COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
August 17, 2015

TO: Karen Molchanow, Executive Director
State Board of Education

FROM: Rita D. Perez, Director
Bureau of Curriculum, Assessment and Instruction

SUBJECT: Recommendation that the Middle States Association of Colleges and Schools, Commissions on Elementary and Secondary Schools (MSA-CESS) be approved as an accrediting body for pre-K (nursery), kindergarten, elementary, secondary and special education private academic schools, tutoring centers, educational testing and remedial centers

Executive Summary

The Commissions on Elementary and Secondary Schools, Middle States Association of Colleges and Schools (MSA-CESS) has requested renewal of its approval from the State Board of Education to act as an accrediting body for the above-noted types of private academic schools in lieu of licensure by the State Board of Private Academic Schools.

MSA-CESS takes all aspects of school operations into consideration through its accreditation processes, including curriculum and instruction, facilities, financial operations, and student activities. MSA-CESS accredits the total school as opposed to stand-alone programs.[1]

The MSA-CESS renewal application was evaluated by a team of three professional staff in PDE's Division of Planning, using the department's standard accreditation agency application rubric. The team's review consisted of an analysis of the MSA-CESS organization, accreditation protocols and processes (including its self-study process), accreditation standards, complaint process, monitoring processes, and oversight efforts

[1] MSA-CESS holds cooperative agreements with accrediting agencies that have compatible standards but which focus on certification or accreditation within a special area (e.g., Montessori schools, schools for the blind and visually impaired, etc.). Because of this understanding, such schools need to prepare only one self-study and undergo one site visit in each seven-year cycle, and the cooperating agencies make their own independent accreditation decisions. All cooperative agency protocols have been vetted and approved by the Middle States Commissions to assure that they meet the MSA-CESS Standards for Accreditation.

with respect to background checks. The team also reviewed MSA-CESS's internal self-study efforts in order to understand what the organization does to engage in reflective self-evaluation and continuous improvement.

The application submitted by MSA-CESS paralleled the department's application format for accrediting agency approval, thus facilitating a straightforward review and comparison. MSA-CESS also provided PDE with an electronic version of the application which contained useful live links to documents with highlighted passages that directly relate to questions on the department's application form. Overall, the various sections of the application addressed each of the rubric criteria with strong, clear responses. The PDE team rated the application as being of "Very Good Quality" or "High Quality" for the majority of attributes on the approval rubric, with the exception that ratings of "Good Quality" were assigned to the attributes dealing with MSA-CESS's criteria for assessing schools' technology capabilities, student activities, plans for future changes, and community involvement program.

MSA-CESS is led by the Commissions on Elementary Schools (17 members) and Secondary Schools (16 members), which are responsible for accreditation decisions, and by an umbrella Board of Trustees, which consists of 12 members, four from each of the MSA Commissions (Elementary, Secondary, and Higher Education). The Board of Trustees is responsible for governance of fiduciary/business operations including, but not limited to, personnel policies, insurance and management of facilities.

Our review included an online verification of the Commissioners' professional affiliations as represented in the application. In addition, PDE staff conducted phone interviews with four selected Commissioners to discuss their service and oversight duties and responsibilities. Each brought many years of experience in education and education administration to their work on the Commissions, and each has served the Commissions in varying capacities as officers and committee members.

Our review of minutes from the two most recent Commission meetings (October 2014 and April 2015) indicates that the commissions exercise independent oversight of the MSA-CESS organization, and engage in independent decision-making with regard to accreditation actions.[2] In addition, PDE requested and received curriculum vitae and official academic transcripts for 10 paid staff members that comprise MSA-CESS's professional team. Our review of their credentials verified that the staff possesses the expertise claimed in the application, enabling PDE to conclude that the staff is qualified to carry out accreditation functions consisting of advising schools on protocol selection and self-study completion, scheduling site visits, reviewing the reports of peer site

[2] PDE staff reviewed separate minutes of the Commission for Elementary Education and the Commission for Secondary Education, as well as minutes for combined meetings of both Commissions.

visitation team reports, and preparing reports for review by the commissioners, in addition to performing all record-keeping and communication responsibilities necessary for institutional review.

