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private school choice and special needs scholarship programs

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Private School Choice and Special Needs Scholarship Programs

Under the Milwaukee, Racine, and statewide Wisconsin private school choice programs, state funds are used to pay for the cost of children from eligible families in the City of Milwaukee, the Racine Unified School District (RUSD), or other Wisconsin school districts statewide to attend private schools participating in the program. Pupils began attending private schools under the Milwaukee program in 1990-91, the Racine program in 2011-12, and the statewide program in 2013-14.

Under the special needs scholarship program, state funds are used to pay for the cost of private school attendance for pupils with disabilities. Pupils first attended schools under the program in 2016-17.

This paper provides information on the following aspects of the three private school choice programs: (1) a brief historical overview of the programs; (2) the major statutory provisions governing the programs; (3) pupil participation; and (4) program funding. The final section describes the special needs scholarship program, including program requirements, participation, and funding.

Historical Overview

As enacted in 1989 Act 336, there were relatively few requirements placed on schools in the Milwaukee program, which was more limited in scope at that time. The program was open to pupils in the City of Milwaukee with a family income less than 175% of the federal poverty level. Private schools in the choice program were required to be nonsectarian and located in the City

of Milwaukee. Choice schools had to comply with federal nondiscrimination laws, meet the health and safety codes applicable to public schools, meet one of the four standards related to pupil achievement or parental involvement to continue to be eligible to participate in the program, and meet certain administrative deadlines. No more than 1% of the enrollment in the Milwaukee Public Schools (MPS) could participate in the program, and no more than 49% of a choice school's enrollment could consist of choice pupils. These thresholds were increased to 1.5% and 65%, respectively, under 1993 Act 16.

Once the choice program was enacted in 1990, its legality was immediately challenged. In subsequent years, the program was upheld by the Dane County Circuit Court, the Court of Appeals, and the State Supreme Court. Appendix I to this paper describes the legal challenges to the Milwaukee choice program during its early history.

The Milwaukee program expanded in 1995 Act 27, which allowed sectarian schools to participate in the program, increased the participation limit to 15% of MPS enrollment, deleted the percentage limit on the share of choice pupils in a choice school, and required that choice schools be subject to uniform financial accounting standards and provided for an annual independent financial audit.

Additional requirements on choice schools related to financial operations were enacted under 2003 Act 155. That act also created penalty provisions under which the State Superintendent could immediately terminate schools from the program, bar schools from participating in the program in the current year, and withhold payment from parents of pupils in choice schools. Under

2005 Act 125, choice schools were required to achieve accreditation and administer a nationally-normed standardized test in certain subjects to pupils in certain grades. That act also increased the enrollment limit for the program to 22,500 pupils. Act 125 also specified that continuing pupils and siblings of pupils would be eligible for the program if their family income was under 220% of the federal poverty level.

Numerous accountability requirements were placed on schools in the Milwaukee program under 2009 Act 28. That act required choice schools to administer the same assessments to choice pupils as required of public school pupils under state and federal law, adopt a policy regarding pupil promotion to certain grades, and adopt pupil academic standards. The act also raised the academic credentials needed by staff in a choice school and the hours of instruction that a choice school needed to provide.

The Milwaukee program was expanded under 2011 Act 32, which deleted the enrollment limit on the program, raised the income threshold to 300% of the federal poverty level, and deleted the geographic requirement for schools in the program.

Act 32 also created a process under which a private school choice program could be created in eligible school districts other than MPS. Under the act, pupils in a district would be eligible to participate in a choice program substantially similar to the Milwaukee program if the district met certain statutory criteria. Under Act 32, the Department of Public Instruction (DPI) determined that RUSD was the only district to meet these criteria. Subsequent legislation ended this process, so that RUSD was the only district in which a choice program was created under the provisions of Act 32.

Under 2011 Act 32, participation in the Racine program was limited to no more than 250 FTE pupils in 2011-12 and 500 FTE pupils in 2012-13.

Beginning in the 2013-14 school year, no pupil participation limit has applied to the Racine program.

The private school choice program was further expanded under 2013 Act 20, which created a statewide private school choice program for pupils with a family income of less than 185% of the federal poverty level who reside in a Wisconsin school district other than Milwaukee or Racine. Act 20 limited pupil enrollment to 500 pupils in the 2013-14 school year and 1,000 pupils in the 2014-15 school year, with participation from any one district limited to no more than 1% of that district's total enrollment. Additionally, the number of private schools that could participate in the program was limited to the 25 schools that received the greatest number of applications in 2013-14. In 2014-15, the schools that participated in 2013-14 were allocated the same number of pupils as they had in 2013-14. The remaining pupils under the 1,000 pupil limit applicable to 2014-15 were allocated to the 25 schools that received the greatest number of applications in 2014-15.

Under 2015 Act 55, the 1,000 pupil limit on the statewide choice program was eliminated. Instead, the total number of pupils residing in a school district who can participate in the program was limited to no more than 1% of that school district's prior year membership in 2015-16 and 2016-17. Beginning in 2017-18, the participation limit increased by one percentage point in each year until the limit reaches 10% in 2025-26. Beginning in 2026-27, no limit will apply. Act 55 also eliminated the restriction on the number of private schools that can participate in the statewide choice program. The family income limit was increased to 220% of the federal poverty level under 2017 Act 59.

Appendix II of this paper describes program evaluations of the choice programs conducted by the Legislative Audit Bureau and other organizations between 1990 and 2012.

Statutory Requirements

The following section describes the major statutory provisions governing the Milwaukee, Racine, and statewide private school choice programs. Separate statutory sections govern the Milwaukee program [s. 119.23] and the Racine and statewide programs [s. 118.60], but those sections are substantially similar. In the following section of this paper, the provisions described apply to both programs, unless otherwise noted in the text.

Limits on Pupil Eligibility. Participation is limited to pupils in grades kindergarten through twelve. Pupils must also meet income and prior year attendance criteria to be eligible to participate in the programs.

Income Eligibility. To be eligible to attend a choice school for the first time, the total family income of a pupil in the Milwaukee or Racine programs must not exceed 300% of the federal poverty level. For new pupils in 2020-21, 300% of the federal poverty level is \$50,730 for a family of two; \$63,990 for a family of three; \$77,250 for a family of four; and an additional \$13,260 for each additional family member above four. For pupils in the statewide program, total family income must not exceed 220% of the federal poverty level. For new pupils in 2020-21, 220% of the federal poverty level is \$37,202 for a family of two; \$46,926 for a family of three; \$56,650 for a family of four; and an additional \$9,724 for each additional family member above four. Family income for a family in which the pupil's parents or guardians are married is reduced by \$7,000. With the \$7,000 reduction, a married couple with two children could have family income up to \$84,250 and be eligible for the Milwaukee or Racine programs, or family income up to \$63,650 and be eligible for the statewide program.

A pupil attending a choice school whose

family income increases may continue to attend a choice school. If a pupil who attended a private school under the statewide program in the previous school year applies to attend a choice school in any other school district, the pupil's family income does not need to be verified a second time. Additionally, if a pupil attended a private school under the Milwaukee, Racine, or statewide choice programs in the prior school year and applies to attend a private school under another choice program in the immediately following school year, the pupil's family income does not need to be verified a second time. As a result, if a pupil participates in the Milwaukee or Racine program and then moves to another school district, the pupil can participate in the statewide private school choice program even if his or her family income exceeds 220% of the federal poverty level, if the pupil met the income eligibility guidelines for the Milwaukee or Racine program at the time of his or her initial participation.

Family income is defined as the federal adjusted gross income of the parents or legal guardians residing in the same household as the pupil for the tax year preceding the school year for which family income is being verified or, if not available, for the tax year preceding the tax year preceding the school year for which family income is being verified.

To verify income eligibility for the choice program, a choice school or a pupil's parent or guardian must submit to DPI the names, addresses, social security numbers, and tax identification numbers, if any, of the pupil's parents or guardians that reside in the same household as the pupil, whether and to whom the parents or legal guardians are married, the names of all the other members of the pupil's family residing in the same household as the pupil, and the school year for which family income is being verified. The Department of Revenue (DOR) must review the information submitted and verify the eligibility or ineligibility of a pupil to participate based on family income.

DOR may take no other action on the basis of the information submitted by DPI. DOR must notify DPI if it is unable to verify family income or to verify whether the pupil is eligible or ineligible to participate in the program based on family income. DPI must then use an alternative process, as established by DPI, to determine whether the pupil is eligible to participate in the program based on family income. DPI may not request any additional verification of income from the family of a pupil once DOR has verified that the pupil is eligible to participate in the program based on family income. DPI must establish a procedure for determining family income eligibility for those pupils for whom no social security number or tax identification number has been provided.

Prior Year Attendance. Prior year attendance criteria apply to the Racine and statewide programs. To be eligible to participate in the Racine or statewide programs, a pupil must satisfy one or more of the following criteria in the year prior, or be enrolling in kindergarten, first grade, or ninth grade in the current year: (a) was enrolled in a public school; (b) was not enrolled in school; (c) was enrolled in a private school choice program; (d) was enrolled in a school in another state; (e) had applied to attend a private school under any of the choice programs and was placed on a waiting list because the private school to which he or she applied did not have space; or (f) applied to participate in the statewide choice program and was placed on a waiting list because of the district's pupil participation limit.

State law defines one exception to the prior year attendance criteria described above. If a private school that does not participate in a private school choice program enters into an agreement to be subject to the same governing body as a private school that participated in the Racine or statewide program in the previous school year, the prior year attendance criteria would not apply to the new school in the first two school years in which the schools are governed by the same governing body

under a governing body agreement.

Admission and Selection Procedures. The State Superintendent of Public Instruction is required to annually inform families of the private schools participating in the programs. Applications must be submitted to the private schools on a form provided by the State Superintendent during specified time periods. For the statewide program, state law specifies that applications must be submitted between the first weekday in February and the third Thursday in April. For the Milwaukee and Racine programs, applications are accepted during specified application periods throughout the year. If more than one pupil from the same family applies to attend the same school, a single application may be used.

Within 60 days after the end of the application period during which the application is received, the school must notify an applicant, in writing, whether the pupil has been accepted. A choice school may reject an applicant only if it has reached its maximum general capacity or seating capacity. If a school rejects an application, the notice must include the reason why it cannot admit the applicant. If a private school rejects an applicant due to a lack of space, the pupil may transfer his or her application to another participating private school that has space available.

An applicant who has been rejected by a choice school or who was placed on the waiting list for the statewide choice program as a result of the pupil participation limit may be admitted to a choice school for the following school year, provided that the applicant still meets the residency requirement for the program. In that following school year, DPI may not require the school to submit financial information regarding the applicant or to verify the eligibility of the applicant to participate in the program on the basis of family income.

The State Superintendent must ensure that private schools accept pupils on a random basis, except that a school may give preference to pupils

in the following order: (1) pupils who attended the private school under the private school choice program during the previous year; (2) siblings of pupils who attended the private school under the choice program during the previous school year; (3) pupils who attended a different private school under a private school choice program in the previous school year; (4) siblings of pupils who attended a private school under a private school choice program in the previous year; and (5) siblings of pupils who have been randomly selected to attend a private school under the choice program but who did not attend a private school under a private school choice program in the previous school year.

For the Racine and statewide programs, each accepted pupil's parent or guardian must notify DPI by the 3rd Friday in September that the pupil is currently participating in the program using a form provided by DPI. The form must require the pupil's parent or guardian to indicate the school year during which the pupil first began participating in the Racine or statewide choice program.

If a pupil's residence changes after the end of the application period and on or before the third Friday in August, DPI may transfer a pupil's application to another private school participating in the statewide program, if the following occur: (a) the pupil was accepted to attend a participating private school, and the pupil's income was verified by that school; (b) the pupil continues to reside in a district other than Racine or Milwaukee; (c) the participating private school to which the pupil transfers has space available in the pupil's grade; and (d) the transfer would not cause the pupil's resident district to exceed the pupil participation limit. DPI may transfer an application between the first weekday in August and the third Friday in August.

Additionally, if a pupil applies to participate in the statewide program, is accepted to a private school participating in both the statewide and

Racine programs, and moves to the Racine Unified School District by the 3rd Friday in September, the pupil is considered to be participating in the Racine program and is not counted towards any district's enrollment limit.

When releasing data about pupil applications, enrollment, or waiting lists, DPI is required to release the data all at the same time, uniformly, and completely.

Enrollment Limit. No enrollment limit currently applies to the Milwaukee or Racine programs. For the statewide program, the total number of pupils residing in a school district who are participating in the program cannot exceed 5% of that district's prior year membership in 2020-21. The limit will increase by one percentage point in each year until it reaches 10% in 2025-26. Beginning in 2026-27, no limit will apply.

Annually by the first weekday in May, each private school that receives applications under the statewide choice program must report to DPI the number of pupils who applied to attend the school under the program and the names of applicants whose siblings also applied to attend a private school under the program. DPI must determine the total number of applicants residing in each school district, counting pupils who applied to attend more than one private school under the program only once. DPI must then determine whether the number of applicants residing in each district would cause the total number of choice pupils residing in that district to exceed its participation limit.

If the number of applicants would cause a district to exceed its participation limit, DPI must determine which applications to accept on a random basis, with preference given to certain pupils as described above, and establish a waiting list in accordance with the statutory order of pupil preference. If a private school determines that an accepted pupil will not attend the private school under the statewide choice program, the school must

notify DPI. If DPI determines that the number of pupils participating in the program has fallen below the school district's participation limit, DPI must fill any available slot in that district using the district's waiting list.

A pupil whose application is not accepted because the number of participants from his or her school district of residence exceeds the district's participation limit can participate in the program if he or she attended a private school under the statewide choice program in the previous school year and if the private school has not exceeded its maximum general capacity or seating capacity.

Requirements of the Private Schools. A number of legal requirements are placed on schools that participate in the choice program.

DPI is required to notify each choice school of any proposed changes to the choice program or to administrative rules governing the program prior to the beginning of the school year in which the changes take effect. By law, this includes changes to application or filing deadlines, but does not include changes to provisions governing health or safety.

General Compliance. The participating schools must meet all state health and safety laws or codes applicable to public schools and a number of federal laws and regulations which apply to both public and private schools. At the time the private school files a notice of intent to participate in the program, the school must agree to comply with federal law that prohibits discrimination on the basis of race, color, or national origin.

Intent to Participate and Auditor Fee. Choice schools must notify the State Superintendent of their intent to participate in the program and the number of pupils for which the school has space by January 10 of the prior school year. A choice school must pay an annual fee to DPI with its notice of intent to participate in the program. DPI is required to set the fee in administrative rule at an

amount such that the total fee revenue covers the costs of employing one full-time auditor to evaluate the financial information submitted to the Department by schools participating in the choice program. For the 2020-21 school year, the fee was \$350. Fee revenue is deposited in a program revenue appropriation, which was budgeted at \$141,900 in 2020-21.

