General Comments

- There needs to be evidence cited for each item. The evidence is what was looked at that led to a “yes” or “no” response. Evidence might be staff or student files, policy manuals, a walkthrough of the building, an interview with the principal, a classroom visit, etc. There doesn’t need to be a lot of detail, but another person should be able to look at the evidence list and find those items if a follow-up visit is needed.
- Everything is assumed to apply to all schools, so anything marked “N/A” needs an explanation.
- If an item refers to an action (a safety drill held, a document collected, a report made, etc.), then it is not enough that the school has a policy regarding the action. Having a policy is not the same as following a policy, so the team must confirm that the action, in fact, was taken.
- Every “No” answer in the probe MUST result in one or more items being listed in the deficiencies section at the end of the probe EXCEPT for II.B. and III.C., where some “No” answers are simply information and do not constitute a deficiency.
- At the conclusion of the visit,
  - Offer the school about 30 days in which to “fix” things. It would be unusual for schools not to have at least one “no” response in the probe, but it would also be typical for schools to have “no” items that are easy for them to fix. This window gives the schools an opportunity to fix those easy items to arrive at a report that does not have any deficiencies indicated.
  - Email a copy of the draft report of the probe to the school for their reference. This must be done within two weeks of the visit. The 30-day window starts when the probe has been sent.
  - At the end of those 30 days, change the probe to reflect any fixes the school has made. This becomes the final report of the team.
  - Email the resulting final probe text as a pdf to the ISC 2 contact. Do not print and scan the probe as the next steps require that the typing areas of the document remain working.
  - It would be very rare for the probe to be accompanied by any additional documentation, but if the team feels something else should be included, do so.

Contacts in Case of Questions

ISBE—Title Grants Administration Division
217-524-4832

Intermediate Service Center 2 (West 40)
708-449-4284
Probe Sections

Preliminary Area
✓ Complete all of the information areas
  o Start with the school year in the header area
  o Include the school’s RCDT code (the region or county name is NOT acceptable). If the school does not know its RCDT code, this is a teaching moment since it is important that they know their number and use it on forms and in communications. One way to find the number is to go to http://www.isbe.net/research/htmls/directories.htm and click on “Directory of Educational Entities”; choose the “Non Pub Sch” tab and find the school in the list. (Hint—Control F will pull up a search function.) The RCDT code is a combination of the numbers in columns C and D.
  o Under type of visit, “other” will be rarely checked, but if it is, an explanation is needed on the blank line provided.
  o The principal’s cell phone is not required.

✓ For the school affiliation, here is a table showing the options. The numbers refer to the last two digits of the school’s RCDT code. Some numbers are not currently used.

<table>
<thead>
<tr>
<th>CODE</th>
<th>AFFILIATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Independent—Regular (Not religious affiliated) (Not parent operated)</td>
</tr>
<tr>
<td>02</td>
<td>Baptist</td>
</tr>
<tr>
<td>03</td>
<td>Christian Schools International (of Michigan)</td>
</tr>
<tr>
<td>05</td>
<td>Jewish</td>
</tr>
<tr>
<td>06</td>
<td>Lutheran</td>
</tr>
<tr>
<td>07</td>
<td>Methodist</td>
</tr>
<tr>
<td>08</td>
<td>Presbyterian</td>
</tr>
<tr>
<td>09</td>
<td>Protestant Episcopal</td>
</tr>
<tr>
<td>10</td>
<td>Roman Catholic</td>
</tr>
<tr>
<td>11</td>
<td>Seventh-Day Adventist</td>
</tr>
<tr>
<td>14</td>
<td>Other Religious Affiliation</td>
</tr>
<tr>
<td>16</td>
<td>Montessori School</td>
</tr>
<tr>
<td>17</td>
<td>Greek Orthodox</td>
</tr>
<tr>
<td>19</td>
<td>Independent—Special Education (Not religious affiliated) (Not parent operated)</td>
</tr>
<tr>
<td>20</td>
<td>Illinois Association of Christian Schools</td>
</tr>
<tr>
<td>21</td>
<td>Amish</td>
</tr>
<tr>
<td>22</td>
<td>Mennonite</td>
</tr>
<tr>
<td>23</td>
<td>Islamic/Muslim</td>
</tr>
<tr>
<td>25</td>
<td>Pentecostal</td>
</tr>
<tr>
<td>26</td>
<td>Association of Christian Schools International (of Colorado)</td>
</tr>
<tr>
<td>27</td>
<td>Christian Schools of Illinois</td>
</tr>
</tbody>
</table>

✓ The grade level question is not the grades served by the school but the grades for which recognition is being sought. For example, a school might serve grades K-12 but is only seeking recognition for the high school grades.

