

May 23, 2018

Good morning Chair Lehner, Vice Chair Huffman, ranking member Sykes and Senate Education Committee members. My name is Lee Reno and I represent the Association of Christian Schools International (ACSI) in Ohio with 117 member schools and over 125,000 students all over Ohio.

I have been an Ohio educator for over 46 years and have served as Head of School at 2 schools, Dayton Christian School System and Madison Christian School. I have served on ODE (Ohio Department of Education) committees starting in 1980's with the Graduation Requirements Review Committee for public and nonpublic schools, the Proficiency Test Review Committee in the 1990's to many other committees since then. Since shortly after it was started by Ted Sanders in 1994, I have served on the Superintendent's Advisory Committee on Chartered Nonpublic Schools.

In October 2001, the State Board of Education delegated to the Superintendent of Public Instruction the authority to act on its behalf to approve accrediting associations that meet established criteria and the authority to grant charters to nonpublic schools that meet the approved association standards. (see attached resolution) The State Superintendent approved the standards of 5 accrediting associations (the Association of Christian Schools International, the Association of Seventh Day Adventists of the Ohio Conference, the Independent School Association the Central States submitted by the Ohio Association of Independent Schools, the Ohio Association of Lutheran Schools and the Ohio Catholic Conference Accrediting Association of the Ohio Catholic Conference).

This action reaffirmed the establishment of the mutual trust between public and nonpublic entities and acknowledges both as valuable contributors to the building of a strong system of education for all of Ohio's students.

While I agree with the concept of deregulation for schools accredited by state approved accrediting associations and laud the ODE for recognizing and approving the 5 accrediting associations as having a special status, I stand opposed to SB 241 in its present form that elevates 1 of the 5 accrediting associations to Accredited Schools status, as somehow better than the other 4 accrediting associations, in order to be a part of this pilot program.

While the intention of this bill may not be to create a confusion with parents and others, I believe that is exactly what the result will be.

I ask that the committee refrain from supporting SB 241 in its present form and ask that a series of interested party hearings be held to allow all of the state approved accrediting associations to be a part of this pilot program.

Chair Lehner and members of the Senate Education Committee, thank you for the opportunity to speak as an opponent of SB 241.

At this time, I would be pleased to answer any questions.

RESOLUTION

State Board



of Education

12. RESOLUTION TO ACCEPT THE NONPUBLIC SCHOOL ACCREDITING IMPLEMENTATION PROCESS

The Standards Committee RECOMMENDS that the State Board of Education ADOPT the following Resolution:

WHEREAS the Operating Standards for Ohio Schools, Ohio Administrative Code Section 3301-35-12, sets forth two options by which a nonpublic school can apply for and receive a charter from the State Board of Education; and

WHEREAS option one is set forth in Ohio Administrative Code Section 3301-35-12(A)(1) which requires that the nonpublic school be "accredited by an association whose standards have been reviewed by the State Superintendent's Advisory Committee on Chartered Nonpublic Schools and approved by the State Board of Education"; and

WHEREAS a committee of experts representing Ohio Association of Independent Schools, Lutheran Schools of Ohio, Association of Christian Schools International, Catholic Conference of Ohio and the Ohio Department of Education has worked to develop the document entitled "Criteria for Establishing the Comparability of Accrediting Association Standards with Operating Standards for Ohio's Schools" that is attached hereto and is incorporated herein by this reference; and

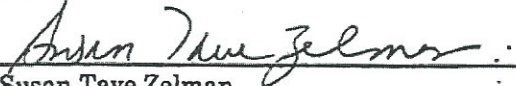
WHEREAS it is the decision of the State Board of Education to delegate its authority to the Superintendent of Public Instruction to act on its behalf to approve the accrediting association standards that meet established criteria as set forth in the document titled, "Criteria for Establishing the Comparability of Accrediting Association Standards with Operating Standards for Ohio's Schools" and to grant charters to nonpublic schools that meet the standards of the approved accrediting associations: Therefore, Be It

RESOLVED, That the State Board of Education hereby delegates to the Superintendent of Public Instruction the authority to act on its behalf to approve accrediting association standards that meet established criteria as set forth in the document titled, "Criteria for Establishing the Comparability of Accrediting Association Standards with Operating Standards for Ohio's Schools"; and, Be It

FURTHER RESOLVED, That the State Board of Education delegate to the Superintendent of Public Instruction the authority to grant charters to nonpublic schools that meet the standards of the approved accrediting associations.

