



## **Ohio's Voucher Programs: An Overview**

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## **INTRODUCTION**

State-funded voucher programs are often hotbeds for political controversy. The birth and growth of vouchers in the Buckeye State is no different, though vouchers (often called “scholarships”) are more widely accepted—or at least tolerated—than ever before. The genesis of vouchers in Ohio stretches back to 1995 and the Cleveland Scholarship and Tutoring program. In 2006, the state expanded vouchers statewide via a program called EdChoice, which aims to assist students assigned to a low-rated public school. Soon after, vouchers were expanded to provide opportunities for special needs students and for low-income students.

As a bellwether state with more voucher programs than any other, supporters and detractors alike have paid close attention to Ohio’s voucher environment. This includes the now-famous Supreme Court case *Zelman v. Simmons-Harris*, which found that Ohio’s school voucher program doesn’t violate the Constitution’s Establishment Clause.<sup>1</sup> The decision set an important precedent that has impacted voucher programs in the United States.

With five voucher programs, continued calls for expansion, changing funding amounts, and ongoing debates in the areas of accountability, quality, and equity, Ohio’s voucher system is large and complex. In this paper, several aspects of this system will be explored, including each of the five voucher programs, testing, and *Zelman v. Simmons-Harris*.

## **CLEVELAND SCHOLARSHIP PROGRAM**

The Ohio General Assembly established the state’s first voucher program in 1995.<sup>2</sup> Though it is commonly referred to as the Cleveland Scholarship Program, it is officially known as the Pilot Project Scholarship Program. The program was designed to give students in grades K-12 the opportunity to attend private schools in Cleveland. The Ohio Department of Education (ODE) furnishes a list of approved schools that students may choose to attend with their scholarship.<sup>3</sup> In order to participate in the program, private schools must meet certain specifications.<sup>4</sup>

### ***Eligibility***

Eligible students reside within the boundaries of the Cleveland Metropolitan School District (CMSD) and are slated to enroll in any grade K-12. Students who receive a scholarship may continue to receive one until they have graduated,<sup>5</sup> but parents/guardians are required to renew scholarships each year.<sup>6</sup> Students retain their scholarship as long as they reside within CMSD boundaries, attend a participating school, and meet all other program requirements.<sup>7</sup> Students are also permitted to transfer to a different participating school,<sup>8</sup> though they may only attend a private school that is located within CMSD boundaries or within five miles of the boundary border.

### ***Application process***

To apply for a Cleveland scholarship, students must first be accepted to a participating private school. Once the private school accepts the student, the school will submit the scholarship application on behalf

of the student via a secure online application system.<sup>9</sup> The law requires the state superintendent to establish the application process, and recent guidance from ODE indicates that students from low-income families are given priority.<sup>10</sup> If necessary, a wait list is created based on the date applications are received.

### ***Funding***

The Cleveland Scholarship Program is funded through an earmark by the Ohio General Assembly.<sup>11</sup> Since each participating private school has a different tuition total, the state pays up to a certain amount of tuition based on the grade level of the student.<sup>12</sup> The current maximum scholarship amount is \$4,250 for grades K-8 and \$5,700 for high school.<sup>13</sup> If a school's tuition is *less* than the maximum amount offered by the state, the state pays the lesser of the two costs. If the tuition total is *more* than the state's maximum provided amount, families with incomes above two hundred percent of the federal poverty level are responsible for covering the difference. Scholarship amounts can only cover school tuition, and families are responsible for registration and materials fees as well as other related expenses.<sup>14</sup> Checks are mailed to individual schools for parents to sign.<sup>15</sup>

## **EDUCATIONAL CHOICE SCHOLARSHIP PROGRAM**

The Educational Choice Scholarship program, known as EdChoice, was established in 2005 as a pilot program. As of 2016, the program provides up to 60,000 state-funded scholarships to students who attend low-performing public schools. The state also appropriates funds each year to students who qualify based on family income.<sup>16</sup> Eligibility rules for each scholarship are different, though state law includes provisions that describe how ODE must handle those who double qualify.

