

# *The Coalition of McKay Scholarship Schools*

## **The Coalition's Position on Accountability Concerning The John McKay Scholarship Program November 2017**

The Coalition of McKay Scholarship Schools is a not-for-profit Florida corporation with a volunteer, elected board of directors. It was established in December 2003 and has the mission to assimilate and disseminate information about the McKay Scholarship Program from sources such as the Department of Education, the legislature, schools, parents, and the community. The Coalition also advocates for McKay Scholarship schools and students with disabilities to ensure the viability of this program. The Coalition is a member of Florida Alliance for Choices in Education and is a member of Florida Association of Academic Non-Public Schools.

Since The Coalition's founding in 2003, we have supported accountability. The Coalition has worked closely with legislators and the Florida Department of Education in crafting legislation which strengthens the McKay Scholarship Program but does not place undue regulations upon parents or schools who wish to participate in the program. The Coalition has also worked with legislators to expand the program. Most notably in 2011 the Coalition worked with the legislature to expand the McKay Scholarship Program to include students on a 504 Accommodations Plan. In addition, in 2015 The Coalition helped to establish the structure for a School to Work Program in the scholarship.

The Coalition's litmus test for legislation or regulation for the McKay Scholarship Program has been its relationship to fiscal accountability, safety and welfare of the student, and accountability to the parent/child. Unfortunately, what may be a "reasonable assumption" for other educational choice programs may not be a "reasonable assumption" for programs addressing students with disabilities.

The strength of the private school sector is in its ability to develop diverse programs which meet the needs of its students. This is not a one size fits all model. A rural county may require different programming than an urban county; a school for autistic students may require different choices than a school for the developmentally disabled; and a parochial school may have a very different philosophy than a secular school. The McKay Program was designed so a parent would have a diverse field from which to choose the best program for their child. **We support regulation that will allow this autonomy to remain in the hands of the private school and of the private school consumer.**

The following outlines the issues that The Coalition of McKay Scholarship Schools feels are of utmost importance in maintaining an accountable and viable scholarship program. Also, listed are the "reasonable assumptions" that The Coalition feels are counterproductive to allowing a disability scholarship program the flexibility and diversity it requires as schools develop programs to address the needs of their students with disabilities.

**Florida Statutes concerning the McKay Scholarship contain the following regulations.** The Coalition has assisted in developing many of these regulations.

**The Coalition Supports Fiscal Accountability Measures Required by Statute:**

Demonstrate fiscal soundness by being in operation for 3 years, or obtain a surety bond or letter of credit for the amount equal to the scholarship funds for any quarter (for schools in operation less than 3 years).

Oversight by FLDOE in terms of attendance verification for scholarship distribution.

**The Coalition Supports Safety Accountability Measures Required by Statute:**

Comply with all state and local health and safety laws and codes and all laws relating to general regulation of private schools prior to being allowed to participate in the program.

Conduct mandatory Level 2 background fingerprint screening for all employees who have unsupervised direct contact with scholarship students in the private schools. Results of the screening shall be provided to the participating private schools.

**The Coalition Supports Accountability to the Parent and Child as Required by Statute:**

Schools must schedule meetings with parents to discuss the child's progress.

FLDOE has established procedures by which parents or others may notify FLDOE of any violation by a private or public school relating to the McKay Scholarship Program.

FLDOE has established processes whereby the parents can obtain information concerning private schools enrolled in the program, as well as information on the McKay Scholarship Program.

FLDOE has established processes whereby the parent can give an evaluation of the private or public school in which they have enrolled.

*Note: Most participating schools exceed the requirements of the statutes in their reporting to the parents information concerning their children and their children's progress.*

**The Coalition Supports Teacher Criteria as Required by Statute:**

The statute provides for "teachers who hold baccalaureate or higher degrees, or have at least 3 years of teaching experience in public or private schools, or have special skills, knowledge, or expertise that qualifies them to provide instruction in subjects taught." We continue to support this portion of the statute. While an examination of McKay schools has shown that, predominately, their teachers hold a baccalaureate or higher degree, room is left for innovative practices such as hiring individuals with AS degrees in computer related fields to be teachers of computer technology, and/or in hiring individuals with health related training to assist programs for students with medical needs.

**Our position continues to be INFORMED PARENTS MAKE GOOD CHOICES. Schools should explain the qualifications of their teachers and let the parents make the choice.**

## **“Reasonable Assumptions, That Aren’t...”**

Bureaucracy likes standardized programs, but programs serving students with disabilities will be destroyed if the “One Size Fits All” model is used instead of allowing for the diversity of programming which is essential for this population. Yearly, certain “reasonable assumptions” for accountability are made by either the media or other groups. The Coalition and other stakeholders are constantly educating legislators, the public and DOE as to the unique nature of this program and that these assumptions are not true accountability measures.

