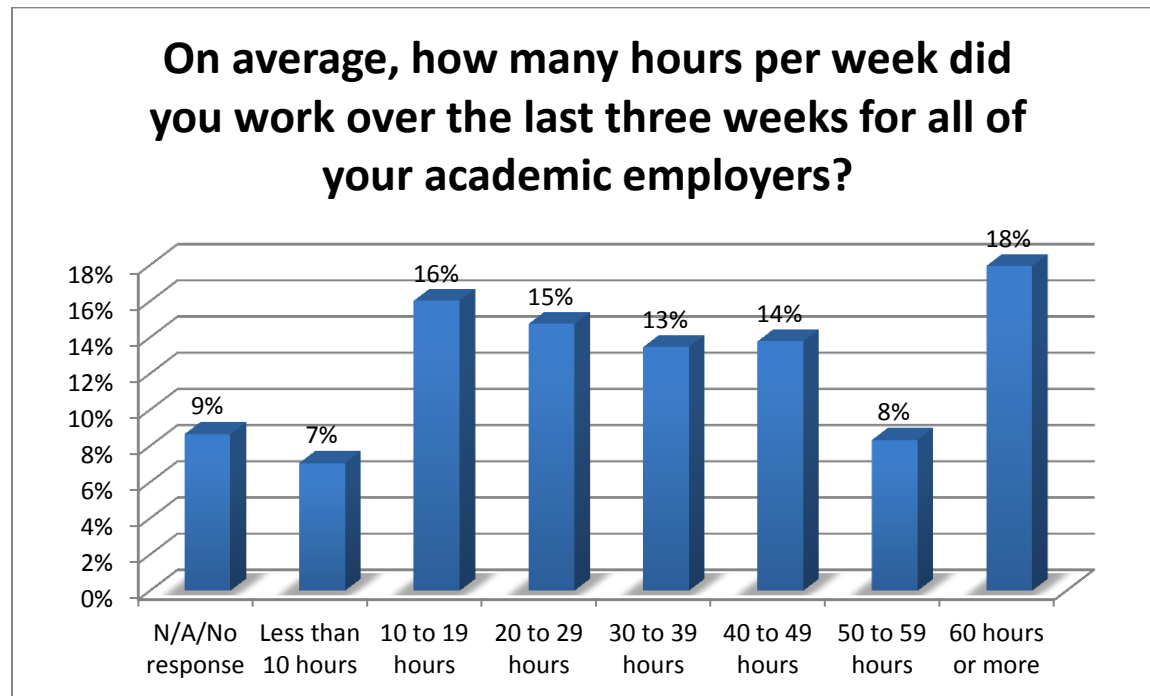
"I have about 18 years teaching in higher education. I have no office. I have to clean out my desk each semester plus I share it with about four other professors in the same situation. There is no privacy at all for work or consulting with students. Other faculty will be tutoring Spanish, math, music and doing their own business nearby and I can't hear or concentrate

.... We are asked to come to meetings of all kinds but only get compensation for one assembly each semester. We are not involved in any discussions unless we volunteer our time."

Adjuncts dedicate a significant amount of time working for their academic employers, far more time than their compensation reflects.

When asked to estimate the average number of hours they work per week for their academic employers:

- 68 percent of respondents estimated that they spend 20 hours a week or more working for their academic employers;
- 40 percent work 40 hours a week or more; and
- 26 percent indicate that they work 50 hours a week or more for their academic employers.



Adjuncts often put in very long days. When asked about the length of the longest day working for an academic employer in the previous week:

- 57 percent responded that their day was 8 hours or more;
- 34 percent worked a day that was 10 hours or more;
- 19 percent worked a day that was 12 hours or more.