✓ For the team
  o indicate by placement whether the person represents the public world, the nonpublic world, or an ROE/ISC
  o the public person
    ▪ must “represent” a public educational entity—that is, the person must be currently employed by such an entity though not necessarily full time.
    ▪ the rule does not specify what role the public person must have in his/her position—teacher, principal, superintendent, business manager, Title I Director, etc. are all fine.
the rule is interpreted to allow persons who teach education courses at a public college or university also to serve on the team.

- the nonpublic person
  - must "represent" a nonpublic educational entity OR be familiar with the nonpublic world, so a retired nonpublic person or a nonpublic person who has taken a job outside of nonpublic schools may serve.
  - the rule does not specify what role the nonpublic person must have in his/her position—teacher, principal, superintendent, business manager, etc. are all fine.
  - the rule is interpreted to allow persons who teach education courses at a nonpublic college or university also to serve on the team.

✓ Do not make any marks in the area below the "ISBE Use Only" indication.
Section I—Administrative

A. Policies

• “Written” includes electronic documents.
• Item 1 is likely to be in the form of by-laws for the corporation that is the school.
• Item 2 is likely to be in some sort of policy manual.
• Item 3 may be accomplished by a handbook distributed to parents, material posted on the school’s website, and/or other means.
• Catholic schools generally go with policy collections created by their diocesan offices, which is fine. However, the schools need a statement that it adopts those diocesan policies wholly—that is, the school needs to take on the diocesan policies as their own in some official, formal way. It could be that other schools are subject to similar policy collections created by an umbrella organization, and those schools would need similar adoption language.

B. Calendar

• Do not use the calendar submitted by the school to ISBE; use the actual calendar the school maintains and distributes to parents and students.
• Do not simply accept the totals given by the school; count each day and hours on the calendar.
• Remember that instruction hours are not the same as attendance hours. Instruction does not include time spent in non-curricular activities such as lunch, recess, chapel, passing periods, rest room breaks, etc.
• While chapel or other worship activities may not be counted as instructional, time spent in religion classes (where there is a teacher, as opposed to clergy, as well as a curriculum, tests and grading, textbooks, etc.) does count as instructional time.
• Half-day kindergarten can be counted if the school allows parents to enroll for both halves of the day even if the parents elect not to do so. It is the days and hours offered by the school that are being counted.

C. Bullying Policy

• The requirement to have a bullying policy only applied to non-public elementary or secondary schools that are non-sectarian, so only RCDT codes ending in -01 or -19 must have these policies. For other schools, mark this N/A.
• Bullying is prohibited on the basis of actual or perceived race, color, religion, sex, national origin, ancestry, age, marital status, physical or mental disability, military status, sexual orientation, gender-related identity or expression, unfavorable discharge from military service, association with a person or group with one or more of the aforementioned actual or perceived characteristics, or any other distinguishing characteristic.
• Students shall not be subjected to bullying:
  - during any school-sponsored education program or activity;
  - while in school, on school property, on school buses or other school vehicles, at designated school bus stops waiting for the school bus, or at school-sponsored or school-sanctioned events or activities;
  - through the transmission of information from a school computer, a school computer network, or other similar electronic school equipment; or
  - through the transmission of information from a computer that is accessed at a nonschool-related location, activity, function, or program or from the use of technology or an electronic device that is not owned, leased, or used by a school district or school if the bullying causes a substantial disruption to the educational process or orderly operation of a school. This item applies only in cases in which a school administrator or teacher receives a report that bullying through this means has occurred and does not require a district or school to staff or monitor any nonschool-related activity, function, or program.
• Bullying includes "cyber-bullying" and means any severe or pervasive physical or verbal act or conduct, including communications made in writing or electronically, directed toward a
student or students that has or can be reasonably predicted to have the effect of one or more of the following:
  o placing the student or students in reasonable fear of harm to the student's or students' person or property;
  o causing a substantially detrimental effect on the student's or students' physical or mental health;
  o substantially interfering with the student's or students' academic performance; or
  o substantially interfering with the student's or students' ability to participate in or benefit from the services, activities, or privileges provided by a school.