### **The Coalition does not support Accreditation:**

It has been suggested that in order to participate in scholarship programs, schools would have to be accredited by certain accrediting agencies. This requirement would not achieve the goal of ensuring fiscal or academic accountability.

Accreditation does not ensure quality academic outcomes. In 2016-2017, Duval County had 1 F public school and 16 D public schools. Orange County had 4 F public schools and 14 D public schools. All but one school is accredited by SACS-Casi, Advanced Ed or Northwest Association of Accredited Schools. No school is in danger of losing their accreditation. Accreditation obviously does not review the elements that the State of Florida deem important when judging a school. Why should participating private schools be held to this standard which does not seem to address the quality of curriculum or student progress?

Many innovative schools serving McKay Scholarship students could not be accredited due to certain technical requirements, such as having a library with a certain number of books, or recreational facilities of a certain type. Approximately one third of McKay students attend unaccredited schools. These students would be forced out of the schools chosen by their parents.

According to FLDOE, there has never been a complaint by any parent as to whether a private school is accredited or not. Who is asking for accreditation as a requirement? Could this just be another bureaucratic stumbling block being proposed by opponents of parental choice?

### **The Coalition does not support unilateral nationally normed testing or state high stakes testing:**

From a 2013 survey of private schools participating in the McKay Scholarship Program, 97% of survey respondents reported that they administer norm-referenced tests.

Our concern with the state requiring state testing and/or general norm-referenced testing unilaterally for all McKay Scholarship students is that nationally normed testing, for some of our students, due to their disabilities (autism, developmentally disabled) is totally inappropriate. We support evaluations appropriate to the student’s disability.

The second concern with this requirement is “who would determine which tests will be acceptable?” Private schools have chosen nationally normed tests based on their philosophy and curriculum. The possibility of taking that choice away infringes on the private school’s autonomy and understanding of its own needs and mission. Financially, the cost of changing to a new test would be an unnecessary burden for private schools.

The same arguments also hold true for requiring high stakes testing (FSA) of our students.

61% percent of schools surveyed indicated that they would no longer accept McKay Scholarship students if they were required to administer the FSA. At a minimum, this represents approximately 7,000 students receiving the McKay Scholarship.

### **The Coalition does not support forced training:**

A suggested amendment to the statute has been the requirement that McKay Scholarship schools send their teachers to two FLDOE sponsored ESE workshops annually. The Coalition is in favor of training for all teachers; however, the autonomy for training in the area of disability and in the manner in which the private schools deem appropriate should not be taken away from the private school.

When this proposed requirement was shared with some McKay parents, their response was, “I left the public school trained teachers in search of something else. Why would I want my private school to be trained by the same people?”

Finally, the financial burden this would place upon both the state and the private schools to train the staffs of more than 1,200 schools would be unsustainable.

### **The Coalition does not support in-field teaching:**

We support trained teachers, but the requirement of “in-field” would have far reaching implications which would make it impossible for most private schools to participate in the McKay Scholarship Program.

The current requirement is for a 4-year baccalaureate degree, but if in-field teaching is required, what “field” would be acceptable for an elementary teacher? The only in-field person qualified would be a certified elementary teacher. A vast shortage of certified teachers exists in public schools. Private schools could not compete with the public school and its resources in terms of salary and benefits. What “certification” will qualify? State? Self-certifying groups?

In the private sector many of our teachers “cross teach subjects”. For example, a history teacher may also teach literature. Most private schools do not have the financial ability or luxury of hiring only “in-field” and sometimes the cross training can create a better teacher.

### **In Conclusion:**

Legislation must protect, not weaken, the autonomy of private schools to continue to succeed and change lives of the children it is intended to benefit while providing for fiscal responsibility, student welfare and parent accountability for The McKay Scholarship Program.



The Coalition of McKay Scholarship Schools is an organization of non-public schools that accepts students receiving funding through the McKay Scholarship program and individuals who are committed to keeping the McKay Scholarship Program a viable choice for parents of students with disabilities in Florida. The Coalition's mission is to assimilate and disseminate information about the McKay Scholarship program from sources such as the Department of Education (DOE), the legislature, schools, parents, and the community. The Coalition also advocates for McKay Scholarship schools and students with disabilities to ensure viability of this program.