

VI.B.

CONNECTICUT STATE BOARD OF EDUCATION Hartford

TO BE PROPOSED:

April 6, 2015

RESOLVED, That the State Board of Education denies the application of Green Apple Accreditation of Children's Services to become a state-approved accrediting agency, and directs the Interim Commissioner to take necessary action.

Approved by a vote of ___ this sixth day of April, Two Thousand Fifteen.

Signed: _____
Dr. Dianna R. Wentzell, Secretary
State Board of Education

**CONNECTICUT STATE BOARD OF EDUCATION
Hartford**

TO: State Board of Education

FROM: Dr. Dianna R. Wentzell, Interim Commissioner of Education

DATE: April 6, 2015

RE: Green Apple Accreditation of Children's Services' Application to become a State-Approved Accrediting Agency

Executive Summary

Introduction:

The Green Apple Accreditation of Children's Services, formerly the Green Apple Association of Christian Schools, (hereinafter, "Green Apple") submitted an application to become a state-approved accrediting agency in April 2014, according to the process approved by the Connecticut State Board of Education ("CSBE"), effective July 1, 2003. One staff member from the Division of Legal and Governmental Affairs ("DLGA") and one staff member from the Academic Office reviewed the application. The team noted areas of concern and requested clarification from Green Apple on April 25, 2014. Green Apple provided such response on December 10, 2014. Based upon the team's review, noted areas of concern and Green Apple's response, the lead staff member from DLGA recommended that the application be denied. Green Apple was provided the opportunity to respond to this recommendation, and it submitted an additional response on February 9, 2015.

The process for evaluating accrediting agency applications, as published on our website, provides that the Commissioner make a recommendation to the CSBE. At the CSBE's meeting, the accrediting agency has the right to address the CSBE members in support of its application. The Executive Director of Green Apple has expressed her wish to address the CSBE and shall do so by telephone.

Included with this board report are: (1) Letter to Green Apple requesting additional information (April 25, 2014); (2) Green Apple's response to the April 25th request for additional information (December 10, 2014); (3) Letter regarding notice of recommendation (January 9, 2015); and (4) Green Apple's response to recommendation (February 9, 2015). Due to the volume of pages, Green Apple's application is available for review in the DLGA office.

Recommendation:

I recommend that the CSBE deny Green Apple's application.

Rationale:

The standards and procedures detailed in the Green Apple application do not meet the State Department of Education's (the Department's) standards for an approved accrediting agency. Under the *Criteria for Agency Recognition, Agency Responsibilities* there are several areas where Green Apple does not meet the Department's requirements, as set forth below.

Scope of Operation of the Agency

- The agency shall be national, regional (interstate or intrastate) or statewide in scope. National means that the accrediting agency's activity, namely accrediting schools, takes place on a national level. A "national" accrediting agency would need to accredit schools that are located in multiple states in more than one region. "Regional" refers to a particular region of the United States, encompassing more than one state within the same geographical area, such as the New England region. "Statewide in scope" means that the agency accredits schools in one state.

One purpose of this requirement is that the agency show it has a presence and is currently providing accreditation services in the Connecticut area—a national agency would have the demonstrated ability and marketability throughout the country and therefore can show an ability to serve the State of Connecticut. We interpret the regional requirement to mean that the agency has a presence in the region surrounding and including Connecticut. We interpret the statewide requirement to mean that the agency is currently accrediting schools in the State of Connecticut. Therefore, the requirement of the agency being national, regional or statewide infers that in order for an agency to attain approval by the CSBE, it must show that it has accredited schools either nationally or within the New England region or the State of Connecticut. All other accrediting agencies approved by the CSBE meet this requirement.

Green Apple has listed as its accredited schools only schools that are located in the State of Florida. DLGA requested that Green Apple provide a listing of all schools it has accredited outside of Florida, and it did not provide such a listing. Green Apple suggests that because it is approved to accredit schools in other states that it is operating on a national basis. However, it does not accredit schools nationally at this time. It has accredited thirteen schools in the State of Florida with seven candidate schools. While it accredits schools in Florida, it has not accredited any schools in Connecticut or in the New England region. Accreditation involves multiple site visits to the schools at the expense of the schools. I do not recommend that the CSBE approve an agency that does not have a presence (i.e. has members, candidates and accredited schools) in the New England region and that has accredited only a small number of schools.

Organization of the agency

- Employ qualified personnel
There are three lead visiting committee members. The first lead visiting committee member, Dr. Ruby Lewis, has experience in clinical psychology, mental health, substance abuse and residential treatment. However, she does not appear to have significant experience as a teacher or a private school administrator. The second lead visiting committee member, Carmen Ruiz, has educational experience as a principal of a private

school. Significantly, one of the two testimonials on the Green Apple website praising the agency for its work comes from Mrs. Ruiz, which appears to be a conflict. The third lead visiting committee member, Faith Brown, is a student at Florida International University working toward a Doctorate in Philosophy of Public Health, and is currently employed as a Florida state certified elementary school teacher.

- Select competent persons for visiting committees, consultation services, and decision-making bodies.

The President of the Board of Directors, Freda Stevens, is also the Executive Director of the agency, who presumably is an employee of the Board. This arrangement represents a potential conflict where the President of the Board has a financial interest as the Director of the agency.

The “accreditation commission” consists of only two members, Dr. Vera Stevens and Dr. Clementine Sherman, who are also on the Board of Directors, which again presents a potential conflict between the governance of the agency and the actual activities of the agency.

Agency Responsibilities

- Provision for adequate discussion between visiting committee and school staff: Green Apple’s practice of visiting a school for approximately one day suggests that there is not sufficient time to conduct the in-depth critical evaluation of a school that the Department expects. Green Apple’s materials indicate that the average school of 200 students would be evaluated by a team of two people for 1.5 days. However, in its letter dated December 10, 2014, Green Apple indicated that “the visiting committee’s visit is usually one day and takes approximately four to six hours to complete.”

This standard appears to be weak in comparison with other approved accrediting agencies. For example, American Christian Schools International requires between 2.5 and 4 days for a site visit. The American Association of Christian Schools requires a minimum of 2.5 days. The New England Association of Schools and Colleges and the Connecticut Association of Independent Schools generally require a visit of at least 2.5 days with a committee of at least six members from peer schools. Given the scope of the areas assessed by the visiting committees, the validation process should be significantly longer. While it is reasonable to adjust the duration of the visit and the size of the team to the size of the school, the current practice is insufficient to meet the Department’s expectations.

