

Policy 2330, Non-public School Accreditation

Comment Log

Comment Period: May 13, 2021 through June 14, 2021

Action

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

Date	Commenter	Comments	Action	Rationale
§126-13C-3.1.c.1.				
6-11-21	Mary Ann Deschaine Superintendent Diocese of Wheeling- Charleston/Dept. of Catholic Schools	<p>a. Adding the requirement, as suggested in the Proposed Amendment, that nonpublic schools communicate the results of their accreditation process to the Department of Education “by providing an electronic copy of the original letter stating the school has achieved full status and the period it is active” is a positive change to Policy 2330 and clarifies the rule.</p> <p>b. The second sentence that is suggested by the Proposed Amendment in Section 3.1.c.1 is unclear, unnecessary, and should be eliminated. The sentence reads: “When the school accreditation is in question the WVDE may request a copy of the full accreditation report.”</p> <p>The Proposed Amendment in this instance would permit the Department of Education to request a copy of the full accreditation report when “the school accreditation is in question...” without recognizing that this is a circumstance that should never arise. Either a non-public school will meet the accreditation requirements of the approved accrediting agency, resulting in a letter to that effect (See the first part of the proposed changes</p>	N	Instead of requiring a full report of the accreditation findings, along with the letter of accreditation status, in order to achieve and/or maintain accreditation status with the WVDE we are only requesting the report findings document in the event of a public inquiry regarding the school’s status that would throw into question if the school should retain its status on the list of accredited non-public schools.

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		<p>to Section 3.1.c.1) or the non-public school will not achieve accreditation and will be unable to provide the necessary letter. As outlined in the 'Background' provided by the Department of Education in the proposal of the Proposed Amendment: "The recognition of the accrediting body by the WVBE was based on defined components which evaluated faculty and administration; curriculum and assessment; health and safety; leadership and continuous improvements; school resources and communication with parents and students."</p> <p>DWC Catholic Schools believes that the Board of Education takes great care to review and approve only those accreditation agencies that will provide accreditations based on procedures and substantive requirements that will ensure that students attending those institutions are able to retain their grade level placement and credits if they transferred to public schools. Any questions, citations, inquiries, deficiencies, follow up matters, or other determinations by an approved accrediting agency will be addressed – through the approved accreditation process – directly between the non-public school and the accrediting agency. If any such matters are resolved to the accrediting agency's satisfaction, then the accreditation would be (presumably) awarded; if any such matters are not resolved to the accrediting agency's satisfaction then accreditation would be (presumably) revoked (and the non-public school would be required by the proposed Policy changes in Section 3.1.c.2 to report the revocation to the</p>		
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		<p>Department of Education).</p> <p>Thus, a circumstance should not arise within the context of limited objectives of Policy 2330, where a 'question' would arise with respect to accreditation that would require the attention of the Department of Education and so the second sentence that is suggested by the Proposed Amendment in Section 3.1.c.1 is unnecessary and should be eliminated.</p>		
§126-13C-3.1.c.3.				
6-11-21	Mary Ann Deschaine Superintendent Diocese of Wheeling- Charleston/Dept. of Catholic Schools	<p>Private school instruction is grounded in a contract between the parents and student on the one hand and the provider of non-public education on the other. As a part of that contract, consideration of various kinds passes between the parties and performance of certain covenants follows from the delivery of that consideration. The proposed edits to Section 3.1.c.3 would interfere with the freedom of the parties to contract with one another in this respect.</p> <p>Specifically, as a part of the typical agreement between a family and a private school, tuition or other monetary consideration is paid and, among other covenants performed by the school, the school delivers written evidence or certifications of completed coursework of courses of study to the student (assuming that the student meets academic, behavior, and other requirements of the agreement). The proposed edits to Section 3.1.c.3 would mandate that non-public schools perform obligations under their agreements (that is, to provide academic records showing completed</p>	N	<p>Accrediting organizations already require prompt and accurate transcript services for students entering and leaving the non-public school.</p> <p>In alignment with national accreditation agencies and for the best interest of students this language has been added in Policy 2330.</p>

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		<p>coursework) without regard to contract performance by the counterparty parents and students – including, but not necessarily limited to where the parents or students fail to remit the agreed upon consideration in the form of tuition or fees. This change is an unnecessary and unwarranted interference with the freedom of contract and should be eliminated.</p> <p>From a policy perspective, should the changes in Section 3.1.c.3 be approved as a part of Policy 2330, non-public schools may be forced to consider restructuring their entire agreements with parents and students to require tuition payments (and other consideration) entirely up front, to ensure performance – which could create substantial financial burden on those West Virginia families that have chosen a non-public school education.</p>		
§126-13C				
6-11-21	Mary Ann Deschaine Superintendent Diocese of Wheeling- Charleston/Dept. of Catholic Schools	DWC Catholic Schools appreciates the engagement of the Department of Education on these matters and is in favor of maintaining a rigorous accreditation requirement for private schools in West Virginia who seek to maintain the ability of their students to transfer to public schools at an appropriate grade or skill level. It is in the interest of the State, parents, and non-public schools themselves to strengthen and defend this accreditation process. However, DWC Catholic Schools urges the rejection of the proposed changes, as described above, in the second Sentence of Section 3.1.c.1 and in Section 3.1.c.3 for the reasons set forth herein.	A/S	