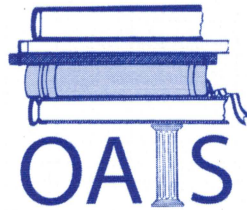


- Agnon School
- Andrews Osborne Academy
- Birchwood School
- Canton Country Day
- Cincinnati Country Day
- Cincinnati Hills Christian Academy
- Columbus Academy
- Columbus Jewish Day School
- Columbus School for Girls
- Columbus Torah Academy
- Gilmour Academy
- Grand River Academy
- Hathaway Brown School
- Hawken School
- Hershey Montessori School
- Hudson Montessori School
- Lake Ridge Academy
- Laurel School
- Lawrence School
- Linden Grove School
- Lippman Day School
- Mansion Day School
- Marburn Academy
- Maumee Valley Country Day
- McGuffey Foundation School
- Miami Valley School
- The New School
- Old Trail School
- Olney Friends School
- Ratner School
- Ridgewood School
- Ruffing Montessori School - Cleveland Heights
- Ruffing Montessori School - Rocky River
- Schilling School for Gifted Children
- Seven Hills School
- Spring Garden Waldorf School
- Springer School and Center
- Summit Country Day
- University School
- Village Academy Schools
- Wellington School
- Welsh Hills School
- Western Reserve Academy



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March 14, 2018

Ohio Senate Education Committee

Proponent Testimony – Senate Bill 241

Ohio Association of Independent Schools

Dan Dodd – Executive Director

Chairwoman Lehner, Vice Chair Huffman, Ranking Member Sykes, and members of the Senate Education Committee, thank you for the opportunity to testify as a proponent for Senate Bill 241. My name is Dan Dodd and I am the Executive Director of the Ohio Association of Independent Schools, an organization of 45 member schools throughout Ohio committed to the innovation and excellence provided by independent education in Ohio.

Senate Bill 241 is the culmination of years of discussions with legislators from both houses of the General Assembly about the appropriate level of regulation for schools accredited by the Independent Schools Association of the Central States (ISACS). SB 241 takes into account many of the concerns voiced by those who may not be totally supportive of the bill, and the result is an initial two year pilot program that has the possibility of leading to real, meaningful freedom for private schools throughout Ohio.

Before explaining what SB 241 does do, I will point out a couple of things that SB 241 does not do. The bill does not declare that Ohio believes one accrediting association and its schools are better than others; in fact, lines 7453-7457 of the bill state the exact opposite and specifically note that this is not the intent of the General Assembly. SB 241 does not reduce the accountability for the limited tax dollars that accredited nonpublic schools would receive; all of the accounting procedures currently required for those tax dollars remain intact in this bill. Finally, we do not believe SB 241 is legislation that is designed to benefit a specific group of schools; instead, it is a pilot program that uses a group of private schools already recognized in statute (ORC 3313.612) as the basis for a pilot program that may allow for greater operational and curricular freedom for other private schools.

What SB 241 does do is offer ISACS-accredited schools the ability to be exempt from a limited number of statutory mandates, including mandatory high school curriculum requirements and mandated participation in College Credit Plus, in order to give them more flexibility and see how the

schools perform. If the schools report a reduction in college acceptance rates or ACT/SAT scores, or see a substantial increase in the rates of remediation for those students attending Ohio's public universities, then the General Assembly will consider repealing the pilot project and declare that the mandates are necessary for a quality education at these schools. However, if there are no changes or increases in student achievement, then the General Assembly can consider expanding the number of schools who qualify for this status.