- Allow inspection of the report by the applicant school for factual accuracy: There does not appear to be a process that allows the applicant school to inspect the site-visit report for factual accuracy prior to final approval. Green Apple allows for a school to appeal a denial for factual inaccuracy. However, the Department requires a presentation of a hard copy of the report, not a verbal report, to ensure that the school can fully inspect, review and respond.

- Promote a well-defined set of ethical practices: While Green Apple provided in its response a code for Green Apple staff, it did not provide a well-defined set of ethical practices for its member schools.
- Financial stability, revenues and expenditures: Green Apple's applicant review procedures provide that the school demonstrate financial stability by providing a school budget year-to-date, inventory, fundraising plan and a profit and loss statement. Standard 3.1.1 requires to the school to retain a Certified Public Accountant to handle tax filings, an independent audit, and bookkeeping. Standard 3.1.6 provides that schools conduct an external audit once every three years if the student population is less than 300 and every two years if the student population exceeds 300.

To ensure the financial stability of a school, it is important to require an annual independent audit and for the evaluation team to assess the financial stability of the school. CSBE approval of a school serves as an indicator to parents that the funds they advance to a school for their child's tuition in the upcoming year will be secure. In other words, the school is unlikely to suddenly close without reimbursing tuition payments. Moreover, all unapproved boarding schools in Connecticut must provide an annual independent financial audit in order to obtain a certificate of exemption to allow them to board students. It is important for a state-approved private school to show substantial proof of its financial stability in order to attain state approval.

Standard 3.1.5 requires adequate insurance protection. Green Apple is recommending a revision to its standards that specifies standard insurance coverage limits. If adopted, this standard would be acceptable to the review committee. However, at this time, Green Apple does not meet this standard.

- Admissions Standards: Green Apple reviews the applicant school's Board of Trustees' written policies, including nondiscrimination; admissions and withdrawal; tuition fees, and refunds; complaints; discipline; conflict of interest; and fraud preventions and consumer protection. However, Green Apple's standards do not appear to take into account the admissions processes at their schools—specifically, there is no standard to review whether the applicant school appropriately advertises its program and presents an accurate description of the school to its prospective applicants. In addition, there is no indication that Green Apple ensures that the schools' admissions processes are such that students who enroll are appropriate for that school and are likely to succeed at that school. There also does not appear to be a standard that addresses a process that would identify students for whom the school is inappropriate and provide counseling and/or assistance to that student.
- Standard 5.5 Blended Learning: Green Apple allows for distance learning programs to attain accreditation. This is a serious concern especially considering the disparity in the quality of such programs. Since the agency would be allowing the schools to confer a state recognized diploma, the CSBE has an interest in online school approvals. Therefore this provision is an area of concern.

- Standard 5.6 Home School Umbrella:
Green Apple allows a private school to serve as a “home school umbrella.” Since an approved accrediting agency has the power to convey CSBE approval upon a school—it is not ideal to allow for a “home school umbrella” to confer state recognized diplomas when it is not clear the extent to which the child has attended the school or the home.
- Facilities and Physical Environment:
Health and Safety. Green Apple requires that the applicant school demonstrate its compliance with local and state fire codes, health inspections and other statutory and regulatory requirements. However, it is not apparent that it requires the following documentation.

For employees, Green Apple should require each school to provide:

- proof of retention of employee records;
- proof of compliance with the FMLA;
- sexual harassment training for employees;
- child abuse reporting training for staff; and
- accommodations for staff with disabilities.

For students, Green Apple should require its schools to:

- retain records as required by law;
- ensure that students and staff have complied with immigration law; and
- if the school has a clinic, demonstrate that it is HIPAA compliant.

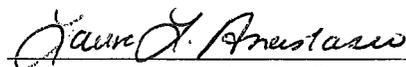
For school facilities, Green Apple should require each school to provide:

- a bloodborne pathogen exposure control plan;
- plans for emergency drills for fire, natural disaster, and homeland security drills;
- proof of proper licensure for student activity van drivers;
- an asbestos management plan;
- proof of CPR and first aid training for first responders; and
- proof of compliance with state pesticide application requirements per Section 10-231b of the Connecticut General Statutes.

Conclusion:

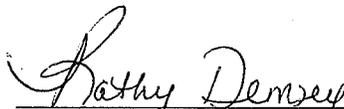
At this time, Green Apple does not meet Connecticut’s standards for an approved accrediting agency. Specifically, it is not a national organization. The practice surrounding the time spent on site visits does not allow for sufficient time for the team to thoroughly validate the applicant schools’ self-studies. It also does not appear to meet the CSBE’s requirements in the other standards listed above. The agency’s standards in areas such as parental involvement, student admissions, financial stability, records retention and health and safety, do not meet CSBE requirements. The organization of the agency, which allows for significant conflicts of interest, is also a serious concern. Based upon the aforementioned concerns, I recommend that the CSBE deny Green Apple’s application. At such time when Green Apple is able to address all of the aforementioned areas of concern, it may reapply to become a state-approved accrediting agency.

Prepared by:



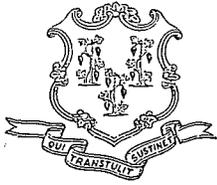
Laura L. Anastasio, Staff Attorney
Division of Legal and Governmental Affairs

Reviewed by:



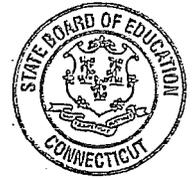
Kathy Demsey
Acting Legal Director
Division of Legal and Governmental Affairs

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STATE OF CONNECTICUT

DEPARTMENT OF EDUCATION



April 25, 2014

Freda Stevens, M.S., Executive Director
Green Apple Association of Christian Schools
7900 Nova Drive, Suite 209
Davie, FL 33324

Dear Ms. Stevens:

I am writing regarding the Green Apple Accrediting Association's (Green Apple's) application to attain the approval of the Connecticut State Board of Education (CSBE). After an initial review of your materials, I have noticed several areas where I will need additional information.