### **Low Pay is Not Ok**

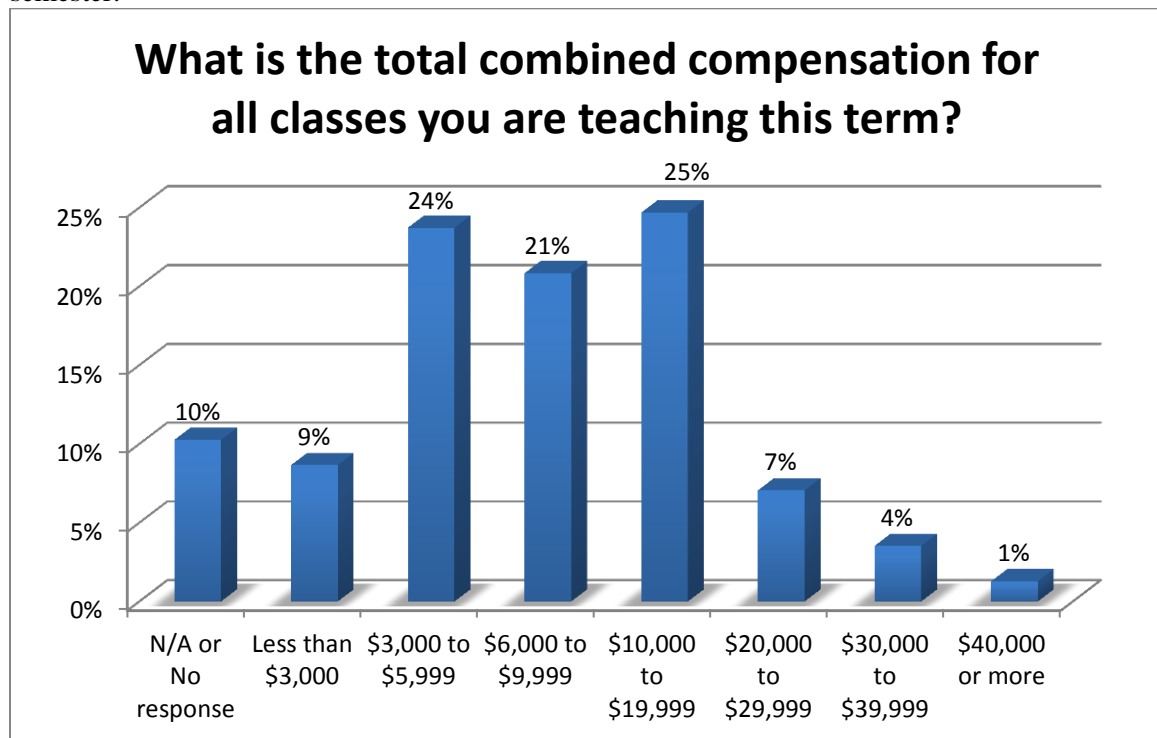
Despite their long hours and dedication, adjuncts' compensation is rarely equivalent to a livable wage. In fact, if it is assumed that an adjunct who responded to the surveys based on his or her experience during the Fall 2014 term will be paid the same amount for the spring and summer terms, then a large percentage of respondents would fall below the poverty guidelines, set at \$23,850 for a family of four in 2014.<sup>vi</sup>

When asked to report **total** combined compensation paid by all academic employers for all classes taught in the Fall 2014 term, the median compensation for the semester was \$8,100 and the average was \$10,775. If we assume that the adjunct receives an equivalent amount in total compensation for the spring semester, then the median total compensation for adjuncts teaching the current academic year is \$16,200 and the average total compensation is \$21,510. Although adjuncts may teach additional classes in the summer, for many their total compensation will fall below a livable wage.

A closer look at the data reveals:

- 9 percent are paid less than \$3,000 in total compensation for all classes taught in the Fall semester;
- 32 percent are paid less than \$6,000 in total compensation for all classes taught in the Fall semester;
- 53 percent are paid less than \$10,000 in total compensation for all classes taught in the Fall semester;
- 68 percent are paid less than \$15,000 in total compensation for all classes taught in the Fall semester;
- Only 5 percent are paid \$30,000 or more in total compensation for all classes taught in the Fall semester.

"I hold a doctorate; I was an Assistant Professor, Coordinator of the Art Therapy Program and Senior PhD Adviser; I was also Associate Editor of my professional journal and a Board Member of my professional organization. Having retired at 62 and moved to another state, I now teach for \$2,500 per 3-credit course."



