



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING



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September 27, 2010

**MEMORANDUM**

TO: State Board of Education

FROM: Mike Flanagan, Chairman

SUBJECT: Presentation on and Approval of Proposed Michigan School Accreditation and Accountability System

In May 2009, the State Board of Education approved the "Michigan School Accreditation System" (MI-SAS) as the state's new accreditation system to provide a means of setting standards for continuous school improvement. Since that time, the United States Department of Education (USED) provided guidelines for identifying persistently lowest achieving schools and School Improvement Grant funds to support significant reform to improve student achievement in those schools. In addition, state education reform legislation was passed, creating a School Reform Office for low achieving schools. In order to align the MI-SAS with the new federal accountability measures and state reform law, staff renamed the system to the "Michigan School Accreditation and Accountability System" (MI-SAAS) and proposed the following changes, which were presented to the Board at its August 10, 2010 meeting.

1. Schools in the lowest 5% in the Statewide Top to Bottom ranking are initially unaccredited.
2. Schools in the lowest 6-20% in the Statewide Top to Bottom state ranking are initially interim accredited.
3. Schools in the lowest 5% for the School Improvement Grant or School Reform Office are initially unaccredited.
4. To be fully accredited, schools must assess at least 95% of students in every tested subject.

In compliance with MCL 380.1280(3), Michigan Department of Education (MDE) staff held two public hearings to receive testimony regarding the MI-SAAS. Comments were received from ten individuals. The comments primarily focused on 1) the use of Adequate Yearly Progress (AYP) in the MI-SAAS, 2) the use of school rankings as one of the qualifications for accreditation, 3) statutory compliance of the MI-SAAS system, and 4) data to be used in school accreditation. The following responds to these comments and further clarifies the ranking process.

1. **The use of AYP in the MI-SAAS.** Two issues were voiced related to the use of AYP in the MI-SAAS: including AYP creates confusion for schools, and including

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AYP should be delayed until the reauthorization of the Elementary and Secondary Education Act (ESEA).

- a. The use of subgroups in AYP ensures that an accredited school is held accountable for all subgroups. The inclusion of AYP in the MI-SAAS assures that subgroups are accounted for in the MI-SAAS. The State Board of Education and the Michigan Department of Education promote the high achievement of all students. Additionally, both the Board and the Department have consistently affirmed the need for a coherent accountability system, and including AYP in the MI-SAAS creates this coherence.
  - b. ESEA reauthorization is an important upcoming milestone in the nation and the state. However, Michigan cannot delay implementation of a significantly improved accreditation and accountability system while waiting for federal legislation. MI-SAAS creates coherence among accreditation and accountability, persistently lowest achieving (PLA) schools lists, and AYP. Furthermore, the portions of the MI-SAAS likely to be affected by ESEA reauthorization (i.e. AYP) are compartmentalized, and can be adjusted when new legislation is released. Finally, while the details regarding AYP may change, Michigan does not anticipate moving away from testing all students, requiring proficiency targets for students in all subgroups, and holding schools accountable for graduation and attendance rates (the main tenets of AYP), nor do we anticipate a federal shift in emphasis away from these key elements.
2. **School rankings as one of the qualifications for accreditation.** There is concern that by designating the lowest 5% of schools as unaccredited, there will always be 5% of schools unaccredited, and that without a specific standard for proficiency, some of those schools should be accredited. MDE agrees in theory. However, at the present time, the lowest 5% of schools cannot be considered to be adequately preparing students for the next level of education. At some time in the future when the vast majority of school systems are adequately preparing students for college and career, the accreditation system may need to be revised.

In the attached document, MDE further clarifies how the Statewide Top to Bottom rankings will be used to generate an initial accreditation status. As the MI-SAAS business rules were developed in support of implementation, MDE more clearly identified the mechanisms by which the rankings would be incorporated into the accreditation system. The mechanisms simplify the system and align the state's reporting processes. Application of these mechanisms resulted in the elimination of confusing and duplicative language that was in the August version, making the attached version significantly easier to understand.