First, the CSBE requires that the agency be national, regional (interstate or intrastate) or statewide in scope. National means that the accrediting agency's activity, namely accrediting schools, takes place on a national level. A "national" accrediting agency has accredited schools that are located in multiple states in more than one region. "Regional" refers to a particular region of the United States, encompassing more than one state within the same geographical area, specifically the New England region. The term "statewide" means that the agency accredits schools in one state, specifically in Connecticut. This requirement is intended to ensure that the agency has an established presence in this region whereby it can demonstrate the capacity to serve this state in that it has accredited schools either in Connecticut, in the New England region or nationally. Please provide a complete listing of all of the schools that are currently accredited by Green Apple, including the accredited schools in the State of Connecticut.

Second, it is not apparent from the materials that you submitted how many days the visiting committee spends at a school. In addition, please verify the number of people conducting the site visit on behalf of Green Apple. Finally, it is not apparent that Green Apple provides an opportunity for the school to inspect the visiting report at the end of the site visit to check for factual accuracy. The references to disputing factual accuracies in the report only appear in the event that the school is denied accreditation.

Third, there are several standards that require some clarification:

- Green Apple's applicant review procedures provide that the school demonstrate financial stability by providing a school budget year-to-date, inventory, fundraising plan and a profit and loss statement. Standard 3.1.1 requires to the school to retain a Certified Public Accountant to handle tax filings, audits, and bookkeeping. However, there is no requirement for an independent audit conducted by a certified public accountant. Please verify that this is true.
- Green Apple allows a private school to serve as a "home school umbrella" under Standard 5.6. Please explain what a "home school umbrella" is and verify whether a

student attending a school as a “home schooled” student would receive a diploma from that school.

- It appears that your agency provides for approval of “blended learning” with online programs. Please verify that the only additional criteria for online programs are listed in Standard 5.5.
- Standard 3.1.5 requires adequate insurance protection—please specify what your agency determines to be “adequate.”
- Green Apple’s standards do not appear to take into account the admissions processes at their schools—specifically, there is no standard to review whether the applicant school appropriately advertises its program and presents an accurate description of the school to its prospective applicants. Please provide information concerning how Green Apple ensures that the schools’ admissions processes are such that students who enroll are appropriate for that school, are likely to succeed at that school, and what processes are in place for students who are not succeeding at a given school.
- With respect to reviewing the administration and governance of a school, does Green Apple review the extent to which the faculty is involved in decision-making about the school’s educational program?
- Green Apple’s standards do not appear to review or take into account parental involvement activities and policies of the applicant schools. Please provide information on how Green Apple monitors parental involvement. In addition, please explain your agency’s process for addressing parent complaints about an accredited or member school.
- Although Green Apple requires that the schools maintain their premises in a clean and orderly state, there do not appear to be requirements that the school demonstrate its compliance with local and state fire codes, health inspections and other statutory and regulatory requirements. Please show how the schools demonstrate compliance with state and federal requirements, including requirements specific to the State of Connecticut.
- Does Green Apple have standards concerning the retention of student records, proper storage of student records and plans in place to retain records in the event of a school’s closure? If so, which standard?
- Does Green Apple have specific standards concerning the review of a school’s emergency operations plan? If so, which standard?

Fifth, the CSBE requires each agency to promote a well-defined set of ethical practices. The application references the Green Apple Code of Ethics. Please provide a copy of this Code of Ethics.

Finally, one serious area of concern is the organization of your agency. Specifically, the Executive Director also is the President of the Board of Directors of Green Apple, which constitutes a conflict of interest. In addition, the “accreditation commission” consists of only two members who are also on the Board of Directors, which again presents a potential conflict between the governance of the agency and the actual activities of the agency.

When State Department of Education receives the above requested information, I will complete the review of your application, and I will make a recommendation to the Commissioner to approve or deny your renewal. In the case of a denial, I will advise you of the recommendation

so that you will have the opportunity to send additional comments and information for the Commissioner to consider before he makes his final determination.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura L. Anastasio". The signature is written in a cursive, flowing style.

Laura L. Anastasio, Staff Attorney
Division of Legal and Governmental Affairs

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Green Apple Association of Christian Schools

State of Connecticut
Department of Education
Box 2219
Hartford, Connecticut 06145

December 10, 2014

Dear Laura Anastasio:

In response to the letter dated April 25, 2014 please find the answers to your questions below.

A. National, Regional, or Statewide Qualification-

Green Apple is a national organization. At this time, Green Apple has not granted accreditation to schools outside of Florida. It is in the process of granting accreditation but schools must adhere to the totality of Green Apple standards before accreditation determination can be made. Schools that have completed the process towards accreditation and obtained accredited status are located in Florida. However, Green Apple is recognized in Florida and Minnesota. Additionally, Green Apple is under review for recognition in several states including Iowa, Oklahoma, Pennsylvania, New Mexico, and Georgia.

B. Visiting Committee-

The visiting committee visit is usually one day. The visit takes approximately four to six hours to complete. A typical visiting committee schedule is below.

Sample Agenda

- | | |
|---------------------------|-----------------------|
| ◦ 10:00 a.m. – 10:05 a.m. | Entrance Meeting |
| ◦ 10:06 a.m. – 10:20 a.m. | Walk-thru |
| ◦ 10:21 a.m. - 11:50 a.m. | Document Review |
| ◦ 11:51 a.m. - 12:31 p.m. | Classroom Observation |
| ◦ 12:31 p.m. - 1:31 p.m. | Lunch |
| ◦ 1:31 p.m. - 2:00 p.m. | Interviews |
| ◦ 2:01 p.m. – 2:15 p.m. | Exit Meeting |

* Allow 4 1/2 – 6 hours for the inspection from start to finish.

C. Standards-

Standard for Certified Public Account-

An independent audit is one of the reasons schools are required to obtain a certified accountant. Standard 3.1.1 is revised to better clarify the intent with respect to audits. Standard 3.1.1 -The school has retained a Certified Public Accountant (CPA) to handle tax filings, an independent audit, and bookkeeping.

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Please note that Standard 3.1.6 specifically addresses the requirement for an external audit.

Standard 3.1.6. External Audit

The school conducts an external audit a minimum of every 3 years if the student population is less than 300, and every 2 years if the student population exceeds 300.

To better clarify the intent of an external audit, Standard 3.1.6 is revised as follows:

The school obtains an external audit from a certified accountant a minimum of every 3 years if the student population is less than 300, and every 2 years if the student population exceeds 300.

