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Private school voucher programs are part of what proponents call the “school choice” movement, which aims to increase educational opportunities for students. The concept of school choice is not without controversy, especially with regards to private school vouchers. While voucher programs have existed in the United States since the 1700s, they did not come into prominence until the passage of the Milwaukee Parent Choice Program in 1990. North Carolina passed two voucher laws in 2013 and numerous states across the country now have some type of voucher program embedded without their public education system. The goal of this dissertation was to study the historical development and contemporary status of the voucher trend while also closely examining North Carolina’s voucher law and analyzing the factors that led to its passage in 2013.

This study provides a historical overview of vouchers in the United States, as well as a detailed review of the literature surrounding private school vouchers. The history of vouchers in the United States can largely be divided into three time frames: the earliest voucher programs from 1776 to 1925, the passage of voucher laws aimed at evading desegregation mandates from 1950 to 1989, and the rise of modern voucher programs from 1990 to present day. My review of the literature revealed eight overarching voucher concepts. These eight themes include (a) academic achievement, (b) free-market competition, (c) individual parental school choice, (d) racial segregation, (e) funding and state budget issues, (f) targeting at-risk and disadvantaged student populations, (g) oversight and accountability, and (h) church-state separation and other legal concerns.

I applied these concepts to the information I gathered while examining over 130 documents published by two of North Carolina's most significant think-tanks, NC Policy Watch (NCPW) and the John Locke Foundation (JLF). I utilized specific coding techniques to identify the major themes found within these documents, which allowed me to analyze more closely how North Carolina's voucher law came into existence. I concluded my dissertation by assessing the impact of vouchers more broadly and offering specific recommendations for policymakers regarding some of the political and social issues that need further consideration.

DEBATING SCHOOL CHOICE IN NORTH CAROLINA:
THE RISE OF PRIVATE SCHOOL VOUCHERS

by

Robert Kennedy

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I dedicate this dissertation to my wife, Lindsey, who has offered unwavering support and encouragement throughout this entire process. It is difficult to be the spouse of a high school principal, especially one in graduate school, but you have been right beside me every step of the way. Reaching the culmination of this journey would not have been possible without the sacrifices you made along the way. This achievement is not mine; it belongs to us both, because I could not have done this without you.

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CHAPTER I

INTRODUCTION

Private school voucher programs have a long history in the United States. For North Carolina, however, the rise of vouchers is a relatively new phenomenon. Researchers and policymakers have debated the effectiveness of private school vouchers since America's first modern voucher program was created in Milwaukee, Wisconsin in 1990 (Carlson & Cowen, 2015; Chakrabarti, 2013; Weil, 2002). Analyzing the potential of voucher programs to raise student achievement for participating students and encourage higher performance for all schools is an important endeavor, especially given the controversial nature of this school reform effort. That, however, was not the purpose of my research. Instead, this qualitative study explored the birth and evolution of private school voucher policy in North Carolina. The goal of my research was to examine the historical development and contemporary status of the trend itself, examining North Carolina's voucher program specifically and analyzing the factors that led to its enactment in 2013.

Private school voucher programs are part of a larger "school choice" movement that is steadily growing across the country. Other school choice and educational reform efforts—including the increase of charter schools and the establishment of educational savings accounts—have been coupled with rising public school accountability plans, particularly in North Carolina. After the creation of Milwaukee's voucher program in

1990, subsequent voucher laws were passed in Ohio and Florida (Metcalf, West, Legan, Paul, & Boone, 2003; Chakrabarti, 2012). Voucher plans became increasingly popular after the 2002 Supreme Court decision in *Zelman v. Simmons-Harris* declared vouchers constitutional (*Zelman v. Simmons-Harris*, 2002b). From 2004 to 2006, following the *Zelman* decision, voucher programs became law in Colorado, Utah, Arizona, and the District of Columbia (Wolf, 2008). It was not until 2013, however, that North Carolina established a private school voucher plan, called “Opportunity Scholarships” by the General Assembly (Wettach, 2017).

While there are numerous voucher plans across the nation, the popularity of such programs grew only modestly from 2006 to 2012. During that time span, a few new voucher plans did emerge, including programs in Georgia, Indiana, Louisiana, Mississippi, and Oklahoma (Abdulkadiroglu, Pathak, & Walters, 2015; Alliance for School Choice, 2015; Martire, 2015). Of those five new programs, four were designed to assist students with special needs, thereby targeting a specific group of at-risk students (EdChoice, 2016d). The use of private school vouchers as a policy vehicle to propel educational reform and school choice agendas has remained relatively slow compared to other reform efforts, particularly charter schooling (Carlson, 2014). Given this national trend regarding vouchers, some may find it odd that North Carolina would initiate a comprehensive voucher program in 2013 aimed at reaching at-risk children from low socioeconomic backgrounds.

Voucher supporters believe this type of school reform initiative will open up greater educational opportunities for students from low-income families. Many of these

children are considered “at-risk” for dropping out of school, so voucher proponents believe providing school choice options for the parents of these children will increase their chances of academic success. On the other hand, voucher opponents believe these programs will pull much-needed funding away from public schools, only to pass that funding to largely unaccountable private schools. For voucher opponents, these programs only further harm at-risk students and their families, pointing to numerous research studies stating that many private schools do not out-perform neighboring public schools.

Embedded in the voucher debate are notions of justice and equity. Interestingly, voucher supporters *and* detractors believe that their position is the one that provides the most assistance for our state’s most disadvantaged students. Is it possible for *both* sides of this debate to believe they are fighting for justice for at-risk students and families? I explore this notion in my research as I study the history of voucher programs across the United States and, more specifically, the growth of voucher programs in North Carolina. To begin, however, I provide some background information to help define the concept of vouchers, differentiating this policy initiative from other similar educational reform efforts.

Background

Voucher programs are controversial initiatives that often target some of our most vulnerable, at-risk student populations. The research surrounding the effectiveness of vouchers and the potential of this reform effort to accomplish the goals outlined by supporters is often inconsistent from study to study. As a policy initiative, vouchers are sometimes confused with other types of school reform efforts. In the section that follows,

I offer a definition of vouchers, along with a description of other similar school choice programs.

What are Vouchers?

Private school voucher programs are one of the many different types of school reform initiatives often utilized by policymakers to promote parental school choice. Wolf (2008) characterized a “school voucher” plan as one where “public funds are made available to qualified parents to cover some or all of the expenses associated with enrolling their child in a participating private school of their choosing” (p. 417). Wolf (2008) stated that there are three defining features of a voucher program:

the source of the funds (governmental), the purpose for which the funds are provided (to enroll a school-age child in a private school), and the party whose decisions fulfill that purpose (a parent or legal guardian of the child). (p. 417)

At their most basic level, vouchers are, as Carl (2011) stated, a “mechanism for the public funding of education” (p. 3). Traditional school funding formulas allow for schools to receive funding based on the number of students that attend that particular school.

Vouchers, however, allow for public tax dollars to follow students to a different school.

As Carl (2011) stated,

Vouchers, by contrast, break traditional public education in two—the state continues to fund students and regulate the schools, but public funding follows the student to whatever school the student attends, be it a pre-existing private school (sectarian or secular), a new private school established to enroll students with vouchers, or a public school funded through vouchers but governed through traditional means. (p. 3)

While educational vouchers have seen some variance in their usage throughout American history, vouchers are, at present, most often used to allow students to attend the private school of their choice.

Similar School Choice Programs

Three similar school choice programs are often confused with private school vouchers: tax-credit scholarships, individual tax credits/deductions, and Education Savings Accounts (ESAs). Each of these three types of school choice initiatives is similar to, yet slightly different from, private school voucher programs, so differentiating them is important. Tax-credit scholarships are probably the most similar to voucher programs. In states with tax-credit scholarship programs, individuals and/or businesses are given tax credits when they make charitable donations to nonprofit organizations that, in turn, provide scholarships for students to attend private schools. The major difference between tax-credit scholarships and vouchers is the funding source: in a voucher plan, the government provides the funding directly (provided through taxation), while charitable donations from citizens and/or businesses provide the funding in a tax-credit scholarship program (EdChoice, 2016e, paras. 4–6).

Some states have authorized programs that give individual tax credits and deductions to parents for educational expenses. EdChoice is a nonprofit organization that supports expanding such school choice options across the country. EdChoice (2016e) noted that, in states with tax credit programs, “educational expenses” can include “private school tuition, books, supplies, computers, tutors, and transportation” (para. 6). Another

school choice reform effort that is gaining popularity in the United States is Education Savings Accounts (ESAs). EdChoice (2016e) described ESAs in this manner:

ESAs allow parents to withdraw their children from public district or charter schools and receive a deposit of public funds into government-authorized savings accounts with restricted, but multiple uses. Those funds—often distributed to families via debit card—can cover private school tuition and fees, online learning programs, private tutoring, community college costs, higher education expenses, and other approved customized learning services and materials. (para. 3)

Some components of voucher programs are evident in ESAs, though ESA programs generally include many more options than simply receiving a voucher to attend a private school. While ESAs, like tax-credit scholarships and deductions, are important elements of the larger school choice movement, the focus of my study was specific to voucher programs that are funded by taxpayer dollars and provide tuition assistance for students who wish to attend a private school.

Purpose

Since the establishment of our nation's first private school voucher programs in the 1990s, the debate over the effectiveness of these initiatives has been shrouded in controversy. These programs, including the one put forth in North Carolina in 2013, use taxpayer money to award scholarships to children from low-income families, allowing those students to attend the private school of their choice. North Carolina's program offers families up to \$4,200 per child, and those monies must be used toward paying the tuition and fees of attending a private school (Wettach, 2017). As discussed in my literature review, the evidence outlining the effectiveness of North Carolina's voucher program—and voucher programs nationally—is mixed at best. Nevertheless, North

Carolina legislators have increased funding each year for the Opportunity Scholarship Program (Wettach, 2017). As with many initiatives, both supporters and opponents of private school voucher programs can point to data, reports, and research that bolster their argument for why this is, or is not, an effective program (Egalite & Wolf, 2016).

What explains the rise of vouchers in North Carolina in 2013? The rise of the Republican supermajority in the North Carolina General Assembly in 2012 is certainly one of the reasons behind the birth of the 2013 voucher program, but was this shifting political tide the main—or only—cause of the program’s establishment? What other reasons can be found that potentially explain this trend toward the establishment of vouchers? The purpose of my research was to identify information that can potentially explain North Carolina’s move toward creating a voucher program in 2013.

Moreover, the social justice implications of vouchers are prevalent and important to examine, since these programs have historically targeted at-risk student populations. North Carolina’s voucher law is no exception: vouchers are only available for students living in low-income households and for students with special needs. Therein lies a large part of the significance of my research, as those who praise the effectiveness of vouchers do so under the basis that such reform efforts assist some of our nation’s most disadvantaged students. Often, both supporters and detractors of vouchers point to the law’s effect on at-risk students as a defense for their position. A major goal of my research was to examine what I believe to be competing notions of justice within the larger context of educational reform. To accomplish this goal, I examine historical research from voucher programs across the country before turning my attention squarely

on North Carolina. By doing so, I provide a historical policy analysis that places the significance of the North Carolina voucher plan in the greater context of the national school choice movement.

Research Questions

My dissertation addressed four main research questions. The first research question is answered through the content within my first five chapters and is summarized in Chapter VI. My final three research questions are discussed in detail in my sixth chapter. The four major research questions at the center of this work are:

1. How and why have vouchers developed into a widespread reform in many states, including North Carolina?
2. Which of the eight voucher themes was most prevalent in the North Carolina voucher debate?
3. Did the arguments made by both sides remain consistent through the years, or was there a noticeable shift in the focus of their arguments?
4. What were the key findings within the arguments made by each side of the voucher debate?

Before questions two, three, and four can be answered in my final chapter, however, the preceding chapters lay the groundwork for the historical context of vouchers nationally and help answer my first research question. That is the goal of my second chapter, where I utilize both primary and secondary sources to develop a historical analysis of voucher trends through the years, beginning with the earliest voucher programs of the mid- to late-1800s through the voucher plans that have been established more recently and still

exist today. Moreover, as part of my historical analysis of voucher programs in the United States, I chronicle the various motivations and objectives behind the major voucher plans, which helps to provide a context in which to examine and discuss the voucher program that began in North Carolina in 2013.

My third chapter provides a detailed review of the eight major voucher themes found in recent research, providing a baseline from which to view the rise and expansion of vouchers in North Carolina. My research into North Carolina's voucher law specifically, which is presented in Chapters IV and V, utilizes these eight major themes and allows for a robust discussion of my research questions in Chapter VI.

Methodology

This dissertation utilizes a qualitative research design and methodology, though some of the techniques and processes incorporated would likely be described as “nontraditional” or “nonempirical.” As Merriam and Tisdell (2016) stated, the goal of qualitative research is often to “achieve an understanding of how people make sense out of their lives, delineate the process (rather than the outcome or product) of meaning-making, and describe how people interpret what they experience” (p. 15). Patton (1985) described qualitative research in this way:

[Qualitative research] is an effort to understand situations in their uniqueness as part of a particular context and the interactions there. This understanding is an end in itself, so that it is not attempting to predict what may happen in the future necessarily, but to understand the nature of that setting—what it means for participants to be in that setting, what their lives are like, what's going on for them, what their meanings are, what the world looks like in that particular setting—and in the analysis to be able to communicate that faithfully to others who are interested in that setting . . . The analysis strives for depth of understanding. (p. 1, as cited in Merriam & Tisdell, 2016, pp. 15–16)

The result of research, especially qualitative research, does not necessarily have to be some determination of cause and effect or a final prediction of events or actions to come. Instead, as Merriam and Tisdell (2016) mentioned, qualitative researchers are often most interested in “understanding how people interpret their experiences, how they construct their worlds, and what meaning they attribute to their experiences” (p. 6).

This dissertation used a combination of qualitative research methods, including coding techniques, to identify major themes within a historical document analysis. When using document analysis within qualitative research, the researcher’s goal is to analyze and interpret documents in such a way so that they reveal meaning related to a specific topic (Bowen, 2009). In order to properly analyze documents, one must incorporate specific and intentional coding techniques to determine relevant themes (Bowen, 2009). To assist researchers as they analyze textual documents, O’Leary (2014) established an 8-step process. This process included (a) building a list of documents, (b) determining the level of accessibility of documents, (c) considering potential biases, (d) ensuring the researcher has the necessary research skills, (e) ensuring research credibility, (f) understanding the data for which the researcher is searching, (g) taking into consideration potential ethical issues or issues of confidentiality, and (h) developing a potential backup plan in case one becomes necessary (O’Leary, 2014). After completing each of the eight steps outlined by O’Leary (2014), I began the process of coding my documents. Creswell (2016) described coding as “the process of analyzing qualitative text data by taking them apart to see what they yield before putting the data back together in a meaningful way” (p. 156).

As important as it was for me to determine the coding and data analysis process I was going to use for my research, it was equally important for me to consider which documents I was going to use for the analysis itself. I chose to examine two of North Carolina's most influential policy organizations—NC Policy Watch and the John Locke Foundation—believing these two groups would best represent the various opinions that exist regarding private school vouchers and related school choice programs. I examined all of the voucher-related articles, policy briefings, editorials, and research publications from these two organizations within the years of 2012 and 2017. These two “think-tanks” represent both sides of the political spectrum: NC Policy Watch is considered a politically “liberal” organization, while the John Locke Foundation is considered to be more “conservative.” The overarching views of the authors and researchers within these two organizations provide a clear dividing line over the issue of vouchers. NC Policy Watch represents a clear opinion against private school voucher laws, while the John Locke Foundation supports the North Carolina voucher plan and hopes it will be expanded in the future.

For my dissertation, I analyzed 137 documents using the general coding techniques outlined by Creswell (2016). First, I completed an initial reading of each text, recording a few notes as I read through each document. Second, I read through the document a second time and began to bracket pieces of text while coding that text as I read. I also began to make additional notes of potential themes that may be apparent given the codes I noted as I read each document. As I finished reading and analyzing a

document, I made a list and then grouped the codes to determine the thematic category (or categories) most apparent in the document (Creswell, 2016).

While my coding procedures up to this point followed the basic methodological guidelines outlined by Creswell (2016), Merriam and Tisdell (2016), and many other researchers, it is from this point that I begin to utilize a slightly different coding and categorization technique. Because of the extensive literature review I completed in the third chapter of this dissertation, I was able to determine eight major voucher themes prior to conducting my document analysis. I utilized these eight themes as I analyzed the various documents for my research. After analyzing and coding these documents using the procedures described above, I determined which themes were present in each document. I assigned no more than two “major” themes to each document and no more than three “minor” themes to each document. The articles were grouped by year and a point system was used to determine which of the eight voucher themes was most referenced during each year studied (from 2012 to 2017). A “major” theme within an article was assigned one point, while a “minor” theme within an article was assigned half of a point. I built a year-by-year chart, which can be found in the fourth chapter of this dissertation, to assist in determining the prevalence of each of the eight voucher themes with the documents I analyzed. While I actively looked for additional voucher themes to emerge in my document analysis outside of the eight noted from my literature review, no new themes were found.

Theoretical Framework

Merriam and Tisdell (2016) described the theoretical framework of qualitative research as the “underlying structure, the scaffolding or frame” of the study (p. 85). The theoretical framework, as Merriam and Tisdell (2016) wrote, is “derived from the orientation or stance that you bring to your study, and every study has one” (p. 85). The theoretical framework of my dissertation utilized two theories, that of Social Justice Theory and Critical Theory. Notions of justice are discussed throughout my dissertation, particularly as I incorporate the eight controversial voucher themes—which are discussed in my literature review—into my larger discussion. I also used Critical Theory to analyze how the eight themes are embedded in the history of vouchers, both nationally and in North Carolina. The use of Critical Theory was particularly important as I began to evaluate the manner in which vouchers were framed by NC Policy Watch and the John Locke Foundation. In the paragraphs that follow, I define and discuss both Social Justice Theory and Critical Theory, describing how these two theories were utilized in my research and overall analysis.

Vouchers and Social Justice Theory

Discussions of social justice have seemingly always been prevalent in debates regarding education. The debate over vouchers and school choice in American education has *become* one centered around the ideas of justice and equity, though that has not always been the case. Sensoy and DiAngelo (2017) wrote that “social justice” is “commonly understood as the principles of ‘fairness’ and ‘equality’ for all people and respect for their basic human rights” (p. xix). While it is likely that most people would

say that they agree with these concepts, Sensoy and DiAngelo (2017) stated that the following questions about social justice are rarely discussed and almost never agreed upon by citizens:

What are those basic human rights? Have we already achieved them? If not, why not? How do we go about achieving them if we agree on what they are and why they haven't yet been achieved? From whose perspective is something fair and equitable? Might something be fair for one person while actually having an unfair outcome for another? What does *respect* actually mean in practice? (p. xix)

Authors have often studied the significance of social justice and its impact on education, specifically with regards to school choice. Wolf (2010) examined the voucher program in Washington, DC to determine if the program advanced the cause of justice. Wolf (2010) argued that universal vouchers—available to anyone in a particular area—met the criteria that distinguish such policies as just. Wolf (2010) noted, however, that those with very few resources may find it difficult to take advantage of a universal voucher system, having written, “critics claim that a universal voucher program, like any unregulated free-market system, will disproportionately benefit the parents who are best positioned to make effective school choice” (p. 137). Therefore, Wolf (2010) believed that targeted voucher plans—those that focus on a specific disadvantaged group—stand a better chance of achieving social justice since they are specifically designed to help the underprivileged. Wolf (2010) described targeted voucher plans as a “low-risk and socially just public policy” (p. 148).