- Bullying may take various forms, including without limitation one or more of the following: harassment, threats, intimidation, stalking, physical violence, sexual harassment, sexual violence, theft, public humiliation, destruction of property, or retaliation for asserting or alleging an act of bullying. This list, coming from the statute, is illustrative and non-exhaustive.

- "Cyber-bullying" means bullying through the use of technology or any electronic communication, including without limitation any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic system, photonic electronic system, or photooptical system, including without limitation electronic mail, Internet communications, instant messages, or facsimile communications. "Cyber-bullying" includes the creation of a webpage or weblog in which the creator assumes the identity of another person or the knowing impersonation of another person as the author of posted content or messages if the creation or impersonation creates any of the effects enumerated in the definition of bullying in this Section. "Cyber-bullying" also includes the distribution by electronic means of a communication to more than one person or the posting of material on an electronic medium that may be accessed by one or more persons if the distribution or posting creates any of the effects enumerated in the definition of bullying in this Section.

- The required policy on bullying, which must be filed with the State Board of Education, shall include a process to investigate whether a reported act of bullying is within the permissible scope of the district's or school's jurisdiction and shall require that the district or school provide the victim with information regarding services that are available within the district and community, such as counseling, support services, and other programs. The policy must be communicated to students and parents/guardians on an annual basis. The policy must be updated every 2 years and filed with the State Board of Education after being updated.

D. Attendance
- Requiring “regular” attendance is not the same as “daily” attendance.
- School policies need to require daily attendance.
- Correspondence schools (online) are not required to have daily attendance, and therefore N/A may be marked for such schools.

E. Anti-discrimination Policies
- These policies may be combined into a single statement or may be distributed throughout a school’s policy documents.

  **Note that the visit team is looking for policies in place and not the implementation of those policies.** For example, based on the information below, a school might have an ADA policy (which the team checks for) but has not installed an elevator for disabled students to use (which the team does not check for).

- Item 1a—Title IX may be N/A under some circumstances. Title IX does not apply to a private school controlled by a religious organization where the application of the law would violate the religious tenets of the organization (34 CFR 106.12). Non-religious schools are also exempt if the schools do not receive federal financial assistance (34 CFR 106.11).
- Item 1b—If a nonpublic school does not receive any federal funding, it is not bound by IDEA requirements that would apply if federal funding was present; this item would then be N/A. If the school does receive federal funds or is an otherwise exempt school voluntarily taking on
the requirements of IDEA, then the school must admit students with disabilities and serve their needs as well as include IDEA in its policy statements. If the school does not take on IDEA, then this item will be N/A. See next bullet.

- **Item 1b**—Please note that under 34 CFR Part 104, if a school receives “Federal financial assistance from the Department of Education,” it may not exclude an otherwise qualified student on the basis of a handicap if the student “can, with minor adjustments, be provided an appropriate education, as defined in 104.33(b)(1).” Moreover, the school receiving those funds must implement a 504 plan for such students under the Rehabilitation Act of 1973 since the plans define what appropriate education will mean for each student. See previous bullet.

- **Item 1d**—Title VI prohibits discrimination by recipients of federal funds on the basis of race and national origin. [http://www.justice.gov/crt/types-educational-opportunities-discrimination](http://www.justice.gov/crt/types-educational-opportunities-discrimination).

- **Item 1e**—Title VII makes it unlawful to discriminate against someone on the basis of race, color, national origin, sex or religion for purposes of employment. [http://www.justice.gov/crt/laws-enforced-employment-litigation-section](http://www.justice.gov/crt/laws-enforced-employment-litigation-section).

