

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
1/7/2025

To: Karen Molchanow, Executive Director
State Board of Education

FROM: Carrie Rowe, Deputy Secretary
Elementary and Secondary Education

SUBJECT: Recommendation that the Association of Christian Schools International should not be recognized as an approved accrediting association under Section 5 of the Private Academic Schools Act

EXECUTIVE SUMMARY

The Association of Christian Schools International (ACSI) is seeking to be recognized by the State Board of Education as an approved accrediting association under Section 5 of the Private Academic Schools Act.

When ACSI accredits an institution, that accreditation takes into consideration all aspects of the institution to include its education programs, services, activities, facilities, components, policies and finances. As a service to certain categories of schools accredited by ACSI, the agency partners with many secular accreditation agencies to provide the recognition and credibility schools may need to serve their students as they move beyond school and into the next step of life. ACSI has partnered with Middle States Association of Colleges and Schools (MSA-CESS), Virginia Council of Private Education and the Georgia Private School Accreditation. According to ACSI, the self-study protocol is recognized by other accrediting agencies and therefore serves as the lead protocol and basis for the school's accreditation by other agencies. ACSI has similar processes to many of the other accreditation agencies.

ACSI differs from secular accreditation groups by ensuring that the Christian mission and ethos of the school is viewed and evaluated as integral to all aspects of accreditation. The school is to be as focused on its discipleship, character, and faith development as it is with its academic rigor and achievement. ACSI Commission on Accreditation ("Commission") stated they take seriously its responsibility to provide schools with a program of recognition that is consistent with ACSI's Christian faith, serves schools as responsible stewards and gives honor to those who should be honored.

The ACSI application was evaluated by a team of professional staff in the Pennsylvania Department of Education's (PDE) School Services Office. The team's review consisted of an analysis of the ACSI organization, accreditation protocols and processes (including its self-study process), accreditation standards, complaint process, monitoring process, and policy on background checks.

The application corresponded with the format of PDE's "Application for Approval New Accrediting Organization/Association." The various sections of the application addressed each of the criteria outlined in the internal review rubric.

Recommendation

Based on the review set forth below, PDE does not recommend that ACSI be recognized as an approved accrediting association under Section 5 of the Private Academic Schools Act.

It is not necessary for the State Board of Education to approve ACSI as an accrediting agency in order to meet the objectives expressed in the application.

ACSI's application seeks to accredit non-secular schools only. Private academic school licensure is not required for non-secular schools (i.e., those owned or operated by or under the authority of bona fide religious institutions). Non-secular schools are referred to as nonpublic, nonlicensed schools because private academic school licensure is not required. Therefore, any nonpublic nonlicensed school entity pursuing ACSI accreditation will not be doing so in lieu of private academic school licensure. Importantly, Pennsylvania law already allows nonpublic, nonlicensed schools to seek ACSI accreditation without further intervention, regulation, or approval by the State or the State Board of Education.

The application process, as outlined in Chapter 52, contemplates the State Board of Education approving accrediting associations to accredit schools subject to private academic school licensure and offer an alternative to private academic school licensure. Again, as nonpublic, nonlicensed schools are not subject to private academic school licensure, then it is unnecessary for the State Board to approve an accreditation association, such as ACSI, for this purpose. Rather, ACSI, is already permitted by current Pennsylvania law, without further intervention by the State Board of Education, to offer nonpublic, nonlicensed schools the additional oversight that their accreditation may bring.

Although PDE is not recommending that the State Board of Education approve ACSI as an accrediting agency based on the foregoing, PDE acknowledges that there are merits to ACSI's accreditation application. For instance, if nonpublic nonlicensed schools would seek ACSI accreditation, such schools would be subject to increased oversight and accountability from the accrediting association beyond what is presently required of the schools, which is detailed in the following report. Said increased oversight and accountability may have the potential to improve student outcomes. However, as indicated above, a nonpublic nonlicensed school is already permitted to obtain accreditation through ACSI, irrespective of ACSI's approval status before the State Board. Whether ACSI is approved by the State Board of Education or not, PDE would have no further position on ACSI's accreditation oversight of non-secular schools because such schools are not otherwise subject to Private Academic School licensure requirements.

Organization

ACSI is a nonprofit accrediting organization headquartered in Colorado Springs, CO. ACSI is the parent organization of ACSIPA which is a network of PA Christian Schools advocating for Christian Education in Pennsylvania. Additionally, ACSI's list of accredited schools are

currently recognized as STAR 3 in the PA Early Education STARS program.¹ ACSI also has a relationship or is affiliated with MSA-CESS, whereby ACSI is recognized as meeting or exceeding the MSA-CESS standards of accreditation, and the Council on American Private Education (CAPE) and is member of PACAPE providing support and advocacy for quality nonpublic education for affiliated schools.

