

## **Policies and Procedures for the Commission on Independent Schools**

### **INTRODUCTION**

The New England Association of Schools and Colleges, Inc. has as its stated purposes: "to advance the cause of education in the colleges and schools of New England and of other geographical areas designated from time to time by the Board of Trustees . . . ; to act as a regional accrediting organization dedicated to the establishment of cooperative relations among the colleges and schools of New England and of other geographical areas designated from time to time by the Board of Trustees and to the development, maintenance, and improvement of sound educational standards and to promote the interests common to both colleges and schools; . . ." (By-Laws of the New England Association of Schools and Colleges, Inc., as amended December 9, 2005.)

The Commission on Independent Schools is one of the six constituent commissions functioning within the framework of the Association. The Commission is responsible for:

- developing standards and procedures subject to Board of Trustees approval for evaluation of institutions for institutional accreditation or Candidate for Accreditation;
- recommending to the Board of Trustees action regarding accreditation or adverse recommendations; (By-Laws, Article IV, Section 7, Appendix B.)
- reporting to the Board of Trustees any actions taken regarding continued accreditation or reports received relative to the continued monitoring of member and affiliate institutions.

Historical note: While the New England Association of Schools and Colleges was founded in 1885, and reference is made to a Standing Committee on Independent (Private) Secondary Schools within the Association as early as 1928, it was not until 1952 that the Association became an accrediting body, and 1966 when the first full-time Director of Evaluation was appointed for the Commission on Independent Schools.

## **The Commission on Independent Schools**

The Commission on Independent Schools meets normally three times a year. The duties of the Commission are in Article IV, Section 7 of the By-Laws. Since the main work of the Association is evaluation and accreditation, the major items on any agenda are action on school reports of one sort or another. The Director of the Commission, in consultation with the Chair of the Commission, prepares the agenda.

At the present time there are twenty-three members of the Commission, one from each of the six New England states, fifteen members-at-large, and two public members. The Commission membership is divided between ten representatives from elementary, five from K-12, and six representatives from secondary schools. Each member serves for a three-year term and may be reelected one time. Eligibility for nomination and procedures for election are in the By-Laws, Article IV, Sections 2-5, and in the memorandum attached (Appendices D and M).

The members of the Commission elect their own Chair in a manner prescribed in Article IV, Section 6 of the By-Laws.

### **Commission Staff**

The Commission is served by a full-time Director, a Deputy Director, two Associate Directors, an Assistant to the Director, and two full-time secretaries. In addition, the Commission makes use of Association Central Office staff and resources as needed. This includes access to accounting and legal services.

The Commission Director acts as an agent of the Commission on Independent Schools in carrying out the responsibilities of the Commission. See Job Descriptions, Commission Director and Associate Directors (Appendix D). The Commission staff responds to communications and inquiries regarding the evaluation process from member and affiliate institutions, from institutions seeking affiliation and/or membership, and from individuals or agencies seeking information about the Association and the evaluation process. The staff is also responsible for the maintenance of accurate records of meetings of the Commission on Independent Schools, up-to-date files on member and affiliate schools, processing reports, and in general overseeing the evaluation and accreditation process on behalf of the Commission on Independent Schools and the Association.

### **Categories of Membership and Affiliation**

An institution may be a member of the Association and accredited thereby or affiliated as a Candidate for Accreditation. The Roster of the Association, published annually, reflects a wide range of types and styles of schools. In terms of program, student body served, grades included, denominational affiliation, residential or otherwise, the universe is broad. The Commission will evaluate for accreditation by NEASC schools that include any combination of grades PK-12 (PG); e.g., PK-8; 7-12; 9-12, etc. The basic criterion defining a school is that programs are provided leading to a diploma or appropriate certificate of completion of the requirements of the program or programs. It is expected that the majority of students spend a least one year enrolled in such a program or a full semester in a semester-length program. The Commission does not accredit free-standing early childhood or day care programs.

