

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
10/31/2024

To: Karen Molchanow, Executive Director
State Board of Education

FROM: Carrie Rowe, Deputy Secretary
Elementary and Secondary Education

SUBJECT: COGNIA Application to Renew Accreditation Authority – Recommendation

EXECUTIVE SUMMARY

Cognia, formerly known as AdvancED, has been an accrediting body approved by the State Board of Education (State Board) for 10 years. Cognia (AdvancED) was originally approved by the State Board as accrediting body for pre-K (nursery), kindergarten, elementary and secondary private academic schools in November 2014. In 2016, Cognia (AdvancED) submitted an application requesting to expand their current scope of accreditation to include special purpose institutions such as tutoring centers, educational testing and remedial centers which was approved in June 2016. In 2018, AdvancED merged with another education nonprofit, Measured Progress, and the combined organization changed its corporate name to Cognia. In November 2020, Cognia submitted a renewal application and was approved to accredit pre-K(nursery), kindergarten, elementary, secondary and special education private academic schools, tutoring centers, educational testing and remedial centers.

Cognia is currently requesting to renew its approval from the State Board to act as an accrediting body for the above-noted types of private academic schools in lieu of licensure by the State Board of Private Academic Schools. Additionally, Cognia is also seeking approval to accredit nonpublic K-12 schools.

Cognia’s renewal application was reviewed by a team of professional staff in PDE’s School Services Office. The team’s review consisted of an analysis of Cognia’s basic accreditation protocols and processes, including its self-study process, accreditation standards, complaint process, monitoring processes, and policy on background checks. Based on its review of the application our team found that Cognia has strong accreditation protocols and procedures for reviewing initial applications, granting candidacy status, initial accreditation and renewal of accreditation.

Recommendation

Based on its review set forth the below, PDE recommends that Cognia be approved as an accrediting body for pre-K(nursery), kindergarten, elementary, secondary and special education private academic schools, tutoring centers, educational testing and remedial centers.

Organization

Cognia is a non-profit 501(c)(3) organization with headquarters in Alpharetta, Georgia. Cognia was formed with the unification of the NCA CASI, SACS CASI and NSSE. In 2008,

the organization was further expanded through the addition of the CITA, and in 2012 the Northwest Accreditation Commission NWAC joined and extended our reach to accredit institutions in all 50 states and more than 90 countries.¹ Cognia currently accredits 43 institutions in Pennsylvania, including non-public schools, charter schools, special purpose institutions, digital learning institutions, early learning schools and unit schools as well as services 25,231 member institutions across the United States and internationally of which 23,207 are currently accredited. The remaining schools are either in the applicant, candidate or member only schools.

Cognia's accreditation process provides assurance to students, parents, the public and governmental entities regarding the quality of education being provided by the schools and districts seeking accreditation. The core business of Cognia is to drive education improvement through assessment, accreditation, research and innovation, policy and advocacy, and technology.

Self-Study Process

All schools are required to engage in a thorough self-study. There is a self-study for both the Candidacy and the Accreditation reviews. The Candidacy self-study is guided by the Candidacy Workbook and the Accreditation Engagement Review is guided by the Self-Assessment Workbook.

The Self-Assessment Workbook is a comprehensive approach to performance accreditation, continuous improvement, and guides institutions as they anticipate the reviews. The Workbook guides the institution through the accreditation process, providing:

- Comprehensive information about the Cognia approach to accreditation and continuous improvement
- Access to information, resources, and tools for an institution, and
- Space for the institution to draft a response to standard ratings and narratives that will be populated into the online Self-Assessment Diagnostics.

Each institution completes the diagnostic, using information gathered through the Self-Assessment Workbook which details the full set of analyses and documentation that schools are required to submit prior to their Accreditation Engagement Review. In their renewal applications, Cognia has indicated that as part of the self-study, institutions conduct three data analyses to include student learning, stakeholder feedback, classroom observations. After the data analyses, schools use the Self-Assessment Workbook to gather evidence that is relevant to the standards, review this evidence, and rate themselves on each standard using a four-point rubric.

¹ North Central Association Commission on Accreditation and School Improvement, Southern Association of Colleges and Schools Council on Accreditation and School Improvement, National Study of School Evaluation, Commission on International and Trans-Regional Accreditation and Northwest Accreditation Commission.

CASI); Northwestern Accrediting Commission (NWAC); and School Improvement (SACS CASI). Commission on International and Trans-Regional Accreditation Northwest Accreditation Commission

Candidates for Accreditation write reflective narratives summarizing the strengths and growth areas relative to the standards grouped into the four Key Characteristics: Culture of Learning, Leadership for Learning, Engagement of Learning, and Growth in Learning. Finally, drawing on their data analyses and their standards self-assessment, Schools identify Areas of Excellence, Areas for Improvement, and Challenges. Schools are required to develop theories of action to sustain areas of excellence and to address areas for improvement.

Engagement Review Site Visit

A site visit is required for every school during the Candidacy phase of their application. A Lead Evaluator and/or State Director will make an in person visit to the school to determine if the institution or system:

- Has the capacity and integrity to meet and adhere to the Cognia Standards, policies, and Assurances.
- Has the capacity to support continuous improvement.
- Should become a candidate for accreditation or remain as a Cognia member.

