

OUTLOOK

A report from the Council for American Private Education, Washington, D.C.

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NEARLY 100,000 WRITE IRS;
MOST OPPOSE PRIVATE SCHOOL
DISCRIMINATION REGULATIONS

Expressions of concern by members of Congress and the private school community have prompted the Internal Revenue Service (IRS) to schedule public hearings on its "Proposed Revenue Procedure on Private Tax Exempt Schools." Accord-

ing to an agency staff member, nearly 100,000 letters have been received by IRS, most opposing the proposal, which would end tax exemptions for private schools judged by the IRS to be racially discriminatory. The Council for American Private Education (CAPE) endorses IRS' purpose but considers the proposals ill-advised. The hearings will be held December 5.

Concern over the proposed rules has centered on two issues: the content of the regulations and the procedure being used by the IRS to create them. Objections to the rules' content center on their implicit assumption that private schools are guilty of racial discrimination until proved innocent and on the specific nature of the tests which would be used to determine guilt. Schools which were established or expanded by more than 10 percent while public schools in their communities were desegregating would be automatically suspect, but all private schools would be subject to the regulations. To prove innocence, they would have to show substantial minority enrollments or evidence of significant "good faith" efforts.

Objections to IRS procedure focus on the fact that the agency is not handling the proposed rules in the manner required under Executive Order 12044 for "significant" government regulations. A "significant" regulation is any rule not strictly an internal or procedural agency matter. Before implementing such a rule, the IRS must draw up a detailed work plan including, among other things, a justification of the need for the regulation, a description of the policy issues involved, and a plan for obtaining "early and meaningful" public comments. "It is a patent evasion to label this regulation 'procedural,'" contends Rep. George Hansen (R-Idaho), who continues to urge IRS to treat the proposed rules as significant.

TUITION TAX CREDITS SHOW
LATE STRENGTH IN HOUSE BUT
ADJOURNMENT CLOSES DEBATE

Tax credits for private elementary and secondary school tuitions got strong House support in the last hours of the 95th Congress, but died in committee. The House of Representatives refused to accept the conference report

on H.R. 12050, which stripped the tax credit bill of its provision for elementary and secondary schools. The House voted 207 to 185 to recommit the legislation to the conference committee with instructions to reinstate elementary/secondary credits.

Conferees met October 13 faced with a dilemma. The House would not accept a bill providing only college credits and Senator Ernest F. Hollings (D-S.C.) had threatened a filibuster if a bill providing school credits passed the House and was sent to the Senate. The conferees compromised, reporting H.R. 12050 back to the House with a provision added for non-refundable secondary school credits. Time ran out on the legislative session before the bill could be approved by the House or Senate.

Congressional backers of tuition tax credits have no specific plans for the 96th Congress, which begins January 15, but they are confident that tax credit legislation will be considered again in the next session.

CONGRESS MANDATES OE LINE
OFFICE FOR PRIVATE SCHOOLS
UNDER DEPUTY COMMISSIONER

Congress agrees with the Carter Administration that the U.S. Office of Education (OE) should have a line office to handle private school matters. President Carter and HEW Secretary Califano announced last February their intention to create such an office. H.R. 15, the Elementary and Secondary Education Act reauthorization bill, directs that the office be created, headed by a Deputy Commissioner.

OE officials and private school representatives will now meet to adapt the plan they previously designed, under the impetus of the Administration's initiative, to the Congressional mandate. The office is created "to insure the maximum potential participation of nonpublic school students in all federal educational programs for which such children are eligible," according to the legislation. The new Deputy Commissioner will be responsible for establishing internal OE policies relating to private schools, monitoring administration of programs and procedures to assure equitable provision of services to private school children, and cooperating with the existing Office of Nonpublic Educational Services. Other Deputy Commissioners in OE head, among other bureaus, the Bureau of Elementary and Secondary Education and the Bureau of Education for the Handicapped.