## **Candidate For Accreditation**

Institutions seeking affiliation in this category must file with the Commission office complete sets of information as requested on the appropriate forms (Forms Appendix). A prospective candidate must have been in operation for at least one year. At the time of application from a school that is a member of a diocesan school system, the Commission requests a written statement from the diocesan superintendent of schools approving the school's application for accreditation by NEASC or explaining why approval is not granted. The Commission will take the response of the diocese into account in its deliberations, but not be bound by it. An evaluation fee equal to the annual fee for a member school with that enrollment is assessed. A committee, ordinarily three people, appointed by the staff on behalf of the Commission on Independent Schools, will be supplied with copies of the report as filed by the school. The committee conducts an on-site visit, ordinarily a day in duration, to verify the information in the report. Expenses of this committee are borne by the school being evaluated. This committee then prepares a written report for the Commission on Independent Schools and provides a recommendation to the Commission as to action on the application. The Commission makes its recommendation to the Board of Trustees whose action is final.

Schools that have been accredited by other accrediting bodies recognized by the Commission may be granted candidacy status based on a staff visit, following the filing of the candidacy report.

Institutions granted Candidate for Accreditation status file Annual Reports (Forms Appendix). A school may be affiliated as a Candidate for Accreditation for a maximum of five years, by which time it must have either applied for evaluation for institutional membership or be terminated as a Candidate for Accreditation. Extension of time may be granted by the Commission on Independent Schools, on an annual basis if, in its opinion, circumstances warrant such an extension.

The annual fee for an institution so affiliated is equal to the annual dues for a member school of that enrollment.

## **Member School**

A school may be considered for accreditation by the New England Association of Schools and Colleges, Inc. only after it has been in operation for a sufficient period of time (a minimum of one year) to establish its ability to carry out its purposes and objectives and program, and provide the necessary personnel and material support. Evidence of this stability may be produced by having successfully passed through affiliation with the Association in the category of Candidate for Accreditation or by submission of such information as will, in the opinion of the Commission on Independent Schools, qualify it for consideration for membership and accreditation.

Institutions seeking accreditation must complete an institutional self-study leading to the preparation of a self-study report according to the *Manual for School Evaluation*. The procedure to be followed is described in detail in the *Self-Study Handbook*. Copies of these documents are available from the Commission.

## Who Does What in the Accreditation Process?

### Schools Seeking Candidacy for Accreditation

- School contacts Commission Office
- Commission staff sends:
  - Information about the Association
  - Standards for Accreditation
  - Manual for School Evaluation*
  - The Self-Study Handbook*
  - Statement regarding Candidate for Accreditation status
  - Application for Candidate for Accreditation
  - Order form for *Manual for School Evaluation*
  - Dues and Fees Schedule
  - THE REPORT, the Association newsletter
  - NEASC Membership Roster
- Commission staff meets, at no expense to the school, with school officials to discuss the evaluation process
- School contacts the Commission office to set a date for the candidacy visit
- School prepares five sets of the Application for Candidate for Accreditation
- School sends two copies of the Application for Candidate for Accreditation report to the Commission office and sends single copies of the report to the members of the visiting committee at least one month before date of evaluation

### Automatic Candidacy

Schools that are currently accredited by certain associations recognized by the Commission (CAIS, AISNE, and several of the Catholic dioceses) may be granted automatic candidacy status. In these situations, a school will submit the Application for Candidate for Accreditation and host a staff visit. The staff member will write a brief report for the Commission, describing the school and making recommendations concerning particular areas of focus for the self-study.

### Schools Scheduled for Evaluation for Continued Accreditation

- Commission office notifies school 18-24 months in advance of the fact that evaluation for continued accreditation is due, and
  - Sends order form for the *Manual for School Evaluation*
  - Offers to visit, at no expense to the school, and meet with school staff to discuss evaluation process
- School obtains evaluation materials from NEASC office

- School prepares self-study report in accordance with instructions in *Manual for School Evaluation*
- School establishes dates for evaluation visit in consultation with the Commission staff
- Commission staff works with head of school to name the visiting committee chair. The school may reject up to three nominees suggested by staff
- Commission staff appoint the visiting committee and notify school
- The head of the school establishes contact with the chair of the visiting committee as soon as notified of the appointment to begin working out details of the evaluation visit
- School arranges for lodging for members of the visiting committee
- School sends the self-study report to members of the visiting committee and Commission office at least four weeks prior to date of evaluation
- Following evaluation and receipt of the visiting committee report, the school responds to the request from the Commission staff with written comments as to accuracy of the report, nature of the recommendations, and observations on the work of the visiting committee

Each member institution must file Interim Evaluation Reports two years and five years following the evaluation in a form as prescribed by the Commission on Independent Schools (Forms Appendix). Special Progress Reports may be requested by the Commission at any time.

