



**NLSA Executive Committee and National Staff Responses
to 2020 District Annual Report Recommendations**

TOPIC: PANDEMIC
Submitting Districts: English, Florida-Georgia, Indiana, Missouri, Northern Illinois
Subject: Continued extensions for schools due to the COVID-19 pandemic. Response: The Pandemic 2.0 proposal was adopted at the July 2020 National Accreditation Commission (NAC) meeting.
TOPIC: VALIDATION TEAM VISIT
Submitting Districts: Indiana, Nebraska, North Wisconsin
Subject: Shortening the Validation Team visit by interviewing stakeholders via video conferencing prior to the visit. Response: The NLSA Executive Committee and National Staff endorse not changing the Validation visit length. Rationale: Validation Team interview questions are often formulated after a day of observation, questions, team discussion, and experiencing onsite the school climate and relationships. Interviews prior to the visit would preclude this background. Arguments can be made for lengthening the visit so that the fidelity of the process is maintained, e.g., the updated, more thorough protocol requires the Validation Team to validate an increased amount of evidence. Schools doing combined early childhood and elementary visits need the entire two and a half or three-day visit.
Subject: Proposal for a virtual Validation Team visit. Response: The Virtual Validation Team Visit policy and procedure was adopted at the July 2020 National Accreditation Commission (NAC) meeting.
TOPIC: SCHOOLS OF DISTINCTION
Submitting District: Missouri
Subject: Elimination of the School of Distinction designation Response: The proposal to eliminate the School of Distinction designation was adopted at the July 2020 National Accreditation Commission meeting.
TOPIC: HIGH SCHOOL ACCREDITATION
Submitting Districts: Michigan, North Wisconsin, South Wisconsin
Subject: Development of an NLSA Protocol for Lutheran high schools. Response: A task force on NLSA protocol for Lutheran high schools has been appointed with the goal of developing a more appropriate process for accrediting our Lutheran secondary schools.

TOPIC: NLSA FEES
Submitting Districts: Kansas, Michigan, Minnesota North, North Dakota, Wyoming
<p>Subject: How can both NLSA and schools/ECs remain financially stable during and after the COVID-19 pandemic, especially if schools/EC chose to cut NLSA from budgets due to financial constraints?</p> <p>Response: Because this submission was stated as a question rather than a recommendation, and each school and early childhood center would answer this question differently, it is difficult for the NLSA Executive Committee and National Staff to propose an answer. It is not financially feasible for NLSA to reduce fees or provide grants at this time.</p>
<p>Subject: Development of a tiered NLSA fee system based on school size.</p> <p>Response: Although NLSA is concerned about the cost of accreditation to small schools, a tiered system for assessing fees based on enrollment is not feasible at this time.</p> <p>Rationale: NLSA has considered various funding models in the past and is open to continue to do so. Careful attention and analysis are given to the annual budgeting process. NLSA fees remain lower than all national accrediting agencies. NLSA must provide the same services to schools of all sizes. In a tiered system, schools would be required to accurately self-report their annual statistics every year (which many Early Childhood centers do not) for NLSA to have an accurate record of the level of fee that they should be assessed. Tracking this information to compile different annual fee invoices for all schools would prove challenging, especially with the current staffing limitations of NLSA and School Ministry. The projected NLSA budget is submitted in the spring (February) to be approved by the ONM/Synod Board for use beginning on July 1. If a tiered approach were utilized, the National Office would not be able to accurately forecast the funding that would be received as the upcoming school year has not begun, and as such would not be able to present an accurate budget for approval. One remedy would be to use the previous year's enrollment to determine the tiering for budget purposes, again creating a difficult logistical challenge for both the school and NLSA staff.</p>