- **Item 1f**—Private schools are considered to be businesses that serve the public, and thus ADA, Title III, requires nonsectarian schools to make their buildings and programs accessible; sectarian schools are not required to do so. These building changes must include auxiliary aids and services to ensure that students with disabilities are not excluded, denied services, segregated or treated differently from other students, but these changes are required only so long as they do not change the fundamental nature of the program or result in significant difficulty or expense. (cf. 28 CFR Part 36)

- **Item 2**—The school needs to have identified in writing who is responsible for ensuring that these policies are followed. In general, this would not probably be the principal since the person most likely to engage in discrimination would be the principal. At some schools, the responsible party will be a member of the Board, but other schools have a staff committee charged with this responsibility. Other options are possible.

- **Item 3**—This item requires general compliance with the requirements for nonpublic schools whether found in statute, in case law, or in regulation.

- **Item 3b**—Plyler v. Doe (a court decision making it illegal for public schools to withhold services to immigrant children lacking legal status) is applicable to nonpublic schools because it is specifically cited in the administrative rules for nonpublic schools.

F. **Student Records**

- **Items 1 and 2**—The Mandated Reporter form is supplied by the Department of Children and Family Services, and this is the form that should be used rather than one created by the school or another entity.

- **Item 4**
  - While it is a good thing that a school may have a policy regarding birth certificates, the existence of a policy does not substitute for looking in the files to see that certificates are actually documented therein.
  - It may be that children from another country do not have birth certificates. A government-issued document indicating date and place of birth, such as a passport, will meet this requirement.
  - Correspondence schools may be N/A for this item.

G. **Violence against School Personnel**

- Note that it is a written statement from the victim that triggers administrative action.
- A written policy is not required so long as the chief school administrator is aware of the required actions; an administrator interview could be sufficient evidence.

H. **Drug and Weapons Incidents**

- This should appear as a policy statement or as an item in the administrator’s handbook or job description, or in some other similar fashion.
• Schools rarely have these issues and therefore are not likely to have proof of having made such reports.
• This item conflates two previous items, both of which deal with drugs but only one with weapons, in response to two statutes, one of which specifies the local law enforcement agencies and the other which does not—hence the odd language in this regard.
• Again, a written policy is not required so long as the chief school administrator is aware of the required actions; an administrator interview could be sufficient evidence.
Section II—Educational Program

General comment—in all three items in this section, note that the issue is subjects and not specific courses.

A. Instruction

- Documentation could be found in curriculum guides, lesson plans, textbook choices, report cards, marketing materials, parent handbooks, etc.

B. Patriotism

- Note that all of this is only required in schools supported or maintained wholly or in part by public funds.
  - Reimbursement programs, such as free and reduced lunch programs, that are a benefit for the students for which the school is an agent, would not constitute sustaining or maintaining the school via public funds as the school itself, as an entity, gets no benefit—only the students benefit.
  - This whole item, therefore, will be N/A for most nonpublic schools. Just check the one box indicating this and go on to Part C.
  - One might also find these topics studied in a civics or government class or as a unit within an American history class; however, some topics might be covered in a world history class (looking at ancient Athens, for example) or even a literature class (looking at Puritan government in *The Scarlet Letter*, for example).
  - “Australian ballot” is another term for a secret ballot, which is to say, the ballot system used in the United States.
  - Documentation could be found in curriculum guides, lesson plans, textbook choices, report cards, marketing materials, parent handbooks, etc.

