

I have thoroughly read this bill. I am grateful that there are checks and balances overseeing education. This bill however is an overreach into the private school sector at several junctions. First, pg. 2, lines 13 - 24. These are listed as the 'minimum requirements per line 11, pg. 2, however they are written with such ambiguity that it leaves a lot to be determined at some future point by an advisory committee and the State Board of Education, all who have political leanings that influence their decision making. Those political leanings are possible points of overreach into a private school that according to the minimums presented here, include teacher qualifications, a facility protecting the health and safety of students, and curricula. At what point would just these minimums become a pathway to dictate to private schools who they hire and what curricula they use as well as creating layers of health and safety rules that are unnecessary but used as methods of controlling and governing private schools.

The experiences I have had with Early Learning Division and licensing a daycare are demonstrations of unnecessary layers of rules and regulations that create a focus on those rules and regulations rather than on caring for children and this bill appears to be yet another attempt to create a level of state oversight into private schools that is far beyond what is necessary as there are already ORS rules/regulations in place to maintain the health and safety of children. For example, in January 2012, then Child Care Division Administrator, Kara Waddell, made the following statements in the "Review of Child Care Licensing Rules": first on page 7: "*Currently, preschool programs are exempt from licensing if providing services four hours or less a day. These programs' current requirements include: 1) criminal background checks, and 2) informing parents that they are a recorded program. **The recommendation to require licensing of these programs is based on the following reasons:***

*'Quality preschool programs have a positive impact on children's readiness for school. School readiness has become a high priority for parents, state policymakers, and increasingly early education teachers who believe school readiness is positively impacted by the learning environment and activities that occur while children are in childcare. **In the statute, a current distinction between licensed and exempt programs is connected to the parents' role: in exempt programs, the parent retains general oversight of what happens to the child in care: while in licensed programs, the oversight shifts to the facility. Is this the right or most appropriate definition knowing how important school-readiness has become? Ideally, parents need to be involved in all programs (including licensed programs), and childcare programs need to be responsible for providing the oversight and program activities that promote optimal development in children.'***

Page 8 continues (in the last paragraph) with "***It is clear that licensing establishes health and safety standards, but also licensing plays a foundational role in defining program standards that support the development of children and impact their readiness for school. Children's school readiness levels can be positively impacted when children receive comprehensive instruction by a qualified teacher. Licensing can play a major role by establishing minimum program requirements for program activities and teacher qualifications.***"

To me these statements and what you are attempting to do in this bill before you is clearly an overreach into the private school sector as it sets the state up to "nanny" the children. Parental choices for the education of their child becomes narrowed to whatever it is the state deems as meeting their criteria under these regulations, therefore actually removing choice from the parent, except the choice of which building their child will be educated in. Please do not pass this bill.

With respect and deep sincerity of conviction for maintaining parental choice,

Kelly GrosJacques