For a school that will be participating for the first time but is not a new private school, the following information must also be submitted by January 10:

- a. the name, address, and telephone number of the school and the name of one or more contact persons at the school;
- b. a list of the names of the members of the school's governing body and of the school's shareholders, if any;
- c. a notice stating whether the school is an organization operated for profit or not for profit, and, if the school is a nonprofit organization, a copy of the certificate issued under section 501(c)(3) of the Internal Revenue Code verifying the school's status;
- d. a copy of the appeals process used if the school rejects the applicant;
- e. a copy of the policy developed by the school specifying the criteria for granting a high school diploma;
- f. a copy of the non-harassment policy used by the school and the procedures for reporting and obtaining relief from harassment;
- g. a copy of the suspension and expulsion policies and procedures used by the school and the procedures for appealing a suspension or expulsion;
- h. a copy of the policy used by the school for accepting or denying the transfer of credits earned

by a choice pupil for the satisfactory completion of coursework at another school; and

i. a copy of the written policy developed by the school governing visitors and visits to the school.

j. a signed statement from each individual who is a member of the school's governing body verifying that the individual is a member of the governing body.

New Private Schools. The law defines a new private school as one which has been open in Wisconsin for less than 12 consecutive months, or one with fewer than 40 pupils enrolled in two or fewer grades.

New private schools must submit required documents by August 1 of the school year immediately preceding the school year in which the school intends to participate in the program. Required documents include:

a. a notice of intent to participate in the program and an agreement to comply with procedural requirements;

b. a complete anticipated budget for the first fiscal period of the school's participation in the choice program demonstrating that the school will have a positive cash flow in each month of the fiscal period and no operating deficit, including anticipated total enrollments and enrollments of choice pupils, estimated revenues and costs, a schedule of anticipated beginning and ending net choice program assets, a schedule of monthly cash flow requirements, and contingent funding sources to be used if enrollments are lower than expected;

c. the mailing address for the school, or, if no building has been secured, the mailing address of an administrator of the school;

d. the nonrefundable auditor fee established by DPI; and

e. information related to the school's policies and governing board.

The school must also obtain preaccreditation from an approved preaccrediting entity by December 15 of that year. By December 31 of the school year immediately preceding the school year in which the new private school intends to participate in the program, DPI must notify the school in writing whether it has met the above requirements. If not, the school may not participate in the choice program in the following year, but may reapply using the same process.

Additionally, a new private school must demonstrate by August 1 of the first school year in which it is participating in the choice program that it has contracted with a third-party payroll service that will remit state and federal payroll taxes for all school employees.

Tuition and Fees. A choice school may not charge or receive any additional tuition payment for a choice pupil other than the state choice payment if the pupil is in grades K-8 or if the pupil is in grades 9-12 and the family income of the pupil does not exceed 220% of the federal poverty level.

A choice school may charge a pupil tuition in an amount determined by the school, in addition to the state choice payment, if the pupil is in grades 9-12 and the family income of the pupil is greater than 220% of the federal poverty level. A choice school is responsible for determining whether tuition may be charged to a pupil on the basis of family income. Each choice school must establish an appeals process to the governing body of the school relating to determination of family income.

For tuition purposes, in 2020-21, 220% of the federal poverty level is \$37,202 for a family of two; \$46,926 for a family of three; \$56,650 for a

family of four; and \$9,724 for each additional family member above four. As with the eligibility determination, family income for a family in which the pupil's parents or guardians are married is reduced by \$7,000 before the verification is made.

A choice school may recover the cost of providing the following to a choice pupil through reasonable fees in an amount determined by the school and charged to the pupil: (a) personal use items, such as uniforms, gym clothes, and towels; (b) social and extracurricular activities if not necessary to the school's curriculum; (c) musical instruments; (d) meals consumed by pupils of the school; (e) high school classes that are not required for graduation and for which no credits toward graduation are given; (f) transportation; (g) before-school and after-school child care; and (h) room and board at the private school. A school may not prohibit an eligible pupil from attending the school, expel or otherwise discipline a pupil, or withhold or reduce a pupil's grades because the pupil or the pupil's parent or guardian cannot pay or has not paid any such fees charged.

Religious Activity. A school participating in the choice program cannot require a choice pupil to participate in any religious activity in the school if the pupil's parent or guardian submits a written request to the pupil's teacher or the school's principal that the pupil be exempt from such activities.

Financial Requirements. Each private school is subject to uniform accounting standards established by DPI.

Each private school is required to maintain a cash and investment balance that is at least equal to its reserve balance. If a private school ceases to participate in or is barred from the choice programs and the school's reserve balance is positive, the school must refund the reserve balance to DPI. If a private school participating in the programs has a reserve balance that is greater than 50% of the total amount the private school received under

either the Milwaukee choice program or the Racine and statewide choice programs in the previous school year, the governing body of the private school must approve a plan for how it will use the amount of the reserve balance that exceeds 50% of the total amount the private school received under the choice programs in the previous school year. If the private school does not maintain a cash and investment balance that is at least equal to its reserve balance, the private school must refund the reserve balance to the department.

By August 1 before the first school year a new school participates in the program, or by May 1 if the school begins participating in the program during summer school, each school participating in the program must submit to DPI:

1. For a private school participating in the Racine or Milwaukee programs, a copy of the school's current certificate of occupancy issued by the municipality within which the school is located. If the school moves to a new location, the school must submit a copy of the new certificate of occupancy issued by the municipality within which the school is located to DPI before pupils attend school at the new location and before the next membership count date (either the third Friday in September or the second Friday in January). If the municipality within which the school is located does not issue certificates of occupancy, the school may submit a certificate issued by the local or regional governmental unit with the authority to issue certificates or a letter or form from the municipality that explains that the municipality does not issue certificates of occupancy. By law, a temporary certificate of occupancy does not meet this requirement.

2. Proof that the school's administrator has participated in a fiscal management training program approved by DPI.

Audit Requirements. Annually, by October 15 following a school year in which a school participated in the choice program, the school must

submit to DPI:

1. An independent financial audit of the private school conducted by an independent certified public accountant, accompanied by the auditor's statement that the report is free of material misstatements and fairly presents the private school's eligible education expenses. Eligible education expenses are defined in law as all direct and indirect costs associated with a private school's educational programming for pupils enrolled in grades K-12 that are reasonable for the private school to achieve its educational purposes, as determined by the governing body of the private school in a written policy and tested by an independent auditor. Eligible education expenses include those related to management, insurance, transportation, extracurricular programming and activities, facility and equipment costs, development expenses, and child care programming. A cost is not included if an independent auditor determines, after testing, that it is not associated with the private school's educational programming for pupils enrolled in grades K-12 that is reasonable for the private school to achieve its educational purposes, as determined by the governing body of the private school in a written policy.

If the school annually received a total of \$100,000 in payments under the three choice programs and the special needs scholarship program, the audit must be conducted in accordance with generally accepted accounting principles, with allowable modifications for long-term fixed assets. If the school has not received at least \$100,000 in any year, the audit must be prepared as prescribed by DPI by rule.

The audit must include a calculation of the private school's net eligible education expenses and a calculation of the balance of the private school's fund for future eligible education expenses. The audit must be conducted in accordance with the auditing standards established by the American Institute of Certified Public Accountants, and DPI

is prohibited from requiring that an auditor comply with standards that exceed the scope of the standards of the American Institute of Certified Public Accountants.

If a private school participating in a choice program is part of an organization and the private school and the organization share assets, liabilities, or eligible education expenses, the private school may submit an audit of the private school or of the organization of which it is a part. If the school chooses to submit an audit of only the private school, the independent auditor is required to use his or her professional judgement to allocate any shared assets, liabilities, and eligible education expenses between the organization and the private school. If a private school participates in more than one choice program, the school may submit one comprehensive financial audit to satisfy the audit requirements.

2. Beginning in the second school year a private school participates in a choice program, a copy of a management letter prepared by the auditor.

3. Evidence of sound fiscal and internal control practices, as prescribed by DPI by rule. An independent auditor engaged to evaluate the private school's fiscal and internal control practices must conduct his or her evaluation, including determining sample sizes, in accordance with attestation standards established by the American Institute of Certified Public Accountants. The fact that a private school reports a negative reserve balance alone is not evidence that the private school does not have the financial ability to continue operating or that the private school does not follow sound fiscal and internal control practices. The independent auditor engaged to evaluate the private school's fiscal and internal control practice must also review any concerns raised in the private school's management letter.

4. If an independent auditor engaged to

evaluate the private school's fiscal and internal control practice determines that the governing body of the private school has not taken reasonable actions to remedy any concerns raised in the management letter submitted in the previous school year, a report prepared by the independent auditor must be included that addresses the auditor's findings related to the governing body's actions to remedy any concerns related to the governing body's actions to remedy any concerns raised in the management letter for the previous school year.

After receiving the audit information, DPI must notify each private school whether or not additional information is required for DPI to complete its review of the audit by no later than February 15, or 120 days after the date on which the audit was received, whichever is later. DPI may request that an auditor provide additional information if the request is related to DPI's review of the audit. DPI must determine whether the school has provided the information and met the requirements by April 1. Prior to April 1, DPI may contact the auditor who prepared the independent financial audit only regarding matters that may impact the school's financial statement by an amount that is greater than 1% of the total amount the school received for the previous school year and any items or information DPI determines is missing from the audit. DPI may communicate with an auditor as necessary for the purpose of assessing the financial viability of a private school participating in the program. An auditor who receives a written communication must respond to DPI within 10 school days of receiving the written communication.

Surety Bond. By May 1 before the first term that a private school participates in a choice program, the school must submit to DPI one of the following: (a) a surety bond payable to the state in an amount equal to 25% of the total amount of payments the school expects to receive under the three choice programs in the first year; or (b) a complete anticipated budget, on a form provided

by DPI, for the first fiscal period of the school's participation and evidence of financial viability, including anticipated total enrollments and enrollments of choice pupils, estimated revenues and costs, a schedule of anticipated beginning and ending net choice program assets, a schedule of monthly cash flow requirements, and contingent funding sources to be used if enrollments are lower than expected.

If the school submits a surety bond, the school must annually provide a surety bond equal to 25% of its anticipated payments until the private school submits all of the following to DPI: (a) a financial audit prepared in accordance with generally accepted accounting principles with allowable modifications for long-term fixed assets that does not contain any indicators that the private school is not financially viable; and (b) evidence of sound fiscal and internal control practices for the school year for which the audit is provided and one subsequent school year, neither of which indicate that the school is not financially viable.

If the school submits a complete anticipated budget, DPI must determine whether the school is financially viable by August 1. If DPI determines that the school is not financially viable, the private school is not eligible to participate in any choice program in the current school year.

Staff Credentials. With certain exceptions, all teachers and administrators in a school participating in the choice program are required to have a bachelor's degree or an educational credential higher than a bachelor's degree, including a masters or doctorate, from a nationally or regionally accredited institution of higher education or a teaching or administrator's license issued by DPI. For the purposes of this requirement, a teacher is defined as a person who has primary responsibility for the academic instruction of pupils. An administrator is defined as the superintendent, supervising principal, executive director, or other person who acts as the administrative head of the school.

Neither a teacher in a choice school who teaches only courses in rabbinical studies, nor an administrator of a choice school that prepares and trains pupils in rabbinical studies, is required to have a bachelor's degree.

Any teacher's aide employed by a choice school is required to have graduated from high school, been granted a declaration of equivalency of high school graduation, been granted a high school diploma by the administrator of a home-based educational program, been issued a general education development certificate of high school equivalency, or has obtained a degree or credential higher than a high school diploma.

Additionally, beginning in the 2018-19 school year, each private school participating in a choice program must conduct criminal background investigations of its employees and exclude from employment any person not permitted to hold a teaching license as the result of an offense and any person who might be reasonably believed to pose a threat to the safety of others.

School Accreditation. A choice school must achieve accreditation by December 31 of the third school year following the first school year in which it participates in the choice program. The statutorily-recognized accrediting agencies are Cognia, Inc., Wisconsin Religious and Independent Schools Accreditation, Independent Schools Association of the Central States, Wisconsin Evangelical Lutheran Synod School Accreditation, National Lutheran School Accreditation, Wisconsin Association of Christian Schools, Christian Schools International, Association of Christian Schools International, the diocese or archdiocese within which the school is located, and any other organization recognized by the National Council for Private School Accreditation.

If, during the accrediting process, an accrediting agency determines that a school does not meet all of the current law requirements for a private

school, the accrediting agency must report that failure to DPI. Under current law, an institution is considered a private school if its education program meets the following criteria: (a) the primary purpose of the program is to provide private or religious-based education; (b) the program is privately controlled; (c) the program provides at least 875 hours of instruction each school year, although more hours are required under the choice program as described later; (d) the program provides a sequentially progressive curriculum of fundamental instruction in reading, language arts, mathematics, social studies, science, and health; (e) the program is not operated or instituted for the purpose of avoiding or circumventing the compulsory school attendance requirement; and (f) the pupils in the institution's educational program, in the ordinary course of events, return annually to the homes of their parents or guardians for not less than two months of summer vacation, or the institution is licensed as a child welfare agency.

If a private school participating in the choice program is accredited to offer instruction in any high school grade, but not any elementary grade and seeks to begin offering elementary grades, the school must apply for and achieve accreditation to offer the elementary grades. If a school is accredited to offer instruction in any elementary grades but not high school grades and seeks to begin offering high school grades, the school must apply for and achieve accreditation in the high school grades.

A private school that is a first-time participant in the choice program and that is not accredited must obtain preaccreditation by August 1 before the first school term of participation in the program, or by May 1 if the school begins participating in the program during summer school. Preaccreditation is defined as the review and approval of an educational plan. This review includes consideration of whether the school submitting the plan meets the statutory requirements of a private school.

Schools may seek preaccreditation from the following entities: the Institute for the Transformation of Learning (ITL) at Marquette University, Wisconsin North Central Association, Wisconsin Religious and Independent Schools Accreditation, Independent Schools Association of the Central States, Wisconsin Evangelical Lutheran Synod School Accreditation, National Lutheran School Accreditation, Wisconsin Association of Christian Schools, Christian Schools International, Association of Christian Schools International, or the diocese or archdiocese within which the school is located. In any school year, a private school may apply for and seek to obtain preaccreditation from only one of the above-listed entities. A school that fails to obtain preaccreditation in a school year may apply for and seek to obtain preaccreditation from one of the above-listed entities in the following school year.

By law, the fact that a school has obtained preaccreditation does not require an accreditation organization to accredit the private school. If, during the preaccreditation process, an entity determines that a school does not meet the statutory requirements of a private school, it must report that information to DPI. An accredited school is not required to obtain preaccreditation as a prerequisite to providing instruction to additional grades or in an additional or new school.

After achieving accreditation, a school must maintain its accreditation from an approved accrediting entity for as long as the private school continues to participate in the choice program. If a school learns that its accrediting entity has been disqualified, the school must immediately notify DPI in writing and must obtain accreditation from an approved organization no more than three years from the date on which it learned its accrediting organization was disqualified. Schools are required to provide evidence of accreditation to DPI annually by August 1 in the form of a notice prepared by an accrediting entity confirming the school's accreditation, and to notify DPI if its accreditation status changes.

Pupil Testing. Private choice schools with at least 20 choice pupils enrolled in grades 3-12 must administer the examinations adopted or approved by the State Superintendent to all pupils in grades 4, 8, 9, 10, and 11 who are attending the school through the choice program. Choice schools are also required to administer the 3rd grade standardized reading test developed by DPI to all choice pupils in that grade.