C. Health

- For the totality of the list of topics, 23 Illinois Administrative Code 1.420(n) requires a general approach to health education:
  - No specific amount of time for K-6 although health must be “a part of the formal regular instructional program at each grade level”
  - A semester of study (or the equivalent if the topics are spread over different courses or blocks of time) in grades 7-12.
- All of the indicated subjects are required, so if one is not present, the answer is “No.”
  - However, the school has some flexibility in this regard. All are required at the elementary level, for example, but not in all elementary grade levels; the school can decide which topics to cover at which grade levels. Similarly, all are required at the secondary level, but the school can decide which topics to cover at which grade levels.
  - Also, these are “topics” and not “courses” that are required, so a school may elect to cover some items in a health class, some in a science class, some in religion, etc.
  - Lastly, the school may exercise good instructional judgment in tackling these topics in an age appropriate manner.
- Documentation could be found in curriculum guides, lesson plans, textbook choices, report cards, marketing materials, parent handbooks, etc.
Section III—Personnel
A. Background Checks
   • Items 1 and 3 require a check of personnel files.
   • Items 2, 4, and 5 are school policy or procedure statements.
   • Item 3 requires some form of evidence that the Sex Offender file has been checked. A printout from that file for each staff member is likely to be the most common documentation.

B. Communicable Diseases
   • The files for all new staff must be checked—no sampling allowed here.
   • The nature of the required evidence is not specified in statute, so it could be as simple as a brief note or as involved as a report on a complete physical.
   • “Communicable diseases” for purposes of this question is defined by the Department of Public Health. The health professional supplying the evidence should know what ailments fall under this heading.
   • This evidence shall be created by
     o A physician licensed in Illinois or any other state to practice medicine in all its branches
     o An advanced practice nurse who has a written collaborative agreement with a collaborating physician that authorizes the nurse to perform health examinations, OR
     o A physician assistant who has been delegated the authority to perform health examinations by his or her supervising physician.

C. Staff Evaluations
   • All staff listed should be evaluated, so one must be sure to check for evaluations of the school’s educational leadership in addition to those for the teaching staff
   • The evaluation requirement extends to teacher aides—all persons involved in the instructional side of the school’s operation must be evaluated.

D. Student Support Services
   • These needs may be met through referrals to community agencies, through agreements with public school districts, through the pastoral staff of a church-related school, etc.
   • The school needs a system by which students get connected to needed help. Some schools have a staff committee; some have a hierarchy leading from student to parent to teacher, etc. that allows any concerned person to step in at any level with a request or recommendation.
   • Students should be allowed to self-refer for help.

E. Degrees
   • Item 1—While it is a good thing that a school may have a policy regarding only hiring persons with degrees, the policy does not substitute for looking in the files to see that degrees are actually documented therein.
   • Item 1—If a person’s file contains a copy of a state-issued teaching certificate/license, it can be assumed that the person holds a bachelor’s degree.
   • Item 1—If a person’s file contains evidence the person has a master’s or higher degree, it can be assumed that the person holds a bachelor’s degree.
   • Item 2 is not about professional development generally. It is about a professional development requirement that applies only to persons hired before 2011-12 who lack a bachelor’s degree.
   • Item will be N/A if all of the educators at the school have at least a bachelor’s degree.

F. Licensure
   • This item refers ONLY to persons such as school nurses, school psychologists, food service workers who have professional licensure outside educator license/certification systems. It does not apply to educators.
   • This will generally be “N/A” as nonpublic schools cannot normally afford to have such persons on staff.
Section IV

A. Building and Grounds

- The old checklist will not be used, and building walkthrough done in the past will not occur.
- In the act of just being in the school building, the team may observe items it deems to be safety issues. Since there is no probe being followed, such items could now be listed in this question’s text box as a concern or recommendation rather than as a deficiency.
- Note whether the school has either of two documents to confirm compliance with safety requirements:
  - A certificate or similar document from a local authority, such as a fire department, that has performed a safety inspection of the school; OR,
  - A certificate or similar document from a third-party inspection company that is knowledgeable in local fire, building, and life safety codes and that has performed a safety inspection of the school.
- Examine the document(s) and take one of three actions:
  - The document states that the school is in full compliance, which leads to a statement to that effect and a “yes” on our probe.
  - The document states that the school has some item(s) to address, the item(s) is/are listed, and one of these two actions is taken:
    - If any item is unresolved, this leads to a “no” on our probe (i.e., it becomes a deficiency for us as well).
    - If all items are resolved, this leads to a “yes” on our probe.
  - The school does not have a document, which leads to a statement to that effect and a “no” on our probe.