### ***Low-performing schools eligibility***

A student can be eligible for EdChoice based on their assignment to a low-performing school. According to ODE, eligibility for this type of voucher is given to the following students:<sup>17</sup>

- Students currently attending a “designated” public school in their resident district
- Students who will be assigned to a designated public school in the upcoming year
- Students currently attending a charter school whose assigned home school is a designated school
- Students eligible to enter Kindergarten who would be assigned to a designated school
- Students enrolling in an Ohio school for the first time who would be assigned to a designated school for the upcoming year<sup>18</sup>

The definition of a designated school—one that earns a child the right to apply for an EdChoice scholarship—is complex. Moreover, the definition has changed numerous times over the years. Currently, buildings that satisfy one of the following options are considered a designated school:<sup>19</sup>

1. The building, on two of three most recent state report cards, meets any of the following specifications:

- a. The building was in a state of academic emergency or academic watch
  - b. The building received a grade of D or F for its performance index score and value added progress dimension during any year from 2012-13 to 2015-16; or if the building serves only grades ten through twelve, it received a grade of D or F for the performance index score and four-year adjusted cohort graduation rate of less than 75 percent
  - c. The building received an overall grade of D or F or a grade of a grade of F for value added during the 2016-17 school year or any year thereafter
2. The building meets both of the following conditions:
    - a. The building was ranked for at least two of the three most recent years in the lowest 10 percent of all buildings according to performance index score
    - b. The building was not declared to be excellent or effective (or equivalent ratings determined by the department) in the most recent published rating
  3. The building meets both of the following conditions and the student is in grades Kindergarten through three:
    - a. On two of the three most recent report cards, the building received a grade of D or F in improving literacy in grades K-3
    - b. The building did not receive a grade of A in improving literacy in grades K-3 on the most recent report card
  4. The building operates in a district that is under the aegis of an academic distress commission

ODE stops awarding first-time scholarships to students in designated buildings when the building ceases to meet the criteria that first labeled it a designated building. However, students who received scholarships in previous years remain eligible until they complete grade twelve as long as the following stipulations are met:<sup>20</sup>

- The student must not move to another public school district. However, if the student would be assigned to another EdChoice designated school in their new district, he or she remains eligible.
- The student is required to take all state achievement tests
- The student cannot have more than twenty unexcused absences for the school year

Students seeking an EdChoice scholarship for the first time on the basis of low-performing schools eligibility are *not* eligible if on the most recent report card rating, their assigned building had an overall grade of A or B and a grade of A in the value added dimension. Students are also ineligible if the building serves only grades ten through twelve and received a grade of A or B for the performance index score and had a four-year adjusted cohort graduation rate of greater than or equal to 75 percent.<sup>21</sup>

Under state law, students are eligible for a scholarship if they are enrolling in Ohio schools for the first time and are assigned to a low-performing school or reside in a very low-performing district that has an intra-district open enrollment policy under which they are not automatically assigned a specific building. A low-performing district for purposes of gaining eligibility under this measure is defined as a district that, on at least two of the three most recent report cards, has received an overall grade of D or F and a grade of F on the value added dimension. However, the district is not considered low-performing—and

students aren't eligible—if the district's most recent report card had an overall grade of A or B and a grade of A for the value added dimension.<sup>22</sup>

Eligibility for EdChoice based on enrollment in a low-performing school was affected by the passage of the 2015 state budget.<sup>23</sup> The budget included safe harbor provisions designed to insulate students, teachers, and schools from state accountability system sanctions during the transition to a new state assessment. Since EdChoice could be considered a sanction on low-performing schools, safe harbor provisions mandate that the schools on the EdChoice eligibility list as of 2014-15 remain on the list and schools not on the list stay off, regardless of improvement or declines in student performance. Guidance from ODE clarified that while state report cards couldn't force a school to be added to the EdChoice eligibility list, schools whose performance improved could be removed from the list.<sup>24</sup> However, during the most recent legislative session, legislators passed language to ensure that schools could not be removed from the list based upon improvement. The list is now static until the 2019-20 school year.