Choice schools with at least 20 choice pupils must also administer all tests in reading, mathematics, and science that are required for public school pupils under federal law to all choice pupils in the relevant grades. Federal law currently requires that all pupils be tested in reading and math each year in 3rd through 8th grades and once in high school, and in science once each in elementary, middle, and high school. The Wisconsin Forward exam is used to assess Wisconsin pupils, including choice pupils, in 3rd through 8th grades in English language arts, math, and science. Pupils in grades 9 through 11 participate in assessments developed by ACT, which test skills including reading and math. Choice schools are also authorized to administer additional standardized tests to choice pupils.

A choice school must excuse a pupil from taking standardized examinations if the pupil's parent or guardian requests it. Choice schools must include special education pupils in these assessments and provide appropriate accommodations and alternate assessments where necessary and as indicated in a pupil's individualized education program. A choice school, in accordance with criteria established by the State Superintendent, may determine not to administer an examination to a limited-English speaking pupil, may permit the pupil to be examined in his or her native language, or may modify the format and administration of an examination for such pupils.

When calculating the percentage of choice pupils at each proficiency level, DPI is required to use the number of pupils to whom the

examinations were administered at each grade level in the school, excluding pupils whose parents requested that they be excused from the examinations, rather than the total number of pupils enrolled at each grade level. DPI publishes testing results from private choice schools on its website (<http://dpi.wi.gov/assessment/parental-choice-program/data>). When releasing data about pupil test scores, DPI is required to release the data all at the same time, uniformly, and completely.

Additionally, any private school participating in a private school choice program is prohibited from granting a high school diploma to any pupil who has not successfully completed the state civics assessment. Under state law, the civics assessment consists of 100 questions that are identical to the questions that may be asked of a person during the process of applying for U.S. citizenship by the United States Citizenship and Immigration Services. A pupil must answer at least 65 out of 100 questions correctly to pass the assessment, and a pupil who does not pass the assessment can retake it until he or she achieves a passing score. Pupils with disabilities are required to complete the assessment, unless their individualized education plan specifies that the test should not be administered, but do not need to achieve a passing score in order to graduate. Pupils with limited English proficiency must be allowed to take the assessment in their language of choice. The private school may determine the format and timing of the assessment.

Accountability Reports. If a private choice school maintains an Internet site and is included in the most recent school accountability report, the school is required to post a prominent link to the pages in that most recent accountability report concerning the school. The link must be posted on the homepage of the school's Internet site within 30 days after DPI publishes the accountability report.

Private choice schools were included in the

state accountability reports for the first time in the reports issued in Fall, 2016, using data from the 2015-16 school year. An accountability report is issued for every choice school based on data from choice pupils only. Each choice school can also choose to receive a second accountability report that includes all pupils attending the private school if the school submits data for all pupils at the school to DPI. The accountability reports can be found online at <http://apps2.dpi.wi.gov/report-cards/>.

All choice schools are required to use a student information system that is compatible with DPI's data collection system to provide information required for the accountability reports. Choice schools are only required to provide information about pupils attending the school under a choice program, unless the school chooses to receive an accountability report that includes all pupils attending the school.

Academic Standards. Choice schools must adopt pupil academic standards in mathematics, science, reading and writing, geography, and history. Academic standards include content, performance, and proficiency standards that specify what pupils should know and be able to do, how pupils will demonstrate they are meeting a standard, and how well pupils must perform in a given subject area.

Pupil Promotion. A choice school must adopt a written policy specifying criteria for promoting choice pupils from 4th to 5th grade and from 8th to 9th grade. The criteria must include: (a) the pupil's scores on standardized assessments, unless the pupil has been excused from taking examinations; (b) the pupil's academic performance; (c) teacher recommendations, which must be based solely on the pupil's academic performance; and (d) any other academic criteria specified by the school. A choice school is prohibited from promoting a choice pupil from the 4th to 5th grade and 8th to 9th grade unless the pupil satisfies the criteria

specified in the school's policy.

A choice school must also develop a policy specifying the criteria for granting a high school diploma to a choice pupil. The criteria must include the pupil's academic performance and teacher recommendations, as well as successful completion of the state civics assessment. A choice school is prohibited from granting a high school diploma to a choice pupil unless the pupil has satisfied the criteria specified in the school's policy. A choice school must issue a diploma to a choice pupil who satisfactorily completes the course of instruction and any other requirements necessary for high school graduation.

Hours of Pupil Instruction. A school participating in the choice program must annually provide at least 1,050 hours of direct pupil instruction in grades 1 to 6 and at least 1,137 hours of direct pupil instruction in grades 7 to 12. These requirements currently apply to public school districts. Under current law, private schools not participating in the choice program are required to provide at least 875 hours of instruction each school year for each grade.

Required Meetings. Choice schools are required to annually schedule two meetings at which members of the governing body of the school will be present and at which pupils and the parents or guardians of pupils applying to attend the school or attending the school may meet and communicate with the members of the governing body. Within 30 days after the start of the school term, schools must notify DPI in writing of the scheduled meeting dates and, at least 30 days before the scheduled meeting date, must notify in writing each pupil or the parent or guardian of each minor pupil applying to attend the school or attending the school of the meeting date, time, and place.

Visitor Policy. Choice schools must develop a written policy governing visitors and visits to the school.

Pupil Records. Choice schools are required to maintain pupil applications and correspondence to or about a pupil attending the school under a choice program for a period of at least five years. Documents can be retained electronically or in paper format.

Additionally, choice schools must maintain progress records for each pupil attending the school under the choice program while the pupil attends the school and for at least five years after the pupil ceases to attend the school.

If a choice school ceases operating, it must immediately transfer all of the progress records of choice pupils to the school board of the district within which the pupil resides and send written notice of this transfer to each pupil, or to the parent or guardian of a minor pupil. If the school that ceases operation is affiliated with an organization that will maintain the progress records of each choice pupil who attended the school for at least five years after the school ceases operation, the school may instead transfer a pupil's records to that organization, rather than to the school district, if the pupil or the parent or guardian of a minor pupil consents in writing to the release of the progress records to the affiliated organization. The school must send a signed written notice from each pupil or the parent or guardian of each minor pupil who consents to the transfer of progress records under this provision to DPI. The written notice must include the name, phone number, mailing address, and other relevant contact information of the organization that will maintain the progress records, and a declaration by the affiliated organization that the organization agrees to maintain the progress records for at least five years after the school ceases operation.

Choice schools are required to provide a choice pupil or the parent or guardian of a choice pupil with a copy of the pupil's progress records upon request.

If a choice school receives written notice that a

pupil intends to enroll or has enrolled in another school or school district, the school must transfer all pupil records for that pupil to that school or school district no later than the next working day.

Provision of Information. Each school participating in the choice program must provide to DPI upon request, and to each pupil, or the parent or guardian of each minor pupil, who applies to attend the school all of the following information:

a. the name, address, and telephone number of the school and the name of one or more contact persons at the school;

b. a list of the names of the members of the school's governing body and of the school's shareholders, if any;

c. a notice stating whether the school is an organization operated for profit or not for profit, and, if the school is a nonprofit organization, a copy of the certificate issued under section 501(c)(3) of the Internal Revenue Code verifying the school's status;

d. a copy of the appeals process used if the school rejects the applicant;

e. a copy of the policy developed by the school specifying the criteria for granting a high school diploma;

f. a copy of the non-harassment policy used by the school and the procedures for reporting and obtaining relief from harassment;

g. a copy of the suspension and expulsion policies and procedures used by the school and the procedures for appealing a suspension or expulsion;

h. a copy of the policy used by the school for accepting or denying the transfer of credits earned by a choice pupil for the satisfactory completion of coursework at another school; and

i. a copy of the written policy developed by the school governing visitors and visits to the school.

A choice school must also provide to DPI pupil scores on required standardized tests, to the extent permitted under the federal Family Educational Rights and Privacy Act, for each of the previous five years in which the school has participated in the choice program. Test scores must be submitted by August 1 of each year.

Choice schools must provide all of the above information upon request to any pupil, or to the parent or guardian of any minor pupil, who is attending or who applies to attend the school.

Choice schools must also provide to DPI a signed statement from each individual who is a member of the school's governing body verifying their role in the school upon the individual's joining the schools governing body.

Indoor Environmental Quality. Schools participating in the choice program are required to develop and implement a plan for maintaining environmental quality in the school. Prior to choice schools developing their plans, DPI developed a model management plan and practices.

Choice schools are required to develop a plan for maintaining indoor environmental quality by October 1 of a school's first year in the choice program. Schools are required to implement the plan by the beginning of a school's second year in the choice program. Choice schools are required to provide a copy of the plan to any person upon request.

Removal of Schools from the Program. The State Superintendent can issue an order immediately terminating a school's participation in the choice program if he or she determines that conditions at the school present an imminent threat to the health or safety of pupils.

The State Superintendent may issue an order barring a school from participating in the program in the current school year if he or she determines that the school has done any of the following:

1. Intentionally or negligently misrepresented any information required under statute or administrative rule.

2. Failed to provide the notice of intent to participate and pay the auditor fee by February 1.

3. Failed to provide information required under the financial audit, including evidence of sound fiscal and internal control practices as evaluated by an independent auditor, by the dates specified in statute.

4. Failed to provide the certificate of occupancy or proof that the school's administrator has participated in a fiscal management training program approved by DPI by August 1.

5. Failed to refund to the state any overpayment made by the date specified by DPI rule (generally within 45 or 60 days of notification).

6. Failed to provide any of the information listed above under "*Provision of Information*" to a pupil or a parent or guardian of a minor pupil who is attending or who applies to attend the school, or as required to DPI.

7. Failed to administer the 3rd grade reading test to choice pupils.

8. Failed to adopt pupil academic standards.

9. Failed to develop a written visitor policy.

10. Failed to ensure that teacher's aides have the required educational credentials.

11. Failed to comply with the various provisions regarding pupil records.

12. Failed to issue a diploma to a choice pupil who satisfactorily completes the requirements necessary for high school graduation.

13. Failed to comply with the provision regarding pupil participation in religious activities.

14. Failed to conduct background investigations of employees or exclude from employment any person not permitted to hold a teaching license because of an offense or any person who might reasonably be believed to pose a threat of the safety of others.

15. Failed to comply with requirements to provide a surety bond or complete anticipated budget and evidence of fiscal viability by May 1 before the first term the school participates in the program.

16. Retained a disqualified person. A disqualified person means a person who, when a school was barred or terminated from the program, satisfied at least one of the following criteria: (a) had a controlling ownership interest in, or was the administrator or an officer, director, or trustee, of the school; (b) was a person designated by the administrator of the school to assist in processing pupil applications; or (c) was responsible for an action or circumstance that led to the school being barred or terminated from the program. Such a person is disqualified for a seven-year period beginning on the date of the order issued by the State Superintendent. A school may be barred if it retains a disqualified person, for compensation or as a volunteer, as an owner, officer, director, trustee, administrator, person designated by the administrator to assist in processing pupil applications, or person responsible for administrative, financial, or pupil health and safety matters.

If the State Superintendent determines that any of the following have occurred, he or she may issue an order barring a choice school from participating in the program in the subsequent school year:

1. A school has not provided required evidence of accreditation or notified DPI if its accreditation status has changed.

2. A school's application for accreditation had been denied by an accrediting organization.

3. A school has not achieved accreditation within the statutorily required timeframe.

4. The private school has intentionally or negligently misrepresented any information required under statute or administrative rule.

The State Superintendent is required to bar a school from participating in the program at the end of the current school year if the State Superintendent determines that: (a) a school has failed to continuously maintain accreditation; (b) the governing body of the school has withdrawn the school from the accreditation process; or (c) that the school's accreditation has been revoked, denied, or terminated.

Whenever the State Superintendent issues an order barring a school from participating in the program, he or she must immediately notify the parent or guardian of each pupil attending the school. In addition, the State Superintendent may withhold payment from a school if it violates the section of law [s. 118.60 or s. 119.23] governing the program or current law requiring the use of a student information system.

In 2019-20, two schools were unable to enter the Milwaukee program, one school was unable to enter the statewide program, and one school was unable to enter the statewide or Racine program, due to the various accountability provisions. One school was removed from the statewide program and no schools were removed from the Milwaukee or Racine programs in 2019-20. Since 2003-04, 61 schools have been removed from the Milwaukee program. One school has been removed from the Racine program and two schools have been

removed from the statewide program since each program's inception.

Responsibilities of Public School Districts.

MPS, RUSD, and other districts are statutorily required to provide transportation to program participants, but only to the extent transportation is required to be provided for other private school pupils under current law. The districts are eligible to receive state categorical aids for pupils who are transported at the districts' expense.

Additionally, school districts are required to annually notify parents or guardians about educational options in the district, including private schools participating in a choice program. The information must be included as a link on the homepage of the district's Internet site. Public schools must also include a notice of educational options when providing the parent or guardian of each pupil enrolled in or attending the school with a copy of the school's annual accountability report.

Program Participation

Table 1 provides historical information on participation in the choice programs since 2001-02. A listing of the private schools participating in the Milwaukee program in 2020-21 and the September pupil headcount and FTE data for each school is shown in Appendix III. Similar information is shown for the Racine program in Appendix IV and the statewide program in Appendix V. The headcount and FTE data is unaudited and is therefore subject to revision.

Program Funding

The following section summarizes statutory

Table 1: Participation in the Choice Programs

Fiscal Year	Milwaukee		Racine		Statewide	
	Private Schools	Aid Membership	Private Schools	Aid Membership	Private Schools	Aid Membership
2001-02	102	10,497				
2002-03	102	11,304				
2003-04	106	12,882				
2004-05	117	14,071				
2005-06	125	14,604				
2006-07	124	17,088				
2007-08	122	18,558				
2008-09	127	19,428				
2009-10	111	20,372				
2010-11	102	20,256				
2011-12	106	22,220	8	219		
2012-13	112	23,812	11	485		
2013-14	110	24,776	13	1,169	25	499
2014-15	113	25,745	15	1,660	31	994
2015-16	117	26,470	19	2,057	82	2,483
2016-17	121	26,913	19	2,420	121	2,978
2017-18	125	27,697	23	2,852	153	4,359
2018-19	129	27,770	26	3,196	213	6,813
2019-20	130	27,912	27	3,490	254	9,315
2020-21*	131	27,805	25	3,764	280	11,740

*Preliminary

provisions regarding payments made under the choice programs since 2001-02.

Choice Payments. Under the choice programs, the State Superintendent is required to pay the school in which a pupil is enrolled, on behalf of the pupil's parent or guardian, from two separate, general purpose revenue (GPR) sum sufficient appropriations. This payment is made in four equal installments in September, November, February, and May of each school year. Each installment may consist of a single check for all pupils attending the school under the choice program.

In the 2020-21 school year, per pupil payments are equal to \$8,300 for a pupil enrolled in a grade from kindergarten to eight and \$8,946 for a pupil enrolled in a grade from nine to 12. In future years, payments will increase by the revenue limit per pupil adjustment, if positive, provided to school districts in the current year plus the change in total categorical aid funding per pupil, if positive, from the prior year to the current year.