Levin, Cornelisz, and Hanisch-Cerda (2013) identified four goals for “evaluating educational outcomes” in an educational system: “freedom of choice,” “productive

efficiency,” “equity,” and “social cohesion” (p. 516). All four of these goals have significant implications for social justice. Levin et al. (2013) found that the highly privatized educational system in the Netherlands met the first two goals for educational quality, as they protected freedom of choice and productive efficiency. However, Levin et al. (2013) wrote that, within the areas of equity and social cohesion, there were “serious challenges to social justice . . . resulting primarily from high patterns of socioeconomic and ethnic stratification across schools and school types” (p. 530). These conclusions would seem to indicate that the educational system described by Levin et al. would likely not be described as socially just, given the definition outlined previously by Sensoy and DiAngelo (2017).

Current voucher laws in the United States often target children from historically disadvantaged backgrounds, including students with disabilities and students from low-income households. There are no voucher programs currently in operation in the United States that use race or ethnicity as a qualifier, but Gooden, Jabbar, and Torres (2016) noted that many proponents of vouchers pursue such policies on the basis of achieving *racial* justice. Gooden et al. (2016) observed that, although all current voucher laws are race-neutral, the discourse around voucher policies “implies race” (p. 533). Analyzing polling, survey, and interview data of African-American parents who participated in the Milwaukee and Cleveland voucher programs, Gooden et al. (2016) determined that voucher laws are not yet achieving the racial justice goals promised by proponents. Gooden et al. (2016) stated that “current voucher programs are inadequate for addressing the systemic policy issues and personal deprivations that poor children of color face in

schools every day” (p. 533). Gooden et al. (2016) concluded that those who support vouchers on the basis of racial justice “must not only acknowledge the political, legal, and social context of vouchers, but must also address the *structural* issues that continue as a result of it” (p. 533).

Since the idea of social justice includes equality for all, without a specific focus on race, social class, gender, or any other characteristic, it is important to consider all of those demographic elements when exploring the theory of social justice. Moreover, it is important to view all of those concepts through a critical lens, which is why I also incorporated elements of Critical Theory within my overall theoretical framework.

Vouchers and Critical Theory

The second part of my theoretical framework involves the use of Critical Theory. Elements of Critical Theory can be found throughout the chapters of my dissertation, though I utilized this theory most heavily during my analysis of how the eight major voucher themes are embedded within the history of voucher laws nationally and in North Carolina. Furthermore, the use of Critical Theory is embedded in the manner by which I evaluated North Carolina’s voucher law and how that law was discussed and framed by NC Policy Watch and the John Locke Foundation.

Based on the works of Horkheimer (1972), what makes a theory “critical” is the level at which it provides a “liberating . . . influence” and freedom from domination for humans (p. 246). Critical Theory, as imagined by Horkheimer (1972), should provide for social inquiry that aims to increase freedom and deliver “emancipation from slavery” for groups of citizens (p. 246). Bohman (2005) argued that a critical theory is only

satisfactory if it is “explanatory, practical, and normative, all at the same time” (para. 3). Bohman (2005) stated that there are three criteria for a critical theory: “It must explain what is wrong with current social reality, identify the actors to change it, and provide both clear norms for criticism and achievable practical goals for social transformation” (para. 3).

These three criteria of Critical Theory are evident throughout my dissertation. My outline and discussion of the eight major voucher themes provides a statement of the current “social reality” related to voucher laws. As I highlight these themes within the voucher debate both nationally and within North Carolina, my analysis of policy briefings, research, and editorials from NC Policy Watch and the John Locke Foundation provide a significant opportunity for utilizing Critical Theory. Authors from both organizations believe their views on vouchers will bring about freedom for families and for children, so I take the opportunity to analyze these claims through my own critical lens.

Lastly, an element of the final chapter of my dissertation includes recommendations for policymakers and other educational stakeholders. Simply discussing the issue of vouchers and highlighting the major areas in which vouchers are controversial does not provide “practical goals” for how this school reform effort should be utilized. I believe the policy recommendations presented in my final chapter fulfill this objective of Critical Theory by offering meaningful conclusions for policymakers to consider prior to establishing future voucher laws or expanding programs already in place.

Summary and Conclusion

Both Social Justice Theory and Critical Theory are embedded in my research and discussions throughout the next four chapters of this dissertation. These two theories work hand-in-hand to help me answer my overarching research questions while also adding to the discussion regarding why these research questions are significant in the first place. While my research questions do not explicitly ask if vouchers are a “socially just” public policy, the nature of that question is explored throughout this dissertation and discussed in further detail in Chapter VI. It is important to ask if vouchers enable or promote social justice, though this question is not easily answered. To even begin to explore this question, I used the methodological procedures previously outlined to *critically* analyze the documents produced by the writers at JLF and NCPW. Therefore, as I analyzed each of these documents, I did so with the elements of Critical Theory at the forefront of my thinking.

In practice, this means not just accepting the arguments made by JLF and NCPW at face value, but also considering potential areas of criticism as well as possible avenues for social improvement. Since voucher programs across the United States—including in North Carolina—often target our most vulnerable and disadvantaged citizens (students from low socioeconomic families, students with disabilities, etc.), incorporating Social Justice Theory and Critical Theory into my research was quite appropriate. Arguments for social justice often center around citizens who are disadvantaged and who, for whatever reason, are not being treated equitably by society. Additionally, disadvantaged citizens are often the victim of laws or policies for which policymakers have not critically

analyzed to determine if they are socially just. By embedding both of these theories into each of the chapters of my dissertation, I can give our state's new voucher law a critical examination, while also discussing if the plan meets the social justice goals it hopes to accomplish for North Carolina's socioeconomically disadvantaged students and for its students with special needs.

Researcher Subjectivities

I have been an educator for the past 11 years, all of which I have spent working in different public schools. I have served as a high school teacher, high school assistant principal, elementary school principal, and high school principal in my 11-year education career. During the time in which I have served in these various roles, I have remained attuned to shifting educational policies at the state and federal level, including the rise of voucher programs in North Carolina and elsewhere. I mention this because, due to my experience as a public school educator, I run the risk of allowing my perspective and personal biases the opportunity to upset the credibility of my data collection and analysis. Some may argue that voucher programs—as well as other school choice initiatives—threaten the livelihood of public schools and the jobs of those employed by them. While my personal employment has never been at risk due to any school choice program or policy, it is certainly possible that the large-scale establishment of a voucher initiative could put any number of schools in danger of closure due to the loss of student enrollment. While I do not believe such a scenario is likely, the simple perception that I may have something to gain from seeing all voucher programs come to an end is reason enough to address what could be viewed as a significant bias against vouchers.

As such, it is important that I present a balanced view of vouchers throughout this dissertation, a goal which I believe I have achieved. Particularly within my review of the literature, I discussed both the research that supports vouchers and the research that does not, relative to each of the eight major themes. Moreover, my goal during the analysis process of my dissertation was to be drawn *into* a conclusion regarding vouchers, rather than going into the process with a preconceived conclusion already drawn. I believe I was able to accomplish this task, though I did have to work intentionally throughout the process to objectively consider both sides of this debate while also utilizing academic literature and research that did the same.

Significance

There are currently few debates in education more divisive and controversial than those surrounding the concept of school choice. The rise of charter schools, magnet schools, homeschooling, online programs, and private school vouchers have sparked a debate in education that strikes directly at the heart of many assumed notions regarding the purpose and objective of schooling. For some, the school choice debate is about who should have the power to make educational decisions for children. Those typically in favor of school choice view public education as an ineffective monopoly that would see great improvement if competitive alternatives were available for parents and students. Advocates of public education worry about the equity issues associated with school choice, particularly with school choice programs that often disproportionately favor socially advantaged families. Still for others the questions about school choice center around the impact that such policies will have on the democratic fabric of our nation, our

states, and our individual communities. For many small towns across the country, public schools are often the hub of the local community and economy. The education those children receive ensure that everyone in that community has at least the basic skills—academic and social—that they need to be caring, productive, and responsible citizens.

The debate surrounding school choice is multilayered and individual experiences play just as large a role in one's opinion on the matter as years of academic research. Private school vouchers have been a major part of the school choice debate for many years, and major changes in voucher policies in some states could significantly alter the landscape of education in this country for years to come. That is why I chose this topic to research for my dissertation, as I believe this issue will, one way or another, have long-term effects on the direction of education in our nation. I believe this study adds to the existing research base on private school vouchers in several ways. First, I believe my third chapter provides a strong academic review of the literature related to private school vouchers. My literature incorporates academic work from researchers dating back to Milton Friedman—who was the first to propose and study educational vouchers—and numerous studies and reports from our nation's first major voucher program in Milwaukee. Of course, my literature review also includes important recent work on voucher programs that just went into law within the last 5 years. Second, the second chapter of my dissertation provides a detailed overview of the history of vouchers in the United States. This chapter can serve as a helpful resource for those looking for a concise summary of the history of private school vouchers.

Finally, the research specific to North Carolina's voucher program, presented and discussed in the fourth, fifth, and sixth chapters, is unlike any that has been compiled before. By studying two major news organizations—one representing a positive viewpoint of vouchers with the other representing a critical stance—I was able to pinpoint the specific arguments most often used by both sides of this debate. These arguments shifted over time, of course, as public opinion of the program changed, but my research provides several very clear points in favor of and against different aspects of North Carolina's private school voucher program. My research also led me to several specific policy recommendations—included in Chapter VI—that I believe should be considered by policymakers looking to begin or expand a private school voucher program. While my policy recommendations reveal my thoughts on private school vouchers, my larger goal is for readers of my dissertation to digest the research, information, and analysis of this work and construct their own opinion about private school vouchers and school choice in general. This is an important issue that will impact education in our country for years to come, so it is important for citizens to know as much about the history, research, and debate surrounding this topic as possible.

Outline for the Study

Including this introductory chapter, my dissertation is divided into six chapters. My second chapter provides a historical overview of vouchers in the United States. I discuss the roots of America's first voucher programs in Vermont and Maine, both of which were created in order to provide schooling for children living in rural towns without their own public schools (Hammonds, 2002). I also discuss the creation of a

voucher program in Prince Edward County, Virginia, established in 1960 with an objective much different from that of Vermont and Maine. Moving forward, I analyze the establishment of the nation's first modern program in Milwaukee in 1990. From 1990 to 2002, other major voucher programs begin in Cleveland and Florida. Voucher programs begin a major expansion starting in 2003, as voucher laws go into effect in the District of Columbia, Utah, Georgia, and Colorado, just to name a few. North Carolina's voucher programs begin in 2013, which I discuss briefly in Chapter II and in greater detail later in my dissertation.

My third chapter consists of a detailed review of the literature surrounding private school vouchers. My review of the literature revealed eight overarching voucher themes or concepts. These eight themes include: (a) academic achievement, (b) free-market competition, (c) individual parental school choice, (d) racial segregation, (e) funding and state budget issues, (f) targeting at-risk and disadvantaged student populations, (g) oversight and accountability, and (h) church-state separation and other legal concerns. My review of the literature provides a clear picture of the relevant research surrounding each of the eight voucher themes. These themes, each of which carries a level of controversy, are then applied to the information gathered in my fourth and fifth chapters as I explore North Carolina's voucher law specifically.

In my fourth chapter, I provide an administrative overview of North Carolina's Opportunity Scholarship Program, including the program's specific eligibility criteria and relevant data regarding the program's voucher recipients and participating private schools. I also provide a short review of the recent literature related specifically to North

Carolina's voucher program. In my fifth chapter, I examine articles, policy briefings, editorials, and research reports developed or created by two of North Carolina's most significant think-tanks, NC Policy Watch (NCPW) and the John Locke Foundation (JLF). These two organizations represent both sides of the political spectrum—NCPW represents a more liberal and progressive viewpoint, and JLF represents a more conservative and libertarian view—and therefore exemplify the arguments most often made for and against vouchers. I utilize the various documents—articles, policy briefings, editorials, and research reports—released by these two organizations from 2012 to 2017 and connect the arguments made by both sides to each of the eight major voucher themes discussed in Chapter III.

My final chapter consists of a summary analysis of the information I have gathered and a discussion of my four major research questions. I also use a portion of my final chapter to assess vouchers more broadly, while also addressing some key questions related to vouchers, school choice, and democracy. Specifically, I consider what larger questions are at stake in the voucher debate and what policy issues need further consideration as vouchers potentially expand in North Carolina. Finally, I include several direct claims about voucher programs as I conclude my dissertation, offering insights and recommendations for policymakers regarding how best to ensure the issue of vouchers is approached equitably.

CHAPTER II

THE HISTORY OF VOUCHERS IN THE UNITED STATES

As an educational reform, vouchers have a long and controversial history in the United States. Voucher proposals and philosophies existed even before the formal establishment of the United States, and the objectives behind various voucher policies have varied throughout the many decades of our nation's existence. In the chapter that follows, I present a brief history of educational vouchers in America, divided into three distinct sections.

The first section discusses the roots of American vouchers from 1776 to 1925, beginning with the educational choice proposals of some of our nation's most influential writers and philosophers, including Adam Smith, Thomas Paine, and John Stuart Mill. I also highlight some of our nation's earliest voucher laws in Vermont and Maine, while also exploring how the rise of Catholic immigration in the late-19th century affected public and private education during that time period.

The second section focuses on the rise of vouchers from 1950 to 1989, paying particular attention to the shifting intentions of voucher proposals in various parts of the country. Throughout the 1950s and 1960s, vouchers were often used to establish separate schools for White children in an attempt to evade federal school desegregation efforts. In the 1970s, federal efforts to establish voucher programs were largely unsuccessful, but by

the late-1980s vouchers were increasingly viewed as a potential remedy for our nation's struggling urban schools.

The third section discusses the creation of America's first modern voucher program, established in Milwaukee, Wisconsin in 1990. This section also highlights other significant voucher initiatives from 1990 to 2017, including Florida's 1999 statewide voucher law, the 2002 Supreme Court decision of *Zelman v. Simmons-Harris*, and the creation or expansion of over 20 different voucher laws across the country from 2002 to 2017.

The Roots of Vouchers: America's Earliest Voucher Proposals and Policies (1776-1925)

Milwaukee's 1990 Parent Choice Program is often given the designation as America's first modern voucher law. This description is accurate, but the roots of our country's voucher programs date back to the early days of our nation's birth. In fact, the writings of several 18th century English philosophers even include references to educational choice proposals and voucher plans. Town-tuitioning programs created in Vermont and Maine in mid-19th century America are often considered the nation's oldest voucher laws, though these programs look much different in comparison to other voucher programs across the United States today. A rise in Catholic immigration in the late-19th century led to calls for the banning of government funds to private religious institutions. The push for support of public education came to a head with the Oregon Compulsory Education Law, which effectively banned private schools. This law was overturned by the Supreme Court in 1925, thereby codifying the notion that parents had the right to choose different educational options for their children.

Early Voucher Proposals and Educational Choice Philosophies

While no formal school voucher programs were established in the United States prior to the mid-19th century, discussions of educational topics were prevalent in academic circles beginning in the late-18th century, especially among European philosophers. The writings of English philosophers Adam Smith, Thomas Paine, and John Stuart Mill helped shape the foundations of American government, and each of these men included thoughts on education in their most famous works. While the proposals of Smith, Paine, and Mill did not lead to the establishment of specific laws, proposals with voucher-like characteristics were later set forth by American politicians Thomas Jefferson in Virginia and William Seward in New York.

Adam Smith. Smith offered what was likely the first philosophical proposal for an educational system with characteristics most closely resembling a voucher program. Smith briefly discussed educational policy in his 1776 book, “The Wealth of Nations,” though his work is generally regarded as a commentary on laissez-faire economics rather than a thesis on education. Smith proposed that private citizens pay for the costs of their education and the education of their children, believing that families would take greater responsibility for their schooling if it was not paid for by the state. Nevertheless, Smith also argued that the government should assist families who would be unable to cover the full cost of schooling. Again, while Smith’s educational philosophy was largely shaped through an economic lens and was primarily focused on higher educational opportunities, his thoughts reveal some similarities with later educational choice proposals, including vouchers (Kirkpatrick, 1999; Smith, 1776).

Thomas Paine. A little over 15 years later, fellow English philosopher Thomas Paine proposed a voucher plan for poor families in England in his well-known work titled “The Rights of Man” (Carl, 2011). Paine appeared to have been an early proponent of educational “choice,” at least by our present-day definition of the term. Paine supported an educational system that would give financial assistance to each child, allowing students the opportunity to attend the school of their choice (Kirkpatrick, 1999). Specifically, Paine’s proposal recommended an allotment of “four pounds a year for every child under fourteen years of age; enjoining the parents of such children to send them to school to learn reading, writing, and common arithmetic” (Paine, 1779, para. 1664). While the proposals of Smith and Paine were philosophically similar, Paine’s thoughts seemed to focus more so on the merits of education itself, at least relative to Smith, who viewed education primarily within an economic paradigm.

Thomas Jefferson. Just a couple of years after Smith wrote “The Wealth of Nations,” Jefferson developed the first proposal for a statewide school system in the New World. In 1778, the Virginia governor recommended the creation of an educational system with voucher-like characteristics. His proposal, known as a “Bill for the More General Diffusion of Knowledge,” called for the creation of 20 secondary schools, with the students and their families paying tuition costs to attend. However, much like Smith, Jefferson proposed that economically disadvantaged students receive scholarships in order to attend these schools. Jefferson’s proposal was presented to the Virginia House of Delegates in 1778 and 1780, but it did not pass. Jefferson’s bill, however, was the precursor to Virginia’s “Act to Establish Public Schools,” passed into law in 1796,

though the final law did not include a voucher or scholarship recommendation and looked much different compared to Jefferson's initial proposal (Berkes, 2009; Kirkpatrick, 1999).

William Seward. Jefferson's 1778 voucher-like proposal was not the last such program presented by a state governor. In his annual message to the New York State legislature in 1840, governor William Seward proposed the re-establishment of a voucher-like law that once existed in New York City in the early 1800s. As Carl (2011) wrote, Seward outlined a plan "whereby public school funds were to be directed to public and parochial schools based on attendance" (p. 5). Much like Jefferson's 1778 proposal, Seward's educational plan did not become law as originally configured, but the compromise bill that was born from this debate would lay the groundwork for New York's current public school system (Baker, 1855).