## Making the Minimum Wage or Less

Reports of long hours coupled with low pay raise the question of whether adjunct pay falls below federal or state minimum wage standards. Survey respondents were asked to provide the number of classes they teach; the estimated number of hours they work each week, including preparation, and the total combined compensation paid for the semester. This data was used to determine if adjuncts are being paid below the minimum wage. Eighty-three percent of respondents provided enough data to support these calculations.<sup>vii</sup>

Among the respondents that provided sufficient data, 38 percent are paid below \$455 per week, the minimum salary that almost all professional employees must receive to be deemed exempt under the current Fair Labor Standards Act (FLSA) regulations.<sup>viii</sup> If teachers were not carved out of the FLSA salary basis requirement, those respondents could potentially access the legal protections against wage theft under the FLSA.

“I have been teaching at the same college for the past 24 years, and still, I do not earn enough to make a living for myself without help from others.”

According to the data provided by respondents, approximately:

- 16 percent are paid below the federal minimum wage of \$7.25 per hour;
- 24 percent are paid below \$10/hour; and
- 43 percent are paid below \$15/hour.

## Erratic Pay Schedules

Often, contingent faculty do not receive their paychecks in a timely manner. Although 89 percent of respondents indicated that they receive payments biweekly or monthly, many reported that there is often a long wait to their first check, which may be paid four to six weeks after classes start. This is a common practice despite the fact that contingent faculty dedicate a significant amount of time before classes start to the work of preparing for the term. This delay can cause hardship when living paycheck to paycheck.

“My first paycheck of the month is the last day of September despite starting classes in mid-August, and starting preparation work well in advance.”

Eleven percent of respondents indicated that they are paid on an irregular schedule. Some are paid as contract employees or they receive their payment in one or two lump sums. The practice of paying in lump sums instead of a regular, predictable paycheck seems to be most common among for-profit colleges and universities. Multiple respondents from different for-profit colleges reported that they are paid in lump sums, with one respondent not receiving payment until after teaching the eight-week session.



Academic employers have paid 18 percent of respondents late in the last 12 months. At times, this was due to administrative problems, which may be more common when an employee has to be rehired—and paperwork refiled—every semester. Other instances of late payment appear to be by design, as one adjunct stated: “All adjunct paychecks for those who teach 16-week courses were delayed for the first paycheck because, we were told, that it was too much work for the payroll clerks to get the paychecks ready for disbursement.”

Colleges and universities may delay payment because they do not process or finalize adjuncts’ hiring paperwork until the class schedules are final. Class schedules often change at the beginning of the semester, with some classes being canceled due to low enrollment. At some colleges and universities, contingent faculty contracts are not prepared or processed until the class schedule is final, which does not happen until a few weeks into the term. It then may take another two to four weeks until the adjunct receives payment. And if the class is canceled during that time the adjunct may not receive any payment.

It is important to note that course cancellation protections are often markedly different among unionized adjuncts.

According to a recent report, 18 percent of adjuncts on unionized campuses said they were paid for course cancellations, compared to 10 percent of adjuncts working at colleges and universities that are not unionized.<sup>ix</sup> For example, SEIU adjuncts at the George Washington

University are paid 20 percent of their salary for the course if the course is cancelled less than 21 calendar days before the first day of class of the semester or less than 10 calendar days before the start of a summer course.<sup>x</sup>

“I went and taught on Monday, taught on Wednesday, and on Friday it came to their attention [that enrollment was too low]. [The college] said ‘we need to cancel.’ So, Friday I went to class to teach and received an email that said your class is cancelled.”

