

Impact Analysis

Rule Title: 16NCAC 06G .0504 High School Accreditation Framework

Agency: Department of Public Instruction
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Authority: N.C. Const. Art. IX, Sect 2 and 5, G.S. 115C-112(39)
Effective June 30, 2013

Impact Summary: Federal Government: No
State Government: Yes
Local Government: Yes
Substantial Economic Impact: No

Purpose

During the 2011 session of the North Carolina General Assembly, a high school accreditation bill was passed. This legislation amended G.S. 115C-12 to include empowering the North Carolina State Board of Education (SBE) to accredit high schools (Session Law 2011-306; HB 342). The purpose of the proposed rule is to provide notification of the accreditation offered, to explain the accreditation process, and to note the measures to be used in determining accreditation. This rule offers schools an alternative accreditation method estimated to be less expensive than methods currently available.

Background

Accreditation is a voluntary method of quality assurance developed more than 100 years ago by American universities and secondary schools. It is designed primarily to distinguish schools adhering to a set of educational standards. The accreditation process is also known in terms of its ability to effectively drive student performance and continuous improvement in education.

Historically, several agencies have accredited schools in the United States. The Southern Association of Colleges and Schools (SACS) accredited schools in North Carolina. In 2006 the SACS Council on Accreditation and School Improvement (SACS CASI) joined with the North Central Association Commission on Accreditation and School Improvement (NCCASI) and the National Study of School Evaluation (NSSE) to form AdvancED, now one of the world's largest educational accrediting organizations. Membership in accrediting councils like SACs or AdvanceEd is voluntary, but receiving formal accreditation from the organization requires membership. Schools must pay an application fee for accreditation as well as an annual membership fee. AdvancEd fees for a single school are \$350 for the non-refundable application fee plus \$625 for the annual membership

(AdvancEd, 2011). Under normal circumstances, AdvancED accreditation is good for 5 years; the total per-school cost to a school district is \$3,475.00 (\$350 application fee + [\$625 annual membership x 5 years]).

Alternatives Considered

Session Law 2011-306 amends §115C-12 of NC General Statutes and confers upon the State Board of Education the power to accredit schools. The law directs the SBE to adopt rigorous academic standards for accreditation after considering regional and national accreditation standards, Common Core standards adopted by the National Governors Association Center for Best Practices and the Council of Chief State School Officers, and “other information it deems appropriate.” No additional guidance is provided in the legislation and the accreditation framework is, therefore, left open to a wide range of potential options in terms of both standards and procedures. The SBE and the Department of Public Instruction (NCDPI) discussed the vast range of possibilities and considered two potential options in addition to the option finally adopted and proposed for codification in this rule.

First, the organization discussed a standard and procedure similar to that used by the Baldrige organization to certify education organizations and evaluate for the Malcom Baldrige Award for Performance Excellence (specifically, the Baldrige Education Criteria).¹ This approach confers several advantages: rigorous standards (as required by law); an objective, third party set of criteria and procedures designed to produce exceptional performance; and international recognition as an indicator of high quality processes and results. Despite these advantages, this option was dismissed due to the significant time and financial costs inherent in such a model.

Second, the SBE and NCDPI considered a model requiring a “desk audit” of indicators already being collected (and possibly others gathered through a self-reflection process) and including a site visit by NCDPI personnel to assess a school first-hand using the Comprehensive Needs Assessment (CNA) process currently conducted only in our lowest performing schools. This option has the advantage of being rigorous and utilizing an existing procedure for which many NCDPI staff are already trained. The main disadvantage is that the process is expensive to conduct due to the travel required and the time invested to ensure a rigorous, value-added review, especially considering that accreditation would have to be completed at the individual school level. Additionally, depending upon demand, the logistics of scheduling a limited number of trained staff and completing accreditations using this process could hinder NCDPI’s ongoing work of supporting the state’s lowest-performing schools through this CNA review process.

The State Board of Education ultimately decided to adopt a variant of the desk audit model noted above. This version reduces the overall cost and potential negative impact on resources by eliminating the site visit component in favor of a pure desk audit that assesses schools based upon a

¹ See http://www.nist.gov/baldrige/publications/education_criteria.cfm?gclid=CivVILSb3LcCFTLNOgodB3YAUQ for additional information

rigorous standard, as required by law, using data the agency already collects, as noted in the rule itself. The SBE believes this offers the agency and schools a high standard for accreditation that meets the General Assembly's requirements and balances this against the numerous priorities currently drawing agency resources.

Fiscal Impact

Fiscal impact is minimal; the information required for the analysis is collected by the Department of Public Instruction already.