Our review of the application found that MSA-CESS has strong accreditation protocols and procedures for reviewing initial applications, granting candidacy status and initial accreditation, renewal of accreditation, ongoing monitoring, complaint processing and investigation. We also found that the agency has adequate processes in place for internal self-study and reflection for continuous quality review and process improvement. Based on our review, PDE recommends that the State Board of Education approve the renewal of MSA-CESS's authority to accredit pre-K (nursery), kindergarten, elementary, secondary, and special education private academic schools, tutoring centers, educational testing, and remedial centers for a term of five years. The remainder of this memorandum provides an overview of the team's findings about the organization and the strength of its accreditation processes and protocols.

Organization and Internal Self-Study

MSA-CESS is a non-profit parent accrediting organization with headquarters in Philadelphia. MSA-CESS has an 87-year history as a Commonwealth-approved accrediting body and currently accredits 707 schools in Pennsylvania, most of which would not require private academic school licensure due to the fact that they are owned or operated by, or under the authority of, a bona fide religious institution. Sixty-seven of the Pennsylvania schools accredited by MSA-CESS are private schools that would be required to have private academic school licensure if they were not accredited because they are not owned or operated by, or under the authority of, a bona fide religious institution.

The parent Middle States Association is made up of three component accrediting bodies:

- The Commission on Higher Education (d/b/a MSCHE, incorporated as MARCHE in Pennsylvania) serves academic, degree-granting institutions of higher education (not within the scope of this application).
- The Commission on Elementary Schools (CES) accredits private academic schools providing early childhood, elementary and middle school education (schools with grades pre-K to 8).
- The Commission on Secondary Schools (CSS) accredits private academic middle and secondary schools (schools with grades 5-12), as well as postsecondary, non-degree-granting career and technical institutions (the latter do not fall under the parameters of MSA-CESS's scope of recognition for purposes of this approval).

Schools serving grades pre-K to 12 are served by a joint committee of representatives from the Commissions on Elementary Education and Secondary Schools. Each

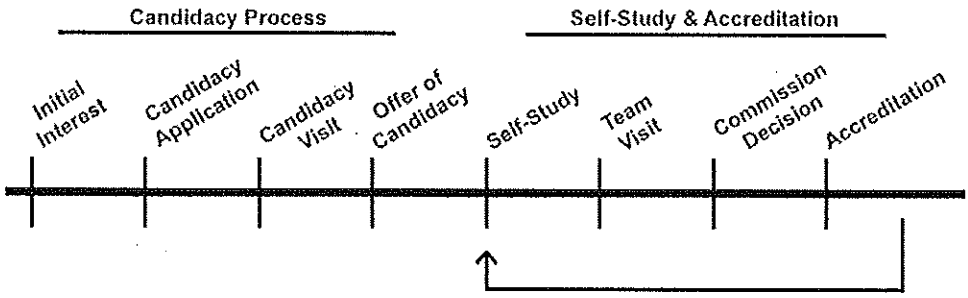
Commission has its own budget and governing board (currently 17 members for CES and 16 for CSS). MSA has a 12- member Board of Trustees with representation from each of the Commissions.

Reports related to accreditation business are mailed to Commissioners on a flash drive 7-10 days in advance of each meeting (October and April of each year). These include both site reports from visiting teams and staff reports with recommendations and questions. Much of this material is quite detailed and can be as voluminous as 300-400 pages. At the subsequent board meeting, additional questions and discussions take place before the Commission votes on accreditation decisions.

MSA-CESS engages in its own continuous self-study as a mechanism for continuous improvement, which is reported in its strategic plan, *The Combined Strategic Plan for the Commissions on Elementary and Secondary Schools: Promoting Leadership for Learning, 2012-2017.* Member institutions were afforded input into the strategic planning process, and recommendations from Commissioners on components of the strategic plan were included as well. Strategic goals for the combined organizations included increasing membership, improving services, reorganizing the Commissions as a unified brand, and sustaining the independent financial positions of both Commissions. Discussion centered on redefining and articulating the Mission Statement, Vision of Excellence, Belief Statements, and Goals and Objectives, in order to reflect changing values and principles over the five-year self-study period.

Self-study Process

MSA-CESS places strong emphasis on the idea of accreditation as a continual process of improvement and accountability, not merely a status to be achieved. The stages represented in the timeline below typically span a 2-5 year period, with the self-study process alone taking between nine months and two years.