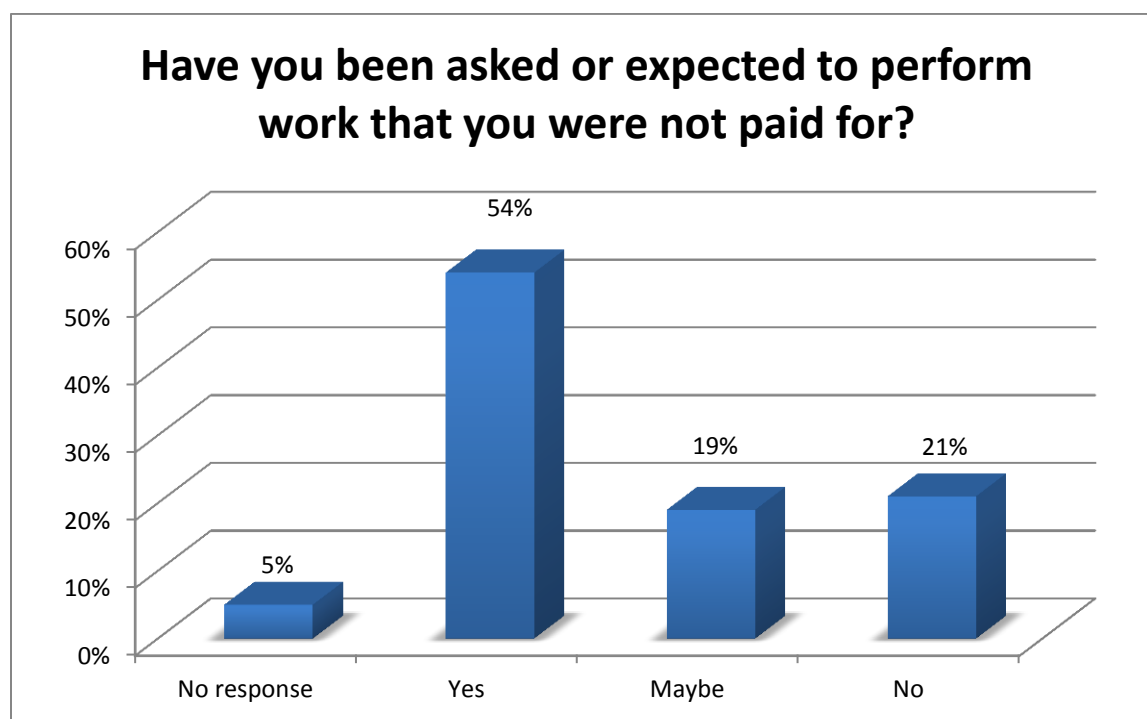
The adjunct received no compensation for any of his time teaching or preparing for the class.

“I teach an average of 9-10 courses per year (3 per semester) and am expected to hold office hours, respond to student emails, write letters of recommendation, teach grad students how to teach, conduct independent studies with no additional pay.”

### Endemic Unpaid Work

When asked if they have ever been asked or expected to perform work that they were not paid for by their academic employers, 73 percent of survey respondents stated “yes” or “maybe.” Additionally, 86 percent of survey respondents from the initial pilot survey responded that they are not compensated for work performed outside of the classroom. Respondents provided examples of unpaid work they have performed, including: advising students enrolled in the major or minor; writing recommendations; attending trainings or learning or transitioning to new course platforms; presenting talks on campus; advising student groups; attending student events; sitting on committees; planning and presenting at

orientation or informational meetings for the department; and designing or developing new courses.



Many survey respondents and interviewees told of instances when they taught a class, such as an independent study class that a student enrolled and paid for, but received little or no compensation for teaching. This appears to be a widespread practice in higher education as we heard these stories from adjuncts in numerous markets, including:

- An adjunct in New York directed a student's Master of Arts thesis and received no compensation;
- An adjunct in Boston taught an independent study course at two different universities, but was not paid for either course.
- An adjunct in the San Francisco Bay area taught, for the first time, a semester-long independent graduate study and was paid \$250.
- A student requested that an adjunct in Los Angeles teach an independent study course, the department approved, but the administration refused to pay the professor to teach the course.
- An adjunct in Boston was asked to mentor a practicum student. The student's practicum is listed as a 3-credit course and the adjunct thought she/he would be paid to teach that course but no compensation was provided.
- An adjunct in California taught an independent study course for multiple students. The adjunct and the students meet for two hours a week and the adjunct spends about three hours each week preparing for the class. The adjunct receives no compensation to teach this course.

Adjuncts often feel that they must agree to perform this extra work or risk losing their positions.

“Last year I was asked to teach a class at half pay because it was under enrolled. It was a new class for me and required extra work to develop class materials. I spent time to recruit students for the class. I was told I had 2 weeks. It was one student short of full enrollment. This is not half of the work. If anything it is 9/10 of the work.... I have been asked to ‘volunteer’ for activities such as junior review, tours, freshman reviews, reviews for other classes, or to review applications to the school. This last one takes a lot of time and was requested of me prior to my being up for review. The implicit assumption is that if I do not volunteer, I will not continue to be employed by the college.”

