



STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
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BILL HASLAM
GOVERNOR

KEVIN HUFFMAN
COMMISSIONER

Blondel E. Senior, Ph.D.
President, E.A. Sutherland Education Association
P.O. Box 495
Collegedale, TN 37315

Dear Dr. Senior,

Category II non-public schools are schools that belong to an agency whose accreditation process is approved by the State Board of Education (SBE). Each prospective agency must submit various materials in the form of an application to the Tennessee Department of Education (TDOE) for review. The agency's rules, regulations and minimum standards for curriculum and operating schedule must conform to the SBE's Rules, Regulations and Minimum Standards. Additionally, at least one school accredited by the agency must undergo a random site visit conducted by TDOE personnel to monitor school approval documents and conformity with the standards presented to the state for review.

Pursuant to Tennessee SBE Rule 0520-07-02-.03,

- *The State Board of Education may approve the school approval procedures of non-public school accrediting agencies.*
- *An agency seeking approval shall apply to the State Department of Education and shall supply relevant information needed by the department.*
- *The State Department of Education shall review the application of the agency with respect to the criteria for approval and recommend to the State Board of Education that the application be approved or denied.*

After careful review of all documentation received within the E.A. Sutherland Educational Association (EASEA) application for agency approval and evidence received and noted during the site visit to Harbert Hills Academy (EASEA accredited school) on January 21, 2014, it has been determined that the TDOE cannot at this time recommend EASEA for agency approval. The factors leading to this decision are as follows:

- 1) According to Tennessee SBE Rule 0520-07-02-.03, *"Each school shall maintain an operating schedule that includes the minimum number of instructional days and hours required of public schools. See Chapter 0520-1-3."* Pursuant to Tennessee SBE Rule 0520-01-03-.02, *"The minimum length of the school day for students shall be 6 1/2 hours."* The EASEA application submitted on October 1, 2013 states on page 81 that EASEA requires, *"The minimum length of the school day shall be 6½ hours gross for grades 1-12."* However, in review of the daily schedule for students at Harbert Hills Academy, students are scheduled

for direct instruction in an amount less than the required number of hours. During an interview with Wanda Sarr (Director of Education, EASEA) and Steve Dickman (President, Harbert Hills Academy) it was stated that all EASEA schools operate utilizing the same basic school/work schedule for students. This could only be interpreted to mean that all EASEA school students are receiving direct instruction for less than the required 6.5 hours per day. A school day of less than 6 1/2 hours for students is in violation of Tennessee statute and SBE rule.

- 2) Pursuant to the same Tennessee SBE Rule 0520-07-02-.03 and 0520-01-03-.02, *"Students shall attend school 180 days."* The EASEA application submitted on October 1, 2013 states on page 81 that EASEA requires, *"The length of the school term shall not be less than 180 days."* However, during review of individual student records on the date of the school site visit, it was not evident that students at Harbert Hills Academy were scheduled to be in class for the minimum required 180 days. As indicated on individual student reports within the student files it was noted that students were scheduled to be in class between 160-170 days each school year. A school term of less than 180 days for students is in violation of Tennessee statute and SBE rule.
- 3) After further review of the EASEA application, it was noted that EASEA requires on page 77, *"Every enrolled student, grades 9-12, shall participate in the vocational education experience a minimum of three hours per day and a maximum of four hours per day."* In review of the daily schedule for students enrolled at Harbert Hills Academy, it was evident that students are scheduled to work as much as seven (7) hours per day during a normal school week (Monday – Friday) with no apparent connection to assigned classes. Evidence indicates this practice is in clear violation of EASEA standards and raises concerns over the monitoring for compliance conducted by EASEA in accredited schools.

The TDOE and SBE take the matter of recognizing agencies as school accrediting bodies very seriously. It is the responsibility of the TDOE and SBE to ensure that all required Tennessee statutes and SBE rules are followed. If at any time an accrediting agency fails to meet minimum standards, the TDOE has no choice but to recommend the denial of approval of said agency.

Unfortunately, the EASEA has not demonstrated to the TDOE that it meets the minimum standard for approval at this time. EASEA's current period of approval is granted through the end of the current 2013-14 school year. It is recommended that EASEA begin now to make plans for alternate school approval for next school year.

According to the Tennessee SBE Rule 0520-07-02-.03, an *"applicant agency may address the State Board of Education at the time its application is being considered."* If EASEA wishes to address the State Board, please contact Dannelle Walker at 615-253-5707 within 30 days of receipt of this letter.

Sincerely,



Marcy Tidwell

TDOE, Director of School Choice