

TO: Indiana State Board of Education
FROM: Indiana State Board of Education Staff; Indiana Department of Education
RE: Recommendation for Third Party Accreditation Recognition
DATE: May 13, 2020

This memorandum provides a recommendation to the State Board of Education (Board) for the establishment of a “seeking recognition” process for third-party accrediting organizations, whereby accrediting organizations may petition the Board for recognition as a third-party accrediting organization for a period of five (5) to ten (10) years.

Background

Ind. Code § 20-51-1-4.7 and Ind. Code § 20-51-1-6 provide that a public or nonpublic school may be eligible to participate in the school scholarship programs provided for under Ind. Code § 20-51 if the school is accredited by either the Board or a national or regional accreditation agency that is recognized by the Board. The Board currently maintains a list of recognized third-party accrediting organizations.¹

Upon review, the list of recognized accrediting organizations currently maintained by the Board has changed very little over the years, and no formal process exists to add or remove organizations from this list. Furthermore, there is no process to evaluate the accreditation standards and practices of those recognized accrediting organizations currently on the list. Given the changing education landscape, Staffs jointly recommend the establishment of a process to provide an avenue for organizations to petition the Board for recognition status; to evaluate the accreditation standards of recognized organizations on a regular basis to ensure alignment with Indiana’s expectations for accreditation; and to allow for the revocation of recognition should an organization fail to meet such expectations.

Recognition Process Recommendation

An accrediting organization wishing to be recognized by the Board may submit a notice of intent to the Department. The window to submit a notice of intent occurs annually between August 1 and September 30. Upon receipt of the notice of intent, the Department will provide the accrediting organization seeking recognition with the petition outline and recognition agreement form. The accrediting organization seeking recognition has until November 30 of that year to compile and submit their petition for recognition. The accrediting organization will not be considered for Board recognition if the organization fails to submit its notice of intent or petition by the stated deadlines.

An accrediting organization petitioning the Board for recognition will be evaluated based on five (5) core components:

I. Overview of Agency

¹ <https://www.doe.in.gov/sites/default/files/choice/15-17-18-recognized-accreditation-agencies.pdf>.

- II. Organization Staffing
- III. Internal Agency Procedures
- IV. Outline of Accrediting Standards for Member Schools
- V. Signed Recognition Agreement

Staffs will review and evaluate petitions for recognition based on an established rubric that scores an organization's responses regarding the five (5) core criteria, as provided in the organization's petition. Organizations will be provided the opportunity to revise their petition to address identified by Staffs when conducting the review.

Staffs will provide a joint recommendation to the Board as to whether an accrediting organization should be recognized by the Board. Organizations not recommended for approval may appeal the recommendation by submitting a request for review within seven (7) days of the Board's final determination. An accrediting organization approved for recognition is eligible for an initial recognition term of five (5) years, with subsequent renewals of five (5) to ten (10) year periods.

The notice of intent form, petition outline, recognition agreement, scoring rubric, timeline, and investigation process form are included with this recommendation.

Evaluation Process Recommendation

In addition to handling new petitions from accrediting organizations, Staffs will evaluate the accrediting organizations currently recognized by the Board on a staggered cycle, with two (2) organizations evaluated per year over the next four (4) years. These organizations will be reviewed using the same core criteria and rubric used to review initial petitioners to ensure those accrediting organizations currently recognized by the Board meet the established expectations. If an accrediting organization currently recognized by the Board fails to meet expectations, Staffs may recommend to the Board that the organization no longer be recognized. As with organizations seeking recognition, organizations in jeopardy of losing recognition status may appeal the recommendation by submitting a request for review within seven (7) days of the Board's final determination.

Revocation Process Recommendation

Staffs may conduct an investigation into a recognized organization to determine whether it remains in compliance with the recognition agreement; whether its accredited districts and/or schools remain in compliance with any and all requirements; or whether a significant amount of the organization's accredited districts and/or schools are demonstrating consistently low student performance. After the investigation has been conducted, Staffs will provide a recommendation to the Board as to whether the organization should maintain its recognition. The Board may choose from three (3) possible outcomes for an organization's recognition: maintain the current recognition term; place the organization on probation by shortening its recognition term; or revoke the organization's recognition. Organizations will be provided sufficient notice to appeal

any decision to revoke or otherwise modify its recognition. The Board may revoke or modify an accrediting organization's recognition at any time during its recognition term should the organization fail to meet the terms outlined in the recognition contract.

If an organization's recognition is revoked through Board action, the organization is ineligible to seek recognition again for a minimum period of one (1) full year. The organization will maintain its recognition status through the end of the school year during which its recognition status is revoked. Any district and/or school holding accreditation from such an organization will maintain its accreditation status through the end of the school year, unless otherwise stipulated by the Board.

Summary of Recommendation

In closing, Staffs jointly recommend the establishment of a recognition process for third-party accrediting organizations using the above criteria to determine eligibility. This recommendation establishes initial recognition terms of five (5) years, and renewal terms of five (5) to ten (10) years. Currently recognized accrediting organizations would be evaluated on a staggered cycle, with two (2) organizations being evaluated annually for renewal. Staffs would oversee the application process for recognition and present a final recommendation to the Board, which would determine whether to grant or renew an organization's recognition. Once recognized, Staffs would continue to monitor an organization, and pursue revocation or modification of recognition when warranted.