ISACS has accredited independent schools since 1965. According to ISACS, independent schools often find specific advantages in the ISACS accreditation program:

- The process involves a peer review, conducted by those who understand and appreciate independent school qualities and contributions to American education, including faculty as well as administrators;
- The standards and procedures have been developed for independent, not public, schools;
- Wherever possible, standards are directed toward quality of school product or outcomes rather than typical "input" factors (such as teacher certification, number of books in the library, etc.);
- School improvement, while informed by data, is not driven by test scores but is pursued as a comprehensive process involving all aspects of human growth and learning;
- The process provides flexibility for unique situations and needs. Schools are required to plan a self-study process, within certain guidelines, that will most help the school in its own search for excellence;
- In both philosophy and practice, the focus of the ISACS accreditation program is on the development and nurturance of excellence rather than certification. The principal objectives are to provide a stimulus for excellence, help the school assess its strengths and weaknesses, and help the school confirm the validity of its priorities and planning for improvement.

A copy of the ISACS Standards for Accreditation and Ohio's own Operating Standards accompany this testimony. The comparison is striking in that Ohio's rules are geared toward a "check the box" certification mentality where schools have to show they are doing A, B, C and then they move onto something else. The internal and external review of strengths and weaknesses that is needed to strive for excellence rather than competency is missing. Schools that are participating in the rigor of the ISACS accrediting process should not be forced to believe that Ohio's Operating Standards are of more importance because state law says so.

For years, members of the General Assembly have heard our concerns about how Ohio is out of step with other states as it pertains to regulating private schools. For example, in the budget bills of 2013 and 2015, the General Assembly voted to exempt ISACS-accredited schools from the end-of-course exams, and both times, the Governor did not veto the provisions despite opposition from the Ohio Department of Education. Legislators have asked how other states monitor private schools and SB 241 uses a couple of practices from other states. While using those practices, Ohio still maintains a much higher level of regulation of private schools

than what many other states have, even with SB 241 in effect. For example, Connecticut sends representatives from their Department of Education on site visits to private schools, and that is incorporated in this bill. Tennessee recognizes different classifications of private schools based on state authorization or outside accreditation and SB 241 is essentially creating that framework that can be adjusted after the pilot project's report is issued. Incorporating these concepts will still allow for some state oversight without unduly burdening or requiring schools to alter what they want to do in order to do what the state says they must do.

A concern raised by staff from the Ohio Department of Education (ODE) to me is the fact that accredited nonpublic schools would continue to receive auxiliary services funding and administrative cost reimbursement without having a state charter. Private schools have been required to hold state charters since at least 1954, although many ISACS-accredited schools are much older than that. Auxiliary services funding was not permanently in place until the mid-1970's and administrative cost reimbursement did not begin until the early 1980's. Non-religious private schools are required by law to hold a charter from the state; it is not an opt-in for them like it is for a religious school. Furthermore, non-religious private schools do not receive funding in exchange for compliance with state mandates; the schools could not request or receive a cent of state funding but would still be required to comply with all applicable state mandates. Even for our religious ISACS-accredited schools, they cannot certify in good faith that they have a religious objection to government involvement in education. Considering the history and the current law, it is difficult to see how the issue of the availability of money is related to the requirement of private schools to follow state mandates.

I have little doubt your offices have received visits or correspondence from other association leaders or members claiming that this bill will put them at a disadvantage if you allow this pilot project to proceed. Nothing could be further from the truth. We have faith in the collective ability of our schools to demonstrate that professional administrators and educators at our schools can demonstrate to government agencies and elected officials that our communities can demand a higher accountability and provide a better educational experience than that which government mandates. ISACS-accredited school students and graduates consistently achieve at an incredibly high level, and SB 241 will help our schools create even better climates for learning for all schools. The process of eliminating burdensome mandates has to begin somewhere; we believe it should begin with us.

Our efforts, and our inevitable success with fewer mandates, will lay the groundwork for high-performing schools in other associations to have the yoke of government mandates lifted from their backs. When that occurs, those schools will continue to excel and those schools that need help providing that high quality education will receive more assistance and guidance from ODE to raise the level of education their students receive, and those schools will get the oversight necessary to make sure they fulfill their their responsibilities.

Chairwoman Lehner and members of the committee, thank you for the opportunity to testify as a proponent for Senate Bill 241. I would be happy to answer any questions you may have.