3. **Lack of statutory compliance.** Comments were submitted regarding Michigan statute MCL 380.1280, which states that standards for accreditation shall not be based solely on pupil performance on Michigan Educational Assessment Program (MEAP) and Michigan Merit Exam (MME) tests. Given the reliance of the statewide rankings on assessment data, there were concerns that the use of the

rankings in the accreditation system meant that the accreditation system was based solely on assessment data. However, the accreditation system requires that four elements must be in place to ensure accreditation, and failure to meet *any one of them* results in interim or unaccredited status. They are: statewide percentile rank, AYP status, presence on PLA lists and additional factors such as graduation rate. The table below demonstrates the determination of accreditation based on all four factors. Therefore, the accreditation system as proposed is compliant with MCL 380.1280.

<b>Determination of Accreditation Status in MI-SAAS</b>					
Statewide Percentile Rank	Not On PLA List	Made AYP	Met Target on Nine Additional Factors	Accreditation Result	
High	Y	Y	Y	Accredited	
High	Y	N	Y	Interim	
High	Y	Y	N	Interim	
Mid	Y	N	Y	Interim	
Mid	Y	Y	Y	Interim	
High	N	N	N	Unaccredited	
High	N	N	Y	Unaccredited	
High	N	Y	N	Unaccredited	
High	N	Y	Y	Unaccredited	
High	Y	N	N	Unaccredited	
Low	N	N	N	Unaccredited	
Low	N	N	Y	Unaccredited	
Low	N	Y	N	Unaccredited	
Low	N	Y	Y	Unaccredited	
Low	Y	N	N	Unaccredited	
Low	Y	N	Y	Unaccredited	
Low	Y	Y	N	Unaccredited	
Low	Y	Y	Y	Unaccredited	
Low	Y	Y	Y	Unaccredited	
Mid	N	N	N	Unaccredited	
Mid	N	N	Y	Unaccredited	
Mid	N	Y	N	Unaccredited	
Mid	N	Y	Y	Unaccredited	
Mid	Y	N	N	Unaccredited	
Mid	Y	Y	N	Unaccredited	

Low = ranking less than 5th percentile  
 Mid = ranking greater than or equal to 5th percentile, but less than 20th percentile  
 High = ranking greater than or equal to 20th percentile

- The need for more data for school accreditation.** MDE agrees with the comments made that school accreditation would ideally be based on a whole host of factors outside of what is currently collected, including more frequent assessment data in more subjects. However, the state is constrained by what data are available, reliable, and valid. At the present time, this means focusing on assessment data, graduation rate data and other validated forms of data included in the system. Data used for high-stakes decision making must be a) collected from all schools and districts in the state, and b) high-quality. If new funding becomes available to provide more frequent assessments, such as

EXPLORE and PLAN in the high school, MDE will be eager to implement those assessments.

In response to requests for inclusion of additional data, MDE reviewed all available data and identified attendance rate for elementary and middle schools as information that can be included as an appropriate corollary to high school graduation rate. Therefore, in response to public comments requesting the inclusion of additional data, as well as to better align the accountability systems, MDE staff propose the following revision in the graduation rate factor: "Is the five- or six-year high school graduation rate 80% or above (if the school has a graduation rate), or is the attendance rate 90% or above (if the school does not have a graduation rate)?"

After careful review of the comments and consideration of revisions to the MI-SAAS, MDE staff recommends the adoption of the MI-SAAS, as attached.

It is recommended that the State Board of Education approve the Michigan School Accreditation and Accountability System (MI-SAAS) as attached in the Superintendent's memorandum dated September 27, 2010.

## **Michigan's School Accountability and Accreditation System: From Education YES! To MI-SAAS**

### **Background**

In March, 2002, the State Board of Education approved "Education YES!—A Yardstick for Excellent Schools" as the state's accreditation system to provide a means of setting standards for continuous school improvement and measuring the need for support and intervention for schools. Michigan's initiation of this accreditation system was concurrent with passage of No Child Left Behind (NCLB), which required states to have an accountability system. As a result, Education YES! has been Michigan's method to align state and federal requirements by blending state accountability and adequate yearly progress (AYP) reporting for NCLB.