Per ACSI's application, many of the schools accredited have been in operation for over 30 years. These schools include early education, online residential, international and hybrid programs which according to ACSI's definition is a college-preparatory school which blends aspects of private and homeschooling. Students meet on campus two or three days per week and complete lessons at home on alternate days under the direction of professional teachers, with parents serving as co-teachers.

ACSI accredits approximately 500 schools in the US.

Self-Study Process

The first stage in the process for a school to be awarded accreditation by ACSI is for the school:

- To submit the application and required fee, be functioning in a manner that it can,
- Be readily identified as a school,
- Provide evidence of sustainability, and
- Has the capacity to meet the standards of accreditation.

An application for accreditation is only accepted after a school has been in operation for nearly a year or more. The candidacy visit may take place during the second year of a school's existence if the school is deemed ready. ACSI guidelines require a minimum student enrollment for the school to be accepted into candidacy. Candidacy may take anywhere from 1-3 years depending on the maturity of the school when entering candidacy.

The school enters candidacy only after an onsite visit verifies the information in the application and the school's potential to become ACSI accredited. The school agrees to follow, with integrity, the fundamental process for accreditation which include:

- Engaging all stakeholders in the self-study process including students, parents, staff, faculty, and board members.
- Establishing steering and standards committees and empowering them to do good work.
- Encouraging a healthy professional dialog across the school community about the findings from the self-study process in each standard area.
- Developing and implementing a Continuous School Improvement Plan (CSIP).

The ACSI self-study protocol includes mechanisms for addressing the 20 ACSI Standards for Accreditation as well as for continuous school improvement. The self-study serves as the guiding

¹ Keystone STARS is Pennsylvania's quality rating and improvement system (QRIS) for early childhood care and education programs. Keystone STARS performance standards build on the health and safety requirements of childcare certification.

document for the visiting team as they examine the school's compliance to the standards, adherence to their mission, and commitment to quality Christian education.

ACSI schools use the Inspire Self-Study protocol which requires the applicant school to:

- Provide accurate and current information, utilizing data from achievement surveys, and finances based on information collected within the past 12 months.
- Make makes full use of the consultant/chairperson to ensure a successful team visit and outcome.
- Host the visiting team during the campus site visit.
- Share the team report with the stakeholders and utilizes the information to plan for the future of the school.

The final task in the self-study is for the school to provide its top-priority goals that will be included in the school's Accreditation Action Plan (AAP). The visiting team will pay special attention to these areas and determine if any additional goals should be considered. On their final day onsite, the visiting team will have a collaborative discussion with the school's leadership regarding priority areas for continuous improvement. Following the team visit, the school will create an AAP. This must be submitted to the ACSI Divisional office with the school's next annual report, and the school will report progress on AAP goals on each accreditation annual report.

Peer Review Site Visitation

ACSI visiting teams are led by the chairperson and an assistant chairperson and is also comprised of peer educators who validate the accuracy and thoroughness of the self-study. To qualify to be the chairperson or team member, in most cases the team member must be a current or former Christian school educator in addition to being able and available to complete the tasks associated with being a team member and adhering to ACSI policies. Additionally, the Chairperson is expected to be from an ACSI accredited school or have previously served at an ACSI accredited school.

The role of the visiting team is to verify that the school effectively meets the Standards for Accreditation and validates the accuracy of the self-study. The visiting team will gain sufficient knowledge of the school and complete a more comprehensive assessment of the school's eligibility for ACSI accreditation and the requirements for the Inspire Self-Study protocol which is intended to stimulate thoughtful self-reflection and continuous school improvement.

During the site visit, the team will conduct classroom visits and interviews, collaborate with the school around future goals and complete the team report in accordance with ACSI accreditation standards and policies, wherein the visiting team articulates their findings in the form of indicator ratings, commendations, recommendations, accreditation action items, and overall analyses. The visit is generally three to four days long and also includes time for the visiting team's orientation and the preparation of the teams exit report to the school.

Eight weeks prior to the site visit, the Chairperson will work with the school to verify 90% of the critical indicators comply with ACSI requirements by completing the Visit Readiness

Checklist which must be submitted to ACSI's Divisional Office. If the school is not in compliance, the visit is to be postponed.

Four to Six weeks prior to the site visit, the Chairperson must ensure that the self-study, evidence and data are completed and posted for the visiting team to access.

The visiting team assesses 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 is formed by areas of measurable objectives the school has identified as being the highest priorities for growth and improvement if the school is to move closer to achieving its Mission. At least two of the objectives must focus on areas of student performance that have been determined to be priorities for growth and improvement. The plan must also include an action plan for each objective and a plan for annual monitoring and review.