See: http://msa-cess.org/RelId/606531/ISvars/default/Process.htm

MSA-CESS offers assistance to schools when considering which of their various protocols will best serve their needs and goals, but all protocols include mechanisms for addressing the 12 MSA-CESS Standards for Accreditation as well as planning for future development. Most individual schools use either: (a) *Designing Our Future* (the more

traditional protocol, recommended for a school seeking accreditation for the first time or one that has undergone significant changes); or (b) *Excellence by Design* (for schools seeking reaccreditation, this protocol enables diverse constituents to participate in long-range institutional planning). An additional protocol, *Sustaining Excellence,* is available upon approval from MSA-CESS for high performing schools likely to continue achieving high results over time.

Schools seeking candidacy prepare an Application for Candidacy, in which they address the 12 Standards for Candidacy (which are subsets of the Standards for Accreditation) and provide background information. The President of the Commissions determines when the time is appropriate for a one-day onsite visit, resulting in a report with recommendations and, if warranted, an offer of candidacy. If accepted to candidacy, the institution begins a rigorous self-study, using the protocol recommended by MSA-CESS. The self-study document, which includes 5-point rubrics aligned with Indicators of Quality for each of the 12 standards, as well as a variety of other qualitative and quantitative data, must include evidence and documentation of the degree to which the school is meeting the standards and achieving the goals stated in its plan for growth and improvement.

Peer Review Site Visitation

MSA-CESS volunteer peer review teams are comprised of educators and administrators who are currently employed or recently retired. Each review team member must hold at least a baccalaureate degree from a recognized college or university and have three years of successful teaching experience in schools accredited by MSA-CESS or another recognized accrediting agency. All visiting teams are drawn from a broad spectrum of educational professionals, ranging from administrators to teachers, as well as specialists in counseling, special education, library media, music, and art. Team members are selected with the host school's unique needs, student population, and school culture in mind.

Peer reviewer preparation begins with a one-hour online webinar in advance of the site visit, which provides an overview of expectations regarding report writing, interviews, and the team decision-making process. This is followed by an organizational meeting led by the team chair at the beginning of the site visit, which consists of an orientation to the protocol, discussion of the team's schedule, and a briefing on the purpose and possible outcomes of the visit. Training for prospective team chairs is also offered (by invitation only) as a one-day workshop which addresses the role and responsibilities of team chairs, as well as procedures for conducting a review of school's progress on MSA-CESS's 12 Standards for Accreditation and the school's Plan for Growth and Improvement. Team chairs are also provided with training on organizing the team visit, preparing oral and written reports, and using supporting resources.

During the 3½ day site visit, the team analyzes the self-study document, conducts interviews and observations, and examines a variety of supporting documentation provided by the school, paying special attention to academic performance data, health and safety compliance information, and other areas covered by the Standards for Accreditation. The team then relates the school's performance on the various standards to the sections where the individual standards are addressed in its Plan for Growth and Improvement.

The peer review team prepares a report of its visit using a thorough, comprehensive template congruent with the accreditation protocol used by the school (e.g., the one provided for *Excellence by Design* is 102 pages in length even before narrative fields are filled in). The team's written report includes observations and recommendations concerning the school's adherence to the Standards for Accreditation and the selected protocol. Many of the fields in the template are designed for open-ended responses, and these provide narrative descriptions of observed conditions at the school, qualitative evaluation of the school's progress toward achieving goals identified in the self-study, and recommendations for implementing improvements.

Accreditation Standards

MSA-CESS has developed detailed and thorough Standards for Accreditation outlining its accreditation principles and expectations in twelve categories:

1. Philosophy/Mission
2. Governance and Leadership
3. School Improvement Planning
4. Finances
5. Facilities
6. School Climate and Organization
7. Health and Safety
8. Educational Program
9. Assessment and Evidence of Student Learning
10. Student Services
11. Student Life and Student Activities
12. Information Resources and Technology

The visiting team makes an assessment of the school's adherence to each of the accreditation standards based on evidence and observation. The team also reviews the school's Plan for Growth and Improvement, which must include measureable objectives, (at least two of which must address student performance), an action plan for each objective, and a plan for annual monitoring and review.