Since 2002, the Board has made significant policy changes that resulted in the Michigan Merit Exam, expanded indicators for the School Improvement Framework self-assessment, MI-Access for students with special needs, testing in grades 3-8, and inclusion of a growth model. In addition to policy changes, educators, parents, and employers have identified concerns with the system and made numerous recommendations to make it more understandable and transparent.

As a result, the Michigan Department of Education (MDE) staff determined a major redesign of the current system was needed. A stakeholder group was convened to evaluate the current system, review the statutory basis for school accreditation, and make recommendations for a redesigned system of state school accreditation.

The redesign team, which met regularly for over a year to complete its work, analyzed the current system and identified the following concerns with Education YES!:

- Consequences of Michigan accreditation and NCLB AYP are not aligned.
- It shifts emphasis from Michigan to federal requirements.
- Its grading structure uses the federal Adequate Yearly Progress (AYP) status to lower the Michigan accreditation status.
- It needs additional clarity, usefulness, and credibility.
- Educators, parents, and employers want and deserve an understandable one-stop information system.

In analyzing NCLB requirements, the team determined that Education YES! failed to distinguish between schools making progress but missing one or two of the 40-plus requirements from those not making progress and missing many or most of the requirements. The team concurred that Michigan needed a system that could make such distinctions as a means to identify schools most in need of interventions and support services.

The proposed redesign, the Michigan School Accountability and Accreditation System (MI-SAAS), addresses these concerns. It makes Michigan standards the primary determinants for the state's accreditation system. It recognizes academic progress in all core subjects, recognizes five and six year graduation rates as successes, and enables schools to calculate their accreditation status. Using a "dashboard" display

rather than a single letter grade, MI-SAAS provides greater credibility, more transparent accountability, and increased usefulness to those interested in the continuous improvement of Michigan schools. The MI-SAAS will report a school's accreditation status, as well as its AYP status and subgroup data as required by the Elementary and Secondary Education Act (ESEA). This will provide both state and federal data to identify those schools that merit the highest priority for support and intervention.

## **PROPOSED REDESIGN: MICHIGAN SCHOOL ACCOUNTABILITY AND ACCREDITATION SYSTEM (MI-SAAS)**

The MI-SAAS is based on student achievement and compliance with Michigan statute and policy. These components are combined to assign an Annual State Accreditation Status to each school. To provide educators, parents, and employers with a complete picture of the school, additional information about the school and its district, community, and the state is included as part of the "dashboard" display.

Each of these four elements is described below:

- 1) Student ~~Achievement~~ PROFICIENCY AND IMPROVEMENT,
- 2) Compliance with Michigan statute and policy,
- 3) Annual State Accreditation Status, and
- 4) Additional School, District, Community, and State Information.

### **1. Student ~~Achievement~~ PROFICIENCY AND IMPROVEMENT**

MI-SAAS sets standards for accreditation that demonstrate students are achieving at appropriate levels. Measurement of student achievement includes ~~three~~ TWO components:

- Proficiency (elementary, middle, and high schools)
- ~~Performance Level Change (elementary and middle school with annual grades 3-8 assessments)~~
- ~~Provisionally proficient on the Michigan Merit Exam (high schools with 11<sup>th</sup> grade assessment)~~
- PERCENT CHANGE INDEX (IN READING AND MATHEMATICS, GRADES 4-8) OR FOUR YEAR IMPROVEMENT SLOPE (WRITING, SCIENCE, SOCIAL STUDIES, AND 11<sup>TH</sup> GRADE READING AND MATHEMATICS).

IN ORDER TO ALIGN THE ACCREDITATION SYSTEM WITH NEW FEDERAL ACCOUNTABILITY MEASURES AND STATE REFORM LAW, THE CALCULATIONS FOR STUDENT PROFICIENCY AND IMPROVEMENT ARE THE SAME AS THOSE USED TO DETERMINE THE PERSISTENTLY LOWEST ACHIEVING SCHOOLS LIST, WITH THE ADDITION OF CALCULATIONS FOR WRITING, SCIENCE, AND SOCIAL STUDIES.