School-level Costs

The accreditation process is expected to require approximately 4 hours for each high school principal choosing to participate. This estimate includes time associated with developing the request, answering questions during the review, and communicating the results. Based upon the average base principal salary of \$63,856, from *Highlights of the NC Public School Budget 2013*,² the opportunity cost of this time, including benefits (assuming the current state employee benefit ratio of 33.9%), is estimated to be \$164 [$\$63,856 \times 1.339 = \$85,503$; $\$85,503 \div 2080 \text{ hours} = \$41.11/\text{hour}$; $41.11/\text{hour} \times 4 \text{ hours} = \164.44].

State Board of Education Charges

SL 2011-306 specifies that local school administrative units shall compensate the SBE for actual costs of the review. The NCDPI, acting as the agent of the SBE, will conduct the reviews and submit a charge to the district for the costs incurred, in accordance with the law. The charge is based upon the expectations that one staff member will be responsible for accepting requests, gathering and analyzing data, communicating with the school principal, and developing the notification of results. This work is estimated to take approximately 12 hours of staff time per request. Based upon an average Academic Services consultant-level salary of \$70,000 plus fringe benefits calculated at 33.9% of salary, the Department expects to incur a cost of \$541 [$\$70,000 \times 1.339 = \$93,730$; $\$93,730 \div 2080 \text{ hours} = \$45.06/\text{hour}$; $\$45.06/\text{hour} \times 12 \text{ hours} = \540.72] per school to complete this work. The charge to the district will be a one-time payment, payable upon completion of the review. No other accreditation-related fees will be charged during the 5-year accreditation term. Upon renewal of accreditation, the NCDPI will charge a fee for each school renewed based upon the same criteria outlined above.

Total Cost to Local School Districts

The total per-school accreditation cost to school districts is estimated to be \$705. This cost includes both school-level opportunity costs and charges from the NCDPI as outlined above. This reflects an estimated \$2,770 reduction in per-school costs for state accreditation as compared to AdvancED accreditation. This figure may underestimate the per school savings because the cost cited for

² NC Department of Public Instruction. "Highlights of NC Public School Budget 2013."
<http://dpi.state.nc.us/fbs/resources/data/#highlights..>

AdvancED accreditation does not include the opportunity cost of school staff time required to obtain it.

It is unclear how many of the currently existing 486 high schools (584 schools including combined schools)³ and future high schools would opt for the SBE accreditation. Assuming all high schools participate and a fifth of the schools have their current accreditation expire in each of the following 5 years (note this is the length of the accreditation conferred by AdvancED), the Department does not foresee a total statewide cost savings to school districts greater than \$270,000 per year (\$325,000 including combined schools). Therefore, the Department does not expect the impact from the proposed rule to be substantial.

Benefits of the Proposed Rule

The proposed rule benefits high schools across the state by providing another option for obtaining accreditation. It also provides a more cost efficient accreditation. Based on the analysis above, high schools would recognize a cost savings of approximately \$2,770 from choosing the Department of Public Instruction accreditation.

³ NC Department of Public Instruction. "Facts and Figures 2012-2013."
<http://www.ncpublicschools.org/docs/fbs/resources/data/factsfigures/2012-13figures.pdf>

Appendix A: Proposed Rule

16NCAC 06G .0504 is proposed for adoption as follows:

16NCAC 06G .0504 High School Accreditation Framework

The High School Accreditation Framework is the process whereby schools or school districts undergo a quality assurance process that includes self-reflection and outside peer review or audit. The processes to request an accreditation review and determine high school accreditation includes the following:

(a) The NCDPI will use the school's performance composite and other indicators, such as the cohort graduation rate and post-secondary readiness measures to determine high school accreditation. The cohort graduation rate is the percentage of ninth graders who successfully complete high school within the same four-year period. Factors of post-secondary readiness measures include:

- (1) successful completion of Algebra II/Integrated Mathematics III,
- (2) ACT, a college readiness assessment; and
- (3) WorkKeys, a career readiness assessment.

(b) The district superintendent must request a high school accreditation review:

- (1) The district superintendent submits a request to the State Board of Education (SBE) for an accreditation review.
- (2) The NCDPI conducts the review using three years of data.
- (3) The NCDPI provides findings to the SBE.
- (4) The LEA is notified of the SBE decision.
- (5) If the school(s) meets acceptable levels of quality, the accreditation is valid for five years.

*History Note: Authority N.C. Const. Art. IX, Sect 2 and 5, G. S. 115C-12(39)
Eff. June 30, 2013*