After the on-site visit, the review team notifies the school of its recommendation in an Oral Report Summary, after which the Chair completes a written report containing a recommended action to the commission. The school has 10 days to review the report, after which it is forwarded to the appropriate commission(s) to be voted on at the next semi-annual meeting. Possible actions for candidate institutions include Accreditation, Accreditation with Stipulations, Accreditation by Recognition of Accreditation by another Agency and Accreditation Denied. Possible actions for previously accredited institutions include Accreditation, Accreditation with Stipulations, Probationary Accreditation and Accreditation Removed.

Grants of accreditation are typically for a period of seven years and retention of accreditation is contingent on the completion of a new self-study, followed by an on-site peer review team accreditation visit, and a reaccreditation decision from MSA-CESS before the expiration of that period.

Monitoring

A report must be submitted at the mid-point of the seven-year term of accreditation, and any monitoring issues that were reported as conditions to the previous grant of accreditation require a special onsite visit to confirm that corrective actions were taken within the timeframe required by the Commission. A reporting template is available for schools to use for this purpose. Reporting obligations are addressed in MSA-CESS Policies 1.2, 5.3, and 5.4.

The Commission may require special reports or special site visits at any time during the term of accreditation, prompted by such conditions or events as significant health or safety issues, financial problems, decline in enrollment, abrupt or unanticipated change in the Head of School, other substantive changes, or the need to verify actions taken to resolve issues that led the Commission to grant Probationary Accreditation or Accreditation with Stipulations. MSA-CESS submits a report of all accreditation actions involving Pennsylvania schools to PDE following each semi-annual meeting of the Commissions.

Complaints

MSA-CESS's policy covers complaints against both fully accredited and candidate schools, as well as complaints against MSA-CESS itself. The only complaints investigated against accredited and candidate institutions are those concerned with compliance with MSA-CESS's policies, procedures, and Standards for Accreditation. Complaints must be submitted in writing, clearly stating the nature of the violation and any steps already taken toward resolution. The complaint must identify the standard, policy, or procedure that has allegedly been violated and must include supporting documentation or evidence. Third parties are neither involved in, nor informed of,

investigations in progress unless requested by the complainant or required by another MSA-CESS policy. The President of MSA-CESS acknowledges each complaint within 30 calendar days of receipt. The chief administrator of the school then has 20 days to respond, after which the President has 30 days to submit a written report to the appropriate Commission. Complaints concerning issues of serious public concern and/or those affecting the health and safety of students and/or staff are forwarded immediately to the appropriate Commission and/or executive committee. The President has the authority to contact the head of the institution, the institution's governing board, and/or the local police or district attorney on behalf of the commissions. The institution will be informed of its right to appeal in cases of adverse accreditation action.

Complaints investigated against MSA-CESS itself as an accrediting body are those that are exclusively concerned with noncompliance with the Commissions' own policies and procedures. The President acts on behalf of MSA-CESS and acknowledges each complaint within 10 calendar days. If not resolved to the satisfaction of the complainant within 30 calendar days, the issue will be addressed by a committee appointed by the chair of the appropriate commission.

Background clearances

MSA-CESS cites Act 24 of 2011 and Section 111 of the Pennsylvania School Code in its requirement for accredited schools to have policies and procedures in place to ensure that all employees and student teachers having contact with students have undergone Pennsylvania and federal background checks. Institutions must also follow regulations regarding retaining records of background check reports for all staff hired or contracted on or after April 1, 2007. This requirement is addressed in the self-study document under Standard 6, School Climate and Organization, Indicators of Quality 6.45-6.48. During the onsite visit, the visiting team documents the school's adherence to the standard, evidence to support its assessment, observations and recommendations regarding the standard, and (if applicable) recommended monitoring issues and stipulations. If problems are noted, these would be addressed by the school in its mid-point review and in any special reports and/or school visits that may be required by the Commission in its accreditation decision.

Addendum to Analysis of MSA-CESS Application for Renewed Approval by the State Board of Education

Accreditation of Tutoring Centers

MSA-CESS is approved to accredit tutoring centers, educational testing and remedial centers in lieu of such centers being licensed under 22 Pa. Code Chapters 51, 61 and 63. Middle States currently accredits 17 tutoring centers of the Huntington chain in Pennsylvania.