Standard for Umbrella School-

An umbrella school/satellite school refers to a private school offering programs or services to home schooling families. An umbrella school is a private school and as a private school must be registered with the Department of Education (if required by state law). The umbrella school must operate on the required school length of days.

In this case, Green Apple accredited private schools must comply with the state length of school year requirement and hold annual school terms as follows:

- One hundred eighty (180) actual school days, or
- A minimum of one hundred seventy (170) actual school days and the hourly equivalent of one hundred eighty (180) actual school days, determined as prescribed below:
 - Kindergarten: Five hundred forty (540) net instructional hours.
 - Grades 1-3: Seven hundred twenty (720) net instructional hours.

Grades 4-12: Nine hundred (900) net instructional hours.

Rationale for this Standard-

Sometimes parents will enroll their children in an “umbrella school” to provide oversight for the curriculum, sports activities, or testing of their child. Homeschooled children are not required to attend school daily but they must adhere to the regular school calendar length of days. The parents may teach the children at home and the school will provide the curriculum and testing services. Green Apple requires the school to maintain the regular school schedule, length of school days, and pupil progression requirements for students enrolled in the umbrella school as the traditional private school.

In other words, if a child is enrolled in XYZ Private Day School through the umbrella school program, the student must register during the same schedule as the traditional private school students. Parents may not utilize the name of a private school for the purposes of the child graduating from school faster than the traditional school setting. Parents desiring to completely homeschool their children will have to homeschool them directly or enroll them in a private school and adhere to the attendance requirement.

One major concern is that “umbrella schools” would allow a student to complete four years of education and graduate high school in less than a year. The rationale behind this standard is to ensure Green Apple accredited umbrella schools avoid the propensity or appearance of creating a diploma mill.

Students enrolled in the umbrella school are considered private school students regardless of where or by whom they receive instruction. The key issue is the fact that the child is registered in the UMBRELLA SCHOOL, which is a private school offering programs or services to home schooling families which also may include including distance learning or correspondence programs.

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Standard for Blended Learning

Yes the additional standards are found in Standard 5.5 on page 38, GAACS Application for Recognition.

Standard for Insurance

I appreciate the question as the term adequate is broad. Typically schools will purchase a minimum of one million dollar coverage. It is a standard coverage limit which most insurance carriers that provide coverage for schools are very familiar. I will recommend a revision to the standard as follows:
The school maintains adequate insurance protection such as liability, accident, vehicle, and other as appropriate for a private school. The minimum liability coverage shall be one million dollars per occurrence.

Standards for Admissions

- 1.1.5 The board has developed written policies including but not be limited to:
- a. Complaint Policy,
 - b. Nondiscrimination policy,
 - c. Admission and Withdrawal Policies,
 - d. Discipline Policy,
 - e. Conflict of Interest Policy,
 - f. Fraud Prevention and Consumer Protection Policy, and
 - g. Tuition, Fees, and Refund Policies.

Standards for Administration and Governance

Governance

- 1.2.1 The board conducts an annual evaluation of the administrator or principal.
- 1.2.2 Each year the board conducts a written evaluation of the school that includes input from the administrator/principal, staff, and parents.
- 1.2.3 The principal submits to the board or immediate supervisor a yearly self-evaluation.
- 1.2.4 The principal submits an annual evaluation of the school and assists the board in setting short and long range goals for the school.
- 1.2.5 The administration and supervision of the school are the chief responsibilities of a school administrator/principal chosen by the governing body to develop, organize and lead the administration, faculty and staff; carryout policies; and oversee the day-to-day operation of the school.
- 1.2.7 The administrative head oversees an effective system of evaluation for all school personnel and conducts evaluations at specific intervals:
- a. 90 days for new or low performing personnel,
 - b. annually for all personnel and/or
 - c. as needed.

Personnel are given written feedback, recommendations for improvement, and an opportunity to participate in a professional development plan.

- 1.2.8 The board develops and approves an annual salary and benefits schedule for all personnel, annual budget for the school, and fundraising plan.
- 1.2.9 The board is responsible for employing the administrative staff/faculty, and shall have the

Green Apple Association of Christian Schools

authority to decide personnel matters when or if disputes arise.

Administration and Records

- 1.3.1. The school maintains current records of attendance, spiritual, physical, social, and emotional growth, birth, immunization, and physical exam.
- 1.3.2 The school operates a minimum of 180 days or the equivalent teaching hours as mandated by the State where the school is located.
- 1.3.3. The school maintains a written calendar including holidays, progress reports, teacher planning days, open house, and start/end of school year.
- 1.3.4 If the school is a ministry of a church, the By-laws should authorize the school ministry as an integral part of the church.
- 1.3.5 The school shall maintain a record of all graduating seniors, college/university acceptance, and/or job placement.
- 1.3.6 The school shall provide career planning and college placement information to graduating students.
- 1.3.7 The school shall register with the College Board to receive an assigned number for students to take the ACT and SAT, college entrance exams.
- 1.3.8 The school shall participate in the National Center of Education Statistics Survey annually.
- 1.3.9 The school shall advertise as a GAACS Member, Candidate, or Accredited School, whichever is the current classification. Use of the GAACS logo must comply with the GAACS Member Logo Policy.

Standards for Parental Involvement

- 9.1.6 The school encourages parental involvement in classrooms, activities, and parental organizations by establishing and maintaining guidelines which are in conjunction with the school's mission and goals.

Standards for Health and Safety

- 6.1.4 The school complies with the various health and safety standards established by federal, state, and local governments and is inspected annually for compliance by local fire and health departments.

Standards for Record Retention and Storage of Records

Records

- 1.4.1 Schools must secure records in one of the following ways:
 - (a) At least one set of records and permanent files for each student must be maintained safely in a fire resistant file or vault, and must contain the cumulative record of attendance, health, and academic progress in terms of the school's demands and the results of objective tests. Duplicate academic records of secondary school students (includes Middle School classes taken for high school credit) should be stored safely in a separate building.
 - (b) If both academic and health records are maintained electronically, current backups are to be securely housed in another building.
- 1.4.2 The student cumulative folders shall contain permanent and current records showing copy of each child's birth certificate (or passport), name, address, parent/legal guardian's name, attendance, health, physical examinations, evidence of state required immunizations, cumulative academic progress, periodic progress reports to parents/legal guardians and individual results on standardized tests.