SCHOOL ENERGY AUDITS HEART
OF NEW COOPERATIVE ENERGY
STUDY BY INDUSTRY, SCHOOLS

Friends School in Baltimore is one of 19 schools chosen from across the country for a two-day energy audit conducted by a team of engineers, designers, and architects in the fields of energy conservation and environmental planning. The project, Schoolhouse Energy Efficiency Demonstration (SEED), is sponsored by Tenneco Inc., Houston, Texas. Through free school building inspections, energy counseling, and national distribution of information, the program is designed to encourage wise energy use in public and private schools. "Most schools are energy sieves," says a Tenneco school energy expert. One estimate is that many waste between one-fourth and one-half of the energy they use. Data gathered from the 19 demonstration schools will be used to develop public information materials to help other schools in conserving energy resources.

In addition to CAPE, seven organizations endorse SEED: The American Association of School Administrators, National PTA, National Education Association, National Association of Elementary School Principals, National Association of Secondary School Principals, Association of School Business Officials, and Education Commission of the States.

WASHINGTON POLICY SEMINAR
CONSIDERS PRIVATE SCHOOLS
AND FEDERAL POLICY PROCESS

Approximately 45 staff members of the U.S. Office of Education considered the federal policy process as it addresses private school issues at a recent Washington Policy Seminar conducted by the Institute for Educational Leadership (IEL) of the George Washington University. The seminars, presented to government and education association groups, provide an overview of the process of educational policymaking on the national level.

Speaking to the topic, "Private Schools and the Federal Policy Process," CAPE Executive Director Robert L. Lamborn discussed the character and condition of the private school movement in America, with its more than 20,000 schools and approximately 5 million students. Public and private schools are, he maintained, complementary social service agencies which benefit all the public; and, in order to achieve consistently sympathetic public policy support, private schools must, he said, make an "unequivocal case before the public" for their role as "legitimate, responsible, and responsive social agencies serving in the mainstream of American education."

The seminar was the first to consider federal policy process as it relates to private schools; IEL Washington Policy Seminar Coordinator George Kaplan says there will be others.

FEDERAL EDUCATION AGENCIES
ADOPTING "PRIVATE" AS TERM
FOR NON-GOVERNMENT SCHOOLS

Top federal education officials have agreed with CAPE's Directors that "private," not "nonpublic," should be used as the term of preference in referring to non-government schools. HEW Assistant Secretary for Education Mary Berry, U.S. Commissioner of Education Ernest L. Boyer, National Institute of Education Director Patricia A. Graham, and National Center for Education Statistics Administrator Marie Eldridge have adopted the practice of using "private" when referring to these schools in legislative proposals, regulations, and communications, as well as in the designation of all appropriate offices and officials in HEW's Division of Education. Congress, the education community, and the media are also being urged to adopt the term.

In supporting this usage, CAPE's Directors contend: "We believe in the social significance of the nation's historical commitment to diversity, individual initiative, and private enterprise. We believe in the importance and legitimacy of the private sector of society. And we believe that private schools, as one of many types of private sector institutions, play a constructive role in serving public needs. The public service character of these schools will be better understood and fundamental social purposes better served if they are designated as 'private' and the term 'nonpublic' is no longer used."

ADVENTISTS RAISE MONUMENT
ON SITE OF FIRST SCHOOL

A monument marking the site of the first Seventh-day Adventist school--and celebrating the growth of Seventh-day Adventist education worldwide--was dedicated recently by Adventist teachers and representatives of church organizations. The school was established in Bucks Bridge, New York, in 1853 by John F. Byington, a former Wesleyan minister who saw a need for religious education for his 17 pupils. A "home school," it predated the establishment of the Adventist church in America. The first church-sponsored school was not opened until 1872. Today, about 1,200 Adventist elementary and secondary schools in the U.S. enroll approximately 80,000 students.

MSA CREATES PRIVATE SCHOOL
OFFICE, APPOINTS DIRECTOR,
FORMS ADVISORY COMMITTEE

Private schools may differ from public schools in philosophy, administrative organization, and educational program; they necessarily differ in the character of their bodies of control and methods of financing. The Middle States Association of Colleges and Schools (MSA), one of six regional accrediting agencies in the U.S., has recently taken steps to assure that these differences are considered in the accreditation process. More than a year ago, MSA organized an ad hoc Special Committee on Non-Public Schools to make recommendations on the agency's private school accreditation policies. The committee was composed of 14 private school representatives and three ex officio representatives of MSA's Commission on Secondary Schools. It made its recommendations to the MSA board of trustees in a series of meetings last year.