Following the site visit, the team prepares a written report consistent with the accreditation protocols used by the institution. The written report includes observations and recommendations regarding the school's adherence to the Standards for Accreditation and selected protocol. A draft copy of the report is sent to the school for feedback. Upon receipt of the final report, the school has 30 days to respond to the team's observations and recommendations. The response is permanently attached to the visiting team's final report and included when the Commission votes to take an accreditation action.²

Schools must seek re-accreditation every six years and are required to submit an annual report on their accreditation action plan, which is reviewed by the Divisional Commission.

Standards for Accreditation

ACSI has developed detailed and thorough Standards for Accreditation for Schools outlining its accreditation principles and expectation in twenty categories:

- Standard 1: Mission, Beliefs, and Foundations
- Standard 2: Spiritual Formation and Biblical Worldview Development
- Standard 3: Governance and School Leadership
- Standard 4: Caring Environment and Positive School Culture
- Standard 5: Stakeholder Engagement
- Standard 6: Community Engagement
- Standard 7: Instructional Program
- Standard 8: Curriculum Planning
- Standard 9: Assessment and Use of Learning Data
- Standard 10: Professional Development and Evaluation
- Standard 11: Legal and Ethical Compliance
- Standard 12: Staff Qualifications and Human Resources
- Standard 13: Student Support Services

² Possible actions for candidate institutions include Accreditation, Accreditation with Stipulations, Accreditation by Recognition of an Existing Accreditation with a Cooperative Partner, Accreditation by Recognition of an Existing Accreditation, Accreditation Decision Postponed and Accreditation Denied.

Standard 14: Financial Oversight
Standard 15: Resource Planning
Standard 16: Facilities and Transportation
Standard 17: Instructional Resources
Standard 18: Health and Safety
Standard 19: Staff Wellness
Standard 20: Student Wellness

Monitoring

The term of accreditation is six years, or it may be adjusted to match the term granted by an ACSI- recognized cooperating accreditation agency. In some cases, the term may be adjusted to meet government requirements. Accredited schools are required to submit an annual report on their accreditation action plan, which is reviewed by the Divisional Commission. The Divisional Commission is made up of representatives from ACSI-accredited schools in each division, or subset of the division. The annual report provides updates on demographics, gives notice of any substantive changes, and affirms ongoing progress on the Accreditation Action Plan, if applicable.

Substantive changes may include but are not limited to the following:

- Change in the school's name.
- Change in legal status.
- Change of location or adding a location that is under the accreditation status or splitting schools.
- Adding a new school.
- Any other change that impacts the meeting of a condition of accreditation.

When a substantive change is received, it is reviewed prior to the next division accreditation meeting. If a substantive change is not approved mid-cycle, the school may add those components the next time the school goes through its full accreditation cycle.

Although ACSI does not require a mid-term visit as an accreditation policy, the Divisional Commission may require a visit to the school within the term of accreditation if deemed necessary. The Divisional Commission usually meets twice a year, to review and monitor accreditation activity in the division and to make decisions on school accreditation.

Schools are expected to respond to relevant requirements and inquiries of ACSI. In the absence of satisfactory responses, the school may be placed on the following statuses:

- Accredited Advised: an accredited school that has a violation of the standards of a fully accredited school. Schools may be on Advised Status for up to 90 days.
- Accredited Warned: an accredited school that has not responded by correcting the deficiency/deficiencies that caused its Advised Status. Schools may be on Warned Status for up to 90 days.
- Accredited-Probation: an accredited school that is being considered by the Divisional Commission for revocation of its accreditation.

- Revocation of Accreditation: a decision by the Divisional Commission that a school no longer warrants its Accredited Status.

ACSI will submit a report of accreditation actions involving Pennsylvania schools to PDE following each semi-annual meeting of the Divisional Commissions. ACSI is also willing to report any findings according to what is required to the PDE.

Complaints

ACSI's complaint policy covers complaints related to accreditation, membership and certification. All complaints must be presented to ACSI through the approved online form.