Green Apple Association of Christian Schools

- 1.4.3 Grade and progress reports must be distributed to parents/legal guardians at regular intervals. This distribution may include online assessments and performance indicators.
- 1.4.4 Standardized tests must be given periodically to individuals, groups, and classes with results, norms, and medians, or other meaningful interpretations being filed. The school should demonstrate its regular review and use of testing data. These records must be retained on a permanent basis.
- 1.4.5 The private school shall submit a copy of all student records in electronic format to GAACS together with the Institutional Annual Report no later than June 30. The student records to be submitted annually include but are not limited to:
 - a. Student Attendance Records
 - b. Student Discipline History including date(s) of incidents, violation, individuals involved, etc.
 - c. Incident Report
 - d. Grades, Progress Reports, Summary Notes
 - e. Standardized Tests
 - f. List of college acceptance, name of students, g.p.a., scholarship offers, etc.
 - g. Other: Any and all student records which may become necessary if the school were to close.
- 1.4.6 The school maintains current records of attendance, spiritual, physical, social, and emotional growth, birth, immunization, and physical exam.
- 1.4.7 The school shall maintain a record of all graduating seniors, college/university acceptance, and/or job placement.

Standards Emergency Operations Plan

The school develops an emergency response plan that addresses:

1. training personnel on how to respond in case of emergency;
2. training children and youth on how to respond in case of emergency;
3. maintaining emergency numbers, including police, fire, ambulance, and poison control, both on- and off-site;
4. coordinating with emergency responders, and accessing emergency transportation both on- and off-site;
5. coordinating and communicating with the families of children and youth;
6. coordinating with appropriate local, state, and federal governmental authorities;
7. evacuating persons with mobility challenges and other special needs;
8. accounting for the whereabouts of children, youth, and personnel; and maintaining a readily accessible telephone for incoming and outgoing calls, both on- and off-site.

Code of Ethics

Green Apple will not discriminate against or refuse employment opportunities or professional services to anyone on the basis of race, color, national origin, gender, religion, citizenship status, veteran's status, age, sexual orientation, disability, or any other status protected by law.

Green Apple will not engage in or condone any form of harassment.

Green Apple Association of Christian Schools

Green Apple will extend respect and cooperation to all stakeholders. This includes respecting their rights and views and treating them with fairness, courtesy, and good faith.

Green Apple will strive to earn the trust of the public, its customers, employees, and every effort will be made to maintain good working relationships that promote the company's mission.

Conflict of Interest

The board has developed written policies including but not limited to:

- Complaint Policy,
- Nondiscrimination policy,
- Admission and Withdrawal Policies,
- Discipline Policy,
- Conflict of Interest Policy,
- Fraud Prevention and Consumer Protection Policy, and
- Tuition, Fees, and Refund Policies.

Please let me know if there are additional questions.

Sincerely,

Freda
Freda Stevens, M.S.
Executive Director

3



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



January 9, 2015

Freda Stevens, M.S., Executive Director
Green Apple Accreditation of Children's Services
7900 Nova Drive, Suite 209
Davie, Florida 33324

Dear Ms. Stevens:

I am writing to inform you that the State Department of Education ("SDE") and the Division of Legal and Governmental Affairs will be recommending that the Interim Commissioner of Education deny the Green Apple Accreditation of Children's Services ("Green Apple's") application to become a state-approved accrediting agency. There are several areas where Green Apple does not meet the criteria of the Connecticut State Board of Education ("CSBE") set forth below.

- Scope of operation of the agency: National means that the accrediting agency's activity, namely accrediting schools, takes place on a national level. A "national" accrediting agency would need to accredit schools that are located in multiple states in more than one region. Green Apple has only accredited schools in the state of Florida. As such, it does not meet the CSBE's criteria.
- Organization of the agency: The President of the Board of Directors for Green Apple is also the Executive Director of the agency, who presumably is an employee of the Board. This arrangement represents a potential conflict where the President of the Board has a financial interest as the Director of the agency.
- Select competent people for visiting committees, consultation services and decision-making bodies. According to the materials provided, there are three members of the visiting committee. First, Dr. Lewis has experience in clinical psychology, mental health, substance abuse and residential treatment. However, she does not appear to have significant experience as a teacher or private school administrator. The second member, Carmen Ruiz, provided one of the two testimonials on the Green Apple website, which appears to be a conflict.
- Provision for adequate discussion between visiting committee and school staff: Green Apple's practice of visiting a school for approximately one day suggests that there is not sufficient time to conduct the in-depth critical evaluation of a school that the CSBE expects. Green Apple's materials indicate that the average school of 200 students would be evaluated by a team of two people for 1.5 days. This standard appears to be weak in comparison with other approved accrediting agencies. For example, ACSI, NEASC and CAIS generally require a visit of 3 days with a committee of at least six members from both the public and private sectors. While it is reasonable to adjust the duration of the visit and the size of the team to the size of the school, we believe that the current practice is insufficient to meet the CSBE's expectations.

- Promote a well-defined set of ethical practices: While Green Apple provided in its response a code for the agency, it did not provide a well-defined set of ethical practices for its member schools.
- Financial stability, revenues and expenditures: Green Apple's applicant review procedures provide that the school demonstrate financial stability by providing a school budget year-to-date, inventory, fundraising plan and a profit and loss statement. Standard 3.1.1 requires the school to retain a Certified Public Accountant to handle tax filings, an independent audit, and bookkeeping. Standard 3.1.6 provides that schools conduct an external audit once every three years if the student population is less than 300 and every two years if the student population exceeds 300. To ensure the financial stability of a school, it is important to require an annual independent audit and for the evaluation team to assess the financial stability of the school. CSBE approval of a school can serve as an indicator to parents that the funds they advance to a school for their child's tuition in the upcoming year will be secure. In other words, the school is unlikely to suddenly close and put the families' tuition payments in jeopardy. Moreover, any unapproved boarding facility in Connecticut must provide several years of annual independent financial audits in order to obtain a certificate of exemption to allow them to board students. It is important for a state approved private school to show more substantial proof of its financial stability in order to attain state approval.
- Admissions Standards: Green Apple reviews the applicant school's board of trustees' written policies, including nondiscrimination; admissions and withdrawal; tuition fees, and refunds; complaints; discipline; conflict of interest; and fraud preventions and consumer protection. However, Green Apple's standards do not appear to take into account the admissions processes at their schools—specifically, there is no standard to review whether the applicant school appropriately advertises its program and presents an accurate description of the school to its prospective applicants. In addition, there is no indication that Green Apple ensures that the schools' admissions processes are such that students who enroll are appropriate for that school and are likely to succeed at that school. There also does not appear to be a standard that addresses a process that would identify students for whom the school is inappropriate and provide counseling and/or assistance to that student.
- Standard 5.5 Blended Learning: Green Apple allows for distance learning programs to attain accreditation. This is a serious concern especially considering the educational merit of such programs and the variations in the quality of such programs. Since the agency will be allowing the schools to confer a state recognized diploma, the CSBE has an interest in online school approvals. Therefore, this provision is a concern.
- Standard 5.6 Home School Umbrella: Green Apple allows a private school to serve as a "home school umbrella." Since an approved accrediting agency has the power to bestow CSBE approval upon a school—it is not ideal to allow for a "home school umbrella" to confer state recognized diplomas when it is not clear the extent to which the child has attended the school or the home.
- Facilities and Physical Environment: Green Apple requires that the applicant school demonstrate its compliance with local and state fire codes, health inspections and other statutory and regulatory requirements. However, it is not apparent that it requires the following:

For Employees: Each school should provide:

- Proof of appropriate retention of employee records;
- Proof of compliance with the Family Medical Leave Act;
- Sexual harassment training for employees;
- Staff training on the reporting of child abuse; and
- Accommodations for staff with disabilities.

For Students: Green Apple should require its schools to:

- Retain records (student and employee) as required by laws;
- Ensure that students and staff have complied with immigration law; and
- If the school has a clinic, demonstration that it is HIPAA compliant.

Facilities: Each school should be required to provide Green Apple:

- A bloodborne pathogen exposure control plan;
- Plans for emergency drills for fire, natural disaster, and homeland security drills;
- Proof of proper licensure for student activity van drivers;
- An asbestos management plan;
- Proof of CPR and first aid training for first responders; and
- Proof of compliance with state pesticide application requirements in Section 10-231b of the Connecticut General Statutes.

The CSBE has delegated its own authority to approve nonpublic schools to its accrediting agencies. A school approved by such an agency is deemed approved by the State. Such approval provides parents with the assurances that the school is in conformity with the CSBE's standards. Due to the deficiencies listed above, there are not sufficient assurances that a school accredited by your agency would meet all of the CSBE's standards. As such, we cannot recommend approval of your application.

Under our procedures for agency approval, Green Apple shall have the opportunity to provide additional information and/or comments regarding the merits of its application for the Commissioner to consider before making his or her final determination. Your response to my letter of April 25, 2014, which I received on December 10, 2014, shall be submitted to the Interim Commissioner for consideration. You may submit additional comments or information, but our office must receive such information within thirty (30) days of the date of this letter for it to be considered.

Sincerely,



Laura L. Anastasio, Staff Attorney
Division of Legal and Governmental Affairs

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GREEN APPLE ACCREDITATION OF CHILDREN'S SERVICES

State of Connecticut Department of Education
P O Box 2219
Hartford, Connecticut 06145

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February 9, 2015

Dear Dr. Wentzell, Interim Commissioner:

For the reasons set forth below, Green Apple's application should be approved:

- a. Green Apple made application to the State Department of Education;
- b. Green Apple has achieved national recognition and accredited schools in Florida, Iowa, and Minnesota, which includes more than one region.
- c. Green Apple has employed qualified personnel;
- d. Green Apple has selected competent people to perform validation visits in accordance with its Validator Requirements/Training; and
- e. Green Apple meets the CSDE criteria for agency approval in that it maintains standards for each Suggested Outline of Accrediting Standards (a general framework)

Below please find responses to the letter of January 9, 2015, for consideration of our application to be recognized as an accrediting agency.

Scope of operation of the Agency:

Response:

The CSDE criteria provides:

The agency shall:

- be national, regional (interstate or intrastate), or statewide in scope;

Green Apple has attained national recognition as an accrediting body. Green Apple is recognized in several states including Florida, Iowa, and Minnesota. Even if we weren't, considered national at a minimum we qualify as a Regional or Statewide accrediting agency.

Organization of the Agency:

Response:

- The CSDE criteria for agency approval provides: Organization of the Agency- The agency shall: employ qualified personnel; and select competent persons for visiting committees, consultation services and decision-making bodies.

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- Green Apple employs qualified personnel to perform its duties; and has selected competent persons for visiting committees.
- The Executive Director will be graduating with a Doctorate degree in February 2015. She holds a Master's Degree in Education with a concentration in Management and Administration of School Programs. She has extensive experience working in a private school setting and child care center. The Executive Director's bio is found in the original application submitted March 2014.
- Whether or not the president and the executive director is a paid position is not relevant or a basis for denial of the application under the CSDE criteria for agency approval.
- The agency has the autonomy on whom it selects as board members and/or hires as employees.
- The only thing that pertains to the CSDE criteria for approval is whether the agency employees qualified personnel.
- Green Apple's Conflict of Interest Policy prohibits board members, employees, and from voting on decisions or inspecting for any school he or she is affiliated with it.
- The process for making the final determination of a school's accreditation status has been outlined in the initial application and publicly noticed on our agency website.
- The final determination is made based on the Accreditation Determination Checklist.

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Select competent people for visiting committees, consultation services, and decision making bodies:

Response:

There are 3 lead visiting team committee members that are divided by service areas and regions. Each visiting team lead and/or committee member has met the Green Apple requirements which were outlined in the original application submitted on March 2014.

Dr. Lewis, Ph.D.-

- Dr. Ruby Lewis, Ph.D., is a lead validator for Child Care Programs, School Age Programs, Substance Age Programs, and Residential Treatment Centers.
- Dr. Lewis has been the director/administrator of Creative World Child Care for the past ten years.
- Creative World Child Care is a preschool for children birth to five years old and school age children up to 12 years old.
- Dr. Lewis' bio is available on page 9 of the original application, submitted in March 2014.

Carmen Ruiz-

- Carmen Ruiz, is a lead validator for Child Care Programs, Private Schools, and Charter Schools.
- Ms. Ruiz's statement was not included in the original application of March 2014 or the letter of December 10, 2014. It is not relevant to this application or the review process. It does not have anything to do with her competency to conduct an inspection or participate on the visiting committee.
- The only way Ms. Ruiz's participation on a visiting committee would be a conflict would be if she tried to validate a school she owns or previously worked for. Neither of these events have ever occurred.