#### Performance Level Change

Performance Level Change (PLC) is a new component for assessing student achievement that was approved for Michigan's use by the United States Department of Education for compliance with NCLB. PLC is important because it provides information

about increases in student academic achievement that are greater than expected for one year of school. Because achievement "growth" can be calculated only for subject areas where students are tested in consecutive years, PLC is calculated only for ~~English language arts~~ READING and math for students in grades 3-8. PERFORMANCE LEVEL CHANGE IS USED TO CALCULATE THE PERCENT CHANGE INDEX, A MEASURE OF STUDENT IMPROVEMENT. FOR CONTENT AREAS AND/OR GRADES THAT DO NOT HAVE ADJACENT GRADE TESTING, THE FOUR-YEAR-IMPROVEMENT SLOPE IS USED TO MEASURE IMPROVEMENT OVER TIME.

Proficiency:

State standards for proficiency in core curriculum subjects are used to determine the accreditation status for all elementary, middle, and high schools. Based on ~~assessment data for the four core subject areas of English language arts (reading and writing), mathematics, science, and social studies~~ A SCHOOL'S STATEWIDE TOP TO BOTTOM RANKING AS DETERMINED BY PERFORMANCE AND IMPROVEMENT ON FIVE CORE SUBJECT AREAS (READING, MATHEMATICS, WRITING, SCIENCE, AND SOCIAL STUDIES), a school's accreditation status is determined to be "summary accredited," "interim status," or "unaccredited" (Section MCL 380.1280 of the Revised School Code).

MI-SAAS establishes the following proficiency standards to determine a school's INITIAL accreditation status:

- ACCREDITED: ~~No more than one subject below 60% proficient and no subjects below 35% proficient.~~ RANK AT OR ABOVE 20<sup>TH</sup> PERCENTILE ON STATEWIDE TOP TO BOTTOM RANKING.
- INTERIM: ~~(Proficiency): Two or more subjects lower than 60% proficient but not lower than 35% proficient; school is identified in the lowest 20% in the state's top to bottom ranking. NOTE: A school may also fall into Interim if it meets all standards for accreditation but does not make AYP. Such a school will be designated INTERIM (AYP).~~ RANK GREATER THAN OR EQUAL TO 6<sup>TH</sup> PERCENTILE BUT LESS THAN 20<sup>TH</sup> PERCENTILE ON STATEWIDE TOP TO BOTTOM RANKING.
- UNACCREDITED: ~~One or more subjects lower than 35% proficient; school is in the lowest 5% in the state's top to bottom ranking; school is identified as persistently lowest achieving (a Tier 1 or Tier 2 school for the School Improvement Grant/State Reform Redesign Office list).~~ RANK LESS THAN OR EQUAL TO THE 5<sup>TH</sup> PERCENTILE ON THE STATEWIDE TOP TO BOTTOM RANKING.

Because of the use of all core curriculum areas, a school that desires full accreditation must assess at least 95% of students in every tested subject. This metric is included in the Compliance with Michigan Statute and Policy section. At least every two years the MI-SAAS proficiency standards will be evaluated by the State Board of Education so that the cut-off percentages may be adjusted upward as student achievement increases statewide or to meet new state or federal legislative requirements. The measures of student achievement include the Michigan Educational Assessment Program (MEAP), the Michigan Merit Examination (MME), and MI-Access (Michigan's alternate assessments for students with disabilities). The assessment data used to determine a school's accreditation status will use only the scores of students at the school for a full

academic year prior to the assessment. Since the MEAP assessment (elementary and middle school) is given in the fall and covers content learned the previous year, feeder codes will be used to attribute the students' scores to the school attended during the prior school year. In contrast to federal AYP requirements, MI-SAAS does not cap the number of students with proficient scores on the MI-Access assessments. All proficient scores on MI-Access will be included in the achievement calculation.