If a private school enrolls pupils under the choice programs in any grade between K-8 and also in any grade between 9-12, the payment per pupil for that school is an amount determined by: (a) multiplying the number of choice pupils enrolled in the school in any grade between K-8 by the payment amount for those grades; (b) multiplying the number of choice pupils enrolled in the school in any grade between 9-12 by the payment amount for those grades; (c) adding those two amounts together; and (d) dividing that sum by the total number of choice pupils enrolled in the school.

The State Superintendent is also required to pay each choice school, on behalf of the parent or guardian, for choice pupils enrolled in a choice school for summer classroom or laboratory periods for necessary academic purposes. Annually, by September 15, each choice school is required to file a report with DPI stating the FTE number of pupils enrolled in summer programs who were attending the school on the second Friday of

**Table 2: Estimated Choice Program Costs (in Millions)
2019-20 and 2020-21**

	Milwaukee		Racine and Statewide		Total	
	2019-20	2020-21*	2019-20	2020-21*	2019-20	2020-21*
GPR	\$229.7	\$234.2	\$105.1	\$131.0	\$334.7	\$365.2
Aid Reduction	<u>36.8</u>	<u>30.0</u>	<u>95.5</u>	<u>121.5</u>	<u>132.3</u>	<u>151.5</u>
Net GPR	\$192.9	\$204.2	\$9.6	\$9.5	\$202.4	\$213.7

* Estimated

January of the school term immediately preceding that summer or whose applications had been accepted for attendance at the private school in the school term immediately following that summer. To be eligible for summer school payments, the school must offer at least 19 days of summer instruction, and each of those days must be equal to at least 270 minutes of instruction. If a pupil attends summer school for at least 15 days of instruction, the payment is equal to 0.05 multiplied by the per pupil payment for the preceding school year. If the pupil attends fewer than 15 days of instruction, the payment is calculated by multiplying 0.05 by the per pupil payment for the preceding year, and multiplying the result by the number of days the pupil attended summer school divided by 15. The State Superintendent must include the entire summer school payment with the November installment, but the summer payment must be made in a separate check.

If a choice school closes after the third Friday in September in a given school year, the school district in which the pupil resides receives a share of any choice payments for that school year that have not yet been paid to the choice school on behalf of that pupil if the pupil enrolls in the public school district in that year. The payment equals the choice per pupil amount as defined above times 61.6% (the state's share that applied in 2012-13) times 25% for each of the remaining installment payments for that pupil. Payments are made from a sum sufficient appropriation from the general fund for this purpose. No funding was paid from this appropriation in 2019-20.

Choice Funding. Table 2 shows the gross

GPR appropriation for the Milwaukee program and the Racine and statewide programs in 2019-20 and 2020-21, as well as the aid reduction and net GPR cost for each.

The Milwaukee private school choice program is funded through a combination of state GPR and local funding. Under the program, payments to private schools are made from a sum-sufficient GPR appropriation. To partially offset the cost of the program, an aid reduction is made to the aid that would otherwise be paid to MPS equal to a percentage of the total cost of the program. In 2020-21, the aid reduction equals 12.8%. The aid reduction will equal 9.6% in 2021-22, and will continue to decrease by 3.2 percentage points in each year until the program is fully state funded after 2024-25. MPS can levy property taxes to make up for the aid reduction.

In the October 15, 2020, general school aids distribution, DPI used an estimate of \$234.2 million for the total cost of the Milwaukee choice program in 2020-21. As a result, the general aid that would otherwise be paid to MPS was reduced by 12.8% of that amount (\$30.0 million) to partially offset the GPR cost of the Milwaukee program. In 2020-21, MPS will receive \$5.0 million in high poverty aid. After consideration of those aid payments, the net aid reduction for MPS related to the choice program is \$25.0 million, which represents 4.1% of the district's estimated 2020-21 gross aid eligibility, and 10.7% of the cost of the Milwaukee program. MPS levied the maximum allowed under revenues limits and backfilled this aid reduction with levy. The state's general fund bears the remaining \$204.2 million cost of the Milwaukee

program. As a result, the net funding split for the Milwaukee program in 2020-21 is 89.3% state general fund/10.7% MPS.

Table 3 summarizes state funding for the Milwaukee program since 2005-06. The per pupil amount and aid reductions shown in the table are those determined under the relevant statutory provisions that applied in the indicated year. The total state payment and aid reduction figures are based on the October general aid distributions prepared by DPI. The city choice program aid is included in the initial general aid reduction numbers. The final figures may have been adjusted based on final choice participation and aid eligibility data. Finally, it should be noted that the choice program funding data in Table 3 reflect only the amount and incidence of the aid reduction from the general school aids appropriation. The interactions of the choice program with the revenue limit and

equalization aid formulas are not addressed in Table 3.

For the statewide and Racine private school choice programs, per pupil payments for legacy pupils (pupils who first participated in the 2014-15 school year or prior) are fully funded through state GPR. Payments for all other pupils are funded through a reduction in the state aid that would otherwise be paid to those pupils' school districts of residence.

To make up for the aid reduction for pupils who first participated in the Racine or statewide program in 2015-16 or later, school districts receive a revenue limit adjustment for each pupil in the current year equal to the aid reduction. If a school district chooses to levy to the maximum, its total resources are unaffected by the choice aid reduction, because it replaced the aid reduction with

Table 3: State Funding of the Milwaukee Private School Choice Program Since 2005-06 (\$ in Millions for Program Estimates and Aid Reductions)

	Aid Membership	Per Pupil Amount	Choice Program Estimate	MPS			Net GPR After Aid Reduction
				General Aid Reduction	High Poverty Aid	Net Aid Reduction	
2005-06	14,604	\$6,351	\$93.7	\$42.2		\$42.2	\$51.5
2006-07	17,088	6,501	110.5	49.7		49.7	60.8
2007-08	18,558	6,501	120.3	54.1	\$7.4	46.7	73.6
2008-09	19,428	6,607	128.8	58.0	9.9	48.1	80.7
2009-10	20,372	6,442	130.1	54.1	9.7	44.4	85.7
2010-11	20,256	6,442	130.8	50.2	9.7	40.5	90.3
2011-12	22,220	6,442	144.3	55.4	5.8	49.6	94.7
2012-13	23,812	6,442	154.6	59.4	5.8	53.6	101.0
2013-14	24,776	6,442	161.1	56.7	4.8	51.9	109.2
2014-15	25,745	7,210 (K-8)					
		7,856 (9-12)	191.0	61.1	4.8	56.3	134.7
2015-16	26,470	7,214 (K-8)					
		7,860 (9-12)	196.4	56.6	5.3	51.3	145.1
2016-17	26,913	7,323 (K-8)					
		7,969 (9-12)	203.7	52.1	5.3	46.8	156.9
2017-18	27,697	7,530 (K-8)					
		8,176 (9-12)	213.3	47.8	6.3	41.5	171.8
2018-19	27,770	7,754 (K-8)					
		8,400 (9-12)	221.8	42.6	6.3	36.3	185.5
2019-20	27,912	8,046 (K-8)	229.7	36.8	5.0	31.8	197.9
		8,692 (9-12)					
2020-21*	27,805	8,300 (K-8)	234.2	30.0	5.0	25.0	204.2
		8,946 (9-12)					

*Preliminary

local levy. School districts also include these pupils in their pupil count for membership in calculating state general aid in the following aid year.

In the October 15, 2020, general school aids distribution, DPI used an estimate of \$31.8 million for the cost of the Racine program and \$99.2 million for the cost of the statewide program in 2020-21. The aid reduction was equal to \$25.7 million for the Racine program and \$95.8 million for the statewide program. Aid reductions were made to school districts on behalf of resident pupils participating in the statewide program. Appendix VI shows the aid reduction made to each district attributable to choice pupils in 2020-21.

Table 4 presents information on state funding for the Racine and statewide programs since their inception.

Special Needs Scholarship Program

The special needs scholarship program was created under 2015 Act 55. Pupils first participated in the program in the 2016-17 school year. To be eligible to participate in the program,

a pupil must have an individualized education program (IEP) or services plan in effect, and submit an application to a private school that is participating in the program at any time during the school year. For the special needs scholarship program, no income limits or participation limits apply.

To participate in the program, the pupil's parent or guardian must agree to make the pupil available for a reevaluation within 60 days following a request for a reevaluation. The reevaluation must be conducted by the IEP team appointed by the pupil's school district of residence, unless the pupil is attending a private school in a nonresident district and the pupil's parent or guardian provides written consent for an IEP team appointed by that nonresident district to conduct the reevaluation. The reevaluation may be conducted no more than once every three years, starting from the pupil's most recent evaluation or the date the pupil began participating in the special needs scholarship program, upon the request of the school board of the pupil's resident school district.

Once accepted to the program, a pupil is eligible to continue receiving a scholarship until the pupil graduates from high school or until the end of the school term in which the pupil turns 21,

Table 4: State Funding for the Racine and Statewide Private School Choice Programs (\$ in Millions)

	<u>Racine Private School Program</u>				<u>Statewide Private School Choice Program</u>			
	Aid Membership	Estimated Payment	General Aid Reduction	Net GPR After Aid Reduction	Aid Membership	Estimated Payment	General Aid Reduction	Net GPR After Aid Reduction
2011-12	219	\$1.6	\$0.6	\$1.0	0	\$0.0	\$0.0	\$0.0
2012-13	485	3.2	1.2	2.0	0	0.0	0.0	0.0
2013-14	1,169	7.5	0.0	7.5	499	3.2	0.0	3.2
2014-15	1,660	12.2	0.0	12.2	994	7.3	0.0	7.3
2015-16	2,057	15.1	4.2	10.9	2,483	18.4	11.9	6.5
2016-17	2,420	18.0	8.8	9.2	2,978	22.4	16.7	5.7
2017-18	2,852	21.9	14.0	7.9	4,359	33.6	28.8	4.8
2018-19	3,242	25.3	18.3	7.0	6,878	54.0	50.0	4.0
2019-20	3,490	28.6	22.3	6.3	9,315	76.5	73.2	3.3
2020-21*	3,764	31.8	25.7	6.1	11,740	99.2	95.8	3.4

*Preliminary

whichever comes first.

Requirements for Participating Schools. To be eligible to participate in the program, a private school must be approved as a private school by the state superintendent or be accredited by one of the following entities as of the August 1 preceding the school term in which a pupil will first attend the school under the program: (a) Cognia, Inc; (b) Wisconsin Religious and Independent Schools Accreditation; (c) the Independent Schools Association of the Central States; (d) Wisconsin Evangelical Lutheran Synod School Accreditation; (e) Wisconsin Association of Christian Schools; (f) National Lutheran School Accreditation; (g) Christian Schools International; (h) Association of Christian Schools International; (i) the diocese or archdiocese within which the eligible school is located; or (j) any other organization recognized by the National Council for Private School Accreditation.

Each participating school is required to notify DPI of its intent to participate and the number of spaces the school has available for pupils participating in the program. Upon receiving an application from a pupil, the private school must determine whether the pupil meets the eligibility requirements for the program, and must request verification from the school district that developed the pupil's IEP or services plan and notify the district that the pupil will participate in the program pending verification of the eligibility requirements. If the school receives more applications than the number of available spaces, the school must accept applicants in the order in which their applications were received, except that preference may be given to the siblings of pupils who are already attending the school. Upon accepting an application to attend the school under the program, the private school must notify DPI.

Each participating private school must meet the following requirements: (a) comply with all health and safety laws that apply to public schools; (b) hold a valid certificate of occupancy, if

required by the municipality in which the school is located, or obtain a certificate of occupancy from another local government unit or letter from the municipality in which the school is located if the municipality does not issue certificates of occupancy; (c) comply with federal law prohibiting discrimination on the basis of race, color, or national origin; (d) conduct criminal background investigations of its employees and exclude from employment any person not permitted to hold a teaching license as a result of an offense and any person who might reasonably be believed to pose a threat to the safety of others; (e) provide each applicant with a profile of the school's special education program, in a form prescribed by DPI, that includes the methods of instruction that will be used to provide special education and related services to the pupil, and the qualifications of the teachers and others who will be providing special education services; (f) implement the pupil's most recent IEP or services plan as modified by agreement between the school and the pupil's parent, and other related services agreed to by the private school and the pupil's parent; (g) provide all records relating to the implementation of a pupil's IEP or services plan within five days of receiving a request from the pupil's resident school board; (h) regularly report to each participating pupil's parent on the pupil's progress; (i) administer state assessments to a participating pupil upon the request of the pupil's parent, if the school administers assessments to any pupils attending the school; and (j) file a summer daily attendance report with DPI no later than September 15 of each year.

Participating schools must also submit an annual independent financial audit to DPI by the October 15 following each year in which the school participates in the program. The audit must be conducted by an independent certified public accountant, and must be conducted in accordance with the auditing standards of the American Institute of Certified Public Accountants (AICPA). DPI is prohibited from requiring the audit to comply with standards that exceed the

scope of the standards established by AICPA. The audit must be accompanied by the auditor's statement that the report is free of material misstatements and fairly presents the school's eligible education expenses, and beginning in the second year of the school's participation, must be accompanied by a copy of a management letter prepared by the auditor. If the school receives at least \$100,000 in payments from the special needs scholarship program and the choice programs, the audit must be prepared in accordance with generally accepted accounting principles with allowable modifications for long-term fixed assets. If the payments total a lesser amount, the audit must be prepared as prescribed by DPI by rule. The audit must include a calculation of the school's net eligible education expenses and the balance of the school's fund for future eligible education expenses. If the private school is part of an organization with which it shares assets, liabilities, or eligible education expenses, the school may submit an audit of the organization or of the school only, with the auditor using his or her professional judgement to allocate any shared assets, liabilities, or eligible education expenses between the organization and the school. If a school participates in the special needs scholarship program and other choice programs, the school may submit one comprehensive financial audit that includes the information required by all programs. Each private school participating in the program is subject to uniform financial accounting standards established by DPI.

Private schools that expect to receive at least \$50,000 in scholarships in a school year must do one of the following before the beginning of the school year: (a) file with DPI a surety bond payable to the state equal to 25% of the total amount of scholarships expected to be received in that school year; or (b) file with DPI financial information demonstrating that the private school has the ability to pay an amount equal to the total amount of scholarships expected to be received in that school year.

Requirements for DPI. DPI is required to develop a document for inclusion with a pupil's application to participate in the program that compares rights for a pupil with a disability and his or her parent attending a public school with rights for such a pupil and his or her parents attending a private school under the special needs scholarship program. Receipt of the document constitutes notice that the pupil has been informed of his or her rights, and acceptance of a scholarship constitutes informed acknowledgement of the rights specified in the document.

DPI may bar a private school from participating in the program and withhold payments if it determines that the private school has done any of the following: (a) intentionally or negligently misrepresented information required under state law or administrative rule; (b) routinely failed to comply with audit and other financial management requirements under state law; (c) used a pupil's scholarship for any purpose other than educational purposes or rebated, refunded, or shared a scholarship payment with a pupil or a pupil's parent or guardian; or (d) failed to refund to the state, within 60 days, any scholarship overpayments. If DPI bars a private school from participating in the program, it must notify all pupils eligible to participate in the program and their parents as quickly as possible. A pupil who is receiving a scholarship and attending a private school barred from the program may continue to receive the scholarship if he or she attends another participating private school.