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- Validators are not allowed to validate their own school or a school in their church network, and no two validators are allowed to validate each other's schools-in accordance with the Validator Requirements. The Validator Requirements were submitted March 2014.
- Mrs. Ruiz holds a Master's Degree and has extensive experience working in a public school setting. She currently owns two private schools and one child care center.
- Ms. Ruiz' bio is available on page 10 of the original application submitted March 2014.
- The Validator Conflict of Interest is on page 15 of the original application submitted March 2014.

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Faith Brown-

- Faith Brown, is a lead validator for Child Care Programs, Private Schools, Charter Schools, and After School Programs.
- Ms. Brown is a certified public school teacher.
- She has extensive experience working in a public school setting, school age program, summer camp, and is the new owner of a summer VPK program.
- Ms. Brown is also studying to complete her doctorate degree.
- Ms. Brown's bio is available on page 11 of the original application submitted March 2014.

Visiting Committee Members-

Education Requirements:

Hold a BA/BS in Elementary Education, Secondary Education, or a closely related field; an Associate's Degree with experience commensurate with a four-year degree may be considered; [Elementary and Secondary School validators]

Work Experience Requirements:

Minimum of 3 years, experience working in a child care or school [public or private]

Additional Requirements:

Attend an Onsite inspector/validator orientation prior to participating on a team visit

Attend annual training

The educational and work experience requirements for visiting team committee members is found in the original application on page 12.

Provision for adequate discussion between visiting committee and school staff:

Response:

The Step by Step Process provides multiple opportunities for the school to interact with the visiting committee before, during, and after the onsite inspection/peer review. During the Self Study Phase, the school is assigned a Consultant to work with as they go through the Accreditation Process. The Consultant is a visiting committee team member whose responsibility is to assist the school in meeting the standards, understanding the approval process, and ease the

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apprehension with the onsite inspection. The school is scheduled for an Accreditation Orientation prior to the onsite visit. The school is invited to contact the assigned Consultant during the process and after to discuss concerns. The school is permitted to make written comments about the inspection report following the onsite inspection/peer review and appeal decisions if necessary.

- The criteria for agency approval requires the agency to conduct an onsite visit. Green Apple meets the onsite visit requirement.
- The CSDE criteria for approval does not require one agency's schedule for the onsite visit to be identical to or even similar to another agency's schedule.
- The word "adequate" which means "satisfactory or acceptable in quality or quantity" may differ in opinion from one individual/agency to the next.
- In order for one agency's standards to be comparable to another agency's standards, the CSDE would have to so notice applicants that its agency standards must be comparable to ACSI, NEASC, and CAIS.

Green Apple's On-site Visit "Sample" Schedule (MORE CLARIFICATION)-

- Green Apple has moved to an electronic format for completing the evaluation tool. We have found the electronic format to be more efficient, time saving, and cost effective.
- Green Apple validators may use an EEPAD, IPAD, IPHONE, or ANDROID phone to process the evaluation tool. The electronic format allows validators to complete the evaluation, school staff to sign directly on the device, and validators to submit the evaluation tool along with a recommendation to approve, deny, or defer accreditation directly from the electronic device. This process accounts for the variation in time that other accrediting agencies may require in completing the evaluation in addition to discussion with the school staff.
- It is important to note that each accrediting body is different and thus our process for evaluating schools using an electronic device saves time. The remainder of the time is used to provide feedback to the school staff, recommendations/commendations, and explain the Next Steps in the process.

Promote a well-defined set of ethical practices:

IV. **Christian Foundation-** *A high quality Christian school has a solid Biblical Foundation, Code of Ethics, and offers Spiritual Enrichment opportunities for Students, Family, Faculty, and Staff.*

4.0. Christian Foundation	
4.2	<u>Code of Ethics</u>
4.2.1	The governing entity, the head of school, the faculty, and all other personnel are born-again believers in Jesus Christ and are persons of integrity, stability, and good reputation.
4.2.2	Personnel are in agreement with the "GAACS Statement of Faith."
4.2.3	The Code of Ethics reflects high Biblical standards for conduct on and off campus.
4.2.4	The staff, faculty, and student handbooks must reflect Christian ethics.
4.2.5	Personnel have read, agreed to abide by, and signed the GAACS School Code of Ethics.
4.2.6	The School complies with and endeavors to remain in compliance with the GAACS Code of Ethics for the duration of its membership.

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4.2.7	The school has established its own code of ethics to which each employee subscribes.
4.2.8	The school distributes its code of ethics to personnel, requires signature from each personnel, and makes periodic updates as needed.
4.2.9	The school senior personnel and board ensures institutional integrity to include advertising, finances, curricular and extracurricular programs, student recruitment and transfers, academic policies and procedures, and the treatment of parent or student complaints.

The Standards for Code of Ethics are on page 33 of the original application submitted March 2014.

Financial stability, revenues, and expenditures:

Responses:

The CSDE criteria for agency approval requires an agency to maintain standards for the school's financial stability. Green Apple meets this threshold for approval.

3.0 Finance	
<i>A high quality Christian school has sound biblical stewardship strategies in place to ensure financial stability, accountability, and sustainability.</i>	
3.1 Business and Finance	
3.1.1	The school has retained a Certified Public Accountant (CPA) to handle tax filings, audits, and bookkeeping.
3.1.2	The school maintains accurate financial records, such as income and expenses.
3.1.3	The school has filed all previous business tax returns and quarterly reports as required by the Internal Revenue Service.
3.1.4	If the school has attained a 501c3 status determination, then the school shall keep record of all donations in accordance with the Internal Revenue Code.
3.1.5	The school maintains adequate insurance protection such as liability, accident, vehicle, and other as appropriate for a private school.
3.1.6	The school conducts an external audit a minimum of every 3 years if the student population is less than 300, and every 2 years if the student population exceeds 300.
3.1.7	The school prepares and operates with an annual budget.
3.1.8	The school provides a written financial compensation package that is based on training, experience, and/or merit, and that is distributed to all personnel.
3.1.9	The school has a salary and benefit schedule that includes incentives for continual education and length of employment. Salaries should be increased for promotions such as lead teacher, director, supervisor, and principal.
3.2 Fundraising	
3.2.1	The school maintains a written policy for dispersing financial assistance and scholarships.
3.3 Scholarships	
3.1	The school maintains a written policy for dispersing financial assistance and scholarships
Self-Study Evidence	

GREEN APPLE ACCREDITATION OF CHILDREN'S SERVICES

- School budget year-to-date
- Profit and Loss Statement
- Inventory
- Fundraising Plan
- Award
- Scholarship information (if applicable)
- Name of recipients and awards
- See Self Study Checklist

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The Standards for Finance are found on pages 31 of the original application submitted on March 2014.