I certify that the above is a true and correct copy of the action taken by the State Board of Education at its meeting on October 18, 2001.

Columbus, Ohio
October 19, 2001



Susan Tave Zelman
Superintendent of Public Instruction

BRIEF HISTORY OF CHARTERED NONPUBLIC (CNP) ACCREDITATION AS A TOOL FOR ACCOUNTABILITY IN OHIO

Early 1990s

1. An advisory committee representing chartered nonpublic schools has met with the State Superintendent or his/her designee since the early 1990s. During the 1990's this committee represented the Catholic Conference, Association of Christian Schools International (ACSI), Lutheran Schools of Ohio, Ohio Association of Independent Schools (OAIS), and Buckeye Christian (representing nonchartered-nontax supported schools). In the early days, the committee met with ODE staff primarily to exchange information of mutual benefit. The committee had no role in establishing or maintaining the accountability of chartered nonpublic schools to the state of Ohio.
2. Ohio's 1983 *Minimum Standards for Elementary and Secondary Standards* included as standard 3301-35-07, that public and chartered nonpublic schools would be evaluated, at least once every five years, to determine their compliance with the *Minimum Standards*, and that the written report of the results of a school's evaluation would be made public. ODE was required to "make public notice of any deficiencies which have not been corrected by the times specified in the evaluation report. Failure to comply . . . shall be cause for initiating charter revocation procedures in accordance with ORC." These evaluations were conducted by staff of the ODE. For many years, this evaluation system served as the primary means by which both public schools and chartered nonpublic schools maintained accountability to the State of Ohio. This system pre-dated the statute governing "home schooling," the statute authorizing community schools in Ohio, and the methods of accountability listed below.

Shifts in the accountability system for public schools

3. ***Statewide Testing Program***
In the early 1990s, as required by new state law, Ohio began to administer the Ninth Grade Proficiency Tests (which later morphed into the Ohio Graduation Tests). Students in Ohio's public schools were required to take and pass these tests as a condition for graduation. In 1993, as part of his "Education for Reforms" package, Governor Voinovich determined to extend this mandate to chartered nonpublic schools. The extension became law: CNPs were required to administer the ninth grade tests, and CNP students were required to pass them as a condition for graduation. The Ohio Association of Independent Schools contested this statute in the Ohio courts, but lost the case.

Ohio's Proficiency Tests also included tests at other grade levels. (These morphed into the Ohio Achievement Tests). Public schools were required to administer the additional tests. Test results became one method by which public schools and school districts demonstrated accountability to the State.
Chartered nonpublic schools were permitted to administer the additional tests (under the same rules that applied to public schools, and with the cost borne by the state), but CNPs were not required to do so. Very few CNPs chose to participate in the additional tests.
4. ***EMIS***
The Education Information Management System (EMIS), as a database on Ohio's public schools, their students, and staff, was developed in the same general era as the statewide

testing program. The EMIS database never included information on chartered nonpublic schools, their students, and staff.

6. ***School Report Cards***

Ohio's report card system for reporting results on state tests, attendance, graduation rates, and similar statistical information – a system which also graded Ohio's public schools and districts--became operational during the same general era as statewide testing and EMIS. For Ohio's public schools, the multi-grade statewide testing program, report cards, EMIS, and other data required by growing federal law, became the primary tools for demonstrating accountability. These tools – including the school report cards – did not apply to CNPs

A new accountability mechanism for CNPs

7. In November 1994, State Superintendent Ted Sanders met with the nonpublic advisory committee and announced that the ODE was discontinuing its practice of evaluating public and chartered nonpublic schools (#2 above). He proposed a “new mechanism” by which nonpublic schools might become chartered, and once chartered, demonstrate accountability to the state for maintaining state standards.