Requirements for Public School Districts. School districts are required to notify the parents of each pupil with a disability enrolled in the school district about the program. If a pupil residing in the district applies for the program, the school district must provide a private school with a pupil's IEP or services plan within five days of receiving a request for the IEP from the private school. Additionally, upon the request of a

participating pupil's parent, the resident school board is required to administer state assessments to the pupil at no cost if the private school the pupil attends does not administer the assessments to any pupil attending the school.

Program Payments. Per pupil payments are equal to \$12,977 in 2020-21, and in future years will increase by the revenue limit per pupil adjustment, if positive, provided to school districts in the current year plus the change in total categorical aid funding per pupil, if positive, from the prior year to the current year.

Payments are also made for summer school if the school offers at least 19 days of summer instruction, and each of those days is equal to at least 270 minutes of instruction. If a pupil attends summer school for at least 15 days of instruction, the payment is equal to 0.05 multiplied by the per pupil payment for the preceding school year. If the pupil attends fewer than 15 days of instruction, the payment is calculated by multiplying 0.05 by the per pupil payment for the preceding year, and multiplying the result by the number of days the pupil attended summer school divided by 15.

If an IEP team reevaluates the pupil and determines that he or she no longer has a disability, the pupil may continue to attend the private school he or she attends under the program, but payments are reduced to the amount applicable to the Milwaukee, Racine, and statewide choice programs beginning in the next school term. Payments continue to be made from the appropriation for the special needs scholarship program.

Payments made in four equal installments in September, November, February, and May of each school year. Each installment may consist of a single check for all pupils attending the school under the choice program.

Program Funding. Payments are funded through a reduction in the state aid that would otherwise be paid to pupils' school districts of

residence.

To make up for the aid reduction, school districts receive a revenue limit adjustment for each pupil in the current year equal to the aid reduction. If a school district chooses to levy to the maximum, its total resources are unaffected by the choice aid reduction, because it replaced the aid reduction with local levy. School districts also include pupils in their pupil count for membership in calculating state general aid in the following aid year.

Beginning in 2018-19, a private school may submit a financial statement and supporting documentation to DPI showing the actual costs that the private school incurred to implement a pupil's most recent IEP or services plan, as modified by agreement between the school and the pupil's parent, and related services. The statement must be submitted at the end of the school year, and must be provided to the pupil's resident school board. If a school submits a financial statement for a pupil, the costs described in the statement are used to calculate the per pupil payment for that pupil in the following year. Up to 150% of the per pupil payment in that year is funded through an aid reduction to the pupil's school district of residence. If the total costs exceed that amount, the school is reimbursed for 90% of the remaining costs, but no corresponding aid reduction is made. (As a result, payments made for costs above 150% of the per pupil payment are funded through state GPR.) In 2020-21, a total of \$113,715 was paid to three schools on behalf of five participating pupils, based on the actual costs of educating those pupils in the 2019-20 school year.

In the October 15, 2020, general school aids distribution, DPI used an estimate of \$18.0 million for the cost of the program in 2020-21. Aid reductions totaling that amount were made to 124 school districts on behalf of resident pupils attending a private school under the program. Appendix VIII shows the aid reduction made to each district attributable in special needs scholarship pupils in

2020-21.

Table 5 shows membership, estimated payments, and general aid reductions for each year of the program.

Table 5: State Funding for the Special Needs Scholarship Program (\$ in Millions)

	Aid Membership	Estimated Payment	General Aid Reduction	Net GPR After Aid Reduction
2016-17	215	\$2.6	\$2.6	\$0.0
2017-18	240	3.0	3.0	0.0
2018-19	670	8.4	8.4	0.0
2019-20	1,000	13.1	13.1	0.0
2020-21	1,400	18.0	18.0	0.0

*Estimated

Program Participation. A listing of the private schools participating in the program in 2020-21 and the September pupil headcount and FTE data for each school is shown in Appendix VII.

Program Evaluation. 2015 Act 55 required the Legislative Audit Bureau to study the special needs scholarship program and submit a report to

the appropriate standing committees of the Legislature by January 9, 2019. The report was required to evaluate the following: (a) the level of satisfaction with the program expressed by participating pupils and their parents; (b) the percentage of participating pupils who were victimized because of their special needs at their resident school district and the percentage of such pupils at their private school; (c) the percentage of pupils who exhibited behavioral problems at their resident school district and the percentage of such pupils at their participating school; (d) the average class size at participating pupils' school district of residence and at their participating private schools; and (e) the fiscal impact of the program on the state and on resident school districts. The act required researchers conducting the study to do the following: (a) apply appropriate analytical and behavioral science methodologies to ensure public confidence in the study; and (b) protect the identity of participating schools and pupils.

The Audit Bureau submitted its report on the special needs scholarship program in July, 2018. An online version of the report can be found at the following website: <https://legis.wisconsin.gov/lab/media/2753/18-6full.pfd>.

APPENDIX I

Legal Challenges to the Choice Program

Once the choice program was enacted in 1990, its legality was immediately challenged. In May, 1990, the State Supreme Court was petitioned by several teacher, administrator, and parent groups and the Milwaukee branch of the NAACP to review the program. The petitioners argued that the program was unconstitutional because it violated: (1) the doctrine that public funds may be expended for only public purposes because the program "contains no educational controls, measures or standards of accountability;" (2) the state constitutional requirement that schools be as uniform as practicable; and (3) the state constitutional provision prohibiting the Legislature from passing a private or local provision as part of a multi-subject bill.

Although the State Supreme Court denied the request, six private schools in Milwaukee and several pupils and their parents wishing to participate in the program brought an action before the Circuit Court of Dane County (*Davis v. Grover*) seeking to compel the State Superintendent to immediately implement the program and to prohibit the State Superintendent from imposing any requirements on participating schools beyond those already specified in the private school choice law. The parties who previously requested the Supreme Court to review the program joined as intervenors in the Circuit Court action asking again that the law be declared unconstitutional.

In August, 1990, the Circuit Court ruled that the program was not unconstitutional. With regard to the public purpose challenge, the Court concluded that education is a public purpose and that the choice program is the Legislature's attempt "to improve the quality of education to the benefit of the entire state." Further, the Court held that the legislation "has sufficient accountability

and control to maintain its public purpose." With regard to the uniformity clause challenge, the Court reasoned that the private schools participating in the program do not become public school districts even though they accept public school pupils and are, therefore, not required to meet the statutory standards required of public school districts. Finally, the Court dismissed the local/private bill challenge by concluding that the legislation is intended to have "a direct and immediate effect on a specific statewide concern or interest" and, therefore, is "neither a local nor a private law."

In addition, the Circuit Court ruled that while the State Superintendent has the authority to ensure that participating schools meet the requirements both of the private school choice law and of other state and federal provisions, "he may not insist on compliance in a manner more onerous or demanding than that insisted upon for other participating programs and public schools." The Circuit Court opinion also agreed with the U.S. Department of Education that the private schools in the program were not required to comply with federal and state laws regarding education for children with disabilities. While the private schools may not deny qualified pupils with disabilities access to their programs, the responsibility to offer them a free and appropriate education still rests with MPS.

In November, 1990, the Court of Appeals reversed the Circuit Court decision and declared the program unconstitutional by concluding that it was a local/private provision passed as part of a multi-subject bill. The Court of Appeals did not address the other two constitutional challenges previously dismissed by the Circuit Court. In March, 1992, the State Supreme Court, by a 4-3

vote, reversed the Court of Appeals decision and ruled that the choice program was not unconstitutional.

Initially, only nonsectarian private schools could participate in the program. In 1995 Act 27, the choice program was expanded to include sectarian schools and a number of other changes were made to the program. The Act 27 changes were challenged in court and a preliminary injunction prohibiting implementation of the Act 27 changes to the program was issued by the Dane County Circuit Court. An original action for removal of the case from the Circuit Court was brought before the Wisconsin Supreme Court and, on March 29, 1996, the Supreme Court issued a decision stating that it was evenly divided on the issues. As a result, the matter was returned to the Circuit Court and the preliminary injunction was continued.

On August 15, 1996, the Dane County Circuit Court made permanent the injunction relating to the expansion of the program to sectarian schools, but lifted the injunction as to nonsectarian schools, which allowed the provisions of Act 27 to take effect for nonsectarian schools in 1996-97.

On January 15, 1997, the Dane County Circuit Court issued a ruling that found that the Act 27 expansion of the program to sectarian schools violated Article I, Sec. 18 of the Wisconsin Constitution (prohibiting state support for religious societies) and the public purpose doctrine. The program, as it relates to nonsectarian schools, was determined to be constitutional. However, the Court found that the Act 27 provisions relating to the program were a local or private bill in violation of Article IV, Sec. 18 of the state Constitution. Under a stipulation before the Court, the program continued to operate, as modified by Act 27, for nonsectarian schools in 1996-97 and 1997-98.

On August 22, 1997, a majority of the Court of Appeals concluded that the Act 27 expansion of the choice program to sectarian schools was invalid under Article I, Sec. 18 of the Wisconsin Constitution because it directed payments of money from the state treasury for the benefit of religious societies. On June 10, 1998, the Wisconsin Supreme Court reversed the decision of the Court of Appeals and upheld the constitutionality of the amended choice program (Jackson v. Benson). In accordance with this ruling, the injunction barring the implementation of the amended choice program was dissolved and the program expansion to sectarian schools took effect in 1998-99. On November 9, 1998, the U.S. Supreme Court declined, without comment, to hear an appeal stemming from the Wisconsin Supreme Court decision.

While the U.S. Supreme Court declined to hear an appeal on the Wisconsin case, on June 27, 2002, the Court upheld the constitutionality of the Ohio Pilot Project Scholarship Program in Zelman v. Simmons-Harris. Under the Ohio program considered in the case, families in the Cleveland School District were provided tuition aid to attend participating public or private schools of the parent's choosing and tutorial aid for pupils who choose to remain enrolled in public school. Sectarian and nonsectarian schools in the Cleveland School District and public schools in adjacent districts were allowed to participate, and aid was distributed based on the financial need of the parents and the educational option chosen for the pupil. The Court held that the Ohio program did not violate the Establishment Clause of the First Amendment of the U.S. Constitution because it was enacted for a valid secular purpose, is neutral with respect to religion, permits participation of various types of schools, and provides assistance directly to a broad class of citizens who direct aid to sectarian schools as a result of their independent and private choice.

APPENDIX II

Program Evaluation

Under 1989 Act 336, the State Superintendent was authorized to conduct evaluations of the choice program. This authority was repealed in 1995 Act 27. Five reports were prepared for DPI by Professor John Witte of UW-Madison evaluating the first five years (1990-91 through 1994-95) of the program. In general, the evaluations concluded that: (a) the program had accomplished the purpose of making alternative school choices available to low-income families whose children were not succeeding in school; (b) parents were very satisfied with the program and have been highly involved in their children's education with attendance rates comparable to the MPS average for elementary schools; (c) the attrition rate in the program declined during the first four years and leveled off in the fifth year, but in the last two years evaluated, was comparable to pupil mobility rates in MPS; and (d) when test scores were controlled for gender, race, income, grade, and prior achievement, there was no systematic evidence that choice pupils do either better or worse than MPS pupils on achievement tests.

As required by 1989 Act 336, the Legislative Audit Bureau (LAB) released an evaluation of the choice program in February, 1995. LAB agreed with Professor Witte's conclusions regarding parental satisfaction with, and involvement in, the program, attendance rates for choice pupils, and attrition rates. However, the Audit Bureau found that his conclusions regarding comparative academic performance were stronger than could be supported by the limited data available due to factors such as pupil attrition and small sample sizes. The LAB concluded that no conclusions could be drawn. In the 1995 evaluation, the Audit Bureau indicated that the program had not had a substantial fiscal effect on MPS for two reasons. First, the program had not diverted a large number of pupils from MPS and had only reduced the increase in

MPS enrollment since the program began. Second, the loss of revenue experienced by MPS did not appear to have impeded the district's ability to fund educational activities for other pupils during the period covered by the LAB evaluation. Choice payments never equaled more than 0.8% of the district's equalization aids during the period covered by the LAB evaluation.

As required by 1995 Act 27, the Audit Bureau released a second evaluation of the program in February, 2000. LAB surveyed participating families about the choice program, and found that most respondents heard about the program through informal sources such as friends or relatives, and that most selected choice schools based on perceived educational quality. Of the choice schools surveyed, LAB determined that nearly three-quarters could be classified as religious. While the Audit Bureau noted that the performance of pupils in MPS and choice schools could not easily be compared given that not all schools administer the same standardized testing, nearly 90% of the choice schools that responded to the Audit Bureau surveys submitted to at least one form of independent quality review or performance measurement and that all schools reported compliance with the statutory performance standards that were selected.

With respect to the possible negative fiscal effects of the choice program on MPS, the Audit Bureau noted that a full cost-benefit analysis of the program would require making assumptions about the choice program. LAB noted, however, that while total revenue received by MPS was not significantly affected by the choice program, costs to MPS property taxpayers were higher than they would have been in the absence of the choice program, given that MPS could increase its property tax levy to offset lost equalization aid. The Audit

Bureau also noted that, in the context of state funding of two-thirds of partial school revenues in place at the time of evaluation, total state aid to MPS had increased, while total property taxes had decreased since the start of the choice program.

Another framework for evaluation of the choice program was established in 2005 Act 125. Under that act, annually from 2006 through 2011, choice schools were required to provide the scores of all standardized tests that they administer to the School Choice Demonstration Project (SCDP), a national collaboration of researchers designing school choice program evaluations which is currently based at the University of Arkansas. The Audit Bureau was required to review and analyze the standardized test score data received from the SCDP. Based on its review, LAB was required to report to the Legislature annually from 2007 to 2011 on: (a) the results of standardized tests administered by choice schools; (b) the scores of a representative sample of choice pupils on the WKCE administered in the 4th, 8th, and 10th grades and the Wisconsin reading comprehension test administered in the 3rd grade; and (c) the scores of a comparable group of MPS pupils on the WKCE and reading comprehension tests. As part of its evaluation, the SCDP also assessed other aspects of the choice program over the five years, such as the effects of the program on pupil attainment, K-12 finance, the demographics of the City, school integration, and the characteristics of participating schools.

The SCDP released reports on choice testing in February of 2008, March of 2009, and April of 2010, March of 2011, and February of 2012. For its February, 2012, report on descriptive test score data, the SCDP analyzed information from 102 choice schools that administered the WKCE to choice pupils in 2010-11 in the 4th, 8th, and 10th grades. On the WKCE, 4th grade choice pupils scored lower than low-income 4th grade MPS pupils on reading, math, and science. In 8th and 10th grade, choice pupils scored higher than low-income MPS pupils in reading and science, but

lower in math. Because these are only descriptive comparisons, researchers from the SCDP noted that the data could not be used to draw any conclusions about the effectiveness of the choice program compared to MPS, which requires data from the longitudinal study.