TOPIC: DISTRICT ANNUAL REPORT
Submitting District: Missouri
<p>Subject: Eliminating the requirement that a maximum of three recommendations be submitted from Districts.</p> <p>Response: The NLSA Executive Committee and National Staff endorse limiting the number of recommendations submitted from Districts to three.</p> <p>Rationale: In limiting the number of recommendations to three, the NLSA Executive Committee and National Staff were attempting to ask Districts to prioritize their recommendations in order to make growth in the process more effective and efficient.</p> <p>Action: The last sentence of the District Annual Report 9/2020, p. 5, III, d. will be stricken: "District Recommendations: List any recommendations from the District Accreditation Commission to the National Accreditation Commission for discussion. (NOTE: Please submit no more than three recommendations for consideration by the NLSA Executive Committee and the NLSA national staff. Any additional recommendations will not be recorded or addressed.)".</p>

TOPIC: EARLY CHILDHOOD ACCREDITATION

Submitting Districts: California-Nevada-Hawaii, Florida-Georgia, Indiana, Kansas, Ohio

Subject: Alternate avenue of Early Childhood Centers to attain accreditation or engage in school improvement.

Response: At this time the NLSA Executive Committee and National Staff believe the development of an alternative accreditation protocol is not feasible.

Rationale: Early childhood centers wishing to engage in school improvement without committing to the rigorous NLSA process have free access to the Early Childhood Self-Study document. Portions of this document can be selected to meet school improvement needs without going through the formal accreditation process.

Subject: Streamlining of the Early Childhood Self-Study document to address its size, detail, and repetition among certain indicators.

Response: The NLSA Executive Committee and the National Staff do not endorse a streamlining of the Early Childhood Self-Study Report document.

Rationale: The NLSA EC 2018 document is national in scope. It is designed to be used with centers that are licensed through a state agency, license exempt centers with oversight and responsibility to comply with state regulations assigned to the church or school, and with centers that are not required to license their programs. Centers and schools, licensed by their state, are better prepared for the accreditation process. Where early childhood programs are not required to be licensed by the state, NLSA serves a document to inform and educate centers about best practices in early childhood education. NLSA has partnerships with several states based on the states' approval of the Early Childhood Self-Study document. Any substantial changes to the document would require resubmission to the states for their approval and risk rejection. Standard 9 – Infants and Toddlers does contribute to the redundancy with centers that also have 3-5 year-old-programs. Standard 9 is designed to be omitted in the Self-Study Report if it is not a part of the school's program. Another contributing factor is that the requirements change based on a child's age. Making sure that every age group is addressed has contributed to the repetition. Every center, large and small, should be gathering data and evaluating it annually. In this case, NLSA EC 2018 is expressing that this is important for the quality of the program. The initial accrediting process is the most time consuming. Subsequent accreditations will be easier with the foundation that is created from the school's first process.

Subject: Changing the rating scale to Met in Full (3), Partially Met (1), Not Presently Met (0).

Response: The NLSA Executive Committee and the National Staff do not endorse a change in the rating scale of the Early Childhood Self-Study Report document.

Rationale: Any Indicator of Success that is not "Met in Full" must be listed and addressed in the School Action Plan. With the goal of school improvement, the areas of improvement are still identified with both the 0 and 1 ratings.

TOPIC: CUMULATIVE ANNUAL REPORT/SCHOOL ACTION PLAN
Submitting Districts: Indiana, Ohio
<p>Subject: Unaccomplished actions from a previous accreditation cycle’s School Action Plan.</p> <p>Response: The NLSA Executive Committee and National Staff endorse that the School Action Plan from the previous accreditation cycle be Required Evidence for Standard 3A—Governance in the Evidence-Based Self-Study Report for Lutheran Schools and the Self-Study Report for Lutheran Early Childhood Centers.</p> <p>Rationale: By having access to a school’s previous School Action Plan the Validation Team can assess the school’s record of successfully accomplishing the recommendations and strategies from the previous accreditation cycle. Unaccomplished actions can be evaluated by the Validation Team for possible inclusion in the new School Action Plan.</p> <p>Action: This will be formally proposed at the July 2021 NAC for inclusion in the September 2021 document release.</p>
<p>Subject: Providing a simple Cumulative Annual Report template required for use in all schools.</p> <p>Response: Cumulative Annual Reports are the responsibility of each LCMS District. Each District is free to design a report form as simple or as complex as is needed to monitor progress on School Action Plans. A sample Cumulative Annual Report template is available on the “NLSA Commissioner Resources Page” of LuthEd.org entitled, “NLSA Sample Cumulative Annual Report Form (9/2020)”.</p>