Among the committee's recommendations was the creation of a full-time private school staff position in the Commission on Secondary Schools. This led to the appointment in July, 1978, of John Dixey as Associate Director for Nonpublic Schools. The ad hoc committee also suggested the creation of a standing advisory committee to regularly inform the Commission of private school concerns. The committee, now being formed, will have one member from each of the five states served by MSA (New York, New Jersey, Pennsylvania, Maryland, and Delaware) and the District of Columbia. A major policy change recommended by the ad hoc committee will be made next year, when the "narrative" form of the Evaluative Criteria will be used by MSA for all private school evaluations. This evaluation instrument is seen as being more responsive to the special characteristics of private schools than the "checklist and evaluation" form previously used for both public and private school evaluations. There are 465 private secondary schools accredited by MSA; about 40 private school evaluations are conducted yearly by teams of public and private school educators.

CAPE ENCOURAGING EXPANDED
PRIVATE SCHOOL COLLECTION
IN LIBRARY OF CONGRESS

Among the more than 20 million cards in the Library of Congress' main catalog, 13,200 titles deal specifically with elementary and secondary education. Of those titles, only 775 deal with private education. "We are encouraging the Library of Congress to expand its private school collection and urging private school people to cooperate in the effort," says Rabbi Bernard Goldenberg, Associate Director of the National Society for Hebrew Day Schools and President of CAPE. "We believe both public and private schools will benefit."

The Library's acquisition procedures vary for copyrighted and uncopyrighted materials. All copyrighted works automatically go through the selection process; not all are retained for the Library's permanent collection. Uncopyrighted works must be sent as gifts to the Library's Exchange and Gift Division to be considered for acquisition. Many types of uncopyrighted, association-produced documents will be considered, among them convention proceedings, annual reports, directories, and materials of relatively broad historical interest. Institutional publications, pamphlets, catalogs, textbooks, student publications, and reprints are not considered.

Once acquired by the Library of Congress, a book or document becomes a part of the permanent collection, accessible not only to Congress and to Washington-area scholars and policymakers, but to college-level libraries throughout the nation through inter-library loan services. "There could be no better library than the Library of Congress to house a growing collection of private school materials," says Goldenberg. "Such a collection will help to provide the basic information needed to create informed public policy relating to private schools."

"MUMBLING MEDIOCRITY" IN
SPEECH, WRITING PRODUCT OF
PERMISSIVE TEACHING: HALL

Blaming television for students' poor English "is like blaming movies for a decline in opera attendance," says Edward T. Hall in his essay "Why Americans Can't Write," published in Human Nature (August, 1978). The real blame, says Hall, rests with elementary and secondary school teachers who do not teach composition or literature with "any degree of discipline or thoroughness." Hall spent the past four years teaching English to African students in Botswana; the previous 28 years as English teacher and headmaster in American independent schools. Teachers in Botswana's schools spend two years preparing students for an English examination they must take at age 15 or 16. Students drill in English usage, punctuation, and vocabulary, as "essay after essay and test after test" bring them closer to the standard demanded.

A balance is needed, Hall believes, between Botswana's "rigid and authoritarian" program and the "loose and permissive" English curricula prevalent in American schools. "If we want students to read good literature and write good English we must build these goals into the curriculum and insist that students reach for them," he contends. "To do less is to condemn the next generation to mumbling mediocrity."

OUTLOOK is published monthly (September through June) by the Council for American Private Education. Annual subscription \$6. Council members: The American Lutheran Church • American Montessori Society • The Association of Evangelical Lutheran Churches • Association of Military Colleges and Schools of the U.S. • Christian Schools International • Friends Council on Education • Lutheran Church—Missouri Synod • National Association of Episcopal Schools • National Association of Independent Schools • National Association of Private Schools for Exceptional Children • National Catholic Educational Association • National Society for Hebrew Day Schools • Seventh-day Adventist Board of Education, K-12 • Solomon Schechter Day School Association • U.S. Catholic Conference. Associated state organizations in Arizona, California, Connecticut, Georgia, Indiana, Kansas, Maryland, Michigan, New Mexico, Oregon, Puerto Rico, Tennessee, Virginia, Washington, and Wisconsin.

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