To conduct the longitudinal study, researchers from the SCDP reported on the methods that were used to generate comparable panels of pupils from choice schools and MPS schools for which to compare WKCE results. Researchers from the SCDP began the longitudinal study by constructing samples of 2,727 pupils each in grades 3 through 9 from the choice program and from MPS matched to the choice sample on achievement level and demographics. In the first year of the report, the SCDP reported on baseline descriptive statistics for both groups from the WKCE. The analyses from the second, third, and fourth years generally concluded that there were few statistically significant differences in achievement growth in reading or math between the pupils the choice and the MPS samples. In the fifth year, the SCDP found that pupils in the choice sample exhibited larger growth in reading achievement than the MPS sample. They also found that some analyses indicated that pupils in the choice sample also exhibited larger growth in math achievement, but that the results were not conclusive. The researchers did note, however, that there was some evidence that the achievement growth by the choice sample in the fifth year was a result of the new requirement that year that choice schools administer the WKCE to all choice pupils in the relevant grades. The researchers also discussed issues relating to pupil mobility and attrition from the original samples.

The Audit Bureau issued its reports on the testing data in September of 2008 and in August of each year from 2009 through 2012. In the August, 2012, report, LAB indicated that it reviewed the data submitted by the SCDP and generally confirmed test score averages and related analyses reported by the SCDP, with some

differences based on treatment of missing test score data and pupil transfers between MPS and choice schools. LAB also concurred with the SCDP that the extent to which the choice program

affected pupil achievement could not be definitely determined because of the introduction of the testing requirement in the final year of the study.

APPENDIX III

Milwaukee Private School Choice Program Headcount and FTE 2020-21 School Year

<u>School Name</u>	<u>3rd Friday in September</u>		<u>Summer School</u>
	<u>Headcount</u>	<u>FTE</u>	<u>Headcount</u>
Academy of Excellence	802	780.8	208
Aquinas Academy - Menomonee Falls	16	14.5	
Atlas Preparatory Academy, Inc.	559	549.0	
Atonement Lutheran School	420	406.8	
Bader Hillel High, Inc.	26	26.0	15
Badger State Baptist School	55	53.5	
Beautiful Savior Lutheran School	0	0.0	
Believers in Christ Christian Academy	195	190.6	
Blessed Sacrament Catholic School	169	163.4	
Blessed Savior Catholic School	462	441.0	
Carter's Christian Academy, Inc.	276	263.5	44
Catholic East Elementary	190	183.2	
CERT School	11	11.0	15
Christ St. Peter Lutheran School	203	193.0	
Christian Faith Academy of Higher Learning	48	47.6	
Clara Mohammed School	198	191.0	
Cristo Rey Jesuit Milwaukee High School	397	397.0	219
Cross Trainers Academy	374	366.4	
Destiny High School	204	204.0	24
Divine Destiny School	86	82.8	
Divine Mercy School	16	15.6	
Divine Savior Holy Angels High School	97	97.0	
Dominican High School	88	88.0	
Early View Academy of Excellence	233	230.2	
Eastbrook Academy	246	238.0	
El Puente High School	92	92.0	
Elm Grove Lutheran School	35	34.2	
First Immanuel Lutheran School	4	4.0	
Garden Homes Lutheran School	262	254.0	
Good Shepherd's Lutheran School - West Allis	31	29.0	
Grace Christian Academy - West Allis	156	153.0	
Grace Lutheran School - Menomonee Falls	53	49.5	
Grace Lutheran School - Oak Creek	9	8.0	
Granville Lutheran School	256	248.4	22
Greater Holy Temple Christian Academy	566	525.2	
Guidance Academy	156	150.5	
Hales Corners Lutheran School	68	66.5	
Heritage Christian Schools	166	166.0	13
Hillel Academy	71	71.0	
Holy Redeemer Christian Academy	300	294.8	18

<u>School Name</u>	<u>3rd Friday in September</u>		<u>Summer School Headcount</u>
	<u>Headcount</u>	<u>FTE</u>	
Hope Christian High School	265	265.0	
Hope Christian School: Caritas	556	532.0	
Hope Christian School: Fidelis	542	520.0	
Hope Christian School: Fortis	501	489.8	
Hope Christian School: Prima	563	543.0	
Hope Christian School: Semper	465	451.4	
Immanuel Lutheran School - Brookfield	169	158.0	
Institute of Technology and Academics	289	277.8	
Jo's Learning Academy	42	36.8	33
Journey's Lutheran School	21	21.0	
Kettle Moraine Lutheran High School	14	14.0	
Kingdom Prep Lutheran High School	166	166.0	66
King's Academy, Inc.	191	184.6	
Lamb of God Ev Lutheran School	10	9.5	
Living Word Lutheran High School	42	42.0	
Luther Preparatory School	39	39.0	
Malaika Early Learning Center	63	57.4	
Marquette University High School	96	96.0	
Martin Luther High School - Greendale	388	388.0	60
Mary Queen of Saints Catholic Academy	48	47.2	
Messmer Catholic Schools	1,212	1,195.2	134
Milwaukee Lutheran High School	773	773.0	30
Milwaukee Seventh Day Adventist School	174	169.5	
Mother of Good Counsel School	192	186.5	
Mount Calvary Lutheran School	167	162.5	
Mount Lebanon Lutheran School	227	219.0	
Mount Olive Lutheran School - Milwaukee	144	137.0	
Nativity Jesuit Academy	234	223.0	163
New Testament Christian Academy	137	129.8	
Northwest Catholic School	174	168.8	
Northwest Lutheran School	222	213.2	12
Notre Dame School of Milwaukee	515	499.8	434
Our Father's Lutheran School	19	18.5	
Our Lady Queen of Peace	164	159.6	
Pilgrim Evangelical Lutheran School - Menomonee Falls	5	5.0	
Pilgrim Lutheran School - Wauwatosa	237	230.2	22
Pius XI Catholic High School	436	436.0	
Prince of Peace	370	358.8	
Right Step, Inc.	46	46.0	
Risen Savior Lutheran School	241	231.4	
Saint Adalbert School	399	387.8	
Saint Agnes School	85	82.5	
Saint Anthony School - Milwaukee	1,455	1,423.8	422
Saint Augustine Preparatory Academy - Milwaukee	1,296	1,272.8	283
Saint Catherine School	133	127.8	
Saint Charles Borromeo Catholic School - Milwaukee	129	126.6	
Saint Gregory the Great Parish School	178	174.5	
Saint Jacobi Lutheran School	43	39.0	
Saint Joan Antida High School	153	153.0	
Saint John Paul II School	243	234.2	

<u>School Name</u>	<u>3rd Friday in September</u>		<u>Summer School</u>
	<u>Headcount</u>	<u>FTE</u>	<u>Headcount</u>
Saint John the Evangelist - Greenfield	42	39.5	
Saint John's Lutheran School - Glendale	50	46.0	
Saint John's Lutheran School - Lannon	3	3.0	
Saint John's Lutheran School - Milwaukee	216	203.6	
Saint Josaphat Parish School	166	160.8	
Saint Joseph Academy - Milwaukee	455	433.4	38
Saint Joseph School - Wauwatosa	46	43.0	
Saint Lucas Lutheran School	110	104.5	
Saint Marcus Lutheran School	739	709.0	
Saint Margaret Mary School	128	124.5	
Saint Martini Lutheran School	153	148.2	15
Saint Matthias Parish School	97	93.0	
Saint Paul's Lutheran School - Cudahy	9	9.0	
Saint Paul's Lutheran School - Muskego	8	8.0	
Saint Paul's Lutheran School - West Allis	41	39.5	
Saint Peter Immanuel Lutheran School - Milwaukee	87	84.2	3
Saint Philip's Lutheran School	124	122.0	
Saint Rafael the Archangel School	331	319.8	
Saint Roman Parish School	292	283.2	
Saint Sebastian School	218	209.5	
Saint Thomas Aquinas Academy - Milwaukee	136	131.2	
Saint Thomas More High School	254	254.0	
Saint Vincent Pallotti Catholic School	160	155.6	
Salam School	825	783.0	16
Salem Evangelical Lutheran School	158	152.4	
Shining Star Christian Schools, Inc.	423	413.5	
Shoreland Lutheran High School	0	0.0	
Siloah Lutheran School	70	67.2	
Star of Bethlehem Evangelical Lutheran School	1	1.0	
Tamarack Waldorf School	178	171.2	
The City School	146	143.5	74
Torah Academy of Milwaukee	31	31.0	
Trinity Lutheran School - Caledonia	0	0.0	
Trinity Lutheran School - Mequon	74	69.5	
Trinity Lutheran School - Waukesha	3	2.5	
Victory Christian Academy	218	213.2	
Wisconsin Academy	18	18.0	
Wisconsin Lutheran High School - Milwaukee	425	425.0	61
Word of Life Evangelical Lutheran School	68	65.5	
Yeshiva Elementary School	198	189.6	
Zion Lutheran School - Menomonee Falls	<u>33</u>	<u>32.5</u>	<u> </u>
Total* (Unaudited)	28,583	27,805.7	2,444

*The aid membership on which choice program payments are made is equal to the average number of FTE pupils enrolled on the third Friday in September and the second Friday in January, plus the summer school FTE.

APPENDIX IV

Racine Private School Choice Program Headcount and FTE 2020-21 School Year

<u>School Name</u>	<u>3rd Friday in September</u>		<u>Summer School</u>
	<u>Headcount</u>	<u>FTE</u>	<u>Headcount</u>
Academy of Excellence	18	18.0	2
Badger State Baptist School	9	9.0	
Catholic Central High School - Burlington	0	0.0	
CERT School	9	9.0	2
Concordia Lutheran School	156	150.5	
EverGreen Academy	395	378.5	
Friedens Lutheran School	16	16.0	
Grace Lutheran School - Oak Creek	10	9.5	
Guidance Academy	0	0.0	
Hope Christian School: Via	416	416.0	
Luther Preparatory School	2	2.0	
Lutheran High School Association of Racine	224	224.0	
Martin Luther High School - Greendale	0	0.0	
Our Father's Lutheran School	4	4.0	
Racine Christian School	103	103.0	
Renaissance Lutheran School	404	393.6	6
Saint John's Lutheran School - Racine	183	174.5	
Saint Matthew School - Oak Creek	27	26.0	
Shoreland Lutheran High School	167	167.0	
Siena Catholic Schools of Racine, Inc	1,265	1,246.6	36
Trinity Lutheran School - Caledonia	99	99.0	
Trinity Lutheran School - Racine	179	173.5	
Victory Christian Academy	1	1.0	
Wisconsin Lutheran School - Racine	148	143.5	
Word of Life Evangelical Lutheran School	<u>0</u>	<u>0.0</u>	<u>—</u>
Totals *	3,835	3,764.2	46

* The aid membership on which choice program payments are made is equal to the average number of FTE pupils enrolled on the third Friday in September and the second Friday in January, plus the summer school FTE.

APPENDIX V

Statewide Private School Choice Program Headcount and FTE 2020-21 School Year

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Algoma	Saint Mary School	5	5.0	
Antigo	Peace Lutheran School	96	91.0	
Appleton	Celebration Lutheran School	22	20.0	
	Fox Valley Lutheran High School	200	200.0	
	Holy Spirit Catholic School	39	36.5	
	Mount Olive Evangelical Lutheran School	81	76.0	
	Riverview Lutheran School	53	51.5	
	Saint Edward School	17	17.0	
	Saint Francis Xavier Catholic School System, Inc.	261	254.5	
	Saint Paul Lutheran School	48	48.0	
Ashland	Our Lady of The Lake School	49	46.5	
Athens	Saint Anthony de Padua Catholic School	19	18.5	
	Trinity Lutheran School	7	5.5	
Baraboo	Community Christian School of Baraboo	62	60.5	
Beaver Dam	Saint Katharine Drexel School	29	29.0	
Beloit	Rock County Christian School	229	229.0	
	Saint John's Lutheran School	9	8.2	3
Berlin	Saint John Lutheran School	18	18.0	
Big Bend	Christ Lutheran School	23	20.0	
Bonduel	Saint Paul Lutheran School	51	47.5	
Boyd	Saint Joseph Catholic School	19	16.0	
Brillion	Holy Family School	25	24.0	
	Trinity Evangelical Lutheran School	14	13.0	
Brookfield	Immanuel Lutheran School	42	38.5	
Burlington	Burlington Catholic School	60	58.0	
	Catholic Central High School	31	31.0	
	Saint John's Lutheran School	47	46.5	
Butler	Saint Agnes School	18	17.5	
Caledonia	Trinity Lutheran School	3	3.0	
Casco	Holy Trinity School	6	6.0	
Cato	Saint Mary Saint Michael School	15	13.5	

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Cedarburg	First Immanuel Lutheran School	41	37.5	
Chilton	Chilton Area Catholic School	21	20.0	
Chippewa Falls	McDonnell Area Catholic Schools	137	137.0	9
Clintonville	Saint Martin Lutheran School	43	43.0	
	Saint Rose Saint Mary's School	13	13.0	
Colby	Saint Mary School	29	27.0	
Coleman	Faith Christian School	59	58.0	
Columbus	Wisconsin Academy	16	16.0	
Cudahy	Saint Paul's Lutheran School	19	17.5	
Delavan	Saint Andrew Parish School	44	44.0	
Denmark	All Saints Grade School	20	18.5	
Dousman	Saint Bruno Parish School	21	20.0	
East Troy	Saint Paul's Lutheran School	14	12.0	
	Saint Peter's School	17	17.0	
Eau Claire	Regis Catholic Schools	175	175.0	
Edgar	Saint John School	19	19.0	
Elm Grove	Elm Grove Lutheran School	8	7.5	
Fond du Lac	Faith Lutheran School	77	75.0	
	Fond du Lac Christian School	45	45.0	
	Redeemer Lutheran Grade School	33	30.5	
	Saint Mary's Springs Academy	112	109.0	
	Winnebago Lutheran Academy	91	91.0	
Fort Atkinson	Crown of Life Christian Academy	41	39.0	
	Saint Paul's Lutheran School	19	18.0	
Freedom	Saint Nicholas Catholic School	29	27.0	
	Saint Peter Lutheran School	38	38.0	
Glendale	Bader Hillel High	7	7.0	6
	Saint John's Lutheran School	3	3.0	
Grafton	Saint Joseph Parish School	14	12.0	
	Saint Paul Lutheran School	49	44.0	
Green Bay	Bay City Christian School	156	144.0	
	Green Bay Adventist Junior Academy	20	20.0	
	Green Bay Area Catholic Education - East	395	388.2	
	Green Bay Area Catholic Education - South	76	76.0	
	Green Bay Area Catholic Education - West	80	77.6	
	Green Bay Trinity Lutheran School	37	37.0	
	Northeastern Wisconsin Lutheran High School	33	33.0	
	Notre Dame de la Baie Academy	185	185.0	