### ***Income-based eligibility***

In addition to establishing eligibility by being assigned a low-performing school, students can qualify for an EdChoice “expansion” scholarship based upon family income. Students qualify for an income-based EdChoice scholarship if they meet the following criteria:<sup>25</sup>

- The student is eligible to enter any grade K-3 in the fall of 2016
- The student does not live in the Cleveland Municipal School District
- Family household income is at or below 200 percent of the federal poverty guidelines

In the years following 2016, the next highest grade level will be added to the eligible grade range. For example, in the fall of 2017, the income-based scholarship will be available for students entering any grade K-4.

The department is mandated by law to award scholarships in the following order of priority:<sup>26</sup>

1. Eligible students who received scholarships via income-based eligibility in the previous school year
2. Eligible students with family incomes at or below 100 percent of the federal poverty guidelines
3. Remaining eligible students

Families applying for the income-based EdChoice scholarship must have their income verified.<sup>27</sup> Once a scholarship is awarded, the student remains eligible for subsequent school years—even if the student's family income rises above the 200 percent of the federal poverty guidelines—though there are a few caveats:<sup>28</sup>

1. If the student's family income is above 200 percent but below 300 percent of the federal poverty guidelines, the student only receives 75 percent of the full scholarship amount.
2. If the student's family income is above 300 percent but below 400 percent of the federal poverty guidelines, the student only receives 50 percent of the full scholarship amount.

3. If the student's family income is above 400 percent of the federal poverty guidelines, the student is no longer eligible.

### ***Students who double-qualify***

A student who is eligible under low-performing school guidelines and income-based guidelines will automatically receive a voucher based on the low-performing school eligibility requirements.

### ***Application process***

ODE has two application windows each year for the EdChoice program. The first period runs for no less than seventy-five days and opens no sooner than the first day of February prior to the school year for which a scholarship will be used. The second window runs for no less than thirty days and opens no sooner than the first day of July prior to the school year for which the scholarship will be used.<sup>29</sup>

ODE guidance states that students should apply for admission to a participating private school first; once the student has been accepted for enrollment, the private school will submit a scholarship application on behalf of the student.<sup>30</sup> Participating schools are not required to accept eligible students.

### ***Funding***

Both types of EdChoice eligibility require ODE to annually pay scholarships for students to attend private schools.<sup>31</sup> These payments, which are periodic partial payments, are made payable to the parent(s) of eligible students who are awarded the scholarship unless the student is at least eighteen years of age.<sup>32</sup> The payments themselves are mailed to eligible private schools for parents to endorse.

The sources of payments, however, are different. If a student is eligible based on their assigned local school, ODE deducts the appropriate amount for each eligible student from the payments made to the school district in whose formula ADM the student is included.<sup>33</sup> In the case of income-based eligibility, ODE draws funds from line-item appropriations in its most recent budget. For the 2016-17 school year, the maximum award for an eligible student in grades Kindergarten through eight is \$4,650; for an eligible student in grades nine through twelve, the maximum award is \$6,000.<sup>34</sup> Awarded scholarships can only be used to pay tuition and can only be used to attend private schools that meet program participation requirements.<sup>35</sup>

EdChoice scholarships pay either the scholarship amount or the private school's actual tuition—whichever is less. No private school may charge students whose family income is at or below 200 percent of federal poverty guidelines a tuition fee greater than the total amount awarded by ODE.<sup>36</sup> Other students, however, may be charged up to the difference between the scholarship amount and the regular tuition charge. In this case, schools may permit families to provide volunteer services rather than cash payment for all or part of their charges. Private schools that charge amounts additional to the scholarship must annually report the number of students they charge as well as the average of the amounts charged.