John Stuart Mill. Later in the mid-19th century, Mill produced an essay that included significant thoughts on education, titled "On Liberty." The most important tenet of Mill's 1859 work outlined his belief that the state should require all citizens to be educated; Mill, however, did *not* believe the state itself should necessarily be responsible for providing that education for its citizens. Mill (1912) wrote,

If the government would make up its mind to require for every child a good education, it might save itself the trouble of providing one. It might leave to parents to obtain the education where and how they pleased, and content itself with helping to pay for the school fees of the poorer classes of children, and defraying the entire school expenses of those who have no one else to pay for them. (p. 129)

Much like his fellow English philosophers Smith and Paine, Mill believed that a voucher-like system of providing funds directly to families would lead to a more efficient and effective educational process. None of their proposals led directly to the passage of educational laws, though the characteristics of their philosophies are visible in modern-day voucher and school choice programs.

Other than the failed proposals of Jefferson and Seward, most of the discussion on this topic took place outside of the United States, namely in England. Though public and private school systems were slowly developing in the United States in the late-18th and early-19th century, education was not the top priority for the young nation during this time period. That started to change in the mid-19th century as America's "common school" movement began and our country's first voucher proposals, known as "town-tuitioning" programs, sought ways to educate poor, rural children in Vermont and Maine.

Town-tuitioning in Vermont and Maine

Vermont instituted the country's first "town-tuitioning" program in 1869 in order to provide schooling for children living in rural towns that did not have their own public schools. As Hammonds (2002) described, this "town-tuitioning" program allowed parents to "send their children to public or non-sectarian private schools in other areas of the state, or even outside the state" as long as the town where the parents of that student lived reimbursed the school or school district that was teaching that child (p. 5). Maine established a very similar program in 1873, and both of these programs are still in effect today. While state statute in Vermont and Maine describes these programs as "town-

tuitioning” laws, these two programs fit the definition of a voucher plan and are considered our nation’s first—and oldest—voucher laws.

The significance of education in early New England governments. The historical context that led to the creation of these voucher programs is unique to the time period and significant within the larger voucher debate. The significance of education in our nation’s earliest New England governments for citizens cannot be overstated. Vermont’s constitution, written in 1777, encouraged all local towns to establish schools. Maine’s constitution made establishing local schools a requirement when it was signed in 1819 (Hammonds, 2002). Hammonds (2002) wrote that the early governments of Vermont and Maine believed in the “importance of education as a means of preserving political freedom and personal enlightenment,” which is why education was mentioned in the first constitutions of both of these states (p. 6).

Most of the schools that opened in individual towns across Vermont and Maine were called “academies” and were considered private; however, these schools were not the same as what we would consider “private” schools today. While some towns did have true public schools that were operated by the local government, most towns utilized “private academies” to provide educational opportunities for students that might otherwise not be available. As Hammonds (2002) stated, “These schools were private only in the sense that the town contracted with an individual schoolmaster to run the school,” making them more akin to modern charter schools in operation across various states today (p. 7).

Town-tuitioning laws are passed in Vermont and Maine. As education reformers pushed for the creation of compulsory education laws nationwide in the late 19th century, many small towns in Vermont and Maine were faced with a difficult decision: create their own public school system or pay surrounding towns to educate their children using the existing system of private academies. Policymakers found it to be less expensive to send students to existing private schools rather than pay for the construction of new schools across the state, particularly in very rural, sparsely populated areas.

In 1869, Vermont passed the state's first "town-tuitioning" law, which, as Hammonds (2002) stated, "allowed school districts or units without any schools to use public funds to pay a student's tuition to a nearby academy in order to educate that child" (p. 7). The circumstances in Maine were very similar after the state passed the Free High School Act in 1873. Towns were given the option to build their own public schools using subsidies from the state or pay for the cost of their students to attend nearby private academies. Much like the rural towns in Vermont, small communities in Maine found it to be more economically feasible to send the students in their town to private schools in other districts. While these laws still exist today and do apply to all levels of K-12 education in both states, these "town-tuitioning" laws were initially aimed at providing secondary education opportunities for students where otherwise such opportunities for schooling would be scarce (Hammonds, 2002).

Vouchers in Vermont and Maine today. Though the voucher programs in Vermont and Maine still exist today, it is interesting to note that each program looks a bit different than it did when it was first created. In Vermont, students are only eligible to

participate if their town does not have a public school, leaving only about 4% of students across the state eligible (EdChoice, 2016f). Moreover, the school a student chooses to attend can be public or private and can even be located outside of the state; however, the school cannot have a religious affiliation (EdChoice, 2016f). In 2014, 151 schools and 3,585 students participated in the program and the average voucher received by a student was valued at \$14,681 (EdChoice, 2016f).

Much like Vermont, Maine's voucher program also restricts religious schools from participating and is only eligible to students in districts without a public school. Consequently, only 3% of students in the state are eligible (EdChoice, 2016b). Sixty schools and 5,559 students participated in the program in 2015, which provided a maximum voucher value of \$10,339 for secondary students (EdChoice, 2016b).

Public Funding for Catholic Education: Anti-Immigration and Blaine Amendments

While most historians agree that the early voucher programs established in Vermont and Maine were created to help aid disadvantaged rural families, undertones of race and politics were prevalent during the era of Reconstruction as various groups lobbied for influence in educational policymaking. During the 1860s and 1870s, the Republican Party and leaders of the Catholic Church engaged in what Justice (2005) called a "bitter battle of words over the future of public education—who should control it, how should it be financed, and what should it teach about religion" (p. 171).

Educational politics and Blaine Amendments. Republican politicians and Protestant leaders believed the influx of Catholics was a "menace" to democracy, pushing for increased funding for "common schools" that were "religiously neutral" and

“ethnically and racially inclusive” (Justice, 2005, p. 171). The Democratic Party often stayed out of educational issues, but prominent Catholic priests argued that the push for “common schools” was more about race and power than education (Justice, 2005; McAfee, 1998). In 1875, Republican James Blaine, the Speaker of the U.S. House of Representatives, pushed for an amendment to the U.S. Constitution that would have made it illegal for the government to allocate any money to religious organizations. This legislation became known as the “Blaine Amendment” (Sutton & King, 2011).

Blaine’s motivation for this constitutional amendment was not out of a pursuit of religious freedom or the separation of church and state. Instead, Blaine was reacting to the large increase of Roman-Catholic immigrants during the early- to mid-1800s, many of whom were establishing Catholic schools in different parts of the country and were pushing for local and state funding for their schools. Blaine, as well as other Republican politicians who opposed Catholic immigration, worried that their increasing numbers in the United States had the potential to alter the political and economic landscape of the nation (Billing, 1974).

Anti-immigrant fervor. The American Party—a staunch anti-immigration organization that was also known as the “Know-Nothing” Party—actively worked to keep all non-Protestant children out of the nation’s public schools (Jorgenson, 1987). The anti-immigration fervor of the time period, including the rise of groups like the American Party, led to the birth of the Blaine Amendment in Congress. While this proposed amendment did not become law, Sutton and King (2011) reminded us that “commonly known Blaine Amendments were successfully added to more than 30 state constitutions

as a precondition for admission to the U.S.” (p. 246). For that reason, there has often been hesitancy within state legislatures to approve programs that initiate or increase government funding to religious organizations, including schools.

Effects of the Blaine Amendment. Interestingly, voucher *proponents* point to the failed Blaine Amendment as proof that the government was blatantly trying to discriminate against Catholic immigrants and the rise of Catholicism in the United States. In fact, President Ulysses S. Grant publicly supported the Blaine Amendment in hopes that the law would help eliminate religious teachings in all public schools (Sutton & King, 2011). Some historians have argued, however, that the government’s effort to reduce funding to religious organizations was in no way spurred by discrimination. Greenfeld (2001) wrote that the administrative agenda of President Grant was developed with the goal of unifying the nation after the Civil War, promoting “religious tolerance,” and growing the U.S. economy (p. 278). Regardless of the motivations behind the Blaine Amendment and related legislation, it is hard to deny that the institution of public education is inherently political and clearly affected by the cultural constructs of a given time period.

The Oregon Compulsory Education Law

Though historians have debated the intentions of President Grant and the Blaine Amendment during the era of Reconstruction, few historians would deny that the main objective of the Oregon Compulsory Education Law was discriminatory in nature. The law, passed in 1922, required that all children attend the state’s public schools; as such, educational alternatives for families were effectively eliminated. Sutton and King (2011)

argued that the passage of the Oregon Compulsory Education Law was undeniably due to “increasing anti-immigrant sentiment and escalating political activity among the Ku Klux Klan and several other groups” (p. 252).

Two nonpublic schools previously operating sued the state of Oregon. The case eventually reached the U.S. Supreme Court as *Pierce v. Society of Sisters* in 1925. The Oregon Compulsory Education Law was struck down by the Supreme Court, which declared that “the fundamental theory of liberty upon which all governments of this Union repose excludes any general power of the State to standardize its children by forcing them to accept instruction from public teachers only” (*Pierce v. Society of Sisters*, 1925).

This ruling is significant within the larger debate surrounding school choice as it essentially codifies the notion that parents should have the freedom to make educational choices regarding their children, and that educational decisions are best left to parents rather than government institutions. As important a court decision as *Pierce* was in the manner in which it affected public education, a court case of even greater significance would arise less than 30 years later in Topeka, Kansas, forever changing the course of American educational history.

***Brown v. Board* and the Rise of Vouchers in America (1950–1989)**

For the next 4 decades, voucher laws emerged across various parts of the United States, all with varying objectives and with varying levels of success. During the 1950s and 1960s, student assignment laws and pseudo-voucher policies were largely used as a means by which to evade school desegregation orders. Voucher proposals popped up in

Arkansas, Louisiana, Virginia, and North Carolina during this time period, all with the primary objective of keeping Black and White children in separate, segregated schools. By the 1970s and 1980s, the context in which vouchers were viewed slowly began to change. Voucher supporters at the federal level tried to implement experimental programs aimed at helping underprivileged students in California and New Hampshire. While these initiatives were largely unsuccessful, they did lay the groundwork for the establishment of our nation's first modern voucher laws, established in the 1990s.

The 1950s and 1960s: Voucher Proposals and Tuition Grants Emerge in the South

The Supreme Court's 1954 ruling in *Brown v. Board of Education*, which outlawed public school segregation, forever changed the course of history in the United States. Reflecting on the decision, Weil (2002) stated,

School desegregation created the hope that perhaps, for the first time in American history, equality in public education would improve the nation's schools—not just for a few privileged students but also for American children of all races, cultures, linguistic backgrounds, gender, and social classes. (p. 48)

As one would imagine, the *Brown* decision was not received positively by all Americans. For many White Americans in the Deep South, the end of school segregation was a threat to the so-called “southern way of life.” Nowhere was this exemplified more clearly than in Louisiana, where the state legislature passed a resolution 3 days after the ruling condemning the federal decision. The legislature described the *Brown* decision an “unwarranted and unprecedented abuse of power . . . which can only result in racial turmoil, strife, and confusion to the irreparable harm and injury of the people of the state” (McCarrick, 1964, p. 30, as cited in Carl, 2011, p. 25).

Southern leaders prepare for the Brown decision. Even before the *Brown v. Board* decision was handed down, leaders in many southern states anticipated that challenges to segregation may be on the horizon. As early as 1951, southern leaders began to propose rather extreme legislation in an attempt to maintain segregation. A proposal to end the funding of all state public schools and replace the system with grants that students could receive in order to enable continued segregation was proposed by Georgia Governor Eugene Talmadge and the Georgia General Assembly in 1951 (Carl, 2011; O'Brien, 1997). Similar proposals were discussed in South Carolina in 1952, and in Mississippi and Alabama in 1953 (Leflar & Davis, 1954; O'Brien, 1997). Discussions of the like only increased following the 1954 *Brown* decision, eventually leading to the passage of voucher laws that aimed to evade desegregation. Weil (2002) wrote,

[The] concept of private school choice was initially used not only as a way around the *Brown* decision but also as an attempt to stop the progress of integration efforts completely and establish “white flight academies.” Private choice did not emerge as an ideological attempt to improve public schools or provide unique learning opportunities to all children . . . (p. 49)

Milton Friedman and “The Role of Government in Education.” It was during this time period when renowned neoliberal economist Milton Friedman proposed the use of private school vouchers to open up education to the free market. In his 1955 work “The Role of Government in Education,” Friedman argued that restructuring education in a way that provided monetary vouchers to each family and allowing parents to send their children to the school of their choice would improve educational outcomes for all (Friedman, 1955).

Interestingly, Friedman supported racial integration, but did not believe the government should put regulations in place that might interfere with the free market of educational choice (Weil, 2002). While Friedman viewed vouchers through an economic paradigm, most of the deep South was only considering how they could use such policies to circumvent federal desegregation orders. The first significant desegregation battle occurred in Little Rock, Arkansas.

Little Rock and the fight against desegregation. In 1957, President Dwight D. Eisenhower sent troops from the 101st Airborne Division to make sure the nine African-American students who integrated Central High School in Little Rock were kept safe (Carl, 2011). Fighting back against the desegregation orders, Arkansas Governor Orville Faubus and the state legislature closed the city's schools in 1958 (Carl, 2011; Weil, 2002). The school board then developed a plan to privatize the city's high schools, giving ownership of the schools to a private corporation that would maintain the schools' segregated status. Federal judges put a stop to the plan before it could be implemented (Carl, 2011; Johnson, Piana, & Burlingame, 2000; Weil, 2002).

This would not be the last time states or local districts would try to bypass desegregation efforts through the use of vouchers and tuition grants. As Carl (2011) stated, "In the wake of Little Rock, other states created tuition grants schemes whereby segregation would be preserved by closing public schools and setting up private ones" (p. 33). Six states had passed comparable laws by 1959, including North Carolina, Louisiana, and Virginia (Carl, 2011).

North Carolina and the Pearsall Plan. Like many other Southern states, the North Carolina General Assembly immediately passed legislation following the *Brown* decision in an attempt to evade the desegregation order. In 1955, the Pupil Assignment Act was passed. This law, in theory, allowed local districts to make school assignments for students using “race-neutral” criteria. In practice, however, this law made it possible for local school officials to keep African-American students from transferring into predominantly White schools (Dunn, 2016; Thuesen, 2006).

In the summer of 1956, the Pearsall Plan was passed by the General Assembly with only two legislators voting against the bill. The Pearsall Plan had two main components. First, it adjusted the state’s Compulsory School Attendance Law and allowed students the option *not* to attend an integrated public school if they so decided. Second, it allowed families assigned to an integrated public school to apply for a “tuition grant,” or voucher, to attend a private school instead. To become law, the Pearsall Plan needed to be approved by North Carolina voters. In September of 1956, the referendum passed by a nearly five-to-one vote (Dunn, 2016; Thuesen, 2006).

Despite its passage, the Pearsall Plan was largely unnecessary due to the state’s Pupil Assignment Act, which essentially halted most school desegregation efforts. Over the next 10 years, no families received private school tuition grants from local districts through the Pearsall Plan and no schools were closed using the legislation (Thuesen, 2006). With the passage of the Federal Civil Rights Act in 1964 and the ruling in the case of *Godwin v. Johnston County Board of Education* in 1969, the Pearsall Plan was officially ruled unconstitutional (Dunn, 2016). Despite not having a major legislative

impact after its passage, the Pearsall Plan significantly affected race relations and desegregation efforts in the North Carolina for years. As Thuesen (2006) wrote, “The Pearsall Plan ultimately failed to block public school integration. Yet in legitimating white fears of desegregation, it contributed to the larger southern resistance movement that delayed *Brown*’s implementation for well over a decade” (para. 6).

Louisiana initiates tuition grants. In Louisiana, the first school to receive funding through state tuition grants was Ninth Ward Elementary School in New Orleans. After the *Brown* decision led to the desegregation of two New Orleans elementary schools—William Frantz School and McDonogh 19 School—the White parents whose children attended those schools began to adamantly, and sometimes violently, protest. These parents boycotted the schools and built a new elementary school—Ninth Ward—that began receiving state funds through Louisiana’s tuition grants program (Carl, 2011; Fairclough, 1997; Inger, 1969; Sokol, 2006).

In 1964, the New Orleans NAACP challenged the legality of Louisiana’s “grants-in-aid” program that funded segregated private schools like Ninth Ward School. In 1968, U.S. District Court ruled in *Poindexter v. Louisiana Financial Assistance Commission* that Louisiana’s voucher law was unconstitutional. The Court stated that the tuition grants program was “the product of the State’s traditional racial policy of providing segregated schools for white children” (*Poindexter*, 1968; as cited in Carl, 2011, p. 53).

Prince Edward County, Virginia. In Virginia, the tactics of leaders to evade *Brown* were similar to those used in Louisiana. In Prince Edward County, officials refused to fund the district’s public school system during the 1959-1960 school year. The

public schools in Prince Edward County were forced to close, seemingly leaving all students—Black and White alike—without public schools to attend (*Griffin v. School Board of Prince Edward County*, 1964a). In 1960, however, the Prince Edward Board of Supervisors established a voucher program that allowed White students to attend newly formed private schools created in the county. No provisions were made for the county's African-American students, who essentially received no formal education from 1959 to 1963. Some African-American children received informal schooling from family members or through makeshift schools established in church basements, but by and large the African-American community faced 5 years of educational disenfranchisement due to Prince Edward County's resistance to school integration (*Griffin v. School Board of Prince Edward County*, 1964a).

In 1964, the Supreme Court ruled in *Griffin v. School Board of Prince Edward County* that the closing of the county's schools and the establishment of a voucher program for White students was unconstitutional. Justice Hugo L. Black delivered the majority opinion and stated,

Closing the Prince Edward County schools while public schools in all the other counties of Virginia were being maintained denied the petitioners and the class of Negro students they represent the equal protection of the laws guaranteed by the Fourteenth Amendment. (*Griffin v. School Board of Prince Edward County*, 1964b)

The Court made it clear that closing the county's public schools was not, in itself, unconstitutional; however, doing so in an attempt to evade integration and subsequently denying educational opportunities for African-American children by limiting the voucher

program to White students violated the constitutional rights of those families (*Griffin v. School Board of Prince Edward County*, 1964b).

The 1970s and 1980s: Federal Involvement Increases and Experimental Programs Emerge

The time period from the late-1960s through the 1970s was a tumultuous one in the United States. From a national perspective, educational policy often took a back seat to other controversial issues, including the Vietnam War and the Civil Rights Movement. Nevertheless, educational issues were still part of national policy debates, and voucher ideas and proposals still simmered just below the surface of larger educational reform efforts.