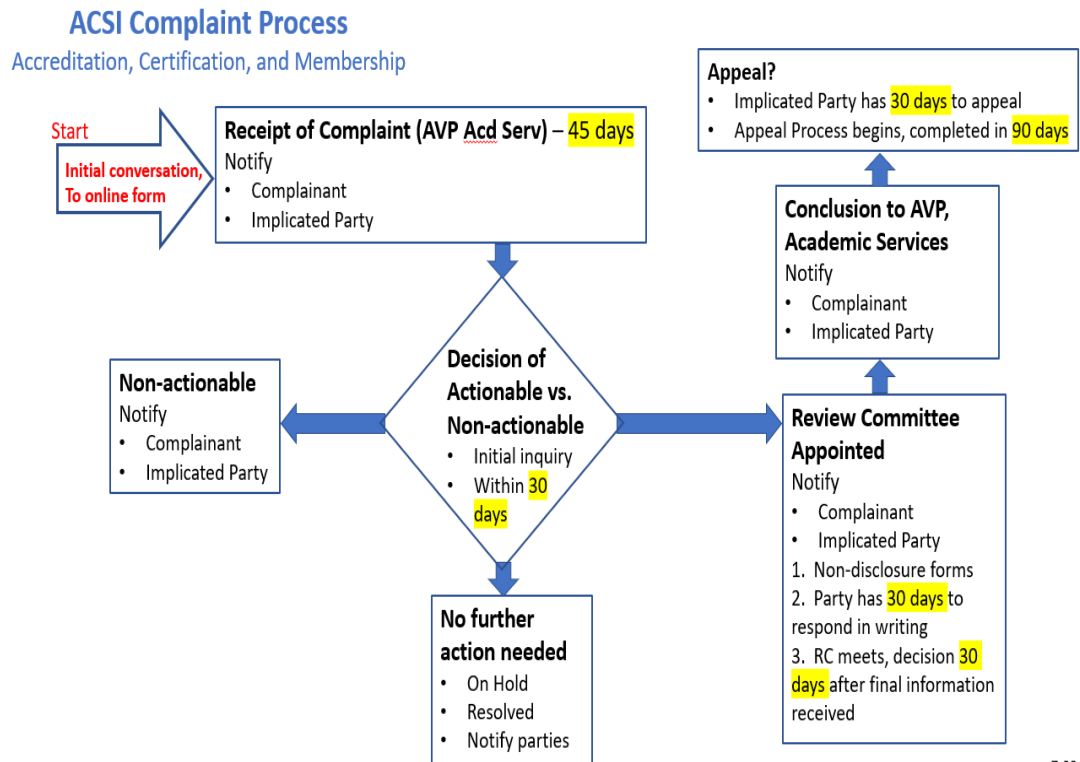
When a complaint is received, ACSI will examine the complaint to determine if it is **Actionable** or **Non-actionable**. ACSI indicated in its application that it does not own, control, or operate its member or accredited schools. It does not solve or mediate disputes between parties such as parents, students, teachers and the schools they are involved with. ACSI's only authority comes in the accreditation and membership of schools or granting of certification of individuals. If the issue involves a violation that significantly disregards the school's or individual's ability to maintain that status, then the issue may be considered actionable. ACSI's primary concern is that schools have appropriate policies and that they implement their policies.

Before filing a complaint with ACSI, the individual complainant must have already exhausted the grievance process within the school including any agreed requirements to use third party mediation.

Complaint process is as follows:

- Initial call received from complainant to explain concern. Complainant will be directed to complete the online complaint form.
- The online form must be filled out by the individual/school with the complaint. Complaints must be submitted in writing through that form.
- Upon receipt, the complaint is reviewed by the Office of Academic Services to determine if the complaint is valid and whether it is **Actionable** or **Non-actionable** depending on the category (accreditation, membership, or certification).
- If **Actionable**, an initial inquiry is conducted to obtain additional information.
- ACSI reserves the right to direct a complainant to complete the school grievance process prior to any action on the part of ACSI, or ACSI may review a written complaint as received and determine which of the following actions may be appropriate:
 - If the complaint is considered **Actionable**, ACSI will pursue the concern further with an inquiry to the school, that may or may not lead to additional actions by ACSI.
 - If the complaint is **Nonactionable**, ACSI may share the concern with the school for their follow-up or file the concern with no further action at the time.
- Depending on if the complaint is Actionable or Nonactionable, the issue is either determined as closed or it moves to a Review Committee which is the next level.
- A Review Committee is formed, and an investigation is conducted. The Review Committee makes a recommendation to the Office of Academic Services for final review.

- The Office of Academic Services reviews the findings and communicates the results. A variety of sanctions are available in each category (accreditation, membership, and certification).
- The Office of Academic Services comes to an agreement with the Review Committee to conclude the investigation by closing the complaint or levying an appropriate sanction.
- Communication to appropriate parties is completed.



7-23-18

Background Clearances

According ACSI, private school administrators must require applicants for positions with direct contact with children to produce with their applications a criminal history report from the Pennsylvania State Police, a clearance statement resulting from a background check for employment conducted by the department of public welfare within the immediately preceding year, as well as FBI clearances for PDE employment completed through Identigo, required Mandated Reporting Training and the ACT 168 Employment history Review documentation. The documentation must be assembled by the school and shared with the visiting team chair either in person, or in a virtual format, during a pre-visit.

Additionally, schools must respond to Indicator 18.3 which requires school to develop child safety policies and procedures that address child abuse, sexual abuse, and neglect, as well as legal reporting responsibilities for staff and volunteers.