### **Federal Programs, Faulty Assumptions**

Adjunct and contingent faculty work hard to help students succeed. They go the extra mile often putting in the long hours it takes to prepare for classes or mentor students. But state and federal laws protecting employees are often based on faulty assumptions about the contingent workforce, how long they work and how much they are compensated.

For example, eligibility for programs like the Family Medical Leave Act, the Public Service Loan Forgiveness program and coverage under paid sick laws and wage and hour laws depend on the number of hours worked. Adjunct faculty can all too easily be exploited by employers who expect adjuncts to perform work for little or no pay—and know adjuncts have no recourse to demand payment for those hours worked.

The average pay per course reported by adjunct faculty nationwide is approximately \$3,000.<sup>xi</sup> Yet, teaching a course requires a significant time investment. Professors must work to prepare for their courses, which may include intense reading and lesson development, and must grade and evaluate students. They must be available to students to respond to questions or concerns. They may have to perform site visits for clinical students or attend student events; participate in university meetings and trainings; write student recommendations; meet with students; and prepare for class. This time investment increases if it is the first time the professor is teaching the course or if a large number of students enroll in the course.

“Good teachers think about how to be better ones in all sorts of unscheduled ways and unquantifiable hours.”

These “unquantifiable hours” matter.

Eligibility for many statutory benefits—including the Family and Medical Leave Act, the Public Service Loan Forgiveness Program and sick leave laws—depends in part on the number of hours worked, and these hours must be certified by the employer.<sup>xii</sup> Eligibility for employer-sponsored health insurance is often based on hours worked, as is employer responsibility for providing health insurance to employees under the Affordable Care Act.<sup>xiii</sup> Since contingent faculty are often hired by the course—and there is no data-driven standard for number of hours of work per credit hour—contingent faculty can be ignored or unfairly penalized by employers who avoid responsibility under these laws.

If an adjunct faculty member develops a course and the course is canceled the adjunct often receives no payment for the time spent developing the course. Many adjuncts reported being assigned an independent study or internship or mentoring project with a student and receiving low or even no payment for their time. Further, many adjuncts reported long delays—sometimes in error and sometimes by design—in receiving their paychecks. These delays often have caused difficulties and hardships for the affected adjuncts, many of who financially live on the margin.

In many industries, the instances described above might be considered wage theft, given legal mandates to pay workers compensation in a timely way. The Fair Labor Standards Act (FLSA) requires employers to pay employees a minimum wage<sup>xiv</sup> and time and a half for all hours worked over 40 hours in one week.<sup>xv</sup> The FLSA also protects salary-paid workers, including professionals who earn low pay.<sup>xvi</sup> And a patchwork of state employment laws supplement the pay guarantees in the FLSA.

While some state laws cover teachers like contingent faculty who earn low pay for long hours,<sup>xvii</sup> the FLSA regulations exclude teaching faculty from its protections.<sup>xviii</sup> The FLSA provides an exemption for bona fide professional employees and does not require that they be paid minimum wage or overtime pay.<sup>xix</sup> Under the Act, teachers are considered professional employees.<sup>xx</sup> The FLSA continues to ensure a minimum standard for most professional employees by requiring that they receive a minimum salary, currently \$455 per week, to be exempt from the Act.<sup>xxi</sup>

In most cases, the law covers professional employees who do not earn \$455 per week. But teachers do not have that protection: the current FLSA regulations state that teachers do not need to be paid the minimum salary; they are exempt from the law regardless of what they are paid.<sup>xxii</sup> Without FLSA coverage, adjuncts have no right in federal law to any payment for their work, or to timely payment for their work.

Through survey comments and in interviews, adjuncts repeatedly expressed dedication to their students and their profession. At the same time, many expressed a frustration with current working conditions and a desire to see the system change. As one adjunct wrote, “I love teaching and am dedicated to the success of my students. But, I am SO sick of being undervalued and disrespected as an adjunct professor. I could care less about benefits.... pay me fairly for the work that I do... all of it.”