TOPIC: TEACHER AND ADMINISTRATOR CERTIFICATION
Submitting District: Iowa East
<p>Subject: Changing Indicators and Benchmarks for 3B:02 and 4:02 concerning teacher and administrator qualifications.</p> <p>Response: The NLSA Executive Committee and National Staff do not endorse a change in the Indicators or Benchmarks for 3B:02 or 4:02.</p> <p>Rationale: Several states have strict guidelines for teacher certification. With a national document, when requirements are relaxed the expectation for teacher and administrator certification credentials are lowered for all schools. In Standard 3B – Administration, and Standard 4 – Professional Personnel, the <i>Required</i> Evidence and the <i>Required</i> Indicators of Success are attainable for schools that are faced with the strict guidelines. The deficiency of not having state certification is reported under a <i>General</i> Indicator of Success in 3B:02 and 4:02. A school will not be denied accreditation because their administrator or a teacher does not hold state certification, but the school will have a lower rating in this Indicator. Upholding the General Indicator could encourage some administrators to complete the process. Should the expectation be lowered, the lowered expectation will become the goal.</p>

TOPIC: PUBLIC RELATIONS
Submitting District: Wyoming
<p>Subject: Preparing materials and strategies to promote the value of NLSA to nonaccredited Lutheran schools.</p> <p>Response: This task will be taken up by the NLSA National Staff.</p>

TOPIC: EVANGELISM PLAN
Submitting District: Ohio
<p>Subject: Making an evangelism plan a required piece of evidence.</p> <p>Response: The NLSA Executive Committee and National Staff recognizes the importance of school and church working together to minister to school families. General indicator 2A:03, Benchmark 3, states, “The school and congregation plan and work together on behalf of families who do not have an identified church home or who do not attend church regularly.”</p> <p>Action: The NLSA Executive Committee and National Staff endorse replacing this benchmark with, “The school and congregation <i>have a written Evangelism Plan</i> to work together on behalf of families who do not have an identified church home or who do not attend church regularly.” This will be formally proposed at the July 2021 NAC for inclusion in the September 2021 document release.</p>

TOPIC: FACE SHEET
Submitting District: Nebraska
<p>Subject: Allowing administrators access to the password-protected Face Sheet currently available to District Commissioners only.</p> <p>Response: The NLSA Executive Committee and National Staff do not endorse granting access to schools and administrators.</p> <p>Rationale: Having Districts fill out the Face Sheet was a change that was introduced at the 2018 NAC. A completed Face Sheet may not be able to be edited by the District if a school submits it as a PDF or as the first page of their Self-Study or Validation Team Report, or if it is password protected, which would result in a secondary face sheet being submitted by the District if changes were needed to the Face Sheet from the school. Also, the current Face Sheet states “<i>The form is to be used for every report that the NLSA National Office receives from the District Offices.</i>” Note that this is not the responsibility of the school currently. The committee and staff recommend keeping the responsibility at the District level, especially since this will not be an issue when the online (Armature) system is in place.</p>

TOPIC: NLSA PROTOCOL REVIEW
Submitting District: Southeastern
<p>Subject: Establishing a policy or procedure for addressing a regular, formal review of the NLSA processes and protocols.</p> <p>Response: Comprehensive review and development of NLSA Standards will occur approximately every five years and may occur more frequently at the discretion of the Executive Committee of the National Accreditation Commission. Any comments received regarding the Standards, whether formally requested through districts or informally through unsolicited submission, will be collected and reviewed with the NLSA Executive Committee as part of the subsequent five-year review process.</p> <p>Action: The preceding statement will be formally proposed at the July 2020 NAC for inclusion in the NLSA Policy Manual.</p>