

MEMORANDUM

TO: Indiana State Board of Education Staff
FROM: Office of School Accountability, Indiana Department of Education
RE: Freeway Accreditation Petition for Basic Prep Academy
DATE: May 22, 2019

Basic Prep Academy submitted a petition for freeway accreditation on May 1, 2019. The Department reviewed the petition, and held a phone conference with Terrence Littlefield, the Head of School at Basic Prep Academy, on May 16, 2019 to discuss the petition. This memorandum provides a summary of the information provided by the school in the petition and during the phone conference, as well as the Department's thoughts regarding the accreditation of Basic Prep Academy.

Background & Demographic Information

Basic Prep Academy's mission is to provide an educational program that enables individuals to complete the requirements for a high school diploma by way of an intensive, individualized, virtual learning experience. Basic Prep Academy provides students with online, virtual instruction.

Mr. Littlefield started Basic Prep Academy, after being a teacher and seeing the low number of graduates. Mr. Littlefield began working with a number of students and school districts to assist over-age, under-credited students in obtaining a high school diploma. When asked why Basic Prep Academy sought freeway accreditation, Mr. Littlefield provided that the state accreditation would provide more value to the diplomas awarded to students by Basic Prep Academy.

Mr. Littlefield indicated that Basic Prep Academy held accreditation with Northwest accrediting body/AdvancEd from 2010 through 2015, but dissolved the relationship in 2015. Per Mr. Littlefield, the relationship dissolved because the accrediting body believed there were a number of areas where Basic Prep Academy failed to satisfy required assurances. Mr. Littlefield also indicated pursuance of accreditation with Middle States. Additionally, Basic Prep Academy initially sought Freeway accreditation during the 2017-2018 school year, but was ultimately not recommended for accreditation by Department and Board staff.

The entity submitted data to the Department for the 2018-2019 school year. The official enrollment data submitted by the entity to the Department demonstrated five (5) students enrolled in grades 10-12. At the time of the phone conference, Mr. Littlefield indicated that Basic Prep Academy had seven (7) students enrolled. When asked about projected enrollment for the 2019-2020 school year, Mr. Littlefield anticipates enrollment of 50-60 students.

Operations

Facilities: The entity currently operates at 5120 Commerce Circle, Indianapolis, Indiana 46239. Given that instruction is provided virtually, Mr. Littlefield indicated that students may come to the brick and mortar setting for instruction, or may participate at Starbucks, place of employment, home, etc. The facility has a capacity of 25 people.

Tuition: The entity charges \$750 tuition per year. Mr. Littlefield indicated that he would like for Basic Prep Academy to participate in the Choice Scholarship Program.

Staffing: Basic Prep Academy has six (6) teachers, two (2) of which are licensed in Indiana and two (2) of which are licensed in Texas. These six (6) individuals provide instruction in math, science, history and English. They also provide special education services and reading services. Mr. Littlefield indicated that the entity strives to have a student/teacher ratio of 25:1.

Academic Programming

Curriculum and Instruction: The Basic Prep Academy curriculum provides a variety of online, instructional courses and workshops. Instruction is self-paced by students and teachers. Mr. Littlefield indicated that students must provide their own computer; the entity does not provide computers to students to access curriculum. Additionally, the entity does not have an established list of minimum technical requirements to enroll (e.g., video accessibility on device).

Basic Prep Academy uses PLATO curriculum and course design to provide online instruction to students. The entity also uses Edmentum as the delivery platform, however teachers provide the instruction. When asked about national standards to evaluate the online educational programming provided, Mr. Littlefield indicated that he was familiar with these standards but had not utilized them to assess the program at Basic Prep Academy.

Basic Prep's instructional day allows for 720 minutes of a combination of synchronous and asynchronous instruction, and runs from 8:30 AM to 8:30 PM on Monday through Friday. When asked how much direct instruction students receive per day, Mr. Littlefield indicated that students typically receive 1-2 hours of direct, synchronous instruction per day, with the remainder of the time devoted to individual, asynchronous work. Mr. Littlefield indicated that he and his staff are available to assist students during that time, and that Mr. Littlefield monitors students to see who is logged on.

While instruction is provided virtually, Mr. Littlefield indicated that he does interact with students on a frequent basis via text, email, and phone. Mr. Littlefield also mentioned that he will meet in person with students. When asked about ensuring student attendance, Mr. Littlefield indicated that he can see when and for how long students log in, and would reach out to students over the phone if they were not attending classes.

When asked about accommodations for students with disabilities, Mr. Littlefield indicated that the accommodations provided by the Edmentum platform include reduction of reading and math assignments. He also indicated that the entity utilizes the student's IEP from the previous school district as a guide for accommodations.

Basic Prep Academy administered the ISTAR assessment during the 2018-2019 school year. No nationally-recognized assessments were administered during the 2018-2019 school year.