The public shouldn't be in the dark about how colleges and universities really work. This report gives faculty, parents and elected officials new insight into what's happening on campus to ensure they have a voice about the quality of education students receive. Issues like unpaid work, long hours, access to Federal programs and employment law protections are part of a broad need for change on campuses across America.

We recommend the following regulatory changes and adjunct actions to improve conditions for the academic workforce:

- 1) **Broaden Federal and State Labor Protections:** We must update our laws to recognize and value the reality of contingent work and hold accountable employers that routinely fail to fairly compensate faculty for hours worked. Contingent faculty—all faculty—should not be exempt from coverage under the Fair Labor Standards Act unless their compensation exceeds the salary basis test for salaried workers set forth in the FLSA regulations. If faculty earnings fall below that minimum salary then they, like other professional employees, should have access to the legal protections of the Act. Colleges and universities should be held accountable to pay their faculty the minimum wage and appropriate overtime compensation, and to do so in a timely manner. We urge the Department of Labor and state authorities to ensure that our laws and regulations are reformed to provide faculty with the rights and protections they deserve as vital participants in our economy.
- 2) **Prioritize Instruction:** Academic employers need to prioritize instruction and fairly compensate all instructional professionals. Currently, the average pay per course for adjunct faculty is approximately \$3,000. This requires adjunct professors to work at multiple institutions and/or hold jobs outside academia. The financial struggle and stress are driving talented faculty out of the profession. Adjuncts are struggling to make their student loan and mortgage payments, forgoing heat in the winter, going hungry and even homeless. This cannot continue. We demand and will fight for a living wage for all contingent faculty.
- 3) **Advocate and Take Action for Better Standards:** Employers must be held accountable for low standards. For example, if an employer is late distributing paychecks—as experienced by nearly one in five respondents to our survey—adjuncts should request their paycheck in writing. If the employer continues to resist providing paychecks then employees should consider filing a claim with the state labor department or file a suit in small claims court for the amount owed. Adjuncts should also apply and pursue Federal and State benefits. Using the *Office Hours* tool on [adjunctaction.org](http://adjunctaction.org), adjuncts can track the number of hours worked and, if eligible, should apply for governmentally mandated benefits such as Family and Medical Leave and Public Service Loan Forgiveness. Faculty should provide employers with the documentation of hours worked and, if rejected, appeal. The Adjunct Action website includes a resource toolkit with materials faculty can use to support these actions on their campuses.
- 4) **Unite with Contingent Faculty on Campus and Nationally to Raise Standards.** Unionizing has made demonstrated improvements to the working conditions of adjuncts. In October 2014, part-time faculty at Tufts University in Boston overwhelmingly approved a landmark first union contract that makes groundbreaking progress in job stability, includes a significant increase in per course pay, and establishes new pathways for professional development. According to a *Boston*

*Globe* report, “most part-time professors at Tufts University will get a 22 percent pay raise over the next three years and improved job security under a new contract that could influence negotiations at other schools in the Boston area and beyond where adjunct faculty have recently organized or are considering doing so.”<sup>xxiii</sup> While unionization has the potential to improve compensation and benefits, it also provides an avenue to improve job security, ensure a voice in administration, protect academic freedom and provide a community for an atomized workforce.

- 5) **Advocate for Transparency on University Spending on Instruction:** Quickly rising tuition has resulted in record levels of student debt—and students and parents should demand to know from college and university administrators what their money is paying for and if the faculty teaching their classes is being properly supported. Call or write a letter to the provost at your school requesting information and demanding that your faculty be treated fairly. Hold a rally on campus to raise awareness of your concerns. The *Adjunct Action* website has resource materials that can help students and parents can use to support these actions on their campuses.

Faculty are coming together in *Adjunct Action*, a project of SEIU, to change the face of higher education. SEIU members are fighting to refocus priorities and accountability on our campuses to ensure that our schools are governed by a student-centered philosophy with one mission: to provide access and opportunity for a high quality education for all students.

By raising standards for faculty, SEIU members believe we can restore a higher education system that prioritizes student learning and invests in the instruction that is the foundation for student success.