The Office of Economic Opportunity studies vouchers. In 1969, President Richard Nixon named Illinois Congressman Donald Rumsfeld as head of the Office of Economic Opportunity (OEO). This was a controversial appointment as many thought Rumsfeld, a Republican who championed smaller government, would eventually dismantle the department that was created by Democratic President Lyndon Johnson in the mid-1960s. Much to the surprise of many, Rumsfeld utilized the OEO to create what Carl (2011) described as “experimental social programs based on free-market principles and individualism” (p. 64). One such “experimental” program in which Rumsfeld and the OEO was interested was educational vouchers. As such, the OEO funded a study to be conducted by the Center for the Study of Public Policy, co-directed by Harvard professor Christopher Jencks (Carl, 2011).

One year later, Jencks (1970) published his think tank’s report, titled “Educational Vouchers,” which studied different types of voucher programs and discussed the

possibility of funding a federal voucher initiative. While Jencks was a proponent of vouchers during the late-1960s when they were being used by local governments to evade desegregation orders, Jencks did not support the idea of the “Friedmanite voucher,” named for conservative economist Milton Friedman, due to its lack of accountability and oversight. Instead, Jencks believed in the use of a “compensatory voucher,” one that targeted minority and economically disadvantaged families (Carl, 2011; Jencks, 1966, 1970). The report to the OEO reflected these beliefs.

A voucher experiment in Alum Rock, California. Following the presentation of Jencks’s report, the OEO began reaching out to large districts across the country in hopes of finding a school system willing to sponsor an experimental voucher program. Despite contacting school superintendents nationwide, only five districts made it into the initial planning stages of the project: Gary, Indiana; Seattle, Washington; New Rochelle, New York; Rochester, New York; and Alum Rock, California (Carl, 2011; Kirkpatrick, 1999). Unfortunately for the OEO, support from local policymakers in each of these locals was limited, and only one city—Alum Rock, California—actually participated in the pilot program (Kirkpatrick, 1999). As Carl (2011) noted, the program at Alum Rock—which was essentially an open-enrollment program that was *only* open to public schools—was simply “too limited to serve as a proper test-case for vouchers” (p. 66). Weil (2002) stated that the “results were disappointing and the program was discontinued” after only a few years (p. 50).

The New Hampshire Voucher Project. Prior to the complete defunding of the OEO by President Nixon in the summer of 1973, conservative OEO officials made one

final push to establish a private school voucher program in one or more of the nation's public school districts. The OEO, however, was having difficulty getting states to apply for a federal grant to start an experimental voucher program. Carl (2011) noted the reason why:

With northern cities reluctant to adopt vouchers, southern states and school districts under desegregation orders, and most suburbanites satisfied with their public schools, there were few options available for conservative free marketeers. (p. 67)

The OEO was able to find one suitor in the small, conservative state of New Hampshire. The New Hampshire State Board of Education submitted an application in 1973 and the New Hampshire Voucher Project was born (Donaldson, 1977; Welsh, 1973).

When New Hampshire's voucher program began in 1973, officials sent information about the proposal to voters across the state. In short, the voucher initiative in New Hampshire was set up using the open, unregulated "Friedmanite voucher," allowing both public and private schools to compete for students and for funding. Despite the concerted efforts of many conservative entities—including federal officials, the governor, and other free-market proponents—the program never really got off the ground. New Hampshire's urban districts chose not to participate and, in the few rural districts that initially participated in 1973, a majority of citizens voted down the program by early 1976 (Carl, 2011; Donaldson, 1977; Welsh, 1973).

"A Nation at Risk" and the call for education reform. The failure of the New Hampshire Voucher Project effectively ended all federal attempts at establishing private school voucher programs in states and/or local districts for the next decade. By the late-

1980s, however, the voucher debate was rekindled within the context of improving America's failing urban schools. A 1983 report by the National Commission on Excellence in Education, titled "A Nation at Risk," highlighted the perceived failures of the country's public education system and served as a clarion call for educational reform. Weil (2002) described the public's reaction to "A Nation at Risk," having stated,

confidence in American education was silently being eroded and many Americans were beginning to develop and hold the quiet conviction that public education was becoming increasingly mired in bureaucracy and inefficiency and that U.S. students—particularly students in urban centers—were falling behind their international counterparts. (p. 51)

While no statewide voucher laws were passed by state legislatures during the 1980s, voucher advocates began targeting urban areas for experimental programs. Some African-American leaders, frustrated with the lack of steady educational improvement in their urban schools, became increasingly open to the idea of vouchers. No longer viewed as a means by which to evade school integration, vouchers were slowly developing into a mechanism by which poor and minority children could potentially escape failing urban schools. Within this context, unlikely allies emerged in Milwaukee, Wisconsin, setting the stage for the development of our nation's first modern voucher program.

The Birth and Expansion of Modern Voucher Programs (1990–2017)

The establishment of Milwaukee's voucher law in 1990 marked the beginning of arguably the most important decade in the history of vouchers in the United States. Following the start of Milwaukee's program, Cleveland began a voucher initiative in 1995. Florida established the first statewide voucher program just 4 years later and, in

2002, the constitutionality of Cleveland’s voucher law was upheld by the Supreme Court in *Zelman v. Simmons-Harris*. These four monumental events set the stage for the passage of 21 different voucher laws from 2002 to 2017. During that time span, 14 states either began a new voucher program or added to an existing voucher law. It all began, however, in 1990 with the creation of America’s first modern voucher program in Milwaukee, Wisconsin.

Modern Vouchers are Born in Milwaukee, Wisconsin

Educational historians point to the 1990 establishment of the Milwaukee Parent Choice Program (MPCP) as the birth of the modern voucher movement in the United States. The MPCP provided vouchers for low-income families to attend any participating private school in the state (Wis. Stat. §§ 119.23 & 235). Carl (2011) pointed to several key factors—many of which were unique to Milwaukee—that ultimately led to the creation of the first modern voucher program in the nation.

Unsuccessful desegregation efforts. First, the desegregation efforts in Milwaukee were largely unsuccessful, which led to the slow loss of African-American support for the public school system in Milwaukee. Carl (2011) concluded that “disillusionment with Milwaukee Public Schools (MPS) transfer policies that required higher percentages of black children to change schools, coupled with low achievement levels of black students in MPS” was one of the main reasons African-American community leaders began seeking educational alternatives (p. 100). School officials in MPS were more likely to close schools with high percentages of Black students, forcing

those students to take long bus rides to attend predominantly White schools in other parts of Milwaukee.

Instead of providing financial aid to struggling African-American schools in Milwaukee, the Wisconsin legislature poured money into a transportation program known as “Chapter 220,” which incentivized the over-reliance of transportation as the primary means of desegregation in the city (Fuller, 1985; I. Harris, 1983). As a means of bringing about educational reform for minority students, desegregation had, as Carl (2011) wrote, “lost its luster” due in no small part to coordinated efforts by White leaders to undercut federal desegregation orders (p. 104).

Large number of independent schools. Second, Milwaukee found itself in a position where its inner-city region already had a significant number of independent, secular private schools that were very interested in finding ways to garner funding from various levels of government. Several of these independent schools had strong connections to the minority community in Milwaukee and, as Carl (2011) wrote, were “willing to enroll underprivileged MPS students in exchange for state funding” (p. 100).

Polly Williams and African-American political power. Finally, the changing political landscape in Milwaukee eventually made America’s first modern voucher plan a reality. Political power for African-Americans slowly but steadily increased during the 1980s. African-American state representative Polly Williams was the lead author of the MPCP. The voucher proposal—which was originally introduced in 1989 by Williams as the “Parental Choice Options Bill”—gave conservative Republicans and moderate

Democrats something on which they could agree, while simultaneously creating “a rift among the legislature’s Democrats” (Carl, 2011, pp. 129, 116).

Williams, who had long been a staunch opponent of desegregation, became the leading African-American figure in the city’s voucher movement and was sometimes viewed more as an “independent” than a Democrat (Olson, 1990). The legislative coalition led by Williams, coupled with the election of Republican Governor Tommy Thompson in 1986, guaranteed, as Carl (2011) put it, that “proposals for state support of private education would emanate from the governor’s office” (p. 100).

Vouchers in Milwaukee today. Less than 2,500 students participated in the program during each of its 8 eight years of existence. In 1999, however, over 6,000 students accepted a private school voucher, and that number has steadily increased every year. In 2009, just over 20,000 students were receiving vouchers. As of the 2015-2016 school year, approximately 68% of students in Milwaukee’s public schools were financially eligible to receive a voucher; 59%, or just slightly under 28,000, accepted a voucher and attended a private school, a rate that presently ranks as one of the highest in the nation (EdChoice, 2016g).

The Cleveland Scholarship and Tutoring Program Brings Vouchers to Ohio

Another major voucher program did not emerge in the United States until the creation of the Cleveland Scholarship and Tutoring Program (CSTP) in 1995. There were a number of key political and religious figures—with leanings toward both political parties—whose educational agendas overlapped just enough in the early 1990s to open the door for vouchers in Cleveland. Former Cleveland Mayor George Voinovich, who

was elected Governor of Ohio in 1990, was one such figure. Voinovich easily won reelection in 1994. Republicans gained majorities in both chambers of the Ohio state legislature in 1994, and state representative Michael Fox, a long-term supporter of vouchers, became chair of the Education Committee. Akron lawyer and entrepreneur David Brennan was highly influential, both financially and as a policy developer through Governor Voinovich's Commission on Educational Choice, of which he served as chair when it was created in 1992 (Voinovich papers, 1992).

Voucher pilot program in Cleveland. While voucher proponents would have preferred a statewide program, confidence that such a plan could emerge from the legislature was low. Instead, Fox and other voucher advocates focused on starting a pilot program in Cleveland, taking advantage of the dire condition of the state's largest school district. Describing the educational crisis in Cleveland, Carl (2011) wrote, "Finances were questionable, negotiations over . . . desegregation . . . were contentious, and, in March 1995, the federal court bypassed the school board and put the district under state control" (p. 170). While Fox's voucher proposal did not pass as a standalone bill, it was included in Governor Voinovich's budget proposal and made it through the reconciliation process in the summer of 1995. Ironically, Voinovich signed the Ohio budget bill, which included the voucher program for Cleveland, in the same month (June) that the state legislature in Wisconsin had voted to allow sectarian schools the opportunity to participate in the MPCP (Lindsay, 1995).

Allies support and help pass the voucher bill. Cleveland Bishop Anthony Pilla was an important ally for Voinovich and Fox, as Catholic private schools were the

institution that stood to benefit the most from the voucher bill. Bishop Pilla was elected president of the National Conference of Catholic Bishops in 1995, and at a State Legislative Breakfast that same year, Pilla stated,

Research supports the particular effectiveness of the Catholic school in the inner city with those children most at risk of failure. . . . We want to continue our presence and our schools in the neighborhoods of our cities. We want to help families break the cycle of poverty through education. (Carl, 2011, p. 135; Voinovich Papers, 1995)

Several prominent Democrats played an important role in the passage of the Cleveland voucher bill, including Cleveland Mayor Michael White, State Representative Patrick Sweeney, and Cleveland Councilwoman Fannie Lewis. Lewis became a voucher proponent in the early-1990s and made a trip to Milwaukee to learn more about the reform effort from Representative Polly Williams. As Carl (2011) wrote, Lewis’s “major argument was that vouchers could create viable alternatives for parents of modest means, the typical parents that Lewis represented” (p. 156).

Cleveland participation grows initially. Unlike the voucher plan in Milwaukee, which saw relatively stagnant enrollment growth from 1991 to 1998, the CSPT saw increased participation from the onset. The program grew from 2,000 participants to over 4,500 from 1997 to 2002, and over 8,000 students were utilizing vouchers in 2016 (EdChoice, 2016c). Also, unlike the MPCP, Cleveland’s voucher plan is open to all students in Cleveland, regardless of income level. Students in low-income families are given priority and can receive the maximum value of the voucher—\$4,250—while

students in families with higher-income levels receive either 90% or 75% of the maximum voucher value (Ohio Rev. Code §§ 3313.974–979).

Though Cleveland’s program is open to all students in the city, as of 2016 only 17% are choosing to participate; 59% of eligible students participate in the MCPC in Milwaukee, which is only open to low-income families (EdChoice, 2016c). Milwaukee’s program allows students to attend the private school of their choice *statewide*, while Cleveland’s plan only allows students to attend *neighboring* private schools; this may be one of the factors contributing to the wide variance in participation between those two programs.

Cleveland’s voucher law is challenged. When the CSTP was established in 1995, opponents argued that it was unconstitutional due to its close affiliation with religious schools. Carl (2011) noted that “several of the provisions could be construed as evidence for upholding the Establishment Clause of the First Amendment,” pointing to the fact that “any non-public school could participate (religious or not)” (p. 172). In the end, arguments over the constitutionality of the law and its inclusion of religious schools would not be resolved until 2002 in what would become the most important Supreme Court case in the history of private school vouchers.

The Supreme Court Debates Vouchers: *Zelman v. Simmons-Harris*

The most significant court case in the history of voucher law occurred in 2002 after the Cleveland Scholarship Program (1995) came under scrutiny. Cleveland’s voucher program was challenged by a group of Ohio taxpayers as a potential violation of the Establishment Clause separating church and state, since both religious and

nonreligious private schools were allowed to participate. Unlike the original voucher law passed in Milwaukee, which did not allow religious schools to participate, Cleveland's program did; as such, 96% of the students who used a voucher in the Cleveland program chose to enroll in a religious private school during the 1999-2000 school year (*Zelman v. Simmons-Harris*, 2002a). Choosing a non-religious school was difficult for parents in Cleveland at that time, since over 80% of the schools that were participating in the voucher plan were considered religious (*Zelman v. Simmons-Harris*, 2002a).

The case reaches the Supreme Court. Initially, the Cleveland citizens who challenged the voucher law prevailed. The U.S. District Court Northern District of Ohio ruled in favor of the taxpayers and the U.S. Court of Appeals for the Sixth Circuit affirmed that decision. However, the case reached the U.S. Supreme Court and was argued in front of Chief Justice William H. Rehnquist's Court in February of 2002. In a narrow 5-4 decision, the Supreme Court ruled in *Zelman v. Simmons-Harris* (2002b) that Ohio's voucher program was constitutional, overturning the rulings of the lower courts. Chief Justice Rehnquist wrote the majority opinion and stated,

The Ohio program is entirely neutral with respect to religion. It provides benefits directly to a wide spectrum of individuals, defined only by financial need and residence in a particular school district. It permits such individuals to exercise genuine choice among options public and private, secular and religious. The program is therefore a program of true private choice. (*Zelman v. Simmons-Harris*, 2002b)

Not since the *Pierce* decision in 1925—which struck down the Oregon Compulsory Education Law and made it illegal for state governments to mandate all citizens had

attend publicly-operated schools—had voucher or private school supporters scored such a significant legal victory.

The judicial path to the Zelman decision. There were several significant prior cases that were used by the justices as they deliberated the case of *Zelman v. Simmons-Harris*. In their deliberations, members of the Court referenced the case of *Witters v. Washington Department of Services for the Blind*, a unanimous decision reached in 1986. In that decision, the Court declared that state aid provisions given directly to students—in this case, a man with a progressive eye condition—within reference to religion was not a violation of the Establishment Clause (*Witters v. Washington Department of Services for the Blind*, 1986b). The Court also referenced its ruling in *Zobrest v. Catalina Foothills School District*, a 1993 case. This 5-4 decision determined that state-sponsored aid to compensate a sign language specialist for a hearing-impaired student attending a parochial school did not disrupt the Establishment Clause (*Zobrest v. Catalina Foothills School District*, 1993b).

Zelman v. Simmons-Harris remains the most significant federal ruling regarding the use of school vouchers in the United States. The decision by the Supreme Court to uphold the legality of Cleveland's voucher law would lead to the creation or expansion of numerous voucher programs across multiple states over the next several years.

Florida Passes the First Statewide Voucher Law

While Cleveland's voucher law was working its way through the judicial system to the U.S. Supreme Court, the Florida legislature was setting the groundwork for a major voucher milestone. Florida Governor Jeb Bush's plan to establish the first statewide

voucher program in the United States was passed by the Florida legislature and became law in 1999 (Weil, 2002). Florida's voucher law, known as the "Opportunity Scholarship Program," was designed to give students the ability to leave their assigned underperforming public school in order to attend a higher-achieving public school or a private school (Florida Department of Education [FDOE], 2017c). The voucher program was a part of Florida's "A+ Plan for Education," and the state defined schools as "underperforming" based on results from student standardized test scores (Weil, 2002).

Legal challenges to Florida's voucher law. It was not long before Florida's Opportunity Scholarship program faced legal challenges. In March of 2000, Judge L. Ralph Smith found the program unconstitutional, ruling that it violated the Education Clause of the Florida state constitution. In August of 2002—less than 2 months after the *Zelman* ruling—Florida State Circuit Court Judge Kevin Davey also found Florida's voucher law unconstitutional (Weil, 2002). The ruling was based on Judge Davey's belief that the law violated the state constitutional provision barring public tax dollars from being sent to religious schools or institutions.

Despite the federal ruling just 6 weeks prior, the *Zelman* decision applied only to the U.S. Constitution, and not necessarily to individual state constitutions. The Florida Supreme Court officially gutted the Opportunity Scholarship Program in 2006, finding that it violated the state constitution by not providing for a uniform system of public schools (Carl, 2011). While Florida's Opportunity Scholarship Program still exists today, it can only be used by a student to attend a higher-achieving *public* school (FDOE, 2017c).

Florida's voucher program for students with disabilities. Despite the legal challenges faced by Florida's Opportunity Scholarship Program, there was another Florida voucher program that began in 1999 and still exists today. The John M. McKay Scholarships for Students with Disabilities Program was also established in 1999 and was expanded by the Florida legislature in 2001. The McKay voucher law was the first program established specifically for students with special needs, making it the first of its kind in the United States (School Vouchers, 2016). All students with Individualized Education Programs or 504 Plans who have been enrolled in a Florida public school for at least one year are eligible to receive a voucher to attend the private school of their choice (Fla. Stat. §§ 1002.39; 1002.421). At present, approximately 13% of Florida students are eligible for this program across the state, and just under 31,500 students—8% of those eligible—are utilizing the program (EdChoice, 2016a).

Other voucher-like programs in Florida. While Florida's McKay voucher program is not open specifically to low-income students, the state legislature did establish the Florida Tax Credit Scholarship program in 2001 for students who qualified for free or reduced-price lunch (FDOE, 2017a). Florida has also created the Gardiner Scholarship program, which is an educational savings account plan that allows parents to purchase educational products or services for their children (FDOE, 2017b).

While tax credit programs and educational savings accounts are not technically voucher programs, the prevalence of these initiatives in Florida reveals a growing desire among policymakers to increase school choice efforts statewide. Florida's creation of our nation's first statewide voucher program designed specifically for students with special

needs remains a landmark moment in school choice history. Due in large part to Florida’s milestone special needs voucher law and the Supreme Court decision in *Zelman v. Simmons-Harris*, voucher laws that targeted specific groups of students—those from low-income families or with disabilities, for example—would become much more prevalent in the United States moving forward.