8. On November 29, 1994, Carolyn Jurkowitz summarized this meeting (#7) in a formal letter to Nancy Eberhart, ODE's Director for Curriculum, Instruction, and Professional Development. Under Sanders' proposal, the state (SBE or State Superintendent) would create a commission on chartered nonpublic schools, separate from the nonpublic advisory committee. The primary role of the commission would be to review and approve the standards and procedures of the various associations that accredit nonpublic schools. The accrediting system would serve as a new tool through which CNPs could demonstrate accountability to the state (i.e., as an alternative to 1983 Standard 3301-35-07). Under Sanders' proposal, the ODE would develop a similar mechanism, to be overseen by ODE, for schools that were not accredited by a recognized accrediting association. Work on the new CNP accountability system began in earnest in January, 1995, under the direction of Eberhart's office.

9. ***Revision of State Standards for Schools***

Simultaneous to the initiative for CNPs, the State Board announced its intention to revise the 1983 *Minimum Standards*. As had been the case in the development of the 1983 Standards (and the standards of the 1970s), representatives of CNP groups were invited to participate in the revision process. They did so – both on the state team that drafted the entire set of state standards, and as a subcommittee to revise AC3301-35-04 [(chartered nonpublic schools) of the 1983 Standards]. In the new standards of 2001, AC3301-35-04 became AC3301-35-12. Work on the accountability system for CNPs, which had been initiated by Superintendent Sanders, folded into work on the revision of state standards.

Ohio's standards revision process soon ran into the buzz saw of “outcomes-based education.” Hence, the *Operating Standards for Ohio Schools* were not completed and adopted by the SBE until December 2000, effective, 2001.

Given the new accountability system for Ohio's public schools – a system characterized by statewide testing, EMIS, school and district report cards --the new *Operating Standards* did not assume the level of importance in public schools that they assumed in the world of CNPs.

10. ***CNP Accreditation as a tool for accountability in Ohio***

(a) The new standard for chartered nonpublic schools (3301-35-12) included two options by which a nonpublic school might “assure that its students receive a general education of high quality . . . (1) being accredited by an association whose standards have been reviewed by the State Superintendent’s Advisory Committee on Chartered Nonpublic Schools and approved by the State Board of Education . . . [or] (2) showing compliance with rules 3301-35-02 to 3301-35-07 and rule 3301-35-11 of the Administrative Code” [with noted exceptions].

(b) Standard 3301-35-12 established a *new* advisory committee -- on *chartered* nonpublic schools, not unlike the commission proposed by (then) State Superintendent Sanders. The rule did not indicate whether this committee would be a standing committee or an ad hoc committee. It extended membership to other associations and individuals beyond the groups in the earlier advisory committee of the 1990s. It did not limit the role of the committee to reviewing and approving standards of the accrediting associations, although this responsibility became the committee’s first and major task.

(c) Under the leadership of ODE’s Center for School Reform and Options, the ODE developed several tools for carrying out the new committee’s work. These included an application process for use by associations, a protocol for the committee to use in reviewing and approving accrediting standards, a template (“Criteria for Establishing the Comparability of Accrediting Association Standards with *Operating Standards for Ohio’s Schools*”) for use by associations and the committee, and an annual report form for use by associations in reporting to ODE on their accredited schools.

(d) In October, 2001, a resolution of the SBE delegated to the State Superintendent “the authority to approve accrediting association standards that meet established criteria as set forth in the document titled “Criteria for Establishing the Comparability of Accrediting Association Standards with Operating Standards for Ohio’s Schools.” By the same resolution, the Board “delegated to the State Superintendent the authority to grant charters to nonpublic schools that meet the approved association standards.”

(e) As each association completed the application process and submitted its standards, the new committee reviewed and (eventually) approved the association’s standards for comparability with the *Operating Standards*. The committee then submitted the standards to the State Superintendent for final approval.

The State Superintendent approved the standards of the Ohio Catholic School Accrediting Association, as submitted by the Catholic Conference of Ohio, in August 2002. Approval of the OCSAA standards was followed by approval of the standards of the Association of Christian Schools International, the Ohio Association of Lutheran Schools, the Association of Seventh Day Adventist Schools of the Ohio Conference, and ISACS (Independent School Association of the Central States), as submitted by the Ohio Association of Independent Schools.

[Carolyn Jurkowitz,
Catholic Conference of Ohio,
January, 2010]