<sup>i</sup> “Integrated Postsecondary Education Data System: Final release data, 2012,” National Center for Education Statistics, accessed October 30, 2014, <http://nces.ed.gov/ipeds/datacenter/Default.aspx>. Data pulled for all employees with faculty status for full-time and part-time employees.

<sup>ii</sup> 29 U.S.C. § 213(a)(1) (2004).

<sup>iii</sup> 29 U.S.C. § 2611(2)(A) (2009) (requiring at least 1,250 hours of work with an employer during a 12-month period).

<sup>iv</sup> 34 C.F.R. § 685.219(b) (2012) (requiring an annual average of at least 30 hours per week).

<sup>v</sup> Because of rounding, percentages in charts may not add up to 100%.

<sup>vi</sup> Annual Update of the HHS Poverty Guidelines, 79 Fed. Reg. 3593 (Jan. 22, 2014).

<sup>vii</sup> In this section, respondents include only the respondents that provided enough data to perform the calculations, or 259 respondents.

<sup>viii</sup> Calculation includes total compensation and number of weeks in the semester as provided. If a range was provided by the respondent then the midpoint of the range was selected.

<sup>ix</sup> *A Portrait of Part-Time Faculty Members*, COALITION ON THE ACADEMIC WORKFORCE, 14 (June 2012), [http://www.academicworkforce.org/CAW\\_portrait\\_2012.pdf](http://www.academicworkforce.org/CAW_portrait_2012.pdf).

<sup>x</sup> Collective Bargaining Agreement between George Washington Univ. and Serv. Emp. Int’l Union, Local 500, CTW (Aug. 11, 2012–Jun. 30, 2014).

<sup>xi</sup> Audrey Williams June & Jonah Newman, *Adjunct Project Reveals Wide Range in Pay*, THE CHRON. OF HIGHER EDUC. (Jan. 4, 2013), <http://chronicle.com/article/Adjunct-Project-Shows-Wide/136439/>.

<sup>xii</sup> See 29 U.S.C. § 2611(2)(A); see also 34 C.F.R. 685.219(b).

<sup>xiii</sup> See 26 U.S.C. § 4980H (2011).

<sup>xiv</sup> 29 U.S.C. § 206 (2007).

<sup>xv</sup> 29 U.S.C. § 207 (2010).

<sup>xv</sup> 29 U.S.C. § 207 (2010).

<sup>xvi</sup> 29 C.F.R. § 541.300 (2004).

<sup>xvii</sup> To cite just two examples: In California, anyone employed in a professional capacity, licensed or certified by the State of California, engaged in teaching in an accredited college or university, or for a school district, and who customarily exercises discretion and independent judgment in performing his or her duties is exempt only if he or she earns monthly compensation at least two times greater than one month of minimum wage at full employment. Cal. Code Regs. tit. 8, § 11040; IWC Wage Order 4–200; see also *Kettenring v. Los Angeles Unified Sch. Dist.*, 167 Cal. App. 4th 507, 513 (2008). In Washington, teachers are exempt from minimum wage and overtime requirements as “professionals” only if they meet a salary basis requirement of \$250 per week. See RCW 49.46.010 (5)(c); WAC 296-128-530; Administrative Policy ES.A.9.5(8.3) (7/15/2014). Washington courts have held that the law applies to part-time college faculty, including those faculty members who enter into a new contract every quarter. *Clawson v. Grays Harbor College Dist. No. 2.*, 109 Wash.App. 379 (Dec. 10, 2001)).

<sup>xviii</sup> 29 C.F.R. § 541.303 (2004).

<sup>xix</sup> 29 U.S.C. § 213(a), (b) (2004).

<sup>xx</sup> 29 C.F.R. § 541.303.

<sup>xxi</sup> 29 C.F.R. § 541.600 (2004).

<sup>xxii</sup> The salary and salary basis requirements also do not apply to bona fide practitioners of law or medicine. 29 C.F.R. § 541.304(d).

<sup>xxiii</sup> Matt Rocheleau, *Tufts Part-Time Professors to Get Better Pay, Job Security*, BOSTON GLOBE (Oct. 27, 2014), <http://www.bostonglobe.com/metro/2014/10/27/part-time-professors-tufts-get-better-pay-job-security-through-first-union-contract/DqDik8plj87bStvIaXk3eN/story.html>.