During the Candidacy Review, if an institution is found with inadequate and/or unsafe facilities, it would not be recommended for Candidate status until the issue(s) was remedied. In this case, a subsequent onsite Candidacy Review is required. During an accreditation or a re-accreditation review, it is at the discretion of Cognia as to whether the school needs an onsite visit; however, Cognia reserves the right to conduct an onsite visit to any of our schools at any time. Schools are expected to respond in a timely manner to all inquiries from Cognia. These inquiries may result from Areas for Improvement identified in Engagement Reviews or Monitoring Reviews, complaints under investigation, notices of substantive changes, or routine ongoing monitoring.

Standards Review

Per Cognia's renewal application, each Cognia Performance Standard is rated using a four-point rubric. These rubrics embed the Identified practices that institutions and systems should have in place. Level 4 of each rubric identifies the demonstration of noteworthy systematic and systemic practices producing clear results that positively impact learners, while Level 1 reflects areas with insufficient evidence and/or limited activity leading toward improvement.

The institution and the Engagement Review evaluators use these rubrics for rating each of the 30 standards. It is expected that Level 3 represents meeting the standard, while Level 4 is well above and beyond the expected practice at Level 3. Levels 1 and 2 represent practices that don't yet meet the intent of the standard.

There are four key characteristics that Cognia indicates are evident when schools effectively adopt the Cognia Performance Standards and engage in Cognia's peer review process for accreditation and continuous improvement. The four characteristics include:

- Culture of Learning
- Leadership for Learning
- Engagement of Learning

- Growth of Learning

All of the Performance Standards are related to one or more of these characteristics, based on the unique context of the school. These characteristics serve as our model for identifying and discussing school quality.

Monitoring

The Accreditation status is based on the performance of a school in areas related to policies, Standards, and Assurances. Per Cognia Policy 2.7 which reads:

Cognia is responsible for supporting and monitoring institution and system adherence to the Cognia Standards and policies, conducting an Engagement Review to every accredited school or system at least once every six years; conducting a Certification Review to every institution holding a certification at least once every six years; reviewing all institution and system reports; granting an accreditation or certification status for all institutions or systems; responding to complaints by and about institutions and systems; and maintaining accurate, complete, and timely records.

The status of a school may be changed by the Cognia Global Commission based on new or corrected information provided by the institution, Engagement Review Reports, Certification Review Reports, reports from special reviews, complaints submitted, or other sources. A school classified as being “under review” is given an opportunity to come into full compliance. The school will submit an annual progress report(s) to Cognia on Areas for Improvement identified in the most recent review report, host an onsite monitoring review within one year of the previous review, and host subsequent monitoring reviews as prescribed by Cognia. The school will continue with that status until the institution or system successfully documents adequate progress in Areas for Improvement and/or by providing documented evidence of substantially meeting policies, Standards, and Assurances for accreditation.

“Accredited under conditions” is a status conferred to a school in poor standing if the school:

- Has held the status of Accredited – Under Review for at least twelve (12) months and,
- Has failed to demonstrate, with documented evidence, substantive progress in addressing the circumstances for which the institution was conferred the status of Accredited – Under Review.

OR

- Has been found by a special review to no longer adhere to the accreditation Standards, policies, and Assurances (refer to Policy 6.5); fails to cooperate with any special review or request for information; and circumstances warrant such action.

Following the expectations set by the Department and at least annually, Cognia will report to the Department the accreditation status of institutions and systems that hold such status with Cognia. Should the status of an accredited school change because of noncompliance or other issues, Cognia will report the change to the Department. Cognia will also determine whether a substantive change at school requires an interim review and will conduct that review in a timely fashion. Cognia will notify the Department of this interim review.

Investigation of Complaints

Cognia's policy states that complaints must be submitted in writing and must include the complainant's name, address, phone number and other pertinent contact information. Complaints must also include a description of the circumstances or events and any relevant documentation that supports the complaint. A statement of relationship with the individual involved, if the complainant is not the aggrieved individual. The name, address and other contact information for the individual at the school/school system that has been contacted by the complainant to resolve the problem or situation. The complainant must give permission for Cognia representatives to access records concerning the complainant if such records are not available to the public. A statement of first-hand knowledge of the substance of the complaint must also be included unless the complaint is supported by reliable documentation which is referenced in the complaint.

Any complaint that identifies potential child abuse, sexual harassment or discrimination on the part of a student or staff member, shall be forwarded immediately to the appropriate agency authorized to manage such complaints. Unsigned complaints concerning potential child abuse, sexual harassment, or discrimination will be forwarded to the principal and the superintendent or other similar official in the institutions or system's organization. Findings by the appropriate agency may result in action by Cognia's Global Commission.

Isolated and individual grievances between an institution or system and person are not evaluated by Cognia. Cognia will acknowledge to the person filing the complaint, in writing, the receipt of the complaint. If the complaint does not meet the requirements of Cognia's Policy 6.1 of the Accreditation and Certification Policies and Procedures, Cognia will inform the complainant that the redacted information, to protect the identity of the complainant, will be shared with the institution if the complainant chooses to continue with the complaint.

Cognia's notification to the institution may request the institution to:

- Within 30 days, respond in writing to Cognia communicating its handling of the complaint, or
- Address the complaint according to the institution's own policy and procedure for managing complaints but that no written response is required to Cognia.
- A copy of the complaint and the institution's response to the complaint, if required, will be maintained by the appropriate Cognia Accreditation Office.

If multiple complaints against a school suggest a particular violation or pattern of violations which might affect the institution's ability to meet Cognia Standards, policies or Assurances, further evaluation may be authorized and shall occur within a reasonable timeframe.

Background Clearances

According to Cognia's application, the Assurance that addresses criminal background clearances and child abuse clearances is Assurance 2 which states the institution complies with all applicable governmental laws or regulations.