Third-Party Accrediting Organization “Seeking Recognition” Rolling Timeline

Please note: organizations renewing their recognition will participate in the “seeking recognition” process during their final year of recognition.

- **August 1:** Application window to submit notice of intent opens. Upon receipt of notice of intent, organizations seeking recognition will be provided the petition materials.
- **September 30:** Last day of the application window to submit notice of intent. Applications submitted after this date will not be accepted.
- **November 30:** Deadline for organizations to submit their “seeking recognition” petition. Petitions submitted after this date may not be accepted.
- **Within 30 Days of Receipt of Petition:**
 - Department and Board staffs will review the petition using the established rubric and determine whether the organization’s petition satisfies the requirements and expectations for Board recognition.
 - For sufficient petitions:
 - Department and Board staffs will notify the organization of the joint staff recommendation to recognize the accrediting organization.
 - The joint staff recommendation will be presented to the State Board at the next scheduled business meeting.
 - If approved by the Board, the organization will be considered “recognized” beginning with the school year immediately following the approval date.
 - For insufficient petitions:
 - Department and Board staffs will notify the organization of deficiencies with the petition, and provide the organization with thirty (30) days to revise and resubmit its petition.
 - If, after revision and resubmission, the petition is found to be sufficient, Department and Board staffs will notify the organization of the joint staff recommendation to recognize the accrediting organization. The joint staff recommendation will be presented to the State Board at the next scheduled business meeting. If approved by the Board, the organization will be considered “recognized” beginning with the school year immediately following the approval date.
 - If, after revision and resubmission, the petition is still found to be insufficient, the Department and Board staffs will notify the organization of the joint staff recommendation to deny recognition for the accrediting organization. The joint staff recommendation will be presented to the Board at the next scheduled business meeting. If the Board denies recognition, the organization will have seven (7) calendar days to submit a request for review of the Board’s determination. The request for review will be assigned to a hearing officer.

Third-Party Accrediting Organization Petition Outline

Accrediting organizations seeking recognition by the Indiana State Board of Education must electronically submit a petition to schoolaccountability@doe.in.gov no later than November 30 of the year during which the organization seeks recognition. Each response will be scored on a 5.0 point scale, then weighted in accordance with the scoring rubric. The petition may be in any form, but must include, at minimum, the following components:

I. Overview of Organization

- a. Please provide information on the organization, including but not limited to the organization's mission and objectives, including any operations or services provided by the organization beyond school accreditation, and years of operation as an accrediting organization.
- b. Please provide information on the scope of accreditation by the organization and a list of current Indiana districts and/or schools accredited by the organization.
- c. Please provide information on qualifications and experience levels of staff and personnel employed with the organization to oversee accreditation operations. Please provide information on the process utilized by the organization to select appropriate personnel to conduct reviews of applicant districts and/or schools and to provide oversight for member districts and/or schools.

II. Accreditation Process and Procedures

- a. Please provide a detailed explanation of the organization's review and approval process for accreditation. Please include information on the duration of the process, and a summary of typical communication and interaction between the organization and applicant district and/or school during and after the review process.
- b. Please provide a detailed explanation of the organization's expectations and requirements for approval of accreditation, and of the types of accreditation granted by the organization to districts and/or schools.
- c. Please provide information on the relationship between the organization and member districts and/or schools during the term of accreditation, including information on technical assistance services, and monitoring and oversight practices of the organization.

III. Accreditation Standards for Member Schools

- a. Please provide a detailed explanation of the organization's accrediting standards for districts and/or schools, including the organization's expectations for member districts and/or schools.
- b. Please provide a detailed explanation of the organization's evaluation practices to determine whether member districts and/or schools are in compliance with accreditation standards, and whether to maintain or revoke accreditation.

IV. Signed Recognition Agreement

- a. Please include a signed copy of the recognition agreement with the petition.

Third-Party Accrediting Organization Recognition Agreement

Accrediting Agency: _____

Recognition Year: _____

As a third-party accrediting organization, my organization agrees to the following terms for recognition:

- Maintain consistent ethical practices and standards for both the organization and its member districts and/or schools;
- Comply in good faith with any investigations or requests from the Indiana Department of Education (Department) or the Indiana State Board of Education (Board);
- Adhere to the organization standards and practices outlined in the organization's petition for recognition;
- Provide written notice to the Department of any significant changes in organization, philosophy, standards, or membership in a timely fashion;
- Ensure that a comprehensive improvement plan is developed and implemented for any member districts and/or schools that fail to meet the organization's internal standards set forth in the petition;
- Understand the organization's recognition may be revoked by the Board at any point during the recognition period should it be determined through investigation that the organization failed to maintain any of the terms outlined in this agreement; and
- Notify the Department of any member districts and/or schools whose accreditation was revoked, along with the reason for revocation.

As a duly-authorized representative of the above accrediting organization, my signature indicates I agree to abide by the above terms of the recognition contract. My signature also indicates I understand my organization has the right to appeal any decisions made by the Board or Department regarding my organization's recognition.

Authorized Representative Signature_____
Date