Admissions Standards:

Response:

Green Apple's standards require a school to establish admission and withdrawal policies.

1.0 Organization and Governance

1.1.5 The board has developed written policies including but not limited to:

- a. Complaint Policy,
- b. Nondiscrimination policy,
- c. Admission and Withdrawal Policies,
- d. Discipline Policy,
- e. Conflict of Interest Policy,
- f. Fraud Prevention and Consumer Protection Policy, and
- g. Tuition, Fees, and Refund Policies.

Response:

5.0 Curriculum

5.3.3 The school has a clearly stated policy relating to entrance testing and other factors in accord with the assessment of student learning which can be monitored and evaluated.

Self-Study Evidence

Sample Admission Test

These standards are found in the original application submitted March 2014.

Blended Learning:

Private schools that offer blended learning environments must adhere to all Green Apple Accreditation Standards for Private Schools just like traditional private schools.

Green Apple's standards for private schools that offer distance learning programs **safeguard** against diploma mills by requiring schools to adhere to school attendance, graduation policies, and maintain attendance records, progress reports, report cards, test scores, transcripts, and

GREEN APPLE ACCREDITATION OF CHILDREN'S SERVICES

student's immunization records on file. Private schools with a blended learning environment must maintain a physical office where parents may visit to discuss student progress, register or withdraw students, and pick up transcripts.

Additionally, the private school must comply with the 180 school year length of days. Students may not be promoted to a higher grade level unless the student has participated in the educational program for a minimum of 180 days. No student shall be granted or promised a high school diploma within less than three academic years [180 days x 3 years] unless the student has sufficient transferrable credit as evidenced on a valid high school transcript from an accredited high school that meets or exceeds the graduation requirements identified in 5.0 Curriculum 5.4.5. This information is found in the original application.

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Note: It appears this is another example of the reviewer interjecting a personal philosophical opinion on blended learning programs, not based on fact, and outside the scope of the CSDE criteria for agency approval.

Home School Umbrella:

Green Apple's accreditation standards for private schools that offer assistance to homeschool students safeguard against diploma mills by requiring these schools to adhere to the standards as other private schools including: school attendance, graduation policies, and curriculum. This information is found on page of the original application and in the letter of December 10, 2014.

Note: It appears this is another example of the reviewer interjecting a personal philosophical opinion on home school programs, not based on fact, and outside the scope of the CSDE criteria for agency approval.

GREEN APPLE ACCREDITATION OF CHILDREN'S SERVICES

Facilities and Physical Environment:

1.0 Organization and Governance	
1.4	Records
1.4.1	<p>Schools must secure records in one of the following ways:</p> <p>(a) At least one set of records and permanent files for each student must be maintained safely in a fire resistant file or vault, and must contain the cumulative record of attendance, health, and academic progress in terms of the school's demands and the results of objective tests. Duplicate academic records of secondary school students (includes Middle School classes taken for high school credit) should be stored safely in a separate building.</p> <p>(b) If both academic and health records are maintained electronically, current backups are to be securely housed in another building.</p>
1.4.2	The student cumulative folders shall contain permanent and current records showing copy of each child's birth certificate (or passport), name, address, parent/legal guardian's name, attendance, health, physical examinations, evidence of state required immunizations, cumulative academic progress, periodic progress reports to parents/legal guardians and individual results on standardized tests.
1.4.3	Grade and progress reports must be distributed to parents/legal guardians at regular intervals. This distribution may include online assessments and performance indicators.
1.4.4	Standardized tests must be given periodically to individuals, groups, and classes with results, norms, and medians, or other meaningful interpretations being filed. The school should demonstrate its regular review and use of testing data. These records must be retained on a permanent basis.
1.4.5	<p>The private school shall submit a copy of all student records in electronic format to GAACS together with the Institutional Annual Report no later than June 30. The student records to be submitted annually include but are not limited to:</p> <ol style="list-style-type: none"> a. Student Attendance Records b. Student Discipline History including date(s) of incidents, violation, individuals involved, etc. c. Incident Report d. Grades, Progress Reports, Summary Notes e. Standardized Tests f. List of college acceptance, name of students, g.p.a., scholarship offers, etc. g. Other: Any and all student records which may become necessary if the school closed.
1.4.6	The school maintains current records of attendance, spiritual, physical, social, and emotional growth, birth, immunization, and physical exam.
1.4.7	The school shall maintain a record of all graduating seniors, college/university acceptance, and/or job placement.
Self-Study Evidence	
<ol style="list-style-type: none"> 1. Registration/enrollment form 2. Emergency medical authorization form 3. Written procedures for the review of student records 4. Student progress reports 5. Report cards 6. Transcript 	

The Standards for Retention and Storage of Records are found on page 25 of the original application of submitted to the review committee on March 2014 and the letter of December 10, 2014.

Page 40 of the Original Application 6.0 Facilities Management provides:

GREEN APPLE ACCREDITATION OF CHILDREN'S SERVICES

6.1.8 Key administrators, staff and at least one faculty member in every building/wing of the on-campus staff must be properly trained and prepared to administer **First aid and CPR treatment**.

Green Apple's position is that it must be evaluated in the scope of the CSDE criteria for agency approval. When the criteria for agency approval is applied properly Green Apple meets the requirements for approval in the State of Connecticut.

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The CSDE criteria for agency approval does not require a crosswalk of agency standards to other national accrediting agencies. There exists no requirement that one agency's accreditation standards mirror another agency's standards.

The CSDE criteria for agency approval provides a Suggested Outline of Accrediting Standards (a general framework). This inherently means that an agency must maintain written accreditation standards for each category or subcategory to pass the threshold of approval in CSDE. Green Apple has achieved national recognition as an accrediting agency.

Further, we request to speak with the board when the application is being considered.

Sincerely,

Freda
Freda Stevens,
Executive Director

CC: Connecticut Department of Education