Voucher Programs Expand Nationwide Post-*Zelman*

Voucher laws became much more prominent in the United States following the *Zelman* decision. Since 2002, 14 states have either created new voucher programs or added to existing voucher initiatives. In total, 21 new voucher laws have gone into effect since 2002, and all but one of these programs are “means-tested.” As such, the targeted student group for each of these programs differs depending on the state, as does the user eligibility rates and student participation rates (School Vouchers, 2016). The tables below highlight the voucher programs that have become law since 2002. In addition to noting the target student group for each program, the charts also highlight the eligibility rate, the participation rate, and the average funding for each voucher initiative.

Eight new voucher programs were initiated from 2003 to 2010 (see Table 1). All of these programs targeted specific groups of at-risk students, namely students from low-income families, students with special needs, or students attending public schools designated as “low-performing” (EdChoice, 2017b).

Table 1

Voucher Programs Initiated from 2003 to 2010

State	Year	Name	Target	Elig. Rate	Part. Rate	Average Funding
OH	2003	Autism Scholarship Program	Special Needs	1%	14%	\$20,279
DC	2004	Opportunity Scholarship Program	Low Income	32%	7%	\$9,472
UT	2005	Smith Special Needs Scholarship Program	Special Needs	12%	1%	\$4,938
OH	2005	Educational Choice Scholarship Program	Low-Perf Schools	10%	12%	\$4,257
GA	2007	Special Needs Scholarship Program	Special Needs	11%	2%	\$5,614
LA	2008	Scholarship Program	Low Income in Low-Perf Schools	36%	3%	\$5,856
LA	2010	School Choice Program for Certain Students with Exceptionalities	Special Needs	6%	2%	\$2,264
OK	2010	Henry Scholarships for Students with Disabilities	Special Needs	16%	1%	\$6,285

Note. All data provided by EdChoice: School Choice in America Dashboard.

The District of Columbia Opportunity Scholarship Program is the only voucher program ever created by Congress. It is overseen by the Department of Education and is funded separately from the public and charter schools in the DC system (EdChoice, 2017a).

Four voucher programs were created in 2011, including one specific to students living in Douglas County, Colorado (see Table 2). The Douglas County Choice Scholarship Program is open to all students living in Douglas County, regardless of income. Similar to the voucher program created in Cleveland, Ohio in 1995, this program is essentially universal and is the first district-created voucher program of its kind in the country.

Table 2

Voucher Programs Initiated in 2011

State	Year	Name	Target	Elig. Rate	Part. Rate	Average Funding
CO	2011	Douglas County Choice Scholarship Program	Universal (within Douglas County)	95%	1%	\$4,572
OH	2011	Peterson Special Needs Scholarship Program	Special Needs	14%	2%	\$9,794
WI	2011	Parental Private School Choice Program (Racine)	Low Income	53%	30%	\$7,337
IN	2011	Choice Scholarship Program	Low/Middle Income	54%	6%	\$4,146

Note. All data provided by EdChoice: School Choice in America Dashboard.

In 2015, the Colorado Supreme Court declared this program unconstitutional on the grounds of violating the separation of church and state. Appeals are still being heard and the future of this law is yet to be determined; however, the Colorado legislature has

since created a new voucher program that does not allow religious schools to participate (American Federation for Children [AFC], 2015).

In 2012 and 2013, five more voucher programs became law, including two very specific programs in Mississippi (see Table 3). The voucher laws passed in Mississippi aimed to help students with dyslexia and students with speech and/or language disabilities. Both of these programs are the only two of their kind in the United States (EdChoice, 2017b).

Table 3

Voucher Programs Initiated in 2012–2013

State	Year	Name	Target	Elig. Rate	Part. Rate	Average Funding
MS	2012	Dyslexia Therapy Scholarship	Special Needs - Dyslexia	2%	1%	\$4,980
MS	2013	Rogers Scholarship for Students with Disabilities	Special Needs - Speech/Language	3%	0%	\$0
OH	2013	Income-Based Scholarship Program	Low/Middle Income	58%	1%	\$3,761
NC	2013	Opportunity Scholarships	Low Income	41%	1%	\$3,839
NC	2013	Special Education Scholarship Grants	Special Needs	12%	<1%	\$6,146

Note. All data provided by EdChoice: School Choice in America Dashboard.

The eligibility rates and participation rates for both Mississippi special needs voucher programs are quite low. In fact, only one student participated in the Rogers

Scholarship program in 2016, while no students participated in 2017. Critics have argued that the burdensome regulations and stringent eligibility requirements of the Rogers program have led to the program's low participation rate (EdChoice, 2017b).

Four additional voucher programs have been established since 2015, including the Special Needs Scholarship Program in Wisconsin (see Table 4). The creation of this program marks the fourth voucher law for the state of Wisconsin; only Ohio has more voucher programs within its state.

Table 4

Voucher Programs Initiated in 2015–2017

State	Year	Name	Target	Elig. Rate	Part. Rate	Average Funding
WI	2015	Special Needs Scholarship Program	Special Needs	13%	<1%	\$12,000
AR	2015	Succeed Scholarship Program	Special Needs	13%	<1%	\$6,646
MD	2016	Broadening Options and Opportunities for Students Today Program	Low Income	25%	2%	\$1,943
NH	2017	Town Tuitioning Program	Towns w/o schools	n/a	n/a	n/a

Note. All data provided by EdChoice: School Choice in America Dashboard.

Conclusion

While most policymakers trace the start of voucher programs in our nation to the initiation of Milwaukee's voucher law in 1990, vouchers actually have a much earlier start and a very unique history in the United States. Even before the official birth of this

nation, the educational philosophies of Smith, Paine, Jefferson, and Mill began to shape the way schooling is viewed in this country. Many of their thoughts on schooling mirror the educational ideas that still exist today.

America's earliest voucher programs were created for a wide variety of reasons. Vermont and Maine created town-tuitioning programs in the mid- to late-1800s in order to help children in poor, rural areas without schools receive an education. By the late-19th century, education became embroiled in the politics of increased Catholic immigration and anti-immigrant sentiment. An attempt to force all students to attend only public schools in Oregon was ruled unconstitutional, officially codifying the notion that parents had the right to send their children to a non-public school if they so desired.

From 1950 to 1989, the rationale behind the creation of various voucher laws changed dramatically. During the 1950s and 1960s, for example, voucher and voucher-like plans were created solely to evade desegregation efforts following the Supreme Court's decision in *Brown v. Board of Education*. Such was the case with the passage of the Pearsall Plan in North Carolina, the tuition grants program in Louisiana, and the voucher program established in Prince Edward County, Virginia. Through the 1970s and 1980s several small, federal voucher pilot programs were created, but all were unsuccessful. Nevertheless, after the publication of "A Nation at Risk," confidence in the nation's public schools continued to fall. With that falling confidence, local and state leaders began to view vouchers as a possible solution to the significant educational issues facing the country's urban schools.

With the establishment of Milwaukee's voucher program in 1990, America's modern voucher movement was born. For the next 3 decades, voucher laws passed across the country and programs continued to expand nationwide. Florida created the nation's first statewide voucher law while also passing the first voucher law aimed specifically at helping students with disabilities. Following a legal challenge to Cleveland's voucher law, the United States Supreme Court ruled that Cleveland's voucher law was constitutional in 2002. The significance of the *Zelman* decision cannot be overstated, as it opened the door for the creation or expansion of over 20 different voucher programs nationwide from 2002 to 2017. Numerous states initiated new voucher programs or expanded current ones, including Indiana, Oklahoma, Colorado, Mississippi, Georgia, Maryland, and North Carolina.

Having presented a history of voucher programs in the United States from the 1700s to the present day, the chapter that follows is a comprehensive review of the literature regarding vouchers, their use and motives, and their effectiveness. As I reviewed the literature on vouchers, eight key themes or concepts emerged. Those eight key concepts include (a) academic achievement, (b) free-market competition, (c) individual parental school choice, (d) racial segregation, (e) funding and state budget issues, (f) targeting at-risk and disadvantaged student populations, (g) oversight and accountability, and (h) church-state separation and other legal concerns. In the chapter that follows, I discuss each of these concepts in detail and review how each is exemplified in the literature. These themes will be used prominently later in my dissertation as I analyze my research regarding the establishment of North Carolina's

voucher program, so the literature review that follows serves as a frame through which to view these eight significant voucher themes.

CHAPTER III

LITERATURE REVIEW

A 2016 poll by Education Next revealed some interesting information about the general public's perception of public schools in the United States. When asked, "What grade would you give the public schools in your community?," 55% of the general public and 70% of parents gave their local school a grade of A or B (Education Next, 2016). An overwhelming majority of Americans believe their local school is *better* than average. However, when asked to grade the "public schools in the nation as a whole," the percentages dropped substantially. Only 34% of parents and 25% of the general public gave the nation's public schools a grade of B or higher (Education Next, 2016). Translation: parents feel their local school is doing great, but all of the other schools in the country are failing.

At a time when our nation's graduation rate is at its highest in history, with more than four out of five students earning a diploma in 4 years, why does the public perception exist that the vast majority of our nation's schools are underperforming (National Center for Education Statistics, 2017)? Could the increase in school choice options—including charter schools and voucher programs—and the associated media coverage of these initiatives be one cause for this intriguing shift in public opinion? It is possible, though school choice programs like vouchers are nuanced initiatives that

include various themes and concepts often discussed in published journals and other media. This chapter explores those very themes and concepts.

This chapter is a comprehensive review of the literature surrounding voucher programs in the United States. My review of the relevant literature revealed eight major themes related to voucher programs and policies. These eight themes include: (a) academic achievement, (b) free-market competition, (c) individual parental school choice, (d) racial segregation, (e) funding and state budget issues, (f) targeting at-risk and disadvantaged student populations, (g) oversight and accountability, and (h) church-state separation and other legal concerns. Each of these concepts represent significant sources of discussion and controversy within the larger voucher debate.

In constructing this literature review and determining the major themes related to private school vouchers, I utilized and expanded upon the research of Haire (2010). Several of the voucher themes noted in the literature by Haire (2010) were similar to those I acknowledged and examined, including academic achievement, the effect of free-market competition and choice, and issues of funding. While Haire (2010) noted six major voucher themes in her research, my review of the literature revealed an additional two voucher themes that were either not present in Haire's research or were discussed only briefly. Those two themes were: (1) targeting at-risk and disadvantaged student populations, and (2) oversight and accountability. These two themes were much more prevalent in the academic literature related to vouchers after 2010, especially as private school voucher programs—almost all of which were means-tested and only open to students from low-income families or students with disabilities—increased across the

country. Haire's (2010) extensive review of private school voucher literature prior to 2010 helped lay the groundwork for my literature review in this chapter. I was able to build upon Haire's (2010) six voucher themes by incorporating updated academic sources and identifying two additional voucher themes. In the literature review that follows, I discuss each of these eight themes in detail with supporting literature before transitioning into a discussion about my own research findings and data in Chapter IV.

Vouchers and Academic Achievement

One of the most significant themes related to the voucher debate revolves around student achievement. As the overarching goal of education—public or private—is to increase student learning and academic achievement, it is no wonder that this theme is found so prevalently in the literature. Those both in favor of and opposed to vouchers are often able to point to literature that bolsters their argument. Proponents contend that vouchers allow students the opportunity to leave low-performing public schools and attend a private school of their choice in order to improve their chances for academic success. Opponents believe that private schools are not necessarily better at educating students, pointing to research showing that students who attend a private school using a voucher often perform no better, and sometimes worse, than they had when they attended a public school the prior year. While vouchers continue to be a hotly debated and often-researched educational topic, the prevailing literature examining whether or not vouchers improve student academic performance is far from conclusive.

Studies Reveal Positive Academic Gains

A number of historical studies have been conducted on our nation's first modern voucher program, established in Milwaukee in 1990. Many authors noted modest achievement gains for students who participated in the Milwaukee Parental Choice Program in the early years of the program's existence (Greene, Peterson, & Du, 1998, 1999; Rouse, 1998; Witte, 1991, 2000). A more recent study from Witte, Wolf, Cowan, Carlson, and Fleming (2014) indicated substantial growth for voucher students, particularly in math. Interestingly, the study from Witte et al. (2014) was conducted right after a new testing policy was instituted in Wisconsin requiring private schools receiving vouchers to participate in the state's high-stakes testing program. Witte et al. (2014) stated that the increase in math scores may "simply indicate that as new legislation required each school's outcomes to be measured and, critically, to be made public, schools simply worked to maximize their aggregate scores" (p. 452).

Studies in other major cities have revealed positive achievement gains for students using vouchers, including Charlotte (Cowen, 2008; Greene, 2001), Cleveland (Metcalf et al., 2003), Dayton (Howell & Peterson, 2006), New York City (Barnard, Frangakis, Hill, & Rubin, 2003; Jin, Barnard, & Rubin, 2010; Krueger & Zhu, 2004), and Washington, DC (Howell & Peterson, 2006; Wolf & McShane, 2013; Wolf et al., 2010, 2011, 2013). Several studies have researched the propensity of voucher programs to increase graduation rates and college enrollment rates, instead of only examining test scores. The DC Opportunity Scholarship Program, which began in 2004, is unique in that it is the only federally funded voucher program in the nation. A study by Wolf and

McShane (2013) found that the students who took part in this Washington, DC voucher program graduated from high school “at a rate 12 percentage points higher than the students in the randomized control group” (p. 75). Chingos and Peterson (2014) found that using a voucher in New York City increased the college-going rate of African American students by nine percentage points. Warren (2011) stated that voucher students in Milwaukee graduated from high school at a rate 18% higher than public school students.

Cowen (2012) examined two significant studies (Howell, Peterson, Wolf, & Campbell, 2006; Wolf, 2010), describing them as the “strongest evidence that school vouchers might work in some way in the United States” (p. 385). Wolf (2010) analyzed achievement data from the voucher program in Washington, DC, while Howell et al. (2006) examined programs in New York City, Dayton, Ohio, and Washington, DC. In his overall analysis of these studies, Cowen (2012) stated that the “trials [indicate] a modest improvement in academic achievement for students offered the voucher” (p. 385). While these studies provide positive evidence for the case of vouchers, Cowen (2012) also discussed what he believed could be the significant factor causing these “modest improvements” (p. 385). Cowen (2012) believed it was more likely the “newfound ability to simply choose a desired school” rather than the actual experience of private schooling that led to the higher levels of achievement (p. 386). Cowen (2012) also mentioned that it was important for scholars and policymakers to “consider the extent to which such studies differentiate between achievement gains associated with private school in particular and simply students’ policy-induced ability to find a school of their choosing”

(p. 386). The distinction Cowen draws here is significant and could have an impact on the manner in which policymakers view controversial school choice programs, including vouchers.

Other Studies Show Negative Academic Outcomes

Despite the number of older studies that found relatively positive academic benefits for voucher students, several more recent studies have not painted such a rosy picture for voucher advocates. Research on the voucher program in Indiana conducted by Martire (2015) found negative effects on academic achievement for students participating in the program. Examining the Ohio EdChoice Scholarship Program, Figlio and Karbownik (2016) also found negative effects for students in both reading and math. Moreover, Dynarski, Rui, Webber, Gutmann, and Bachman (2017) found negative effects in math for students participating in their first year in the DC Opportunity Scholarship Program. A follow-up report in 2018 by Dynarski et al. once again found drops in achievement scores for the students participating in the DC voucher program. Dynarski, Rui, Webber, Gutmann, and Bachman (2018) examined the program's second-year students and found drops of approximately 10 percentile points in math and 3.8 percentile points in language arts.

Examining the voucher program in Indiana, Waddington and Berends (2018) found that the participating low-income students saw drops in their test scores in math. Student achievement fell, on average, from about the 40th percentile to the 35th percentile (Waddington & Berends, 2018). The authors also noted that, even as students remained in the program for up to 4 years, the students participating in the Indiana

voucher program still had lower math test scores than demographically similar students in the local public schools (Waddington & Berends, 2018).

Two studies were recently published regarding the voucher program in Louisiana. Examining the students who participated in the first year of the Louisiana Scholarship Program in 2008, Abdulkadiroglu et al. (2015) found that students dropped 15 percentile points in math and 14 percentile points in reading. A separate report by Mills, Egalite, and Wolf (2016) also revealed achievement declines for voucher students. Mills et al. (2016) tracked the progress of students receiving private school vouchers in Louisiana over a 2-year period and found “strong and consistent evidence that students using an LSP [Louisiana Scholarship Program] scholarship performed significantly worse in math after using their scholarship to attend private schools” (p. 8).

The authors offered several possible explanations for the decline in achievement, noting that the lack of curricular alignment between the private schools and the required Louisiana state assessments may have led to the lower achievement scores. Mills et al. (2016) also mentioned that private schools may not have been adequately prepared to meet the unique needs of the at-risk, high-poverty students who took advantage of the program; moreover, the lack of quality private schools may have caused the drop in achievement since, as Mills et al. (2016) stated, “Less than one-third of the private schools in Louisiana choose to participate” in the program in the first year (p. 9).

Studies Find No Significant Impact

Other research studies have found that vouchers had neither a positive nor a negative effect on student achievement (Figlio, 2009), including experimental studies

conducted in New York by Bitler, Domina, Penner, and Hoynes (2014) and Krueger and Zhu (2004). Two recent meta-analyses of voucher programs examined the effects of such policies both in the United States and internationally (Epple, Romano, & Urquiola, 2017; Zimmer & Bettinger, 2015). Interestingly, both studies found more consistently positive results in lesser-developed countries, while the results from the United States were much more unclear. Epple et al. (2017) stated that in developed nations like the United States, the “research on the impact of small-scale programs on test scores exhibits no consistent, robust pattern. . . . It is frequently the case that no significant impact is found” (p. 485). Zimmer and Bettinger (2015) pointed to improved academic outcomes in Chile as positive evidence for vouchers, but again noted that American voucher programs produced “inconsistent results” (p. 458). Summarizing the data they collected, Zimmer and Bettinger stated, “Overall, behind the rhetoric of the voucher debate is a set of mixed results which is less bullish than voucher advocates hoped for” (p. 458).

As evidenced by the research I have just discussed, the literature surrounding the effect of vouchers on student achievement is mixed. There is a sufficient sampling of research that both supports and criticizes vouchers for their effect on student achievement. As one might expect, the number of researchers who believe they can explain the reasons why a particular voucher program is or is not a catalyst for increased student achievement is also in abundance. Nevertheless, voucher supporters and critics will have to look elsewhere for concrete arguments to bolster their position, as research has not consistently found—especially recently—that vouchers increase or decrease student achievement.

Free-Market Competition in Education

All of our nation's modern voucher programs—beginning in 1990 through to the present day—were in some way grounded in the work of Milton Friedman. Early voucher advocates, including Friedman, did not pursue this school reform effort in the name of justice or equity. Instead, it was the principles of opening up education to the free market—utilizing deregulation, elements of competition, and parental demand—that drew other conservative, free-market thinkers to support educational vouchers (Friedman, 1955, 1962).