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Green Bay (continued)	Pilgrim Lutheran School	39	34.0	
	Saint Mark Lutheran School	41	41.0	
	Saint Paul Lutheran School	44	39.0	
Greendale	Martin Luther High School	54	54.0	8
Greenfield	Our Father's Lutheran School	25	25.0	
	Saint Jacobi Lutheran School	16	13.5	
	Saint John the Evangelist	14	14.0	
Greenleaf	Morrison Zion Lutheran School	19	18.5	
Greenville	Immanuel Evangelical Lutheran School	42	42.0	
	Saint Mary of the Immaculate Conception	42	41.5	
Hales Corners	Hales Corners Lutheran School	66	64.0	
Hartford	Peace Lutheran School	34	32.0	
	Saint Augustine School	21	18.3	
	Saint Kilian School	5	4.5	
Hartland	Divine Redeemer Lutheran School	39	37.0	
	Lake Country Lutheran High School	47	47.0	
	Zion Lutheran School	3	3.0	
Helenville	Saint Peter's Lutheran School	17	15.0	
Hilbert	Saint Mary Catholic School	15	14.5	
Horicon	Saint Stephen Lutheran School	10	8.5	
Howards Grove	Saint Paul's Lutheran School	16	14.0	
Jackson	David's Star Lutheran School	15	15.0	
	Kettle Moraine Lutheran High School	124	124.0	
	Living Word Lutheran High School	26	26.0	
	Morning Star Lutheran School	30	28.5	
Janesville	Saint Paul's Lutheran School	24	24.0	
Jefferson	Saint John's Ev Lutheran School	25	25.0	
Kaukauna	Saint Ignatius of Loyola Catholic School	46	41.0	
Kenosha	Bethany Lutheran	31	31.0	
	Friedens Lutheran School	84	82.5	
	Saint Joseph Catholic Academy	196	188.5	
Kewaunee	Holy Rosary Catholic School	16	15.5	
Kiel	Divine Savior Catholic School	19	17.0	
La Crosse	Aquinas Catholic Schools	147	145.5	
Ladysmith	Our Lady of Sorrows Grade School	14	13.0	
Lake Geneva	First Evangelical Lutheran School	13	11.5	
	Saint Francis de Sales Parish School	23	21.5	

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Lake Mills	Lakeside Lutheran High School	117	117.0	
Lannon	Saint John's Lutheran School	23	20.5	
Little Chute	Saint John Grade School	32	30.5	
Luxemburg	Saint Mary School	12	12.0	
	Saint Paul Lutheran School	13	11.5	
Madison	Abudant Life Christian School	96	96.0	
	Eastside Evangelical Lutheran Elementary	38	33.5	
	High Point Christian School	84	80.0	
	Holy Cross Lutheran School	44	44.0	
	Lighthouse Christian School	132	126.4	31
	Madinal Academy of Madison	29	29.0	
Malone	Holyland Catholic School	8	7.5	
Manitowoc	First German Evangelical Lutheran	44	42.5	
	Manitowoc Lutheran High School	78	78.0	
	Roncalli Catholic Schools	226	223.5	
Marinette	Saint Thomas Aquinas Academy	57	54.5	
	Trinity Lutheran School	21	19.0	
Marshfield	Columbus Catholic Schools	182	174.0	
Mayville	Saint John's Lutheran School	19	19.0	
Medford	Holy Rosary Catholic School	20	19.0	
Menasha	Shepherd of the Valley Lutheran School	34	34.0	
Menomonee Falls	Aquinas Academy	38	34.0	
	Grace Lutheran School	20	18.5	
	Pilgrim Evangelical Lutheran School	19	18.0	
	Zion Lutheran School	12	12.0	
Menomonie	Saint Paul's Lutheran School	27	24.2	
Mequon	Trinity Lutheran School	19	18.5	
Merrill	Trinity Lutheran School	40	40.0	
Middleton	Westside Christian School	43	41.8	
Milwaukee	Academy of Excellence	131	129.0	8
	Atonement Lutheran School	1	1.0	
	Blessed Savior Catholic School	4	3.5	1
	Catholic East Elementary	7	6.6	
	Chesterton Academy of Milwaukee	15	15.0	
	Christ St. Peter Lutheran School	12	11.5	
	Cristo Rey Jesuit Milwaukee High School	18	18.0	8
	Eastbrook Academy	32	31.2	
	Garden Homes Lutheran School	4	3.6	
	Hillel Academy	46	46.0	
	Messmer Catholic Schools	1	0.6	
Milwaukee Lutheran High School	15	15.0		

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Milwaukee (continued)	Milwaukee Seventh Day Adventist School	12	11.5	
	Mount Lebanon Lutheran School	1	0.6	
	Mount Olive Lutheran School	7	6.5	
	Nativity Jesuit Academy	14	13.0	8
	New Testament Christian Academy	7	7.0	
	Northwest Catholic School	2	2.0	
	Northwest Lutheran School	4	3.2	
	Notre Dame School of Milwaukee	21	20.6	18
	Our Lady Queen of Peace	7	7.0	
	Pius XI Catholic High School	37	37.0	
	Prince of Peace	9	9.0	
	Risen Savior Lutheran School	10	9.6	
	Saint Adalbert School	12	11.6	
	Saint Augustine Preparatory Academy	38	38.0	10
	Saint Charles Borromeo Catholic School	19	17.8	
	Saint John's Lutheran School	29	27.8	
	Saint Joseph Academy	20	20.0	
	Saint Lucas Lutheran School	18	17.0	
	Saint Martini Lutheran Grade School	8	8.0	2
	Saint Matthias Parish School	24	24.0	
	Saint Rafael the Archangel School	11	11.0	
	Saint Roman Parish School	14	13.6	
	Saint Sebastian School	6	6.0	
	Saint Thomas Aquinas Academy	13	12.6	
	Saint Thomas More High School	23	23.0	
	Saint Vincent Pallotti Catholic School	5	4.2	
	Salam School	17	17.0	
	Salem Evangelical Lutheran School	6	6.0	
	Torah Academy of Milwaukee	1	1.0	
	Wisconsin Lutheran High School	98	98.0	7
Word of Life Evangelical Lutheran School	2	2.0		
Mosinee	Northland Lutheran High School	15	15.0	
Muskego	Saint Leonard School	16	15.5	
	Saint Paul's Lutheran School	37	35.5	
Neenah	Neenah Lutheran School	45	41.5	
	Saint Mary Catholic Schools	169	169.0	
New Berlin	Heritage Christian Schools	201	201.0	10
	Star of Bethlehem Evangelical Lutheran School	37	36.0	
New London	Emanuel Lutheran School	58	53.0	
	Most Precious Blood Parish Catholic School	16	15.0	
Newburg	Saint John's Lutheran School	26	25.5	
Oak Creek	Badger State Baptist School	17	15.0	
	Grace Lutheran School	21	19.5	
Oakfield	Saint Luke's Lutheran School	32	30.5	
Oconomowoc	Saint Jerome Parish School	35	33.5	
	Saint Matthew's Lutheran School	30	27.5	
	Saint Paul's Evangelical Lutheran School	18	17.5	
Oconto Falls	Saint Anthony School	21	19.0	

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Onalaska	Luther High School	54	54.0	
	Saint Paul's Ev Lutheran School	75	71.0	
Oostburg	Oostburg Christian School	61	55.5	
Osceola	Valley Christian School	45	45.0	
Oshkosh	Grace Lutheran School	51	45.5	
	Lourdes Academy	152	152.0	
	Martin Luther School	18	18.0	
	Trinity Lutheran School	18	17.5	
	Valley Christian School	224	224.0	
Pewaukee	Prairie Hill Waldorf School	58	53.0	
Plymouth	Saint John Lutheran School	46	43.5	
Port Washington	Saint John XXIII Catholic School	13	13.0	
Portage	Saint John's Lutheran School	22	22.0	
Pulaski	Assumption of the Blessed Virgin Mary School	29	26.2	
Racine	Renaissance Lutheran School	4	4.0	
Randolph	Randolph Christian School Society, Inc.	19	17.0	
Reedsburg	Saint Peters Lutheran School	39	35.0	
Reedsville	Saint John Saint James Lutheran School	13	13.0	
Rice Lake	Saint Joseph School	17	15.5	
Richland Center	Saint Mary of the Assumption Catholic School	22	21.0	
Shawano	Sacred Heart Catholic School	44	41.0	
	Saint James Lutheran School	67	67.0	
	Wolf River Lutheran High School	11	11.0	
Sheboygan	Bethlehem Lutheran School	72	69.5	
	Christ Child Academy	37	36.5	
	Saint Elizabeth Ann Seton Catholic School	28	28.0	
	Saint Paul Lutheran School	48	46.5	
	Sheboygan Area Lutheran High School	67	67.0	
	Sheboygan Christian School	143	135.0	
	Trinity Lutheran School	44	42.0	
Sherwood	Saint John Sacred Heart School	7	6.5	
Somers	Shoreland Lutheran High School	51	51.0	
South Milwaukee	Divine Mercy School	52	48.8	
	Guidance Academy	35	32.5	
Sparta	Saint John's Ev. Lutheran School	22	20.0	
	Saint Patrick School	39	35.0	
Spooner	Saint Francis de Sales Grade School	36	34.5	

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Stevens Point	Pacelli Catholic Schools	142	142.0	
	Saint Paul Lutheran Grade School	51	49.0	
	Stevens Point Christian Academy	34	34.0	
Stoddard	Saint Matthew's Evangelical Lutheran School	10	8.0	
Stratford	Saint Joseph Catholic School	8	8.0	
Sturgeon bay	Saint John Bosco Catholic School	29	28.0	
Thiensville	Christ Alone Lutheran School	19	19.0	
Thorp	Thorp Catholic School	21	18.5	
Two Rivers	Saint John's Lutheran Elementary School	19	19.0	
Watertown	Calvary Baptist Christian School	78	71.0	
	Good Shepherd Lutheran School	58	55.0	
	Luther Preparatory School	113	113.0	
	Maranatha Baptist Academy	12	12.0	
	Saint John's Lutheran School	20	18.0	
	Trinity St. Luke's Lutheran School	26	25.6	
Waukesha	Beautiful Savior Lutheran School	25	23.5	
	Catholic Memorial High School of Waukesha, Inc.	67	67.0	
	Trinity Lutheran School	17	16.5	
	Waukesha Catholic School System	92	90.0	
Waupaca	Waupaca Christian Academy	72	69.2	
Waupun	Central Wisconsin Christian School	112	108.8	
Wausau	Faith Christian Academy	97	89.5	
	Newman Catholic Schools	127	127.0	
	Saint John Lutheran School	19	17.5	
	Trinity Lutheran School	56	53.5	
Wauwatosa	Kingdom Prep Lutheran High School	0	0.0	
	Pilgrim Lutheran School	5	5.0	
	Saint Joseph School	13	12.5	
Wayside	Zion Lutheran School	11	11.0	
West Allis	Good Shepherd's Lutheran School	8	8.0	
	Grace Christian Academy	32	30.0	
	Lamb of God Ev Lutheran School	11	11.0	
	Mary Queen of Saints Catholic Academy	50	48.4	
	Saint Paul's Lutheran School	17	16.0	
	Victory Christian Academy	47	46.2	
West Bend	Good Shepherd Evangelical Lutheran School	37	33.5	
	Saint John's Lutheran School	52	48.0	
West Salem	Coulee Christian School	85	82.5	
Whitefish Bay	Dominican High School	14	14.0	

<u>City</u>	<u>School Name</u>	<u>3rd Friday in September Headcount</u>	<u>FTE</u>	<u>Summer School Headcount</u>
Wisconsin Rapids	Assumption Catholic Schools	133	132.5	
	Immanuel Lutheran School	85	82.0	
Wrightstown	Saint Clare Catholic School	16	15.0	
	Saint John Ev Lutheran School	<u>10</u>	<u>9.0</u>	<u> </u>
	Total* (Unaudited)	12,111	11,740.0	136

* The aid membership on which choice program payments are made is equal to the average number of FTE pupils enrolled on the third Friday in September and the second Friday in January, plus the summer school FTE.

APPENDIX VI

State General Aid Reduction Attributable to Pupils in the Racine and Statewide Choice Programs 2020-21 School Year

<u>District</u>	<u>Aid Reduction</u>	<u>District</u>	<u>Aid Reduction</u>
Abbotsford	\$24,900	Crivitz	\$35,138
Algoma	76,638	Cudahy	697,730
Almond-Bancroft	33,200	Cumberland	24,900
Altoona	141,100	D C Everest Area	672,124
Antigo	780,846	De Soto Area	67,692
Appleton Area	3,328,066	Deerfield Community	13,280
Arrowhead UHS	125,244	De Forest Area	147,834
Ashland	365,846	Delavan-Darien	367,138
Ashwaubenon	191,456	Denmark	241,718
Athens	182,600	De Pere	443,502
Auburndale	8,946	Dodgeland	141,198
Augusta	17,246	Dodgeville	38,180
Bangor	42,146	Drummond	8,300
Baraboo	361,422	Durand-Arkansaw	9,960
Barron Area	17,892	East Troy Community	311,622
Beaver Dam	482,974	Eau Claire Area	1,060,658
Beecher-Dunbar-Pembine	16,600	Edgar	141,746
Beloit	1,469,275	Edgerton	58,100
Beloit Turner	199,110	Elcho	8,300
Berlin Area	284,784	Elkhart Lake-Glenbeulah	17,892
Black River Falls	30,342	Elkhorn Area	55,888
Bloomer	25,546	Elmbrook	526,663
Bonduel	228,250	Elmwood	8,300
Bowler	41,500	Erin	8,300
Brillion	296,588	Evansville Community	51,092
Brown Deer	402,319	Fall Creek	16,600
Bruce	8,300	Fall River	17,892
Burlington Area	1,059,092	Flambeau	33,200
Cadott Community	124,849	Fond du Lac	2,241,637
Cambria-Friesland	16,600	Fontana J8	8,300
Cambridge	4,150	Fort Atkinson	578,240
Campbellsport	137,968	Fox Point J2	79,680
Cashton	33,200	Franklin Public	551,375
Cedar Grove-Belgium Area	248,080	Freedom Area	474,279
Cedarburg	302,676	Gale-Ettrick-Trempealeau	54,596
Central/Westosha UHS	17,892	Genoa City J2	24,900
Chilton	269,476	Germantown	377,474
Chippewa Falls Area	948,242	Gillett	63,542
Clinton Community	60,038	Glendale-River Hills	166,000
Clintonville	488,134	Grafton	309,222
Cochrane-Fountain City	35,784	Granton Area	24,900
Colby	186,750	Green Bay Area	7,382,305
Coleman	245,868	Green Lake	17,892
Colfax	16,600	Greendale	252,414
Columbus	86,230	Greenfield	941,133