### ***If demand outpaces supply***

Although the number of scholarships in use is currently well below the statutory cap, if the number of students who applied for a scholarship did exceed the number of scholarships available, the department would award scholarships in a prescribed manner. In general, priority would be given to returning students and then low-income students.<sup>37</sup>

## **AUTISM SCHOLARSHIP PROGRAM**

The Autism Scholarship Program (ASP) was created in 2003 by the Ohio General Assembly and began in 2004. It entitles children with autism to attend a special education program other than what is provided by their school district of residence<sup>38</sup> in order to receive the services outlined in their individualized education program (IEP).<sup>39</sup> Participating private schools and providers must meet certain guidelines in order to participate in ASP.<sup>40</sup> Public school districts can also register as scholarship providers for students who reside outside of their district.<sup>41</sup>

### ***Eligibility***

In order to be eligible, a child must be identified as a child with autism by their school district of residence.<sup>42</sup> The student must also have a finalized, district-created IEP that has been agreed upon by all applicable parties.<sup>43</sup> However, the student does *not* have to be officially enrolled in the district.<sup>44</sup> Children are eligible to apply to participate once they are three years of age.<sup>45</sup>

Students who are enrolled in the Jon Peterson, EdChoice, or Cleveland Scholarship programs are not able to simultaneously participate in ASP.<sup>46</sup> Students who attend a community school may apply to participate in ASP, but they must have a current multi-factored evaluation and IEP from their district of residence. If awarded an ASP scholarship, the child must withdraw from their community school in order to accept it.<sup>47</sup> Similarly, students who are enrolled in a private school or are homeschooled are also eligible to apply once they obtain an IEP from their district of residence.<sup>48</sup>

### ***Application process***

Parents/guardians are empowered to select participating programs that they believe will best meet their child's needs from a database of registered providers.<sup>49</sup> Once a provider is selected, students must apply directly to the provider and be accepted for enrollment.<sup>50</sup> Participating providers are not required to accept eligible students.<sup>51</sup> Students who are accepted for enrollment are provided with an ASP application by the provider, who submits the application on their behalf once it has been completed.<sup>52</sup> Applications are accepted throughout the year.<sup>53</sup> ASP officially begins on July 1 and ends on June 30, so applications submitted from April to June do not start until the new program year that begins on July 1.<sup>54</sup> Since there is no cap on the number of ASP scholarships available, a student will be awarded a scholarship as long as they meet eligibility requirements.<sup>55</sup>

Parents must renew their scholarship each spring by submitting a renewal application.<sup>56</sup> These forms are mailed to parents in late March and are accepted beginning on April 1. As long as the student has a current IEP and still qualifies for special education due to autism, they will continue to receive the scholarship through high school graduation or the age of twenty-two.<sup>57</sup>

## **Funding**

The maximum amount of the scholarship is \$27,000 per year, which is the disability formula funding amount set in law for all public school students.<sup>58</sup> If the fees charged by a provider add up to less than \$27,000, ODE will pay the lesser amount.<sup>59</sup> Providers submit monthly invoices through an online system;<sup>60</sup> scholarships are then deducted from amounts paid to each school district and are considered an approved special education and related services expense of the school district.<sup>61</sup> ODE is responsible for paying for scholarships<sup>62</sup> by mailing a check to the provider in the name of the parent, who must then sign it.<sup>63</sup> Students who apply and begin ASP after the start of the year or withdraw before the end of the year receive a prorated scholarship.

Scholarships can only be used for the specific child who was awarded the scholarship. Funds can be used to pay tuition for a special education program at an alternative public school or registered private school that will implement the student's IEP; they may also be used to pay for services agreed on by the provider and parent/guardian that may not be included in the IEP but are still associated with the child's education.