The five-year Interim Evaluation Report submitted by member institutions in the State of Vermont will satisfy that state's reporting requirement, and copies of the correspondence to the school following review of the report by the Commission will be forwarded to the Vermont State Department of Education.

## **The Visiting Committee**

Members of visiting committees to institutions undergoing evaluation for initial institutional or continued accreditation or candidate for accreditation are appointed by the Commission staff. Persons are nominated to serve on visiting committees by heads of member or affiliate schools or are chosen from other sources that may provide useful candidates to be of assistance in the evaluation process.

Rosters of these potential visiting committee members are kept in a database at the Association office. Their names, school positions, and experience on visiting committees are on record. These records are updated at least annually. General Instructions to the visiting committee are contained in the *Handbook for Visiting Committee Members*. Detailed instructions for the chair of the visiting committee are contained in a *Handbook for Visiting Committee Chairs*.

The visiting committee will conduct its evaluation in accordance with procedures outlined in the *Handbook for Visiting Committee Chairs* and the *Handbook for Visiting Committee Members*. A copy of the visiting committee report prepared by the chair on behalf of the visiting committee will be sent to the Commission Director within a month following the evaluation. The report will be accompanied by a letter from the chair of the visiting committee including the recommendation to the

Commission regarding membership and accreditation, the result of the specific votes by members of the committee on the Standards for Accreditation, performance rating sheets for visiting committee members, and his/her expense voucher for expenses incurred in conducting the evaluation as well as the cost of preparing the visiting committee report.

Visiting committee members will send expense vouchers in accordance with instructions to the Director of the Commission for approval and submission to the institution for payment directly to the committee members.

The members of the visiting committee, once the report is completed and filed with the Director of the Commission, have completed their responsibilities to the Association and the school. Members of the committee will receive a copy of the notification letter to the school from the Commission.

### **Commission Action**

Following is the Commission procedure for handling the reports on a school undergoing evaluation for initial institutional or continued membership and accreditation:

#### **Each Commission member is sent:**

- Agenda for meeting including specific committee assignments
- Supporting material for agenda including:
  - documentation or information regarding agenda items
  - visiting committee reports for all schools on the agenda for action regarding initial or continuing membership and accreditation or Candidate for Accreditation
- To individual commission member assigned to a given school:
  - above material plus copy of school's self-study report, school's reaction letter to the visiting committee report, and confidential material as described in the *Manual*. The individual commission member is expected to become an "expert" on that school, make a motion regarding a recommendation as to accreditation or affiliation, and lead discussion and respond to questions.

### **Following Commission meeting:**

In cases of schools applying for initial institutional membership and accreditation or Candidate for Accreditation:

- A letter from the Director of the Commission summarizing recommendations made by visiting committee and Commission, reviewing the recommendation to be made to the Board of Trustees, and outlining school's responsibilities to the Commission in the way of reports, etc., is sent to the head of school. This letter states that the action is not final until acted on by the Association Board of Trustees. Copies of this letter are sent to the chair of the governing body, the diocesan superintendent (where applicable), and the chair and members of the visiting committee.
- Following Board of Trustees action, the President of the Association writes to the head of school regarding the action of the Association.

In cases of schools undergoing evaluation for continued accreditation:

- A letter summarizing key recommendations made by the visiting committee and Commission and outlining the school's responsibilities to the Commission in the way of reports, etc. is sent by the Director of the Commission to the head of the school. Copies of this letter are sent to the chair of the governing body, the diocesan superintendent (where applicable), and the chair and members of the visiting committee.

### **Changes of Status**

#### **a. Mergers**

In the event of a merger where one or more of the merged schools is accredited by the New England Association, and where there is no substantive change in purposes and objectives, the accreditation of the school will be continued for up to three years by which time the new institution will have undergone a complete evaluation for continued accreditation in accordance with Commission procedures.

#### **b. Corporate or Other Substantive Change**

Schools that undergo a corporate or other substantive change are required to notify the Commission on Independent Schools in writing of this change or changes and may be required to submit further documentation and/or be visited by representatives of the Commission for the purpose of making a recommendation to the Commission regarding continued accreditation. Substantive changes are those that affect significantly the nature of the institution; e.g., its purposes and objectives, its educational programs, the allocation of its resources, and its financial base.

