COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
August 11, 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 Pennsylvania Association of Independent Schools (PAIS) be approved as an accrediting body for pre-K (nursery), kindergarten, elementary, and secondary private academic schools

Executive Summary

The Pennsylvania Association of Independent Schools (PAIS) has requested renewal of its approval from the State Board of Education as an accrediting body for pre-K (nursery), kindergarten, elementary, and secondary private academic schools in lieu of licensure from the State Board of Private Academic Schools. PAIS has a long history of being a State approved accrediting body and was last approved with its current scope of recognition in September 2010.

The PAIS renewal application was reviewed by a team of three professional staff in PDE's Division of Planning. The team's review consisted of an analysis of the PAIS organization and its accreditation protocols and processes, including its self-study process, accreditation standards, complaint process, monitoring processes, and policy on background checks. The application was rated using PDE's standard accreditation agency application rubric.

The application was well-organized and paralleled the format of PDE's accrediting organization renewal application. The various sections of the application addressed each of the rubric criteria with strong, unambiguous responses. The three reviewers on PDE's team rated the PAIS application as either being of "Good Quality" or "Very Good Quality" on all attributes of the approval rubric. In follow-up to our analysis of the application, the PDE team made phone calls to PAIS board members to verify their status, their knowledge of PAIS accreditation processes, and to discuss their role in providing independent oversight. Board minutes for the last year were reviewed and indicate that the board provides independent oversight of PAIS as a functioning organization and its accreditation actions. Official transcripts were requested and received from the PAIS professional staff in order to verify their qualifications and

possession of the expertise needed to carry out their staff roles associated with accreditation functions.

Our review found that PAIS has rigorous and effective self-study and peer review processes in place for evaluating and granting candidacy status and initial accreditation, as well as effective measures in place to assure continued institutional and academic quality through ongoing monitoring and the accreditation renewal process.

Based on our review, PDE recommends that the State Board of Education approve the renewal of PAIS's authority to accredit pre-K (nursery), kindergarten, elementary and secondary private academic schools for a period 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 process and protocols.

Organization and Internal Self-Study

PAIS has been an approved accrediting body in Pennsylvania for 67 years. The organization is headquartered in Plymouth Meeting in Montgomery County. PAIS accredits 74 private schools across the state and is a charter member of the National Association of Independent Schools (NAIS), which has certified 20 independent associations worldwide and has accredited schools in over 100 countries. Forty-two of the Pennsylvania schools accredited by PAIS are private schools that would need to have private academic school licensure if they were not accredited because they are not owned or governed by a bona fide religious body, 17 of which are also accredited by Middle States. As an NAIS affiliate, PAIS follows NAIS policies and protocols and receives an audit from the parent organization in order to verify the rigor of its accreditation practices, standards, policies and procedures and models of accreditation. As part of that process, PAIS is required to do an in depth self-study much like those which are required of its member schools. It also receives an onsite visit by a review team and a written report is issued on findings and expected actions. PAIS is on a 10-year review cycle with NAIS, with two interim reports and one final report being required to complete the cycle. PAIS recently completed its three year review and is working on its seven year report to NAIS, which is due in 2017. A letter from NAIS was included with the application acknowledging and supporting PAIS's accreditation practice. A copy of the latest financial audit findings was also included. The audit contained no findings and determined that PAIS was compliant with all nonprofit organization regulations and was operating within federally insured limits.

PAIS is governed by a seventeen member Board of Directors, most of whom are teachers and administrators from its member schools. The Board manages the business and affairs of the corporation in addition to overseeing the academic integrity

of PAIS's accreditation practice. The organization's by-laws allow for the creation of a number of committees including an Ad Hoc Committee, Committee for Legislative Affairs and various standing committees. PAIS also has an eighteen member Commission for Accreditation, the members of which are appointed from its member schools. The Commission is responsible for the establishment of accreditation standards and the accreditation reviews of applicant schools, and is chaired by a member of the PAIS Board of Directors.

Following site visits to schools, PAIS the peer review teams compile their reports, which are then forwarded to the accrediting commission for review and assessment. The Commission then makes recommendations to the Board of Directors concerning accreditation actions for individual applicant schools. The Board then acts on those recommendations independently.

To further enhance the organization, PAIS has implemented its own continuous self-study to reflect on its processes for continuous improvement. The Commission reviews standards annually for relevance to organizational improvement, school performance and instructional effectiveness. Assessment of learning is always a topic under discussion. In the summer of 2014, the PAIS Board of Directors and members of the Commission for Accreditation met to review their annual self-study work. During this meeting, consistency of language was updated, standards relating to residential life for boarding schools and international students were updated, and standards for best practices in new learning models (specifically blended learning and online learning). All members of the Commission for Accreditation and all Board Members have input into the self-study process.

School Accreditation Self-Study Process

In order to be considered for accreditation by PAIS, a school must be already licensed by the State Board of Private Academic Schools, be accredited by Middle States, or be operating under valid legal authority (i.e., be duly registered with PDE if it is a nonpublic/non-licensed school operated by a bona fide religious body). Joint accreditation is available with Middle States but all PAIS requirements still need to be met. For initial accreditation, the PAIS self-study takes from one to two years to complete. Self-study for renewal of full accreditation also takes an equivalent amount of effort and time.