Department Comments

- The entity's lack of accessible technology for students is concerning for an educational program provided entirely online. Further, there is no control to determine whether the student-provided device contains all of the required components to participate in the

educational program. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.

- The entity failed to address questions and concerns posed by the Department on several occasions as part of the seeking accreditation process. Responses were often vague and difficult to decipher, and the entity did not provide adequate clarifications when requested by the Department.
- The entity has not aligned with national standards for quality online education providers. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.
- The quality of student/teacher interaction was not well established. There is some hesitation regarding whether students receive adequate instructional support and feedback from instructors. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.
- The entity does not have an established student assessment system, and could not adequately demonstrate how student data from formative and/or summative assessments is utilized to guide instruction.
- The entity provides that their instructional hours are 720 minutes per day, but could not adequately demonstrate whether students receive at least six (6) hours of synchronous instruction per day, nor whether a system was in place to ensure student attendance.
- The entity indicates that students have anywhere from four (4) to eighteen (18) weeks to complete courses. There is some hesitation regarding whether students are provided with meaningful instruction to satisfy course requirements in order to earn credits or simply participating in credit recovery opportunities, given the difference in time students can complete coursework.
- The entity serves a high school population but has not adequately demonstrated its plan for students to satisfy all of the requirements for Indiana's Graduation Pathways. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.
- The entity did not provide an adequate plan to meet the minimum educational benefits required under the Freeway statute.
- The entity's historic enrollment data indicates the majority of Basic Prep's students were over the age of 18 when enrolled. The Board has no previous record of accrediting adult high schools, so this would need to be considered further.
- The entity provides more than 50% of instruction virtually. The Board has no previous record of accrediting virtual schools, so this would need to be considered further. For example, new requirements for virtual programs introduced in Public Law 159-2019 do not apply to nonpublic schools.

Recommendation:

The Department and Board staffs jointly recommend that Basic Prep Academy not be afforded freeway accreditation.

May 22, 2019

Mr. Terrence Littlefield
Basic Preparatory Academy
5120 Commerce Circle, Suite C
Indianapolis, IN 46239

Re: Freeway Accreditation Petition

Dear Mr. Littlefield:

As you are aware, Basic Preparatory Academy (Basic Prep) sought state accreditation by the Indiana State Board of Education (Board) pursuant to IC 20-26-15 *et seq.* for the 2019-2020 school year. In response to the request, the Indiana Department of Education (Department) instituted a “seeking accreditation” year to ensure a school’s ability to comply with Indiana law as to educational requirements and other health and safety standards.

On May 1, 2019, Basic Prep submitted its petition for freeway accreditation to the Department for review. Board Department and Board staffs reviewed the petition, as well as Basic Prep’s performance during the “seeking accreditation” year. Based on the review, both the Department and the Board staffs determined that Basic Prep would not be recommended as a candidate for state accreditation due to the following reasons. Such denial of recommendation for freeway accreditation does not preclude Basic Prep to seek state accreditation at a later time.

- The entity’s lack of accessible technology for students is concerning for an educational program provided entirely online. Further, there is no control to determine whether the student-provided device contains all of the required components to participate in the educational program. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.
- The entity has not aligned with national standards for quality online education providers. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.
- The quality of student/teacher interaction was not well established. There is some hesitation regarding whether students receive adequate instructional support and feedback from instructors. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.
- The entity serves a high school population but has not adequately demonstrated its plan for students to satisfy all of the requirements for Indiana’s Graduation Pathways through virtual programming. This particular concern was raised by Department and Board staffs last year when Basic Prep sought accreditation and was not rectified.
- The entity failed to address questions and concerns posed by the Department on several occasions as part of the seeking accreditation process. Responses were often vague and

difficult to decipher, and the entity did not provide adequate clarifications when requested by the Department.

- The entity does not have an established student assessment system, and could not adequately demonstrate how student data from formative and/or summative assessments is utilized to guide instruction.
- The entity provides that their instructional hours are 720 minutes per day, but could not adequately demonstrate whether students receive at least six (6) hours of synchronous instruction per day, nor whether a system was in place to ensure student attendance.
- The entity indicates that students have anywhere from four (4) to eighteen (18) weeks to complete courses. There is some hesitation regarding whether students are provided with meaningful instruction to satisfy course requirements in order to earn credits or simply participating in credit recovery opportunities, given the difference in time students can complete coursework.
- The entity did not provide an adequate plan to meet the minimum educational benefits required under the Freeway statute.
- The entity's historic enrollment data indicates the majority of Basic Prep's students were over the age of 18 when enrolled. The Board has no previous record of accrediting adult high schools, so this would need to be considered further.
- The entity provides more than 50% of instruction virtually. The Board has no previous record of accrediting virtual schools, so this would need to be considered further. For example, new requirements for virtual programs introduced in Public Law 159-2019 do not apply to nonpublic schools.