The Friedmanite Voucher

While Friedman believed in awarding vouchers to families to be used at the educational establishment of their choice, his proposal—which is often described as part of his larger “School Choice” Theory—consisted of much more than just a simple voucher program. Friedman (1955, 1962) believed in deregulating and decentralizing the education system, opening schools to the full force of the free market in order to increase competition and give parents more schooling options from which to choose. Friedman theorized that increasing parental demand, involvement, and oversight, while giving parents access to more schooling options, would drive up the productivity of all schools.

Though Friedman's work is also clearly related to my third controversial voucher theme—parental school choice—I specifically highlighted it here because of the economic perspective by which his theories were developed. Friedman (1955, 1962) clearly understood the importance that parental school choice played in his free-market system, but he also believed in the importance of deregulating the education system to

maximize efficiency. If schools are given the greatest amount of flexibility and are subject to the least amount of government oversight, he believed more schools would be willing to join the market and drive up competition between schools. The significance of competition in Friedman's work cannot be overstated; for Friedman, competition is what drives his entire theory. Through Friedman's (1955, 1962) "voucher system," both public and private schools must compete to maintain or increase student enrollment and the corresponding funding provided through the voucher system. Schools that do not meet the expectations of parents lose their students and, subsequently, their funding. The principles of Friedman's School Choice Theory continue to permeate most major educational reform efforts today, including charter schooling, tax-credits, educational savings accounts, and voucher programs.

Chubb and Moe's Voucher Vision

The educational reforms advanced by Chubb and Moe (1990) drew from the free-market philosophy of Friedman. Interestingly, Chubb and Moe were not vocal advocates of voucher programs, at least initially. The educational system envisioned by Chubb and Moe consisted of a free market of schools that any student could attend across an entire state and more closely resembled the ESA school choice systems of today. Chubb and Moe proposed the creation of a "Choice Office" within each state that would determine the amount of "scholarship" money each student would have provided for them by local, state, and federal agencies (p. 219). Students and families would then utilize a "Parent Information Center" and would be "free to attend any public school in the state,

regardless of district, with the relevant scholarship . . . flowing to the school of choice” (Chubb & Moe, 1990, p. 221).

Chubb and Moe’s (1990) proposal also allowed each school to set their own admission standards and their own tuition. As long as the school’s policies met nondiscrimination requirements, Chubb and Moe (1990) stated that schools “must be free to admit as many or as few students as they want, based on whatever criteria they think relevant” (p. 222). Finally, Chubb and Moe (1990) believed each school should have the authority to set up its governing structure, removing power from the state. Statewide tenure and collective bargaining laws would be eliminated, though similar policies could be adopted by schools if the local governing body chose to incorporate such provisions. One such governing provision could include private schools and vouchers, though Chubb and Moe (1990) believed incorporating private schools into this free-market educational system was not essential. Chubb and Moe (1990) observed that “all sorts of diverse arrangements are compatible with the basic principles on which choice is funded,” so including a private school voucher program as part of their overall free-market education system is an option, but is not mandatory (p. 218).

Early Research on the Effects of Free-Market Competition

While the work of Chubb and Moe (1990) highlighted how a free-market philosophy could be fully incorporated into the public education system, their work was published just before America’s first modern voucher programs began in Milwaukee (Carlson & Cowen, 2015). Just a few years later, Moe (1995) was one of the first authors to analyze the effects of these early voucher programs. Discussing the research of Witte

(1991) and Witte, Bailey, and Thorn (1992, 1993) on Milwaukee's voucher program, Moe (1995) stated that there was "no clear evidence that [the children receiving vouchers] are achieving more academically" (p. 19). However, Moe was harshly critical of the restrictive manner in which Milwaukee's program was initially established. Moe (1995) wrote that the "number of onerous restrictions [that were] heaped on the program by its political opponents [made it] difficult for market forces to work at all" (p. 19). Notably, Moe (1995) stated that using Milwaukee's initial voucher program as a "basis for evaluating the effects of vouchers . . . verges on the ridiculous" (p. 19). For Moe, and many other voucher supporters, this reform effort is at its most effective as part of a free-market system that enables schools to compete for students and allows families to choose any school they wish to attend across an entire state.

Positive Effects of Free-Market Competition

Today, many schools face competition from private schools and other choice options in their districts. Voucher supporters have long argued that the competition caused by voucher programs will lead to greater public school achievement. Epple et al. (2017) argued that most recent literature supports this claim, but also stated that researchers have often pointed out that "it is very difficult to isolate the effect of competition" in order to determine what ultimately caused a specific public school to improve (p. 443). Figlio and Hart (2014) found a correlation between the achievement gains of Florida public schools when faced with the threat of losing students to private schools by way of vouchers. Chakrabarti (2013) noted a similar trend, providing evidence that the threat of vouchers led to larger achievement gains, particularly for public schools

receiving a “F” grade within Florida’s school accountability model. However, Epple et al. (2017) noted that studies like these, while informative and valuable, also “[weaken the] implications that can be drawn for the more common accountability-independent voucher programs” due to the “challenge of disentangling the accountability and voucher effects” (p. 477).

Concerns about Free-Market Competition

Not all researchers believe applying competitive market effects to the education system will lead to improved schools or increased student achievement. Authors have raised concerns about the limits of a market-based educational system, having argued that vouchers, charters, and other “school choice” reform efforts lead to inequities among schools and an unwarranted decline of confidence in public schooling (Finnegan, 2007; Hess, 2002; Henig, 1995; Levin, 1998). Grigg (2012) argued that regardless of the quality of a school, high student mobility—which a fully competitive educational market essentially encourages—leads to decreased student achievement. Students using a voucher to move to a different school are likely to see declines in academic performance, even if the private school s/he attends is considered high quality.

The crux of the “free-market” argument centers on the manner in which education is viewed. For voucher supporters, education is often viewed as a commodity, while voucher opponents often see education as a shared good with benefits that extend to the society as a whole. Kober (1996) wrote that education was never supposed to be treated as a “consumable, private good,” making it difficult, if not impossible, to apply free-market theories to it appropriately (p. 7). While the existence of markets in the private

sector normally has positive results, Blakely (2017) reminded us that markets “always have winners and losers” (para. 7). When a business in the private sector fails, the damage done to the public is minimal. On the other hand, Blakely (2017) asked, “What happens to a community when its public schools are defunded or closed because they could not ‘compete’ in a marketized environment?” (para. 8). In most cases, it is the underprivileged who are harmed the most when education is treated like a commodity rather than as a shared public good. Blakely (2017) summarized the importance of the latter: “Free societies need educated members to intelligently and critically deliberate over public life, select representatives, and help guide policy decisions. Market freedom is thus in tension with the freedom of democratic participation” (para. 14).

Individual Parental School Choice

Closely related to the theme of free-market competition in education is individual parental school choice. In many ways these two themes overlap, since free-market competition in education can increase parental school choice. The ideals of the free market are closely linked to individualism and the consumer’s freedom to choose, which is why these two themes often overlap in the research. However, I chose to separate these two themes since the possibility exists that voucher supporters may like such programs for the manner in which they increase parental choice, without being concerned about how the competitive nature of the free market—whether positive or negative—may affect education.

School Choice Options in the Absence of Vouchers

It is important to remember that the issue of school choice is not one that is only related to or affected by private school vouchers. While vouchers certainly add to the debate, school choice options can be available within districts through the use of open-enrollment policies or magnet schools. Also, the increase in charter schools across the country has had a profound effect on parental school choice. With these school choice options increasing, what groups of Americans already have the greatest amount of choice in education? As Viteritti (1999) found, socioeconomic status (SES) largely determines if a family has access to high-achieving public schools. By and large, the middle- and upper-class have the financial resources to relocate into school districts with schools that are better funded and have high test scores (Viteritti, 1999). Black (1999) even found that parents are willing to pay 2-3% more for a home that feeds into a school with test scores that are at least 5% higher than the average.

According to Grady and Bielick (2010), over one-fourth of parents whose students attend public schools moved into a neighborhood specifically so that their child could enroll at the public school assigned to that area. This percentage is higher if one considers high SES families (30%) and families living in suburban neighborhoods (33%) (Grady & Bielick, 2010). This is not to say that *all* low SES families do not have the resources to move to a district with high-achieving schools, but impoverished families and families of color have considerably fewer school choice options than the middle- and upper-class. Haberman (2003) stated that children living in “urban poverty, [who are]

disproportionately represented by children of color, attend school in the 130 largest school districts” (p. 2).

Private School Options

In addition to having the financial means to move to the school district of their choice, affluent families also have the option to enroll their children in private schools if they are not satisfied with their assigned public school system. Approximately 11% of families utilize private schooling for their children without receiving any type of voucher, grant, or scholarship (Snyder & Dillow, 2015). Those who support vouchers feel that low income families should have the same educational choice options as the wealthy, believing that voucher laws open up the opportunity for equitable school choice to exist. Voucher advocates often see the parents as the consumers in the public education system, believing they should have the right to choose where their child attends school during the K-12 years. As Levin (2002) states, “Families have the right to choose schools for their children that match the families’ values, educational philosophies, religious teachings, and political outlooks” (p. 162). Interestingly, when the Wisconsin Supreme Court decided that the Milwaukee voucher program was constitutional in 1991, the program’s ability to offer educational choice to low-income families was highlighted:

The program allows participating parents to choose a school with an environment that matches their child’s interest and needs, and with a location that is convenient. If the school does not meet the parents’ expectations, the parents may remove the child from the school and go elsewhere. (Bolick, 2003, p. 42)

For many voucher advocates, public schools are often seen as government monopolies that reduce choice and do great harm to the disadvantaged (Bolick, 2003). According to a

survey conducted by Egalite, Gray, and Stallings (2017a), the parents who participated in North Carolina's voucher program were generally satisfied with the private school their children were able to attend. When asked to evaluate their school, 94% gave it a grade of "A" or "B" and the majority of parents "expressed satisfaction with school safety and with the instruction their child receives in character or values" (p. 23).

The Private School Advantage?

For most voucher supporters, pushing the expansion of private school choice options comes with the assumption that private schools are inherently "better" schools. The underlying perception for many is that private schools, in general, do a better job of educating students, regardless of racial or social class. A recent longitudinal study by Pianta and Ansari (2018) offers a counter-argument to those claims. Tracking nearly 1,100 students, Pianta and Ansari (2018) studied the "extent to which enrollment in private schools between kindergarten and ninth grade was related to students' academic, social, psychological, and attainment outcomes at age 15" (p. 419).

The authors found that, without adjusting for social class, the students who had a history of attending private schools had higher outcomes in essentially all of the categories evaluated by the time they reached the age of 15. However, when Pianta and Ansari (2018) controlled for the socioeconomic demographics of the students and their families, the authors stated that "all of the advantages of private school education were eliminated" (p. 419). Pianta and Ansari (2018) also mentioned that their study revealed "no evidence to suggest that low-income children or children enrolled in urban schools benefited more from private school enrollment" (p. 419).

Private School Access for Economically Disadvantaged Families

Even if private schools offered an inherent educational advantage for students relative to public schools, voucher opponents argue that most school choice initiatives—especially vouchers—are not as accessible to disadvantaged families as they claim. In North Carolina, for example, most of the state’s more prestigious private schools charge a tuition rate well above the value of the voucher, which is \$4,200. As can be seen from Table 5 highlighting ten large private schools in Forsyth and Mecklenburg counties, the \$4,200 voucher that North Carolina’s program provides to qualifying families comes nowhere close to covering the full tuition cost of the private school.

Table 5

Comparison of Select North Carolina Private Schools

School	Grades	Students	Tuition Cost*	% Students of Color
Bishop McGuinness High School	9–12	516	\$10,656	3%
Forsyth Country Day School	PK–12	823	\$19,910 (grades 7-12)	8%
Summit School	PK–9	551	\$20,400 (grades 6-9)	19%
Calvary Baptist	PK–12	604	\$9,470 (grades 9-12)	10%
Salem Academy [^]	9–12	160	\$20,260	17%
Charlotte Country Day	PK–12	1,622	\$21,440 (grades 9-12)	8%
The Fletcher School ^{**}	K – 12	268	\$22,440 (grades 9-12)	4%

Table 5

Cont.

School	Grades	Students	Tuition Cost*	% Students of Color
Providence Day School	PK – 12	1,501	\$22,080 (grades 9-12)	19%
Southlake Christian Academy	K – 12	747	\$10,300 (grades 9-12)	10%
Covenant Day School	PK – 12	858	\$12,700 (grades 9-12)	3%

Note. Source: privateschoolreview.com and school web sites

*Tuition costs do not necessarily include additional fees for textbooks, activities, materials and meals

^All-girls school

**Specifically serves students with disabilities

Voucher opponents note that low-SES families will not be able to utilize the program to attend any of these private schools because they will not be able to pay the remaining tuition cost not covered by the voucher. For most low-SES students, their education must be offered completely free or they simply will not be able to participate.

Hidden or Unanticipated Private School Costs

Egalite, Gray, et al. (2017a) noted that only 66% of eligible voucher recipients (3,673 out of 5,545) in North Carolina actually used the voucher in 2015-2016. Having surveyed parents, the researchers found that “hidden or unanticipated costs, such as transportation, as well as breakfast and lunches” were cited as the main reason for not being able to participate (p. 1). One parent wrote, “We couldn’t afford for them to eat breakfast at home then bring their lunches, daily. [S]o we had to send them to public school cause the breakfast and lunches are provided free. Sadly that’s the truth” (p. 11).

Another parent stated, “Transportation is a big issue. No busses come pick up or drop off” (Egalite, Gray, et al., 2017a, p. 12). Cowen (2010) studied a Mecklenburg County lottery-style voucher program that ran from 1999 to 2000 and found that, of the families who declined a voucher offer to a private school, 33% did so because they could not afford the remaining tuition at the school they preferred to attend. These families are effectively locked out of this “school choice” program. For voucher opponents, this negates the argument that vouchers provide increased parental choice. It is also important to note that private schools are under no federal obligation to provide bus transportation or free or reduced-price meals to students, unlike public schools. High-poverty families often count on free and reduced-price meals and bus transportation for their children; failing to provide these services essentially eliminates that student’s ability to utilize the voucher and attend that school.

Access to Voucher Program Information

For voucher critics, this issue largely centers around access. While the concept of “access” can include financial resources, it can also include a family’s ability to acquire important information about programs and initiatives. Families without the right information or knowledge of voucher programs will not be able to take advantage of them, regardless of their potential value. Cooper (2005) noted that disadvantaged groups—including low-SES families and minorities—often do not have the same access as other parents who may be better connected or resourceful. Cooper (2005) also wrote that even if marginalized groups are able to acquire the information they need about a

program designed to help them, they may find the information confusing and be left with questions that they are not able to get answered.

Studying the voucher program in Cleveland, Forster (2006a) described families that found the paperwork associated with the voucher program lengthy and onerous. Forster (2006a) also stated that over 40% of parents who were approved to receive a voucher in this Cleveland program did not use it because they did not know their application had been approved. The Office of School Options in Ohio had been unable to get in touch with them, suggesting that many of these families were highly mobile (Forster, 2006a). From a larger policy perspective, voucher opponents note that such programs are too small to meet the educational needs of our nation's children. According to Apple and Bracey (2001), all of the private schools in the United States could only enroll about 4% of our country's children. Apple (2000) wrote that vouchers could lead to a culture of "selfish individualism" since many of our most marginalized students may not be able to participate due to a lack of financial resources, access to important program information, or otherwise (p. 3).

Racial Segregation

School choice initiatives, especially voucher programs, are often linked with issues of race. Though most present-day voucher programs incorporate socioeconomic and school performance factors when determining voucher eligibility, Gooden et al. (2016) reminded us that "from their inception, vouchers were not race-neutral instruments" (p. 524). Many voucher opponents cite concerns that racial segregation will increase as voucher programs grow across the country. Some of these concerns stem from

the controversial history by which some early voucher programs were born in the 1950s and 1960s. Even though many who support vouchers today claim that the goal of these programs is to help the disenfranchised—particularly racial minorities—there is no denying that many of the voucher laws passed in the 1950s and 1960s aimed to sidestep federal desegregation orders. Ford, Johnson, and Partelow (2017) noted that over 200 private “segregation academies” had been created by 1969 across several states in the South. The authors wrote that seven southern states, including Virginia, North Carolina, South Carolina, Georgia, Alabama, Mississippi, and Louisiana “maintained tuition grant programs that offered vouchers to students in an effort to incentivize white students to leave desegregated public school districts” (p. 5).

The Discriminatory History of Private School Vouchers

As noted in the previous chapter, one specific example of the checkered history of voucher programs occurred in Prince Edward County, Virginia, soon after the Supreme Court’s landmark school desegregation ruling in *Brown vs. Board of Education, Topeka, Kansas*. In defiance of the Court’s ruling, local officials in Prince Edward County refused to fund the district’s public school system during the 1959-1960 school year. All schools in the county were forced to close, but the Prince Edward Board of Supervisors established a voucher program in 1960 that allowed White students to attend newly formed private schools. No provisions were made for the county’s African-American students. As such, African-American children in Prince Edward County received no formal education from 1959 to 1963. In 1964, the Supreme Court ruled that the voucher

scheme used in Prince Edward County to evade desegregation was unconstitutional (*Griffin v. School Board of Prince Edward County*, 1964b).

The Slow Process of School Desegregation

The desegregation process of our nation's public schools over the last 50 years has been a slow process. One could argue that desegregation has stopped altogether and schools are slowly experiencing resegregation. Some school districts have become increasingly integrated over the last several years, but there are still many segregated school districts across the country. Smith and Meier (1995) pointed out that urban areas in particular remain largely segregated despite the fact that school integration has been such a major focus for public education for many years. Public schools have tried required busing programs and courts have even taken control of some schools in an effort to increase integration, yet highly segregated schools still exist nationwide (Merrifield, 2001; Viteritti, 1999). Some public school districts have tried to use unconventional admissions policies in order to integrate schools, but some such policies have been overturned by the courts.

The Supreme Court determined that the admissions policy used in Seattle, which used race as a second tiebreaker in hopes of keeping schools integrated and diverse, was unconstitutional (*Parents Involved in Community Schools v. Seattle School District No. 1*, 2008). Despite voting with the majority in a 5-4 decision, Justice Anthony Kennedy did highlight the importance of school integration, having stated, "This Nation has a moral and ethical obligation to fulfill its historic commitment to creating an integrated society that ensures equal opportunity for all of its children" (as cited in Mead, 2008, p. 19).