Examples:
1. Spokane Fire Department inspection report dated 11/15/16 listed no violations.
2. Spokane Fire Department inspection report dated 11/15/16 listed two violations: stage curtain needs fire proofing, and flammable storage in the boiler room must be removed. School has resolved both violations.
3. Spokane Fire Department inspection report dated 11/15/16 listed two violations: stage curtain needs fire proofing, and flammable storage in the boiler room must be removed. School has resolved the second violations, but it has not completed fire proofing of the stage curtains.

For something like 1 or 2, this would be a “yes” (in compliance). For something like 3, this would be a “no,” and the school would need to let us know when the matter was resolved in order to move this to a “yes” (compliant).

B. Asbestos Plan

- If a school was built after asbestos ceased to be used, the school needs some sort of documentation of this fact from the architect, contractor, etc. This would take the place of the asbestos plan for the purpose of this compliance visit.
- A school that can document there is no asbestos in its physical plant may also apply to the state for waiver from needing an asbestos plan. This waiver would take the place of the asbestos plan for the purpose of this compliance visit.
- Since all schools would have such a plan, statement or waiver, the asbestos item cannot be N/A.

C. School Lunch and Nutrition

- If a school does not participate in the specified federal or state school lunch program elements, the appropriate box should be checked, and the team should follow the instructions to arrive at the next indicated item.

D. Student Health

- Correspondence schools may be N/A for some or all of these items.
Item 1
- Although some grade levels are specifically mentioned, the requirement applies to all first-time Illinois students who can enroll at any nonpublic school.
  - The health examination may include a tuberculosis skin test screening if the student resides in an area designated by the Illinois Department of Public Health as having a high incidence of tuberculosis.
  - The Department of Public Health has rules and regulations specifying the examinations and procedures that constitute a health examination.

Item 4—although kindergarteners are specifically mentioned, the requirement applies to all first-time Illinois students who can enroll at any nonpublic school. Only a correspondence school could be marked N/A for this item.

Items 5, 6, and 7 are policy and/or procedure items, so the evidence will be found in those kinds of documents.

Item 7 refers to the requirements of items 1 and 2 and not to all of the health items listed here.

E. Safety Drills
- Since a compliance visit may occur well before the end of the year, some drills may not have occurred yet. If such drills have been scheduled, this may be indicated in the evidence section, and the relevant item is marked “yes.”
- Item 3—The school may also conduct additional drills to account for other incidents, including earthquakes or hazardous materials
- Item 4—These drills may be conducted when students are not present in the school building.
- Item 5b—Since a compliance visit may occur well before the end of the year, which is when this report is normally submitted, so long as the school is aware of the requirement and planning to meet it, this is fine. Either a date of report submission or “in process” is then entered on the line, and this item is marked “yes.”

F. Art Supplies
- Usually the issue is paint, and the paint container normally will have “non-toxic” on it.
- If not, the school might try the manufacturer’s website to see if a non-toxic assurance is available there.

G. Eye Protection
- Note that one item listed involves kiln firing—this generally means a kiln found in an art classroom.
- Similarly, some of these other named activities may occur in art classes or other settings within a school.

H. Auto-injectors
- The school must have policies that allow for both of these situations to be true, so this item cannot be N/A.
Final Area
✓ Commendations
  • List here items relevant for which the team feels the school should be noted.
  • It would be usual for a team to be able to identify something commendable at a school.
✓ Advice, Concerns, Suggestions, or Recommendations
  • List here items by which the team wishes to advise the school about a better practice to follow.
  • If applicable, please indicate the section and item number to which the advice applies.
  • Concerns are advice; they have no impact on a decision regarding the school’s recognition status.
  • Make sure that items that should be under “Deficiencies” are not listed here under “Concerns.”
  • All items earlier in the probe that have been marked as “Recommendation included” should have the recommendation(s) repeated here.
✓ Deficiencies
  • List here items that have an impact on a decision regarding the school’s recognition status.
  • Please indicate the section and item number to which the deficiency applies.
  • Every “No” answer in the probe MUST result in one or more items being listed in the deficiencies section at the end of the probe EXCEPT for II.B. and III.C., where some “No” answers are simply information and do not constitute a deficiency.