To obtain services that are not included on the student's IEP, parents must complete a service modification request with their provider in accordance with ODE guidelines. Once approved by ODE, the modification allows parents to purchase the additional service using scholarship funds.<sup>64</sup> Funds cannot be used to purchase equipment or materials or to pay for assessments, respite care, or recreational classes such as martial arts and riding lessons.<sup>65</sup>

Services must be supplied by a registered ASP provider,<sup>66</sup> although parents are permitted to select multiple providers.<sup>67</sup> Parents and their selected provider(s) complete a fee and service agreement that lists all services to be provided and associated fees so that parents can determine the funding amount to distribute to each provider.<sup>68</sup> However, ASP funds *cannot* be used as a supplement to the education provided by a district of residence—if a student accepts an ASP scholarship, they must enroll with a participating provider (either alternative public or registered private) to obtain their education and supportive services.<sup>69</sup>

## **JON PETERSON SPECIAL NEEDS SCHOLARSHIP PROGRAM**

The Jon Peterson Special Needs Scholarship Program (JPSN) was created in 2011 by the Ohio General Assembly and began during the 2012-13 school year.<sup>70</sup> Unlike ASP, which is intended only for students with autism, JPSN provides scholarships to any student who has been identified by their public district of residence as having a disability.<sup>71</sup> JPSN scholarship funds empower parents to select a participating school—whether an alternative public school or registered private provider—to implement their child's IEP in place of the district of residence.<sup>72</sup> Parents are also permitted to utilize multiple providers in order to deliver the specific services and meet the goals listed on the child's IEP.

However, parents are *not* permitted to use JPSN to supplement their child's enrollment and education in a traditional district.<sup>73</sup> This means that once a student is approved for a scholarship, they must use it to obtain their education and supportive services outside the public schools in their district of residence.



This also means that while using a JPSN scholarship, parents (*not* the district of residence) take full responsibility for ensuring that their child receives necessary special education services.<sup>74</sup> Districts are still responsible for conducting required evaluations and annually updating the child’s IEP.<sup>75</sup>

### ***Eligibility***

Any student in grades K-12 who has been identified as having a disability and has a current and finalized IEP from their district of residence is eligible for JPSN.<sup>76</sup> Children who are homeschooled or are enrolled in a private school are eligible to apply to the JPSN program as long as they have a current and finalized IEP from their district of residence.<sup>77</sup> Students who are enrolled at a charter school are also eligible to apply if they have a current and finalized IEP; however, upon being awarded the scholarship, the student must withdraw from the charter school.<sup>78</sup> Although children may be eligible—and even apply for—multiple state funded scholarship (including ASP and JPSN), parents may only accept one.<sup>79</sup>

### ***Application process***

If a student is determined to be eligible for JPSN, parents must select a participating provider from the list of registered providers provided by ODE.<sup>80</sup> The chosen provider then submits the application on behalf of the student.<sup>81</sup> If a parent elects to use multiple providers, only one is able to submit the initial application—other selected providers will register as secondary providers once the scholarship has been awarded. As is true with ASP, participating providers are not required to accept eligible students.

The JPSN application process occurs on a yearly basis,<sup>82</sup> though there are two application windows per year.<sup>83</sup> The first application window begins in February and ends on April 15; any student awarded a scholarship during this window receives an award for the full school year. The second application window begins in October and ends on November 15; any student awarded a scholarship during this window receives an award for half of the school year (January through June).

The number of scholarships awarded under JPSN in any fiscal year cannot exceed 5 percent of the total number of students in the state who were identified as children with disabilities during the previous year.<sup>84</sup> While this places a cap on the number of students who can use a scholarship, no students to date have been denied a scholarship because of the cap, nor has the limit been close to being reached.

Parents must renew the JPSN scholarship each year.<sup>85</sup> ODE accepts renewal applications beginning on February 1. In order to be eligible for renewal, all of the following must be true:<sup>86</sup>

- The renewal application was submitted by the deadline
- The student took all state-required tests for their grade level (exceptions apply)
- The student still meets requirements for being diagnosed with an educational disability
- The student has a current IEP from their district of residence

### ***Funding***

The amount of funding awarded to eligible applicants is dependent on the child’s special education category, and each amount (with the exception of the highest category) matches the funding formula

amount for public school students in the same category. The categories and their associated funding amounts are as follows:<sup>87</sup>

Category number	Category description	Scholarship amount for 2016-17
1	Speech and language only	\$7,578
2	Specific learning disability, intellectual disability, or other health impairment-minor	\$10,005
3	Hearing impaired or emotional disturbance	\$15,622
4	Vision impaired or other health impairment-major	\$18,841
5	Orthopedic impairment or multi-handicapped	\$23,390
6	Autism, traumatic brain injury, or hearing and vision impaired	\$27,000

As of the 2014-15 school year, children whose disabilities are labeled as category one—students whose disability is speech or language only—are only permitted to use the JPSN scholarship for related services included in the child’s IEP.<sup>88</sup> These students are not permitted to use the scholarship for private school tuition.