Studies Claim Vouchers Increase Segregation

Despite the struggles of public school districts to better racially integrate their schools, voucher critics contend that expanding voucher policies will only make things worse. Harris, Herrington, and Albee (2007) noted the possibility that private schools could be race-selective, not allowing some students of color to attend since their admissions process tends to be much more independent. Interestingly, Egalite, Gray, and Stallings (2017b) conducted a survey of private school leaders who participated in North Carolina's voucher program and found that the majority did so in order to "achieve greater racial and socioeconomic integration in their schools" (p. 1). Nevertheless, they also found that only 41% of parents who had a child in the voucher program indicated that they were "very satisfied with racial diversity at their chosen private school" (Egalite, Gray, et al., 2017a, p. 1). Some researchers worry that vouchers and other school choice initiatives will lead to greater societal segregation within categories other than just race, including religious preference, disability status, English language ability, and socioeconomic status (Garcia, 2008; Godwin & Kemerer, 2002). In fact, studying some of our nation's earliest voucher program, as well as some international voucher plans, Levin (1998) found consistent evidence that "educational choice leads to greater socioeconomic and racial segregation of students" (p. 373).

Other Studies Reveal Vouchers Decrease Segregation

Not all data support these claims, however, as other researchers have found that private school voucher programs sometimes lead to *decreased* segregation. Studying Louisiana's voucher program, which is almost exclusively used by low-SES African-

American students, Egalite, Mills, and Wolf (2017) found that the Black students who utilized the voucher program often left a racially segregated public school. The authors did note that many of these students later enrolled into a segregated *private* school; however, the overall effect on integration was slightly positive. Four reports published within the last 8 years (Egalite & Mills, 2014; Greene, Mills, & Buck, 2010; Ritter, Jensen, Kisida, & Bowen, 2014; Ritter, Jensen, Kisida, & McGee, 2010) found that vouchers used in areas where the public schools were already highly segregated—due in large part to residential segregation—could lead to improved racial integration.

Older studies have also noted the benefits of vouchers and private schooling in regard to segregation. Greene (2006) stated that empirical evidence “clearly supports the positive effect of private education on reducing racial segregation” (p. 54). Evidence from our nation’s earliest voucher programs in Cleveland and Milwaukee seem to suggest that school choice initiatives actually decrease segregation (Fuller & Caire, 2001; McGroarty, 2001; Walberg, 2007). Researchers found that only about 5% of students in the public schools in Cleveland attended a school with similar racial demographics as the city; meanwhile, just under 20% of students attending a “choice school” met that threshold. While 20% is not a high bar to set for integration, that is an improvement. Looking specifically at the voucher programs in Milwaukee and Cleveland, Forster (2006b) found that the participating private schools were less segregated—by 13 points in Milwaukee and 18 points in Cleveland.

Charter School Segregation Raises Concerns for Voucher Critics

While research does not seem to back up the claim that small voucher programs will lead to segregation, there is some evidence to suggest that large-scale voucher laws could lead to greater racial stratification. Voucher critics point to the rapid expansion of charter schools—an educational choice initiative that has risen in popularity much more quickly than vouchers—and their effect on racial segregation as justification for their fears. Four recent reports from North Carolina, Pennsylvania, Indianapolis, and Michigan all revealed evidence that charter schools caused greater racial stratification (Kotok, Frankenberg, Shafft, Mann, & Fuller, 2017; Ladd, Clotfelter, & Holbein, 2017; Stein, 2015; Yonmei, 2012). It remains to be seen if these concerns from voucher opponents will ever be realized since there are no large-scale voucher programs in place in the United States.

The Significance of Racial Desegregation

An important factor to consider in this discussion is the significance of desegregation itself. Does racial desegregation inherently lead to higher-quality schools? If not, and if desegregation and high-quality schooling are mutually exclusive, which of the two is more important, and why? Many scholars have argued that racial and socioeconomic integration is important for strengthening the fabric of our nation's democracy. As Levin (1998) stated, "Effective participation in a democracy requires a willingness to tolerate diversity as well as an acceptance of a common set of values and a shared base of knowledge" (p. 382).

The research of Torney-Purta (1984) found that in order for youth to learn tolerance for other ideas and viewpoints, they have to be exposed to such viewpoints. The easiest medium for achieving this is in a diverse school setting. Needless to say, when children are enrolled in schools that have very little racial, socioeconomic, and/or religious diversity, their opportunities for exposure to various viewpoints is diminished, leading to fewer opportunities to learn the skills of tolerance and acceptance that Levin (1998) described (Cookson, 1994).

Vouchers and Public School Funding

While there are some voucher programs that are funded by private, charitable donations, the vast majority of voucher initiatives are funded using government tax dollars. The distinction is significant, because public opinion surveys have revealed significant decreases in support for vouchers when the survey questions included emphasize that vouchers utilize government funds to allow students to attend private schools (Education Next, 2016; PDK/Gallup Poll, 2015). This trend is made more interesting given the fact that the public generally supports charter schools and similar school choice programs, most of which also utilize tax dollars in some form (Education Next, 2016; PDK/Gallup Poll, 2015). Many scholars have conducted research on the financial impact of voucher programs on public schools and public school districts. Supporters argue that vouchers save taxpayer dollars because they provide a more efficient use of funding to increase student achievement and help at-risk children. Critics claim that voucher programs pull money away from public schools, both in terms of

students leaving the public school system and in reduced budgetary allocations provided at the state and local level.

Projecting the Cost of Vouchers on the Taxpayer

North Carolina's voucher program was funded at \$10 million for its first year in 2014-2015 (Wettach, 2017). The level of funding for the program increased to \$17 million in year two and \$60 million in year three (Wettach, 2017). Assuming the rate of enrollment growth continues at its current pace—adding approximately 2,000 students each year—and the North Carolina General Assembly continues funding the program as it has pledged, Wettach (2017) projects the program will cost approximately \$145 million per year after 2027. While it is possible that North Carolina's overall budget will grow by a similar proportion, it is also possible (and voucher critics would argue that it is much more likely) that the General Assembly will reduce funding in other areas—possibly in K-12 education spending—in order to fund the state's voucher program.

While it may be too early to assess the financial impact of North Carolina's voucher program on the state's public schools, a report from the Indiana Department of Education indicated that Indiana's voucher plan has cost taxpayers significantly more than projected since 2014. Lawmakers intended for Indiana's voucher program to redirect the savings generated back to the state's public schools (McInerney, 2016). While the first 2 years of Indiana's voucher program showed a total savings of \$9 million, the program ran a deficit of \$40 million in 2014-2015 and \$53 million in 2015-2016 (McInerney, 2016).

Evidence Points to More Efficient Use of Tax Dollars

The research on the financial effect of vouchers for taxpayers is far from conclusive; some research has shown that voucher programs have saved states and school districts money over time, either on the basis of per pupil expenditure or as a matter of efficiency. From either perspective, voucher advocates are able to make a formidable case. Levin (2002) argued that vouchers may offer a more “productively efficient” use of taxpayer dollars, noting there is “little evidence” to indicate that “large increases in spending have produced significant improvement in student achievement . . . , particularly in inner-cities and rural areas” (p. 162). Reviewing programs both nationally and internationally, Epple et al. (2017) found:

[Voucher plans] offering less than per-student expenditure in public school will be generally preferred by those who would continue to attend public school. Such a partial voucher induces some households to switch to private school, and this yields a net tax savings to those attending public school equal to the differential between per-student public spending and the voucher. (p. 466)

Wolf and McShane (2013) published a cost-benefit analysis of the District of Columbia Opportunity Scholarship Program based on data indicating a statistically significant positive relationship between voucher recipients and increased graduation rates. Wolf and McShane (2013) stated, “the benefits estimated to be realized as a result of that higher graduation rate are more than double the documented program costs” (p. 17).

Examining evidence from Milwaukee’s voucher program, approximately 10,700 students utilized the program during the 2001-2002 school year, at a taxpayer cost of \$58 million. By comparison, the Milwaukee Public School system educated eight times as

many students that year, but at a cost 20 times higher (Bolick, 2003; State of Wisconsin Department of Public Instruction, 2008). Wolf (2009) found that the Milwaukee Parental Choice Program (MPCP) saved an estimated \$39 million in Wisconsin in 2009. Wolf noted that students participating in the MPCP cost less to educate than those in the Milwaukee Public Schools system, but that the savings for Milwaukee taxpayers varied depending on the type of taxpayer. For example, Milwaukee residents have to pay higher property taxes to help fund the program, even though Milwaukee and non-Milwaukee residents alike have the opportunity to participate in the voucher program (Wolf, 2009).

Critics Argue Vouchers Do Not Provide Special Education Services

Though voucher payments may cost less than per pupil expenditure rates in school districts, opponents argue that the major reason the difference exists is because private schools often exclude students with special needs. Miner (2003) noted that private schools are not required to provide services for special education in the same manner as public schools. Though some private schools receiving vouchers may educate students with special needs, Miner (2003) found that many of those students had disabilities that cost significantly less to address, like language and speech. The financial implications of vouchers bring opponents back to the topic of access. Voucher critics often argue against redirecting taxpayer money for vouchers because of the limitations of voucher access.

Iver (2000) completed a meta-analysis of various laws from across the country, including New York, Washington, DC, and Ohio. Iver's research noted that a significant number of families were unable to access the voucher program. While Iver (2000) made clear her support of school choice programs, she recommended that policymakers

increase school choice opportunities for low-income families while also increasing funding for public schools with high concentrations of disadvantaged students. While this is a noble goal, it may be difficult to achieve given the limited revenue available within most state budgets. Iver (2000) concluded by stating that “even under a publicly funded voucher system,” a substantial “proportion of disadvantaged children would be forced to remain with the public school system” (p. 410). This is a point that is often argued by voucher critics and overlaps other themes in this literature review: voucher plans do not meet the needs of all students and, instead, redirect money from state and local budgets that otherwise could have been used for local public schools.

At-risk Student Populations

Our nation’s earliest and most vocal school choice and voucher proponent, Milton Friedman (1955) developed a proposal that included offering vouchers to any student who wanted one. Despite the fact that Friedman’s earliest school choice proposal included this universal voucher plan, almost all of the voucher programs that have developed across the United States have been “targeted” or “means-tested.” Supporters of universal voucher programs, like Friedman (2006), have called means-tested voucher programs “charity vouchers,” claiming that these types of programs will not bring about the greatest amount of needed educational reform. Universal voucher advocates believe the competitive market effect is greatly limited in a means-tested program since universal voucher laws would serve all families regardless of socioeconomic status, disability status, or any other criteria (Gillespie, 2005; Moe, 2001).

Means-Tested Vouchers Preferred Over Universal Vouchers

Public opinion remains higher for targeted voucher programs than it does for universal ones, which is likely the main reason that voucher laws across the country almost exclusively target disadvantaged students (Education Next, 2016; PDK/Gallup Poll, 2015). Many voucher advocates only support means-tested programs intended to help specific groups of at-risk students, including children from low-SES families, children with disabilities, and other minority groups. Bast, Harmer, and Dewey (1997) noted that the community leaders and policymakers in Milwaukee, home to our nation's first modern voucher program, pushed for the initiative as a way to promote equity and choice for low-income students.

There is a social justice aspect to this debate for advocates of means-tested vouchers who believe these programs can help improve the lives of disadvantaged families. This appears to be true for many of the private school leaders in North Carolina who accepted students through the state's voucher program. In a survey of these leaders, Egalite, Gray, et al. (2017b) found, "The primary reason participating private schools cite for accepting students through the Opportunity Scholarship program is to help the school serve more disadvantaged students" (p. 1). Research from earlier programs show evidence that some voucher plans lead to lower dropout rates and higher graduation rates (Gottlob, 2007). A report by Wolf and McShane (2013) found that the students who participated in the voucher program in Washington, D.C. improved their chances of graduating from high school.

Means-Tested Programs Reduce the Prevalence of Cream-skimming

Voucher critics have long been fearful that choice programs encourage “cream-skimming,” a phenomenon whereby only the best, brightest, most supported—and, hence, easiest to educate—students are plucked from their traditional public school to attend a private or charter school (Forster, 2016). Altonji, Huang, and Taber (2015) examined the cream-skimming effect in schools of choice, including within voucher programs. The researchers found a very small cream-skimming effect, having stated,

The results suggest that the effects of vouchers on the productivity of public schools, either through a positive or negative response to competitive pressure or through an effect on the financial resources available in public schools, may be more important than the cream skimming effect. (pp. 29–30)

In general, means-tested voucher programs that target at-risk student populations reduce the risk of cream-skimming since disadvantaged students are historically among the most challenging to education; nevertheless, the potential for cream-skimming still exists.

The Admissions Process Prevents Some Private School Enrollment

Though concerns about cream-skimming appear to be largely unfounded, some programs allow private schools to screen students who have applied for admission before deciding if they will be allowed to enroll. This is the case in North Carolina, where participating private schools retained their legal right to admit or deny students, even if they were eligible for and received a voucher. In some cases, these provisions are understandable, particularly for programs that are only intended for students with disabilities. However, there are many voucher programs that are required to use an open admissions process or admit all eligible students on a random basis, including the

Milwaukee Parental Choice Program and the Louisiana Scholarship Program (Egalite, Gray, et al., 2017b). These programs, like North Carolina's Opportunity Scholarship Program, also target students from low SES families.

Egalite, Gray, et al. (2017b) found that private school leaders most often use student interviews to decide if they will admit a student, though many also examine the student's academic record, testing history, and disciplinary record before making their decision. In North Carolina, there were some students who, despite receiving a voucher from the state, did not participate in the program because they were not accepted by their preferred private school. However, the exact percentage of students who did not participate in the program because they were denied admission, and the reasons why they were denied, is not clear (Egalite, Gray, et al., 2017a).

Programs Targeting Students with Disabilities

After Florida created the first voucher program specifically targeting students with disabilities in 1997, similar programs have popped up across the country over the last two decades (McKay Scholarship Program, 2010). Considering that children with learning disabilities are some of our country's most disadvantaged students, special attention should be paid to these types of voucher programs. While there are states with programs designed specifically for students with special needs, school choice options for such students are not limited to those programs. Students with disabilities can also participate in the means-tested voucher programs targeting children from low-SES families, if they are eligible.

Voucher opponents point out, however, that private schools are not required to provide the same services to students with learning disabilities as are public schools.

While studying Milwaukee's voucher system, Wolf, Witte, and Fleming (2012) found,

If a parent enrolls a student with special needs in a private school, that student must surrender her legal rights to special educational services. Private schools are not required by federal law to enroll students with special needs, and they are not entitled to any additional resources from the state if they do so. Private schools can either accommodate the student themselves, using whatever resources they have, or negotiate with public school officials regarding the provision of special services to the student by the public school system with additional public funds. (p. 19)

Kemerer and Maloney (2001) noted that the early programs created in Milwaukee and Cleveland were not required to follow the requirements laid out in the federal Individuals with Disabilities Education Act (IDEA). It is for this reason that voucher critics worry children with disabilities will not get the services they need at private schools that are not held to the same regulatory and reporting standards.

These concerns may be well-founded, as a recent report from the U.S. Government Accountability Office (U.S. GAO, 2017) found that “private school choice programs inconsistently provide information on changes in rights and protections . . . when parents move a child with a disability from public to private school” (para. 3). U.S. GAO (2017) noted that most websites informing parents about voucher programs did not provide information about special education and/or disability-related policies. After interviewing officials from the Department of Education as well as various private school choice programs and stakeholder groups, U.S. GAO (2017) reported that some parents “do not understand that certain key IDEA rights and protections—such as discipline

procedures and least restrictive environment requirements—change when parents move their child from public to private school” (para. 3).

Voucher Participation Rates for Students with Disabilities

The Center for Education Reform noted in 2005 that thousands of private schools in the United States serve children with learning disabilities and medical needs.

Nevertheless, research from Milwaukee has revealed that the percentage of students with disabilities is higher in Milwaukee’s public schools than in the private schools receiving vouchers. Wolf et al. (2012) stated that the “estimates . . . indicate a 7.5 to 14.6 percent participation rate for students with disabilities in the voucher schools in comparison to the 17 to 19 percent participation rate reported for students with disabilities by the public schools” (p. 22).

Voucher critics argue that because private schools have admissions guidelines, they will not be required to accept students with special needs; additionally, even if a participating private school accepts a student with special needs, that school will not be required to provide the same services and accommodations as public schools. To better justify the argument for vouchers as a medium for serving at-risk students, Mead (2008) provided several recommendations for policymakers. Among his recommendations, Mead argued that all choice programs utilizing public money should be available for students with disabilities, and parents should not be forced to give up any services their child needs in order to take part in the choice program.

Means-Tested Programs Can Transform into Universal Programs

There is no guarantee that voucher programs that start out targeting only low-SES students or students with disabilities will not one day morph into universal voucher programs. For example, Indiana's voucher program began in 2011, aiming to help minority students and low-SES families who wanted better school choice options. Two years later, however, the Indiana Legislature, with the support of Governor Mike Pence, voted to expand the program in order to allow more affluent families to participate. Moreover, the requirement that students had to first attend a public school before they could receive a voucher was removed. Quick (2017) noted,

Today, over half of Indiana voucher recipients have no record of ever attending a public school, the percentage of white voucher recipients has increased from 46 to 60 percent, the percentage of black recipients has dropped from 24 to 12 percent, and the students receiving vouchers are increasingly suburban and middle class. (para. 6)

There are many staunch voucher supporters who believe the only way education in the United States will systematically improve is if voucher programs become universal. Writing for the Friedman Foundation for Educational Choice, Forster (2016) stated, "The only way to make school reform work on a large scale is to break the government monopoly on schooling" (p. 35). Forster (2016) added, "Only universal choice can open the door to the full-fledged revolution in schooling America needs in the new century" (p. 35). Though the opinions of researchers like Forster appear to be in the minority at the present time, voucher critics worry that targeted programs will eventually be expanded

into proposals that no longer aim to help just those who are economically, racially, and educationally disadvantaged.

Oversight and Accountability

One of the most common arguments levied against voucher programs from opponents relates to accountability. For supporters, particularly those who believe in the power of the free market, having the least amount of government intervention and regulation is ideal. It is in those scenarios, they argue, that educational innovation can flourish. For opponents, the lack of accountability seen in most voucher plans across the country is dangerous, since these programs not only aim to help our country's most disadvantaged students, but they do so using taxpayer money.

A State's Constitutional Obligation to Educate Every Child

Every state in the country is required to provide a free public education to every student. State legislatures in every state have some kind of mandate written into their constitutions that ensures all children are offered a basic level of education in order to be successful. As Coulson (2006) wrote, an important characteristic of public education is to provide for a "common core of values [deemed] requisite for social stability . . . [which] strengthens communities and promotes harmonious social relations" (p. 107). Voucher critics worry that implementing such programs without appropriate oversight and regulation will make it difficult for the state to meet their constitutional obligation and determine if students are being provided an appropriate education. Researchers have argued that it is important for the government to ensure that students are being educated

properly and that without appropriate regulation and oversight, societal discord is possible (Doerr, Menendez, & Swomley, 1996; Kemerer & Maloney, 2001).