If Basic Prep wishes to contest the joint recommendation of staffs, it may attend the Board's regular business meeting occurring on June 5, 2019 at 9:00am EDT. The meeting will take place at the Indiana Government Center, Conference Room B, located at 302 West Washington Street, Indianapolis, IN 46204. If no objection is made to the joint recommendation by Basic Prep, then the Board will take no action on the matter. Basic Prep must notify Board and Department staffs no later than Tuesday, May 28, 2019 if it wishes to contest the joint recommendation.

Sincerely,

Maggie Paino
Director of Accountability
Indiana Department of Education

cc: Brian Murphy, Chief of Staff, Indiana State Board of Education



Dear Ms. Paino,

Good morning. Basic Prep Academy (BPA) engaged in the Freeway Application Process with the intention to become accredited for the 2019-2020 school year. However, per your letter, dated May 22, 2019, you indicated that based on the information BPA submitted, the State Board of Education and Indiana Department of Education will not recommend BPA as a candidate for state accreditation. In light of this, BPA is providing this letter as formal notice of our intent to contest the joint recommendation of staffs. We respectfully request time during the Board's regular business meeting occurring on June 5, 2019 at 9:00 am EDT, to present our appeal.

To ensure BPA is adequately prepared, we would like to know the appropriate steps to follow in presenting our appeal. As such, would you please provide BPA with documentation that outlines the Board's formal appeals process?

In addition, to providing your formal, documented appeal process, BPA has some specific questions, outlined below:

- Aside from the reasons noted in your denial letter, are there any other concerns the Board has that BPA should address in our appeal?
- How much time will be allotted for BPA to present our appeal?
- Is there information BPA needs to submit to the Board prior to the appeal date?
- Is there an opportunity to present testimony from former students?

Respectfully,
Terrence Littlefield

cc: Brian Murphy, Chief of Staff, Indiana State Board of Education



INDIANA STATE BOARD OF EDUCATION

BEFORE THE INDIANA STATE BOARD OF EDUCATION

NOTICE OF RECOMMENDATION AND ADMINISTRATIVE PROCEEDING

In Re the Matter of:

Basic Prep Academy's Freeway Accreditation Petition
Pursuant to I.C. 20-26-15 *et seq.*

Notice is hereby provided that the Indiana State Board of Education ("Board"), pursuant to IC 4-21.5-3-20 and IC 20-26-15 *et seq.*, shall conduct an administrative proceeding regarding Basic Prep Academy's ("BPA") Freeway Accreditation Petition. BPA is hereby notified that the proceeding will be conducted at the following time, place and date:

DATE: June 5, 2019
TIME: Approximately 9:00 a.m. (eastern)
PLACE: Indiana Government Center South, Conference Room B
302 W. Washington Street, Indianapolis, IN 46204

The May 22, 2019, joint recommendation to deny the Freeway Accreditation Petition will be presented to the Board during the proceeding referenced above. Representatives from BPA will have an opportunity to directly address the Board regarding the joint recommendation.

Any documents to be presented for the Board's consideration must be provided to Brian Murphy by 5:00 p.m. (eastern) on May 29, 2019. It is recommended that BPA prepare and submit a written summary of the relevant facts, contentions, and legal support for purposes of the Board's deliberations. It is recommended that any BPA presentation to the Board be limited to five (5) minutes. Board members may ask questions during BPA's presentation. The proceeding will be recorded. As the agency's ultimate authority, the Board will make a final determination subsequent to the presentation.

Following the Board's vote, Board staff shall issue a final order to BPA. Pursuant to IC 4-21.5-3-31, the Board may modify a final order before the earlier of the following: 1) thirty (30) days after the Board has served the final order, 2) another agency assumes jurisdiction over the final order, or 3) a court assumes jurisdiction over the final order under IC 4-21.5-5. BPA may petition the Board for a rehearing of a final order if BPA can demonstrate that newly discovered material evidence exists, and the evidence could not, by due diligence, have been discovered and produced at the hearing or before the Board's vote. Please note, that the Board's decision to modify a final order does not toll the period in which a party may petition for judicial review under IC 4-21.5-5. However, if a rehearing request is granted, this period is tolled and a new period begins on the date that a new final order is served. Pursuant to IC 4-21.5-5, final orders issued by the Board are subject to judicial review.

Any procedural questions or materials for consideration should be directed to:

Brian Murphy
Chief of Staff
Indiana State Board of Education
143 W. Market, Suite 500
Indianapolis, IN 46204
317-233-6809 BMurphy@sboe.IN.gov F: 317.234.8726

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was sent to the following:

Terrence Littlefield <academy@basicprep.com>

Dated: May 24, 2019

Brian M. Murphy

Brian Murphy
Chief of Staff
Indiana State Board of Education