Scholarships can only be used to pay tuition and fees to an alternative public or registered private provider that implements the child’s IEP (including public school districts)<sup>89</sup> and for services listed on the IEP. If a parent believes that their child needs an additional service not listed on the IEP, he or she must request a modification of services from the provider—this process does *not* revise the IEP itself.<sup>90</sup> Services not included in the IEP but associated with the child’s education must be agreed to in writing by both the parent and the selected provider.<sup>91</sup>

Providers are invoiced monthly via ODE’s online system.<sup>92</sup> Scholarship checks are written to both providers and parents and must be signed by the parent before the provider can cash it.<sup>93</sup> Parents who opt to use multiple providers choose what percentage of the scholarship to give to each provider.

## **TESTING**

Federal law and Ohio’s state school accountability system requires annual testing for the vast majority of its K-12 students. While private schools that take part in voucher programs cannot be required by the state board or ODE to comply with any education laws, rules, or requirements that would not otherwise apply to private schools, students participating in some voucher programs are required to take state tests. In addition, a private school that has at least 65 percent of its total enrollment made up of students participating in state scholarship programs must administer state assessments to all of its students.

Students participating in EdChoice and the Cleveland Scholarship Program must take all tests required by state law.<sup>94</sup> This includes state testing in grades 3 through 8 in English language arts and math, grades 4 and 6 in social studies, and grades 5 and 8 in science. Chartered nonpublic schools are also required by state law to report to ODE the results of each assessment given to a scholarship student.<sup>95</sup> ODE is then required to compile and aggregate the scores into the following categories:<sup>96</sup>

- By state, which includes all EdChoice scholarship students
- By district, which includes all scholarship students
- By chartered nonpublic school, which includes all scholarship students enrolled at the school

ODE also aggregates student performance into the following groups:

- Grade level
- Race and ethnicity
- Gender
- Students who have participated in the scholarship program for three years or more
- Students who have participated in the scholarship program for more than one year and less than three years
- Students who have participated in the scholarship program for one year or less
- Economically disadvantaged students

ODE must post the disaggregated data on its website by February 1 each year and distribute it to the parent of each eligible student. The department is also required to provide parents of scholarship students with information comparing the student's performance with the average performance of similar students enrolled in the district building the scholarship student would have originally attended. To determine a similar student, ORC mandates that the district consider age, grade, race and ethnicity, gender, and socioeconomic status.

Students who participate in the Autism Scholarship Program are not required to participate in state achievement and graduation tests. ASP students attending chartered nonpublic high schools, however, are required to participate in any tests required for graduation—as is true for most private school students in the state (even those not using EdChoice scholarships).<sup>97</sup> Students who participate in the Jon Peterson Special Needs Scholarship Program must take state tests required for their grade level, and students who do not complete the test are not permitted to renew their scholarship.<sup>98</sup> However, students can be exempted from state tests if an exemption is provided in their IEP. For JPSN students, administering required state tests is the responsibility of the primary scholarship provider, not the public school district.