Corporate Office Reviews. Corporate tutoring center franchising organizations are classified by MSA-CESS as Learning Services Providers (LSP). Individually franchised tutoring centers under an LSP umbrella are classified as Component Centers. Middle States conducts a program evaluation of the central corporate office's model for the delivery of tutoring services, which, if implemented with fidelity by its franchised centers, is deemed to have a high likelihood of success in improving student achievement. The cost of this corporate review is $2000.[1] The corporate review, or program evaluation, is independent of the reviews MSA-CESS conducts for individual component centers. In the case of Huntington Learning Centers (the only corporate tutoring center chain accredited by MSA-CESS which has component centers in Pennsylvania), the corporate review is conducted on a seven year cycle.

If a corporate tutoring chain not previously accredited by MSA-CESS would seek accreditation, it would need to initiate the process by applying for candidacy. The cost of the candidacy visit is $600 and the firm would also be required to pay a $600 team visit preparation fee, which would be required before the corporate review could take place. Once the corporate review has been conducted and the central corporate franchising organization has been accredited as an LSP, annual dues are based on its annual corporate operating budget. Annual dues amounts charged by MSA-CESS are as follows:

- < $100,000 budget — $850
- $100,000 to $500,000 budget — $1,100
- > $500,000 budget — $1,600

The size of the peer site visitation team that MSA-CESS would send to an applicant LSP would range from 2-3 to 4-5 persons, and would consist mainly of MSA-CESS staff, at this time. The reviewers will tour the facility and interview the staff to get an idea of the day to day operations. The main visit occurs in collaboration with the LSP Planning Team and administration, to review the workings of the business and answer any questions that may have arisen during the review of the self-study. The nominal time required for a site visit to an LSP franchising organization would be approximately

[1] The $2000 LSP corporate review fee for Huntington Mark, LLC is split between MSA-CESS and the Western Association of Schools and Colleges (WASC) Elementary and Secondary Accrediting Commissions, since WASC accredits individual component Huntington tutoring centers in the Western U.S. Huntington Learning Centers, Inc. is headquartered in Oradell, NJ and is incorporated in the State of New Jersey.

2½ days, but the precise amount of time, as well as the size of the team, would be tailored to the situation and would also depend on whether the LSP was renewing on the seven year cycle, or whether it was an initial application for candidacy working toward full accreditation.

Component Center Reviews. As noted previously, accreditation of component centers is independent of the corporate office LSP accreditation discussed above. Individual component franchised centers seeking accreditation from MSA-CESS would pay a $600 site preparation fee as well as a $600 fee for the candidacy visit. Peer review site visits are typically made by a single site visitor and last 1½ to 2 days. The reviewers would carry expertise in both the accreditation peer review process as well as the workings of the particular tutoring center. The review team will gain a general knowledge of the workings of the center while affirming that the operations are occurring as outlined in the self-study report. The reviewers will also interview students, parents, and staff from the center to gain an understanding of their perspective. One additional task of the peer review team is to ascertain how the component center is operating in relation to the goals and expectations of the LSP corporate office. Once accredited, a component center pays annual dues of $650 per year in each year of the seven year term of accreditation. Once accredited, renewal visits would cost $600 along with the $600 site preparation fee.

If a tutoring center franchised by a corporate chain that has not already been accredited by MSA-CESS through corporate review were to seek accreditation from MSA-CESS independently, MSA-CESS would consider it in accordance with its accreditation procedures for Supplementary Education Organizations. Similar to an LSP's franchised component centers, the site preparation fee would be $600 and the candidacy visit fee would be $600. The number of site visitors would likely range from 2 to 4, with the visit lasting approximately 2½ days, depending on the size of the center and the scope of its tutoring curriculum and services offered to students. During the candidacy visit, the site review team would determine if it is appropriate for the center to seek MSA-CESS accreditation. Once accredited, annual dues would be based on the number of students enrolled, as follows:

- 1-250 students $650
- 251-449 students $1,050
- > 449 students $1,550

For all peer review site visits discussed in this addendum, the LSP or the component center pays the travel, food and lodging costs incurred by the team members, although for component centers, these costs are capped at $250.

If any educational testing and remedial centers of the type licensed by the State Board of Private Academic Schools in accordance with 22 Pa. Code Chapters 51 and 63 were to apply for accreditation through MSA-CESS, they would be treated as Supplementary Education Organizations and follow a similar accreditation protocol. Currently, MSA-CESS does not accredit any educational testing and remedial centers within Pennsylvania.