~~Students are counted as proficient if they show more than the expected improvement in their achievement level. This measure is based on the PLC model using scores that fall into the Improvement or Significant Improvement range.~~

~~Performance Level Change allows schools to demonstrate increases in pupil achievement, the result of intensive efforts of students and staff, even though a student is not yet scoring in the proficient range on the MEAP assessment.~~

~~PLC enables schools to show their students may not yet be proficient, but achievement is improving. To determine the PLC for elementary and middle schools, the achievement levels (Not Proficient, Partially Proficient, Proficient and Advanced) for all grades for the four core subjects are totaled and students in the top two levels (proficient and advanced) are counted as proficient. Then for English language arts (ELA) and math, the following number of students is totaled:~~

- ~~• Students testing proficient but not improving~~
- ~~• Students improving but not proficient~~
- ~~• Students who are both proficient and improving.~~

~~Since social studies, science, and writing are not tested annually, the PLC calculation cannot be used for these subjects. The totals of students in each category of proficient or not proficient are divided by the total number of students tested to arrive at the percentage of students proficient in each subject area.~~

#### Proficient or Provisionally Proficient on the Michigan Merit Exam

~~At the high school level, no subject area is tested at consecutive grade levels. Therefore, PLC cannot be measured for high schools. Instead, the MI-SAAS determines the number of students, based on the Michigan Merit Exam (which includes the ACT, Michigan Content Expectations, and WorkKeys), who are proficient or provisionally proficient. Provisional proficiency uses a standard error measurement to provide greater reliability and to eliminate any false negatives. This is similar to polling data that makes reference to "a margin of error of + or - 4%." The margin of error is applied to student scores that are just below the cut score.~~

~~Student achievement is based on the total of achievement levels for English language arts, math, science, and social studies. Then, for each subject, the following number of students is totaled:~~

- ~~• Students testing proficient~~
- ~~• Students provisionally proficient (within a margin of error).~~

~~These totals are divided by the total number of students tested to determine the percent proficient.~~

#### Improvement of Student Achievement

~~Performance Level Change (PLC) is used in cases where achievement is measured at adjacent grade levels in the same subject on the same state assessment.~~

~~Improvement of student achievement (non-cohort growth) will be measured in the following cases:-~~

- ~~• Science, Social Studies and Writing for each grade level in which it is tested; and~~
- ~~• Mathematics and Reading at the high school level.~~

~~A school in which achievement improves ten or more percentage points from year to year in a subject will be considered as having achieved the next higher threshold for classification as interim or accredited in that subject.~~

## **2. Compliance with Michigan Statute and Policy.**

The second core element for accountability in the MI-SAAS is a school's compliance with Michigan statute and policy. For schools to be accredited, they must comply with basic accreditation requirements in MCL 380.1280 and with the requirement to employ only teachers who hold a valid teaching certificate (MCL 380.1233). ~~The eight~~ NINE statutory/policy requirements appear below.

The MI-SAAS will measure compliance by evaluating schools on the following ~~eight~~ NINE questions.

- Do 100% of the school's staff hold the necessary Michigan certification? (MCL 380.1233)
- Is the school's annual School Improvement Plan published? (MCL 380.1204a)
- Are required curricula offered (MCL 380.1204a):
  - Grade Level Content Expectations in grades K-8?
  - Michigan Merit Curriculum in grades 9-12?
- Is a fully compliant Annual Report published?
- Have the Performance Indicators or equivalent been submitted through the School Improvement Framework or AdvancED Standards and Assessment Report? (MCL 380.1204a)
- Are literacy and math tested annually in grades 1-5? (MCL 380.1280b)
- If the school was designated for participation in the National Assessment of Educational Progress (NAEP), did the school participate? (MCL 380.1280b)
- ~~Is the high school six-year graduation rate 80% or above? IS THE FIVE- OR SIX-YEAR HIGH SCHOOL GRADUATION RATE 80% OR ABOVE (IF THE SCHOOL HAS A GRADUATION RATE) OR IS THE ATTENDANCE RATE 90% OR ABOVE (IF THE SCHOOL DOES NOT HAVE A GRADUATION RATE?)~~ (MCL 380.1280b and MCL 388.1619)
- Did the school test at least 95% of eligible students in every subject tested? (Board Policy 10/18/2001)

If the answer to **any** one of these questions is “no” for two consecutive years, the school’s accreditation status is lowered one level even if the “no” is for a different question each year.

**3. Annual State Accreditation Status.**

Student achievement and compliance with Michigan statute and policy are combined to annually assign a state accreditation label for each school. A school cannot be fully accredited if it does not make AYP or if it is among the lowest quintile in the state’s top to bottom school ranking as illustrated below. FAILURE TO MAKE AYP CAN ONLY LOWER A SCHOOL’S ACCREDITATION STATUS TO INTERIM.