**c. Termination or Suspension of Operation**

It is the responsibility of school officials to notify the Association in the event of a termination or suspension of the operation of the school and to provide information as to where the permanent records of current and former students are to be located as well as the responsible person/agency to contact to obtain pertinent records

**Evaluation Expenses**

Schools undergoing evaluation for initial accreditation or Candidate for Accreditation are responsible for the following expenses related to the evaluation:

- Expenses of the visiting committee for travel, lodging, and meals related to the evaluation.
- Costs of preparing the self-study report and visiting committee report.

Special Visits: In the event of a special visit by a representative or representatives of the Commission to review an Interim Evaluation Report or Progress Report or any other matter relating to continuing accreditation or affiliation; i.e., a Focused Visit, (Appendix I), the school is liable for expenses for the travel, lodging, and meals of the representative(s). Expenses of Commission staff are not charged to the school.

**State Departments of Education**

In Connecticut, as part of the approval process, the State Department of Education may appoint a member to the visiting committee. If the department or agency exercises that option, their designee will remain with the visiting committee during the entire visit, participate as the chairperson may direct in the preparation and review of the visiting committee report, and serve as a voting member of the committee. His or her expenses will be paid by the institution being evaluated on the same basis as the other members of the committee.

In the event of evaluation of special education programs where separate procedures are required for approval by state departments of education or agencies, the Director of the Commission will exercise his/her judgment as to whether it can be combined with the evaluation and accreditation on the basis shown above or will require a separate evaluation by that agency for their purposes.

A copy of the visiting committee report, votes on standards, and the letter of notification from the Commission will be sent to the responsible person in the state department of education in Connecticut and Vermont

## **Reports**

### **Annual Reports**

Each year the Association requests each member and affiliate to file an Annual Report. (Forms Appendix.) This report is routine in nature and asks for basic information such as enrollment total and, by categories, names and addresses of certain officials, and notification of any "substantive change." This report provides information for the school master file, enrollment figures for calculating annual dues, and information that might suggest a change in the circumstances under which a school was accredited.

### **Interim Evaluation Reports**

Each member institution is required to complete Interim Evaluation Reports to be filed two and five years following their most recent evaluation for institutional or continued accreditation (Forms Appendix). The Five-Year Interim Evaluation Report filed by Vermont schools will fulfill that state's reporting requirements.

### **Progress Reports**

Schools may be required, at the discretion of the Commission, to file Progress Reports responding to specific concerns expressed and identified by the Commission.

## **School File**

Each school file includes routine correspondence since the most recent evaluation, copy of the most recent self-study (culled at the time of the Five-Year Interim Evaluation Report), the visiting committee report, and Two and Five-Year Interim Evaluation Reports where applicable. Also included are previous visiting committee reports and notification letters from the Director of the Commission and President of the Association where applicable. Files are culled following each periodic evaluation. Irrelevant correspondence is destroyed.

## **Ownership of Evaluation Materials**

Prior to Association action on the application for institutional membership or Candidate for Accreditation and Commission action on schools seeking continued accreditation, the documents relating to the evaluation, reports prepared by the school for the visiting committee and for the Commission and the visiting committee reports are privileged documents, for use by the Commission/Association and school only.

Following action by the Association or the Commission, the documents are the property of the school and may be used by them as they see fit, except the Association reserves the right to take action against a school misusing or misrepresenting material in the reports.

## **Public Disclosure**

For policy on public disclosure of information about affiliated institutions, see Appendix O.

## **Due Process**

The Commission's procedures provide reasonable due process to schools undergoing the evaluation process

## **Adverse Recommendations**

In addition, the due process procedures in use by the Association are spelled out in a document entitled Policy and Procedure for Appeal of Adverse Action Affecting Institutional Accreditation or Candidate for Accreditation Status, September 15, 2005, adopted by the NEASC Board of Trustees. (Appendix G.)

## **Complaint Procedure**

From time to time, the Commission on Independent Schools (Association) receives a complaint about a member or affiliate school. Usually these are concerned with allegations of unfair disciplinary procedures in regard to a student dismissed or suspended, or a dispute over the financial obligations. The Commission has adopted a Complaint Procedure. (Appendix I.)