



# *New York State Council of Catholic School Superintendents*

20 CORPORATE WOODS BLVD., STE 211 • ALBANY, NY 12211 • 518.434.6195  
WWW.NYSCATHOLIC.ORG • JCULTRARA@NYSCATHOLIC.ORG

JAMES D. CULTRARA  
Executive Secretary

To: The Honorable Kathy Hochul, Governor  
The Honorable Members of the NYS Legislature

From: Jim Cultrara

Re: Substantial Equivalency of Religious & Independent Schools

Date: April 1, 2025

-----

Our 400 Catholic schools, serving thousands of students and their families across the state, take great pride in exceeding state academic standards in our mission to prepare our graduates to be loving, responsible, and productive adults fully engaged in society. Accordingly, parents are confident that their hard-earned tuition dollars are not squandered at a Catholic school. In adopting the “substantial equivalency” regulations, the Regents took considerable steps to protect the confidence parents have in our schools. As such, we write to convey our unwavering opposition to any back-room legislative deal that would undermine the accountability provisions set forth in these regulations.

This Council applauded the Commissioner of Education and the Board of Regents for actively engaging *all* stakeholders, for more than two years, in the development and adoption of the regulation that strikes a critical balance between the rights of parents to direct their children’s education and the state right to impose minimum standards on schools. Although this Council maintains its position that the Regents and State Education Department should have focused their enforcement efforts on only those schools that may need some improvement, we are, on the other hand, grateful that the regulation incorporates the rigorous accreditation process and testing regimens by which our schools are judged and for which they devote considerable financial and administrative resources. Administering standardized tests and being accredited by a reputable agency are both critically important to our schools, who must rely on the confidence and financial sacrifice of parents who entrust us with their children’s formal education.

Any legislative effort to meddle with these provisions runs the great risk of eroding parent confidence in their schools and can easily present an existential threat to Catholic schools and the families we serve. Just as the Regents engaged all stakeholders in the public process of crafting the regulation, consideration of any statutory change also requires input from all stakeholders, with public debate through the legislative committee and hearing process. Dodging this fundamentally democratic process risks an erosion of the public’s confidence in their government.