

Testimony on Senate Bill 223: Private School Registration
March 17, 2021

TO: Senate Committee on Education
FROM: Sherri James, Superintendent of North Clackamas Christian School
RE: Statement Opposing SB 223

Thank you for taking time to read my testimony in opposition of SB 223, which is from the perspective of a private school administrator. First, it is relevant that I take a moment to give the committee context from which I am writing. As the Superintendent of North Clackamas Christian School ([NCCS](#)), I want to share these details with you. NCCS has been an integral part of the Oregon City community since 1973. We provide an education for children, preschool through high school, with a current total enrollment of 260 students. We are an independent, non-denominational Christian school, fully funded by tuition paid by those enrolled at the school. Our families are tax-paying residents of Canby, Molalla, Gladstone, Beavercreek, Lake Oswego, West Linn, Happy Valley, Clackamas, and Oregon City. Parents work as farmers, fire fighters, police, public school teachers, community college instructors, medical professionals, laborers, small business owners, realtors, engineers, and many other valued contributors in our community. Our school is fully accredited by Cognia, as well as the Association of Christian Schools International (ACSI), with a history of excellence. We are a member of Oregon Federation of Independent Schools (OFIS) and OSAA.

I have worked at schools in Oregon for 29 years, while demonstrating a high level of dedication and extensive experience as a leader in education. Once SB 223 came to my attention, I felt strongly led to speak up against it as it is written. I believe this bill negatively targets private education and gives little regard for the constitutional rights of private schools, educators, students, and parents, in our great state.

There are several reasons to hold a position in opposition to SB 223 :

1. The Bill states that yearly, "...the private school must demonstrate to the satisfaction of the department that the private school complies with the criteria adopted by the State Board of Education."(section 3.3, pg.2) Additionally, "The Department of Education may suspend or revoke or deny renewal of a private school registration." (section 5.1, pg.3) To take

the registration process further, "Every registered private school shall promptly provide any reports or information required by the Department of Education." (section 5.4, pg.3) The proceeding sections of SB 223 are overreaching, with a great deal of private school business wrongly placed in the hands of the government (ODE). This practice would be inappropriate and unwelcomed entanglement of government in private education.

2. The Bill states that it "Limits participation in interscholastic activities by private schools, to private schools that are registered." (section 10.1E, pg.8) This section of the bill will block private schools from access to organized high school competition in activities (sports, choir, band) provided by OSAA, should they choose to not register with the state. This would be a great hardship on private school students, as well as those in public schools, who gain a great deal from participating in these competitions against one another. It is a loss for all students in the state.
3. In SB 223, sections 7-8, address matters already covered by SB 155, signed into law and effective July 1, 2019, to help ensure the safety of all K-12 students in Oregon. Private schools are designated as education providers under the bill. It directs schools in working with the ODE for non-licensed applicants for employment in schools, as well as non-licensed contractors, agents, or volunteers to provide services in schools. It also directs working with TSPC regarding licensed applicants for employment in schools. This redundancy could be better coordinated with work already being done through SB 155 and does not need to be further outlined in another bill.
4. Private schools have the option to be accredited. This process includes extensive reporting, requirements and protocols, as well as on-site examination of organizational practices. This process of accreditation already addresses the items outlined in SB 223, and a great deal more, during its annual review cycle. If a private school is accredited, there should be no need to prove such matters in yet another format or process.
5. The Bill is a threat to parents' First Amendment right to religious freedom and Fourteenth Amendment right to liberty, which includes the right to choose private education for their children. However, with SB 223, it appears that private schools would be held to the same requirements as public schools (without the funding to support them).

6. The extensive work (by ODE) that would need to be put into registering private schools, in order to include all that is within the scope of this Bill, seems overwhelming at best, on a system that is stretched so thin as it is now.
7. Private schools do not want or need this process as a benefit to their operations. This is a waste of tax-payer dollars and a horrendous initiative to push government oversight into private schools.

Currently, ODE policy states that "non-public education is recognized as a vital part of Oregon's educational system." The families of over 50,000 Oregon school children choose private schools for a reason. SB 223 would negatively impact North Clackamas Christian school students and parents, as well as hundreds of thousands of other private school students, for the reasons mentioned. This bill appoints a state committee to approve Oregon private school operations, for those applying for registration. The approval intends to include review of curriculum, schedules, facilities, policies, and staffing. Is this additional work of managing 500 additional schools in the state, while placing Oregon in a position of threatening a great number of parent's constitutional rights, a direction you want to head?

Thank you for considering an opposing position and taking time to read through my testimony against SB 223. A vote opposing the bill would continue to uphold a clear line between the oversight of public education and the independence of private education. Your support, with a vote against SB 223, would be greatly appreciated by the many parents, students, teachers, support staff, administrators, alumni, and other private school stakeholders in the state of Oregon.