<u>District</u>	<u>Aid Reduction</u>	<u>District</u>	<u>Aid Reduction</u>
Greenwood	\$8,300	Marshall	\$52,384
Gresham	24,900	Marshfield	897,516
Hamilton	479,932	Mauston	17,892
Hartford J1	224,100	Mayville	194,130
Hartford UHS	143,136	McFarland	112,050
Hartland-Lakeside J3	129,052	Medford Area	202,430
Herman-Neosho-Rubicon	62,250	Menasha	855,370
Hilbert	112,050	Menomonee Falls	727,362
Holmen	676,646	Menomonie Area	182,600
Holy Hill Area	59,760	Mequon-Thiensville	409,656
Horicon	100,892	Merrill Area	376,730
Hortonville	869,758	Merton Community	58,100
Howard-Suamico	407,444	Middleton-Cross Plains	392,513
Howards Grove	136,030	Milton	60,038
Hurley	16,600	Mineral Point	74,700
Hustisford	44,730	Mishicot	162,868
Iola-Scandinavia	71,842	Mondovi	17,246
Ithaca	8,300	Monona Grove	105,201
Janesville	361,550	Monroe	33,200
Jefferson	439,998	Montello	47,588
Johnson Creek	117,492	Monticello	8,946
Kaukauna Area	925,274	Mosinee	129,942
Kenosha	2,704,450	Mount Horeb Area	151,890
Kettle Moraine	315,498	Mukwonago	435,027
Kewaskum	190,352	Muskego-Norway	348,115
Kewaunee	232,772	Neenah	1,504,258
Kiel Area	126,438	Neillsville	12,450
Kimberly Area	468,402	Nekoosa	215,526
Kohler	24,900	New Berlin	874,828
La Crosse	1,000,444	New Holstein	194,130
Ladysmith	66,400	New London	653,586
Lake Country	8,300	New Richmond	17,246
Lake Geneva J1	215,800	Niagara	38,180
Lake Geneva-Genoa UHS	53,676	Nicolet UHS	154,603
Lake Mills Area	237,020	North Cape	8,300
Lakeland UHS	8,946	North Fond Du Lac	199,572
Lena	42,146	Northern Ozaukee	104,396
Linn J6	8,300	Northland Pines	8,946
Little Chute Area	463,880	Northwood	8,946
Lomira	185,184	Oak Creek-Franklin	468,637
Loyal	89,088	Oakfield	84,292
Luck	33,846	Oconomowoc Area	939,016
Luxemburg-Casco	241,346	Oconto	33,846
Madison Metropolitan	2,302,699	Oconto Falls	176,422
Manawa	43,438	Omro	250,018
Manitowoc	1,933,568	Onalaska	572,896
Maple Dale-Indian Hill	24,900	Oostburg	324,072
Marathon City	63,542	Oregon	8,946
Marinette	591,336	Osceola	144,976
Marion	104,396	Oshkosh Area	3,073,526

<u>District</u>	<u>Aid Reduction</u>	<u>District</u>	<u>Aid Reduction</u>
Osseo-Fairchild	\$8,300	Spooner	\$244,850
Owen-Withee	12,450	Stanley-Boyd Area	49,800
Palmyra-Eagle Area	117,492	Stevens Point Area	1,527,768
Pardeeville Area	17,892	Stockbridge	16,600
Parkview	75,992	Stone Bank School District	4,150
Peshigo	140,180	Stoughton Area	67,692
Pewaukee	131,234	Stratford	75,346
Phillips	12,450	Sturgeon Bay	208,792
Pittsville	50,446	Sun Prairie Area	272,244
Plymouth	414,080	Suring	8,300
Port Edwards	49,800	Swallow	8,300
Port Washington-Saukville	318,630	Thorp	124,500
Portage Community	276,484	Tomah Area	60,684
Poynette	8,300	Tomorrow River	72,026
Princeton	17,892	Turtle Lake	17,246
Pulaski Community	368,614	Two Rivers	455,032
Racine	25,705,071	Union Grove J1	8,300
Randall J1	16,600	Union Grove UHS	35,784
Randolph	150,418	Unity	8,300
Random Lake	26,838	Valders Area	172,088
Raymond #14	45,650	Verona Area	220,178
Reedsburg	331,726	Viroqua Area	72,026
Reedsville	279,068	Wabeno Area	24,900
Rhineland	17,892	Walworth J1	8,300
Rice Lake Area	128,650	Washburn	37,350
Richland	145,250	Washington-Caldwell	29,050
Richmond	37,350	Waterford Graded	75,530
Ripon Area	86,230	Waterford UHS	8,946
River Valley	29,050	Waterloo	35,138
Rosendale-Brandon	68,522	Watertown	1,641,901
Rosholt	58,100	Waukesha	2,457,888
Saint Croix Falls	95,822	Waunakee Community	39,472
Saint Francis	288,205	Waupaca	513,406
Salem	41,500	Waupun	650,912
Sauk Prairie	92,592	Wausau	1,453,244
Seneca	25,546	Wausaukee	42,792
Sevastopol	16,600	Wautoma Area	17,246
Seymour Community	231,480	Wauwatosa	746,032
Shawano	967,322	West Allis	3,588,143
Sheboygan Area	2,917,666	West Bend	1,953,856
Sheboygan Falls	208,792	West Depere	214,234
Shell Lake	41,500	West Salem	308,764
Shiocton	91,946	Westby Area	73,134
Shorewood	60,038	Westfield	72,026
Slinger	67,046	Weston	16,600
Somerset	33,846	Weyauwega-Fremont	118,048
South Milwaukee	638,552	White Lake	8,300
Southern Door County	42,146	Whitefish Bay	26,192
Sparta Area	474,118	Whitehall	29,696
Spencer	143,684	Whitewater	131,234

<u>District</u>	<u>Aid Reduction</u>	<u>District</u>	<u>Aid Reduction</u>
Whitnall	\$343,229	Wisconsin Rapids	\$1,358,812
Wild Rose	16,600	Wittenberg-Birnamwood	17,246
Wilmot UHS	8,946	Wrightstown Community	<u>276,484</u>
Winneconne Community	130,588		
Wisconsin Dells	58,100	Total	\$121,451,208

APPENDIX VII

Special Needs Scholarship Program Headcount and FTE 2020-21 School Year

<u>City</u>	<u>School Name</u>	<u>Headcount</u>	<u>FTE</u>
Appleton	Fox Valley Lutheran High School	17	17.0
	Saint Francis Xavier Catholic School System	36	36.0
Ashland	Our Lady of the Lake Catholic School	17	17.5
Baraboo	Community Christian School of Baraboo	1	1.0
Bonduel	Saint Paul Lutheran School	10	10.0
Brookfield	Immanuel Lutheran School	33	32.0
Chippewa Falls	Holy Ghost Grade School	9	9.0
	McDonell Area Catholic Schools	9	9.0
	Notre Dame Middle School	6	6.0
	Saint Charles Borromeo Primary School	4	4.0
Coleman	Faith Christian School	1	1.0
Dousman	Saint Bruno Parish School	8	8.0
East Troy	Saint Paul's Lutheran School	1	1.0
Eau Claire	Saint Mark Lutheran School	9	9.0
Fond du Lac	Saint Mary's Springs Academy	44	42.5
	Winnebago Lutheran Academy	11	11.0
Fort Atkinson	Crown of Life Christian Academy, Inc.	23	22.0
Freedom	Saint Peter Lutheran School	1	1.0
Grafton	Saint Joseph Parish School	4	4.0
Green Bay	Notre Dame de la Baie Academy	9	9.0
	Saint Paul Lutheran School	16	16.0
Greendale	Martin Luther High School	14	14.0
Hales Corners	Journeys Lutheran School	54	54.0
Hartford	Peace Lutheran School	3	3.0
Hartland	Divine Redeemer Lutheran School	21	20.5
	Lake Country Lutheran High School	12	12.0
	Zion Lutheran School	1	1.0
Jackson	Kettle Moraine Lutheran High School	15	15.0

<u>City</u>	<u>School Name</u>	<u>Headcount</u>	<u>FTE</u>
Kaukauna	Saint Ignatius of Loyola Catholic School	13	11.5
Kenosha	Open Wings Learning Community	27	27.0
	Saint Joseph Catholic Academy	16	16.0
Kiel	Divine Savior Catholic School	4	4.0
La Crosse	Aquinas Catholic Schools	31	30.5
Lannon	Saint John's Lutheran School	3	2.5
Luxemburg	Saint Paul Lutheran School	2	2.0
	Saint Mary School	2	1.5
Madison	High Point Christian School	11	10.6
	Lighthouse Christian School	19	18.6
Manitowoc	Roncalli High Schools	4	4.0
Medford	Holy Rosary Catholic School	6	6.0
Mequon	Lumen Christi Catholic School	10	10.0
Menomonee Falls	Bethlehem Evangelical Lutheran School	25	23.0
Middleton	Westside Christian School	13	12.2
Milwaukee	Carters Christian Academy	7	7.0
	Christ St. Peter Lutheran School	2	2.0
	Cross Trainers Academy	28	28.0
	Granville Lutheran School	4	4.0
	Hillel Academy	8	8.0
	Messmer Catholic Schools	7	7.0
	Milwaukee Lutheran High School	37	37.0
	Northwest Catholic School	2	2.0
	Northwest Lutheran School	5	5.0
	Notre Dame School of Milwaukee	8	8.0
	Pius XI Catholic High School	14	14.0
	Prince of Peace	2	2.0
	Risen Savior Lutheran School	16	16.0
	Saint Anthony School	30	30.0
	Saint Augustine Preparatory Academy	101	100.2
	Saint Charles Borromeo Catholic School	2	2.0
	Saint Coletta Day School	28	28.0
	Saint Lucas Lutheran School	8	8.0
	Saint Marcus Lutheran School	80	78.8
	Saint Martini Lutheran School	4	4.0
Saint Rafael the Archangel School	7	7.0	
Tamarack Waldorf School	13	13.0	
Torah Academy of Milwaukee	2	2.0	
TransCenter for Youth/ El Puente	27	27.0	
Wells Street Academy	22	22.0	
Yeshiva Elementary School	6	6.0	
Monona	Immaculate Heart of Mary Catholic School	11	11.0

<u>City</u>	<u>School Name</u>	<u>Headcount</u>	<u>FTE</u>
Mount Pleasant	Sonnenberg School	58	58.0
New Berlin	Heritage Christian Schools	14	14.0
Newburg	Saint John's Lutheran School	2	2.0
Port Washington	Saint John XXIII Catholic School	17	17.0
Racine	Racine Christian School	2	2.0
	Renaissance School	6	6.0
Randolph	Randolph Christian School Society, Inc.	6	6.0
Shawano	Saint James Lutheran School	6	6.0
Sheboygan	Saint Elizabeth Ann Seton Catholic School	15	14.5
	Saint Paul Lutheran School	4	4.0
	Sheboygan Christian School	19	19.0
Shorewood	Saint Robert School	11	10.6
Somers	Shoreland Lutheran High School	1	1.0
Sparta	Saint John's Ev Lutheran School	8	8.0
Stevens Point	Stevens Point Christian Academy	6	6.0
Sturtevant	Concordia Lutheran School	19	19.0
Sun Prairie	Sankofa Talented and Gifted North	10	10.0
Waterloo	Saint John Evangelical Lutheran School	3	3.0
Watertown	Saint John's Lutheran School	6	5.0
Waukesha	Beautiful Savior Lutheran School	19	18.0
	Montessori School of Waukesha	14	13.6
Waupun	Central Wisconsin Christian School	27	27.0
Wausau	Newman Catholic Schools	13	13.0
Wauwatosa	Pilgrim Lutheran School	3	3.0
West Allis	Mary Queen of Saints Catholic Academy	3	3.0
West Bend	Good Shepherd Evangelical Lutheran School	14	13.0
	Living Word Lutheran High School	7	7.0
West Salem	Coulee Christian School	19	19.0
Whitefish Bay	Holy Family School	8	8.0
Wisconsin Rapids	Assumption Catholic Schools	15	15.0
	Immanuel Lutheran School	<u>14</u>	<u>14.0</u>
	Totals	1,425	1,406.6

APPENDIX VIII

State General Aid Reduction Attributable to Pupils in the Special Needs Scholarship Program 2020-21 School Year

<u>District</u>	<u>Aid Reduction</u>	<u>District</u>	<u>Aid Reduction</u>
Adams-Friendship Area	\$12,977	Horicon	\$25,954
Appleton Area	436,541	Hortonville Area	51,908
Arrowhead UHS	64,885	Howards Grove	6,489
Ashland	120,416	Howard-Suamico	64,885
Ashwaubenon	12,977	Hustisford	12,977
Bangor	12,977	Iola-Scandinavia	21,277
Baraboo	12,977	Johnson Creek	12,977
Beaver Dam	38,931	Kaukauna Area	175,190
Bonduel	90,839	Kenosha	856,482
Brown Deer	25,954	Kettle Moraine	104,452
Cadott Community	51,908	Kewaskum	25,954
Cambria-Friesland	8,300	Kewaunee	12,977
Cambridge	19,466	Kiel Area	25,954
Campbellsport	25,954	Kimberly Area	38,931
Cashton	12,977	Kohler	12,977
Cedarburg	25,954	La Crosse	201,144
Chilton	12,977	Lake Country	14,789
Chippewa Falls Area	316,537	Little Chute Area	12,977
Clintonville	21,277	Luxemburg-Casco	32,443
Coleman	12,977	Madison Metropolitan	343,011
Columbus	12,977	Manitowoc	38,931
Cudahy	38,931	Markesan	12,977
D C Everest Area	38,931	Medford Area	77,862
De Pere	25,954	Melrose-Mindoro	25,954
Dodgeville	12,977	Menomonee Falls	168,701
East Troy Community	25,954	Mequon-Thiensville	155,724
Elmbrook	58,397	Middleton-Cross Plains Area	162,522
Fond du Lac	489,207	Milwaukee Public Schools	6,881,958
Fort Atkinson	196,467	Monona Grove	90,839
Fox Point J2	19,444	Mosinee	12,977
Franklin Public	21,277	Mount Horeb Area	25,954
Freedom Area	25,954	Mukwonago	25,954
Galesville-Ettrick-Trempealeau	25,954	Neenah	12,977
Genoa City J2	12,977	Nekoosa	38,931
Germantown	189,979	New Berlin	77,862
Glendale-River Hills	60,208	New Holstein	60,208
Grafton	51,908	New London	12,977
Green Bay Area	298,471	North Fond du Lac	38,931
Greenfield	25,954	North Lake	8,300
Hamilton	84,351	Oak Creek-Franklin Joint	25,954
Hartford J1	25,954	Oakfield	21,923
Hartford UHS	38,931	Oconomowoc Area	103,408
Hartland-Lakeside J3	55,531	Oconto	12,977
Holmen	138,070	Onalaska	73,185
Holy Hill Area	38,931	Oregon	7,786

<u>District</u>	<u>Aid Reduction</u>	<u>District</u>	<u>Aid Reduction</u>
Oshkosh Area	\$38,931	Two Rivers Public	\$12,977
Palmyra-Eagle Area	25,954	Union Grove J1	12,977
Pewaukee	21,277	Verona Area	51,908
Plymouth	25,954	Washburn	71,374
Port Edwards	12,977	Waterford UHS	25,954
Port Washington-Saukville	198,278	Waterloo	38,931
Portage Community	12,977	Watertown	64,885
Racine	678,427	Waukesha	431,837
Randolph	47,877	Waunakee Community	12,977
Richmond	13,528	Waupun	198,278
Rio Community	12,977	Wausau	112,116
Rosendale-Brandon	51,908	Wauwatosa	116,793
Saint Francis	12,977	West Allis-West Milwaukee	207,632
Salem	25,954	West Bend	337,402
Sauk Prairie	12,977	West De Pere	25,954
Seymour Community	38,931	West Salem	142,747
Shawano	86,162	Westby Area	12,977
Sheboygan Area	436,541	Whitefish Bay	90,839
Sheboygan Falls	12,977	Whitehall	12,977
Shorewood	38,931	Whitewater	64,885
South Milwaukee	51,908	Whitnall	25,954
Sparta Area	86,162	Wisconsin Rapids	289,117
Stevens Point Area Public	64,885	Wittenberg-Birnamwood	12,977
Sun Prairie Area	38,931	Wrightstown Community	<u>21,277</u>
Twin Lakes #4	12,977	Totals	\$18,038,129