
Category II Non-Public School Accrediting Agencies

The Background:

In 1987, the State Board of Education created a method of approving non-public school accrediting agencies. Category II non-public schools are schools that belong to an agency whose accreditation process is approved by the State Board of Education. Approval of category II agencies lasts for a period of five (5) years.

Each prospective agency must submit various materials in the form of an application to the Tennessee Department of Education for review. The agency's rules, regulations and minimum standards must conform to the State Board of Education's Rules, Regulations and Minimum Standards. Additionally, at least one school accredited by the agency must undergo a site visit to monitor school approval documents and conformity with the standards presented to the state for review.

Previously Tennessee had recognized nine (9) accrediting agencies. Seven (7) of these agencies reapplied for approval:

1. Association of Christian Schools International
2. Catholic Diocese of Knoxville
3. Catholic Diocese of Nashville
4. Mississippi Association of Independent Schools
5. Southern Union Conference of the Seventh-day Adventists
6. Tennessee Association of Christian Schools
7. Tennessee Association of Non-Public Academic Schools

Harding Academy of Memphis chose not to reapply as a recognized accreditation agency since all of their schools are now accredited by AdvancED (Category III).

Two new agencies applied for recognition as a category II accreditation agency:

1. Association of Classical & Christian Schools
2. National Lutheran School Accreditation

All applications for agency approval were received and reviewed by the Tennessee Department of Education during the fall of 2013. School site visits were completed in January of 2014.

Of the ten (10) submissions, nine (9) agencies demonstrated compliance with all rules, regulations and minimum standards for approval as category II accreditation agencies. The E. A. Sutherland Educational Association (EASEA) did not demonstrate to the department that it meets the minimum rules, regulations, and standards for approval at this time.

Several areas of non-compliance to state board rules were noted while conducting a school site visit to Harbert Hills Academy, an EASEA accredited school, and it was determined that the school failed to meet the minimum standards set forth in the Rules of the State Board of Education Chapter 0520-07-02-.03. Based on this information, the Tennessee Department of Education recommended that the State Board of Education deny EASEA's application to be a category II non-public school accrediting agency at the April 11, 2014, State Board of Education meeting. At this meeting, the State Board of Education approved the recommendation on first reading but allowed EASEA to provide additional information to be considered by the State Board of Education prior to making a final decision on the application.

EASEA submitted revisions to the original application and additional information to support the application's approval which was reviewed by the Department of Education. The additional information is included as Attachments B-F to this document as described below. Attachment A has been provided to the State Board of Education's General Counsel for review to protect the confidentiality of the sensitive personally identifiable student information it includes.

- **Attachment A:** Information regarding and copies of all student visas allowing foreign students to attend school in this country legally
- **Attachment B:** Revisions to the original application submitted during the fall of 2013
- **Attachment C:** PDF pages of EASEA school calendars
- **Attachment D:** A revised 190 day accountability report to be used in the future by all EASEA schools
- **Attachment E:** Correspondence from the Department of Education to EASEA regarding the EASEA vocational diploma requirements
- **Attachment F:** A comparison of the EASEA vocational diploma and the State Board of Education diploma requirements

The Department of Education found no evidence to support a change of the original recommendation to the State Board of Education to deny the EASEA application based on the information in the above listed attachments.

Also, subsequent to the April 11, 2014 State Board of Education meeting, the Department of Education identified an additional area of noncompliance with state board rules. This additional finding of noncompliance was identified after the April meeting regarding the EASEA vocational diploma. EASEA issues vocational high school diplomas to students who have not met the minimum requirements for graduation. According to Tennessee SBE Rule 0520-07-02-.03, *"(III) Each student shall meet the same minimum requirements for graduation as students in public schools."* EASEA's vocational diploma does not meet the minimum requirements for these students to graduate. This has been determined to be another area in which EASEA standards are out of compliance with what is required in State Board rules for category II agencies/schools.

The Department of Education recommends the approval of the following schools as category II non-public school accrediting agencies for schools years 2014-2015 through 2018-2019:

Association of Christian Schools International
Association of Classical & Christian Schools
Catholic Diocese of Knoxville
Catholic Diocese of Nashville
Mississippi Association of Independent Schools
National Lutheran School Accreditation
Southern Union Conference of the Seventh-day Adventists
Tennessee Association of Christian Schools
Tennessee Association of Non-Public Academic Schools

The Department of Education recommends the denial of the E. A. Sutherland Educational Association as a category II non-public school accrediting agency.

The Recommendation:

The Department of Education recommends adoption of this item on final reading. The SBE staff concurs with this recommendation.