PAIS has two self-study/evaluation protocols, both of which are anchored to its accreditation standards and place a strong emphasis on developing and maintaining the capacity for continuous improvement. Full accreditation review and renewal takes place every 10 years, with an abbreviated review process occurring at the 5 year midpoint.

The full initial and 10 year renewal self-study is guided by a 43-page document entitled *Evaluative Standards for Accreditation,* which covers all aspects of school operations in depth. The criteria cover areas such as policies and practices on background checks, certifications, complaint procedures, and alignment of curriculum with the school's philosophy, mission and academic objectives. For the second self-study, which is conducted as schools are approaching the 5-year midpoint, an abbreviated "interim" protocol is used to maintain continuous improvement, awareness of the accreditation standards, and to gauge schools' implementation of recommendations from the previous 10-year evaluation.

Peer Review Site Visitation

Preparation for peer review starts well in advance of the actual site visit. A PAIS member school leader is appointed to act as Chair of each peer review team and meets with the school prior to initiation of the self-study for training on the self-study process and to discuss communication during the self-study. The Chair oversees the on-site visitation and is responsible for preparation of the final report and presentation of the team's recommendations to the PAIS accrediting commission. The other members of the peer review team are appointed from other PAIS member schools, and include teachers and administrators who are matched to the school's mission and culture. This helps to ensure that the team's recommendations and commendations are based on realistic and achievable goals.

Each peer review consists of a meeting with all school staff and visit to each classroom. The peer reviewers check lesson plans for alignment to the curriculum. School curriculum is required to be researched based and evidence that curriculum and instruction support student achievement objectives must be available for the team to review.

Accreditation Standards

PAIS's Standards of Accreditation serve as the information and evidence gathering tool for the PAIS accreditation process. The document consists of 25 standards developed within 10 sections covering topics which include school philosophy and mission, governance, school and community, personnel, and health and safety. Each standard is then broken down into subcategories for increased specificity.

Peer review team members use a rubric aligned with the Standards of Accreditation. The rubric allows for a "Yes" (the school met the standard) or "No" (the school did not meet the standard) in each section. A narrative is also given in each section. A schools is expected to receive a "Yes" in each standard but if it does not, the school is not

automatically precluded from accreditation. The school then must develop a plan on how it will address any of the standards not met. The accrediting commission then takes this plan into account in making its decision about whether a recommendation for accreditation should be made to the Board of Directors.

Section 7 of the standards document contains Standards 15 through 20 which deal with the school's academic program. PAIS requires the curriculum to be cohesive, intentional, sequential, and aligned with the school's mission and philosophy. The curriculum must be in a user-friendly printed or electronic format and have been communicated to all constituents. Standard 16 requires regular reviews of objectives and outcomes, while Standard 17 focuses on methods of instructional delivery. Technology use is evaluated under Standard 17.03 (Parts A & B) and the school being evaluated must provide an explanation of how it is using best practices in implementing technology to increase instructional effectiveness.

Standard 19 requires schools to "... provide evidence of procedures to evaluate, report and track individual and collective student progress; assess effectiveness through the use of data, and how the data is used to make informed decisions." Schools must list their benchmarking tools for student assessment, describe their use of both internal assessments and external norm-referenced assessments, describe how the information obtained from assessments is used and explain how it is aligned with curriculum goals. During the site visit, reviewers look at specific lesson plans to help determine whether the school's curriculum is aligned with its academic objectives.

Monitoring Process

PAIS has measures in place to monitor the entire 10-year span of the accreditation cycle, beginning with the help that peer members provide to schools at the front end during the application and self-study process. One year after the peer review site visit, schools file a report with PAIS addressing the recommendations contained in the peer review team's report. At the 5 year midpoint, schools complete an abbreviated self-study, which is followed up by a one-day visit of two peer reviewers. If needed, PAIS reserves the right to conduct a visit at any time and has a third document called the *Focused Revisit* which is used to assist schools in implementing the final accreditation report's recommendations. Two years before the 10 year renewal, the cyclical process starts again with preparation for the renewal self-study.

Complaint Process

PAIS has a detailed complaint process described in its policies, which is also listed as a tab on its website. Complaints must be submitted in writing, signed and dated, and must be received at the PAIS office address. All complaints are reviewed by the Executive

Director. If a complaint is inside the scope of PAIS policies, it is forwarded to the school's chief administrator for a response. Depending on the issue and severity of the complaint, this response will generate further action in the form of further investigation, or the matter may be closed. Depending on the seriousness of the complaint and its scope, a special PAIS committee may be formed for additional consideration and action. All documents from the complaint process will be retained in a school's file at PAIS. At any point, a complaint may be referred to PAIS legal counsel for further consideration regarding possible action.

Background Clearances

The self-study requires positive confirmation that all federal and state regulations specific to background checks are being followed. During the site visit, background checks are verified and documented by the peer review team.