## **ZELMAN VS. SIMMONS-HARRIS**

From its start in 1995, the Cleveland Scholarship Program was surrounded by controversy. Much of the debate was centered on the fact that the majority of Cleveland's private schools were religiously affiliated. By the 1999-2000 school year, 96 percent of students participating in the program attended

religiously affiliated schools.<sup>99</sup> Opponents argued that since the vast majority of participants attended religious schools, and since the government is forbidden from advancing or restricting any particular religion, the state money provided to parents to fund the scholarships was a violation of the Establishment Clause. Opponents also argued that vouchers lured students away from traditional public schools (thereby robbing public schools of funding), and that it was unfair that students who already attended private schools without the aid of state funds were able to obtain a voucher.<sup>100</sup>

Action against the program was undertaken by a group of Ohio taxpayers residing in Cleveland, including Simmons-Harris. They filed their action against the then-superintendent of public education in Ohio, Susan Zelman.<sup>101</sup> Both the initial ruling by district court and the verdict by the court of appeals were in favor of Simmons-Harris. Zelman appealed the case to the United State Supreme Court, which ruled in Zelman's favor with a 5-4 opinion delivered by Chief Justice William H. Rehnquist.<sup>102</sup> Rehnquist wrote that although the program used state money, families made their own "voluntary and independent choice" to select a religious school.<sup>103</sup> In addition, the program allowed all schools to participate, regardless of their religious affiliation or lack thereof. In short, since the program didn't favor a particular religion but rather enabled individual citizen choice, it couldn't be ruled a violation of the Establishment Clause. This powerful decision has played an important role in the growth of private school choice programs around the nation.

## END NOTES

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<sup>1</sup>Oyez, Illinois Institute of Technology Chicago-Kent College of Law, *Zelman v. Simmons-Harris*, accessed April 13, 2016, <https://www.oyez.org/cases/2001/00-1751>.

<sup>2</sup> Ohio Revised Code § 3313.975

<sup>3</sup> Ohio Department of Education, Scholarship Program Selection, accessed April 13, 2016, <https://scholarship.ode.state.oh.us/>.

<sup>4</sup> Ohio Department of Education, Cleveland Scholarship: Information for Providers, accessed April 13, 2016, <http://education.ohio.gov/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/Cleveland-Scholarship-Tutoring-Program-For-Provide>.

<sup>5</sup> Ohio Revised Code § 3313.975.

<sup>6</sup> Ohio Department of Education, Cleveland Scholarship Program 2016-2017 Fact Sheet, accessed April 13, 2016, [http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016\\_2017\\_CSP\\_FactSheet.pdf.aspx](http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016_2017_CSP_FactSheet.pdf.aspx).

<sup>7</sup> Ohio Department of Education, Cleveland Scholarship Program 2016-2017 FAQs, accessed April 13, 2016, [http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016\\_2017\\_CSPFAQs.pdf.aspx](http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016_2017_CSPFAQs.pdf.aspx)

<sup>8</sup> Ibid.

<sup>9</sup> Ohio Department of Education, Cleveland Scholarship: Information for Providers, accessed April 13, 2016, <http://education.ohio.gov/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/Cleveland-Scholarship-Tutoring-Program-For-Provide>.

<sup>10</sup> Ohio Department of Education, Cleveland Scholarship Program 2016-2017 Fact Sheet, accessed April 13, 2016, [http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016\\_2017\\_CSP\\_FactSheet.pdf.aspx](http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016_2017_CSP_FactSheet.pdf.aspx).

<sup>11</sup> Ohio Revised Code § 3313.975.

<sup>12</sup> Ohio Department of Education, Cleveland Scholarship Program, accessed April 13, 2016, <http://education.ohio.gov/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program>.

<sup>13</sup> Ibid.

<sup>14</sup> Ohio Department of Education, Cleveland Scholarship Program 2016-2017 Fact Sheet, accessed April 13, 2016, [http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016\\_2017\\_CSP\\_FactSheet.pdf.aspx](http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016_2017_CSP_FactSheet.pdf.aspx).

<sup>15</sup> Ohio Department of Education, Cleveland Scholarship Program 2016-2017 FAQs, accessed April 13, 2016, [http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016\\_2017\\_CSPFAQs.pdf.aspx](http://education.ohio.gov/getattachment/Topics/Other-Resources/Scholarships/Cleveland-Scholarship-Tutoring-Program/2016_2017_CSPFAQs.pdf.aspx).

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