<i>Preliminary Accreditation Status</i>	<i>Final Accreditation Status</i>			
	<b>Makes AYP</b>	<b>Does not make AYP</b>	<b>Lowest 20%</b>	<b>Lowest 5% or Persistently Low Achieving (PLA)</b>
Accredited	Accredited	Interim (AYP)	Interim (School Rank)	Unaccredited
Interim	Interim (Proficiency)	Interim (Proficiency)	Interim	Unaccredited
Unaccredited	Unaccredited	Unaccredited	Unaccredited	Unaccredited

**Determination of Accreditation Status in MI-SAAS**

Statewide Percentile Rank	Not On PLA List	Made AYP	Met Target on Nine Additional Factors	Accreditation Result
High	Y	Y	Y	Accredited
High	Y	N	Y	Interim
High	Y	Y	N	Interim
Mid	Y	N	Y	Interim
Mid	Y	Y	Y	Interim
High	N	N	N	Unaccredited
High	N	N	Y	Unaccredited
High	N	Y	N	Unaccredited
High	N	Y	Y	Unaccredited
High	Y	N	N	Unaccredited
Low	N	N	N	Unaccredited
Low	N	N	Y	Unaccredited
Low	N	Y	N	Unaccredited
Low	N	Y	Y	Unaccredited
Low	Y	N	N	Unaccredited
Low	Y	N	Y	Unaccredited
Low	Y	Y	N	Unaccredited
Low	Y	Y	Y	Unaccredited
Mid	N	N	N	Unaccredited
Mid	N	N	Y	Unaccredited
Mid	N	Y	N	Unaccredited
Mid	N	Y	Y	Unaccredited
Mid	Y	N	N	Unaccredited
Mid	Y	Y	N	Unaccredited

Low = ranking less than 5th percentile

Mid = ranking greater than or equal to 5th percentile, but less than 20th percentile

High = ranking greater than or equal to 20th percentile

Note that state accreditation status is not related to federal Title I funding. A school in need of support and intervention should be treated the same regardless whether:

- It receives Title I funds or not.
- The standards it does not meet are federal or state.

**4. ADDITIONAL SCHOOL, DISTRICT, COMMUNITY, AND STATE INFORMATION.**

In the same way that a car’s dashboard provides gauges with a variety of helpful information, MI-SAAS displays various data elements to create a more complete picture of the school. These data elements are clustered into ~~four~~ THREE areas: District Context, People/Programs, AND Success Indicators, ~~and NCLB Performance~~. These elements are not included in the accreditation status calculation in the interests of credibility and transparency. That is, when a school is unaccredited, it is because of achievement and compliance with statute, not due to other variables. MI-SAAS also includes space for the school or school district to report its own “points of pride.”

The District Context can display financial data comparing the district's per pupil funding with the state average, the average teacher salary, the percent of funds spent on instruction as a percent of operating costs and other data already collected by MDE. Enrollment trends for both the building and district may be displayed, along with the percentage of students in the building from various feeder schools in the district and their annual state accreditation status.

People/Programs section may display the teacher/student ratio and percent of teachers receiving professional development. The percentage of students enrolled and participating in Career and Technical Education programs is displayed, as well as the percentage of students who are "concentrators" (i.e., a secondary student who has completed at least six of the twelve segments and is enrolled in the next segment). Finally, the different student populations served in the building are reported: English Language Learners, students eligible for Free and Reduced Price meals, and students with Special Needs.

The Success Indicators may include post-secondary readiness (for high schools) to report the percentage of students who applied to post-secondary institutions, the percent who achieved a college ready score on the ACT, and the percent who achieved a workforce ready score on the WorkKeys assessment. Completion-success rates for high schools are reported for the percentage of students dually enrolled, graduated within six years, or dropped out of school. Schools also show the percentage of students making progress as English Language Learners and the 9<sup>th</sup> grade promotion rate. Schools may choose other data to report, such as Title I Distinguished Award, or Teacher of the Year. If a school is accredited through AdvancED (parent organization of North Central Accreditation), the accreditation logo appears in this section.