

Dear Members of the Subcommittee,

I am writing to express concerns regarding Georgia S.B. 446 as it is currently drafted. While the intent to expand educational opportunity is commendable, several provisions in this bill raise important questions that should be addressed before moving forward.

First, the bill requires that schools receiving scholarships from Scholarship Granting Organizations (SGOs) must “adhere to the provisions of the federal Civil Rights Act of 1964.” As you are aware, the Civil Rights Act contains multiple titles, many of which are not applicable to private educational institutions. These include provisions related to voting, public accommodations, and desegregation of public facilities and public education.

While Title VII appropriately applies to employment practices, and Title VI may apply in cases where federal financial assistance is received, the current language creates ambiguity. It raises concern that provisions beyond those intended for private school; could be applied in ways never meant for private educational institutions. Given how other states have begun treating scholarship programs as government assistance, this ambiguity could lead to unintended consequences.

A more precise approach would be to clarify that schools must adhere only to the *applicable provisions* of the Civil Rights Act of 1964.

Second, the bill includes a provision stating that no entity that operates, owns, is affiliated with, or is a subsidiary of an organization that provides accreditation of elementary or secondary schools may serve as a Scholarship Granting Organization. This raises concerns about unintentionally excluding organizations with longstanding experience and credibility in supporting schools and administering programs effectively. Limiting eligibility in this way may reduce the capacity and effectiveness of SGOs.

These concerns may not present immediate issues, but the statutory language as written leaves room for interpretation that could significantly impact private schools over time. Addressing these ambiguities now will help prevent unintended consequences in the future.

I respectfully urge the subcommittee to clarify the applicability of the Civil Rights Act and reconsider the restriction on SGOs before advancing the bill.

Thank you for your time and consideration

Sincerely,

Autumn Elkins Faulkner  
Director of State Public Policy Engagement  
Association of Christian Schools International

**ASSOCIATION OF CHRISTIAN SCHOOLS INTERNATIONAL**

Phone 719.528.6906 | Fax 719.531.0631 | [ACSI.org](http://ACSI.org) Post Office Box 62249 Colorado Springs, CO 80962