Balancing Autonomy and Oversight

Voucher supporters—especially those who prefer expanded, universal programs—believe less regulation and government oversight is the only way to increase educational innovation. Forster (2016) lamented the state of the nation’s current voucher programs, noting that they have been “curtailed by strict limits on the students they can serve, the resources they provide, and the freedom to innovate” (p. 1). Forster (2016) stated that “only a thriving marketplace that allows entrepreneurs to get the support they need by serving their clients better can produce sustainable innovation” (p. 35).

Nevertheless, it can be difficult for policymakers to strike the appropriate balance between educational autonomy and oversight. As Kemerer and Maloney (2001) noted, it is the responsibility of the government to make sure that certain regulations are in place in order to ensure students’ constitutional right to an education is protected. To do that, certain restrictions may have to be put in place that may make the private school less appealing than it otherwise would have been if those necessary regulations were not required (Kemerer & Maloney, 2001).

High-Stakes Testing as a Form of Accountability

Accountability systems that include testing mandates and/or grading schools using performance data is one form of government oversight. Such models, especially high-stakes testing, have been in the public school system for nearly 2 decades, becoming prominent in every state after the 2002 passage of the *No Child Left Behind Act of 2001*.

Scholars have studied the effects of high-stakes testing and other general accountability models on student achievement, having found generally positive achievement gains. Though there is much debate regarding the long-term impact of high-stakes testing in schools, several researchers have noted test score growth, at least in the short term, within schools and districts that employ testing and accountability programs (Carnoy & Loeb, 2002; Dee & Jacob, 2011; Hanushek & Raymond, 2005). Numerous scholars have examined the school grading and accountability model found in Florida, having noted that, in general, the performance for students in the worst schools improved (Chakrabarti, 2007; Chiang, 2009; Figlio & Rouse, 2005; Rouse, Hannaway, Goldhaber, & Figlio, 2007; West & Peterson, 2006). Research from New York City (Rockoff & Turner, 2010; Winters & Cowen, 2012) and Chicago (Jacob, 2005) revealed similar results, providing additional evidence that accountability models in the public schools lead to, at a minimum, short-term achievement gains for students.

Regulations and Oversight for Private Schools

While public schools have been subject to scrutiny in the form of testing programs and accountability models for years, private schools, as one might imagine, have not faced the same level of regulatory oversight. Witte et al. (2014) stated,

Beyond rudimentary demographic data collection on the part of state and federal education agencies . . . private schools are typically left to their own devices to monitor and ultimately improve the quality of the educational product they provide. (p. 439)

In addition to testing and accountability measures, private schools also are not subject to regulations related to financial oversight and personnel certification. These regulations

are necessary to ensure public accountability of taxpayer dollars, but they are costly, burdensome, and—as voucher opponents argue—are faced by public schools, but not private ones. Analyzing the voucher program in Florida, Harris et al. (2007) expressed particular concern over the lack of oversight and accountability for the private schools accepting vouchers:

[...] it is clear that nearly all existing private schools, including religious ones, can accept voucher students and funds without complying with most of the regulations required of public schools. Perhaps most importantly, most voucher students do not take the state's standardized test, and those scores are not used as the basis for accountability. (p. 238)

For most voucher opponents, the issue of how the government regulates private schools is as much one about accountability as it is competition, since private schools have an inherent advantage when the rules and regulations they must follow are lighter than nearby public schools.

Voucher programs across the United States have varying degrees of regulatory requirements to which private schools must adhere. In North Carolina, private schools must meet the regulations of the North Carolina Department of Public Instruction's Division of Non-Public Education. They also must conduct a criminal background check on the highest-ranking employee or official and, if the school receives over \$300,000 in voucher monies, they must submit a certified financial report to the state. Lastly, voucher students must be given a nationally-normed test, the results of which are reported to the state. However, these results are only released to the public if 40 or more students attend the school using a voucher (Egalite, Gray, et al., 2017a).

Comparing Voucher Accountability Structures across States

The accountability structures in place in North Carolina are relatively weak compared to many voucher programs across the country. In Louisiana, students using a voucher must take the same standardized test as those in the local public schools. Schools may also receive a performance rating based on these assessment results. In Indiana, private schools are subject to the state's "A-F" school evaluation model. The local programs in Cleveland and Milwaukee, as well as Ohio's statewide voucher program, all require private schools to give state assessments and publish the results (Emerson, 2014). Analyzing these and other voucher programs, Wettach (2017) stated that the "accountability measures for North Carolina private schools receiving vouchers are limited and among the weakest in the country" (p. 1). North Carolina's voucher law does not require private schools to give their students the state's standardized assessments, which Wettach (2017) noted will not allow the public to "develop valid conclusions about the success of the program" (p. 1).

Some school choice advocates have recently called for increased accountability for private schools that participate in voucher programs. In a report for the Thomas B. Fordham Institute, traditionally a conservative organization that supports school choice, Emerson (2014) recommended that all students receiving a voucher should also take part in the state's assessment program. Additionally, Emerson argued that all schools should release these test results to the public unless the school enrolls less than 10 voucher-funded students. Lastly, Emerson indicated that schools receiving a large part of their

revenues from taxpayer vouchers should be held accountable for test results, potentially to the point of being ineligible for the program if student achievement results are too low.

Research Indicates Increased Private School Accountability Can Increase Student Achievement

Research has shown that increasing testing requirements and accountability measures for private schools participating in voucher programs can lead to increased student achievement at those schools. Analyzing Milwaukee's voucher program, Witte et al. (2014) stated,

[The] results suggest that—even without attaching explicit sanctions for poor performance—applying testing and public reporting requirements to private schools will improve test scores in that sector either through enhanced test preparation or through meaningful gains in educational quality itself. (p. 438)

Emerson (2014) outlined several reasons why increasing test-based accountability measures in voucher programs would be beneficial. Doing so gives parents vital information about different schools, making it easier to compare schools and providing them with a more informed choice. There are political advantages as well, since adding accountability measures to voucher programs may be more appealing to policymakers who were otherwise lukewarm about vouchers. As Emerson (2014) stated,

Accountability in return for serving more families with more generous scholarships may be a better political calculation than the current status quo, which tends to cap the size of voucher programs while leaving them free of many testing and transparency requirements. (p. 7)

Finally, Emerson (2014) noted increasingly test-based accountability would not cause many private schools to leave the program. A survey conducted by Stuit and Doan (2013)

found that only 25% of private school leaders “stated that state assessment mandates figured importantly in [their] decision” to participate (as cited in Emerson, 2014, p. 6).

Private School Leaders May Balk at Increased Government Oversight

Research from a recent survey of private school leaders in North Carolina, however, seems to refute these claims. Egalite, Gray, et al. (2017b) found that future regulatory requirements, including testing mandates, was one of the top two concerns for private school leaders. Several private school leaders participating in North Carolina’s voucher program stated that they would no longer do so if regulations became stricter or if testing requirements were added. Within the survey conducted by Egalite, Gray, et al. (2017b), one private school leader from Raleigh wrote,

We wouldn’t participate if we were told . . . what tests to use. We would just have to pull out of it. . . . [T]here is that kind of looming concern that eventually it will become the North Carolina End-of-Grade tests and it’s not necessarily our curriculum, and it doesn’t sync up with our curriculum. (p. 25)

It is impossible to tell how increasing accountability measures would affect private school participation, but one can reasonably assume that participation rates would drop unless the increase in accountability was coupled with a sizable increase in the value of the voucher. Nevertheless, Emerson (2014) summarized the argument made most often by those who support increased measures of accountability in voucher programs: “Parents and schools aren’t the only parties in a transaction paid for with vouchers or tax credits. The taxpayer also needs assurances that schools are producing solid learning results for the children who participate in such programs” (p. 8).

Church-State Separation and Other Legal Considerations

A major reason why many find vouchers to be a controversial reform initiative stems from the connection that voucher laws often have with religious private schools. Many voucher opponents argue that such policies violate the constitutional separation of church and state, since the tax dollars that are used to fund vouchers are most often used in religious private schools. Others believe voucher laws violate state constitutions that include “uniformity” clauses, which call for the creation and maintenance of a uniform public school system. Conversely, voucher proponents believe that denying the inclusion of religious schools in a voucher system greatly diminishes choice options for parents, since the vast majority of private schools in the United States are religious (Kemerer & Maloney, 2001). It is impossible to disconnect voucher initiatives from religion, simply because so many private schools in this country have a religious background or affiliation. In North Carolina, Egalite, Gray, et al. (2017b) found in a survey of private school leaders that 76% of “participating schools . . . indicated that their school has a religious orientation,” which was significantly less than non-participating schools (42%) (p. 7).

Separating Church and State

Though the idea of maintaining “separation” between church and state is an argument often used by voucher opponents, “separating” church and state is not a constitutional concept. Thomas Jefferson was the first to use the phrase “separation of church and state” in a letter written in 1802. The Supreme Court used the phrase as part of a 1947 ruling in *Everson v. Board of Education*. Presently, the phrase is most often

used to criticize government action that appears to support religion in general, or one religion over another (McCarthy, Cambron-McCabe, & Thomas, 1998). The U.S. Constitution states, “Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof”; these statements in the First Amendment are known as the “Establishment Clause” and the “Free Exercise Clause” (McCarthy et al., 1998). All of these concepts—the separation of church and state, the Establishment Clause, and the Free Exercise Clause— have been discussed and debated within various local, state, and federal judicial systems for decades.

Significant Court Cases Rule Vouchers Constitutional

At the federal level, the Supreme Court decision in *Zelman v. Simmons-Harris* (2002b) determined that Cleveland’s voucher program, enacted in 1995, did not violate the Constitution’s Establishment Clause separating church and state. During the 1999-2000 school year, 96% of the students receiving a voucher through the Cleveland program were enrolled in schools with a religious affiliation (*Zelman v. Simmons-Harris*, 2002a). In a 5-4 decision, the Supreme Court ruled that Ohio’s voucher program was constitutional, overturning the rulings of the lower courts. Chief Justice Rehnquist wrote the majority opinion and stated,

The Ohio program is entirely neutral with respect to religion. It provides benefits directly to a wide spectrum of individuals, defined only by financial need and residence in a particular school district. It permits such individuals to exercise genuine choice among options public and private, secular and religious. The program is therefore a program of true private choice. (*Zelman v. Simmons-Harris*, 2002b)

The ruling in *Zelman v. Simmons-Harris* remains the greatest legal victory for voucher supporters; that decision has since opened the door for additional voucher programs to begin across the nation.

The *Zelman* ruling was preceded by the 1971 Supreme Court case of *Lemon v. Kurtzman*. This case sought to define the criteria that the government would need to follow in order to keep from violating the First Amendment's Establishment Clause (McCarthy et al., 1998). These criteria became known as the "Lemon Test," which held that any state law or statute "must have a secular legislative purpose, its principal or primary effect must be on that neither promotes or inhibits religion, and it must not foster "excessive government entanglement with religion" (*Lemon v. Kurtzman*, n.d., para. 4). Focusing mainly on the first two parts of the Lemon Test, the justices in the *Zelman* decision felt that Cleveland's voucher law had a secular purpose—that of educating low-income students—and did not unfairly promote or inhibit religion (Vacca, 2002).

Arguing that Vouchers are "Constitutionally Neutral"

Making the case that voucher laws are neutral toward religion is an important argument for supporters. Even before the *Zelman* decision was being litigated, Weinberg, Cooper, and Fusarelli (2000) argued that vouchers are "constitutionally neutral" in regards to religion (p. 39). Weinberg et al. (2000) stated that since "neutrality means 'no harm,' including religious choice would not be unconstitutional since government would not be favoring any particular religion" (p. 39). Weinberg et al. (2000) mentioned that voucher critics who rely on a strict interpretation of separating church and state are actually "denying children and their families [the] fundamental right of choice" and are

“[reinforcing] a grossly inequitable system that discriminates against the least fortunate members of society” (p. 40).

This provides an example of where two or more controversial voucher themes sometime overlap. In this case, Weinberg et al. (2000) invoked the themes of legal concerns, targeting at-risk student populations and individual choice to present an argument in favor of vouchers. Interestingly, though not surprisingly, facets of the “constitutional neutrality” argument presented by Weinberg et al. (2000) were evident in the *Zelman* ruling.

State-Level Constitutional Challenges to Vouchers

While the *Zelman* decision declared vouchers constitutional at the federal level, many voucher laws continued to face legal challenges at the state level. Voucher opponents argue that most state constitutions include language that would make vouchers illegal. These provisions often fall into one of two categories: (a) Blaine Amendments, which discourage the flow of public money to religious institutions, and (b) uniformity clauses, which ensure an appropriately-funded, uniform system of public schools in the state (Bolick, 2003). Both of these concepts were evident when North Carolina’s Opportunity Scholarship Program was initially ruled unconstitutional by state Superior Court Judge Robert Hobgood in 2014 (Wettach, 2017). However, the North Carolina Supreme Court overturned that ruling in 2015 by a 4-3 decision (Americans United for Separation of Church and State, 2015; Blythe & Hui, 2015). The four judges who ruled in favor of the program declared that the law used tax dollars for a public purpose, while those in dissent believed it violated the state constitution by directing funds to religious

schools without a proper mechanism for accountability (Americans United for Separation of Church and State, 2015; Blythe & Hui, 2015).

The ruling in North Carolina notwithstanding, legal decisions at the state level have not always favored voucher supporters. A 2006 decision by the Florida Supreme Court found the state's Opportunity Scholarship Program violated the state's "uniformity" clause, which mandated that "adequate provision . . . be made by law for a uniform, efficient, safe, secure, and high quality system of free public schools" (Supreme Court of Florida, 2006).

Similarly, the Colorado Supreme Court has found voucher laws unconstitutional three separate times—in 2003, 2011, and 2015—though for reasons slightly different from those in Florida (Lovett, 2017). In 2015, Colorado's highest court ruled that the Douglas County voucher plan unconstitutionally provided public money to religious schools (Lovett, 2017). The Colorado Supreme Court was also critical of the program for not having adequate safeguards built into the law to protect families against future rising private school tuition (Lovett, 2017). Since the *Zelman* decision ruled that vouchers were constitutional in regards to public funding transferring to private schools, it is likely that voucher opponents will focus on state-level uniformity clauses in future attempts to block voucher legislation (Dycus, 2006).

Conclusion

Researchers have studied the effects of voucher programs since Milwaukee adopted the first modern voucher law in 1990, and the number of research studies have only increased as the number of voucher programs have continued to rise across the

country. As I reviewed the literature related to vouchers, eight major themes emerged related to voucher programs, policies, and laws. These eight themes include (a) academic achievement, (b) free-market competition, (c) individual parental school choice, (d) racial segregation, (e) funding and state budget issues, (f) targeting at-risk and disadvantaged student populations, (g) oversight and accountability, and (h) church-state separation and other legal concerns.

While all eight of these concepts are controversial in their own right, few have raised more debate than the issue of academic achievement. As my literature review revealed, studies regarding the effect of vouchers on student achievement have yielded mixed results. Many reports have claimed positive academic outcomes for students who used vouchers, while other reports—especially those released most recently—claimed that students using vouchers perform worse on some math and language arts assessments. Still other reports have shown no discernable difference in academic performance, leaving policymakers with little concrete evidence regarding the academic effect of vouchers on the students who use them.

The roots of vouchers can be traced to the free-market philosophies of Friedman, as well as the more recent voucher proposals of Moe and Chubb. Some research backs up the claims that free-market competition can improve education, but many authors express concerns about moving education into a fully market-driven entity. Closely related to the theme of free-market competition is that of parental school choice. Voucher supporters have argued for years that the option to attend a private school should be open to all families, regardless of income. Critics, however, argue that private schools do not offer

an inherent educational advantage over public schools; moreover, voucher critics note that, due to hidden and unanticipated costs, private schools are not accessible to the poor even if a voucher is available.

Many voucher critics worry that the increase in voucher laws will lead to increased school segregation. While voucher programs do have a checkered history with regard to school desegregation efforts, there is little evidence to support the claim that voucher laws increase school segregation. There has also been much research conducted on the implications of vouchers on state funding, with a specific focus on how such programs affect public school funding. Some research has shown that voucher programs may be a more efficient use of taxpayer dollars and may actually save money. However, critics point out that few voucher programs provide appropriate funding for special education services, leaving students with disabilities without the resources they need if they choose to attend a private school.

The effect of vouchers on at-risk student populations, including students with disabilities, was another important theme revealed during my literature review. Most voucher laws use “mean-tested” vouchers that target historically disadvantaged groups, including students from low-income families and those with special needs. These programs generally reduce the risk of “cream-skimming,” but critics still worry about the relatively low participation rates in voucher programs for students with special needs.

Few voucher themes have raised more debate than the argument over accountability and oversight. Supporters believe private schools accepting vouchers need autonomy and little regulation to be most effective. Critics feel citizens deserve to know

how their tax dollars are being utilized, calling on increased oversight of the curriculum and greater transparency of the test scores of the private schools that accept vouchers. There are other legal and constitutional debates ongoing regarding vouchers, including the argument that vouchers are a violation of the Establishment Clause because they fail to maintain a separation of church and state. The 2002 *Zelman* decision effectively neutralized that argument and opened the door for voucher programs to increase nationwide. Other state-level legal challenges to voucher laws have had mixed results, with some state courts ruling in favor of vouchers and others finding a constitutional violation of some kind within the state's voucher law.

The literature review presented in this chapter is vital to the next two chapters that follow. After providing an organizational and operational overview of North Carolina's private school voucher program in Chapter IV, I discuss the results of the many documents I analyzed--all of which were written by either NC Policy Watch (NCPW) or the John Locke Foundation (JLF)—in my fifth chapter. These two organizations represent two of North Carolina's most significant policy groups, and writers from both organizations published numerous articles, policy briefings, editorials, and research reports related to private school vouchers from 2012 to 2017. As I analyzed these documents, I used the eight major voucher themes from this literature review to determine which themes were the most prevalent during the birth and expansion of the voucher program in North Carolina from 2012 to 2017.

CHAPTER IV

PRIVATE SCHOOL VOUCHERS IN NORTH CAROLINA: HISTORY, OPERATIONS, AND RELATED LITERATURE

The eight major voucher themes discussed in the previous literature review are significant concepts regularly found in voucher debates across the country. However, not every voucher theme is central to the arguments made by those for and against vouchers. In North Carolina, for example, some of the eight major vouchers themes—including accountability and individual parental school choice—were much more prevalent than others during the formidable years of the state’s voucher debate from 2012 to 2017. As a review, the eight major voucher themes I utilize in my research are:

1. Academic Achievement
2. Free-Market Competition
3. Individual Parental School Choice
4. Racial Segregation
5. Funding and State Budget Issues
6. Targeting At-risk and Disadvantaged Students
7. Accountability and Oversight
8. Church/State Separation and Other Legal Concerns

In this chapter, I provide a short review of the recent literature related specifically to North Carolina’s voucher program. First, however, I provide an administrative overview of North Carolina’s Opportunity Scholarship Program, including the program’s

specific eligibility criteria and relevant data regarding the program’s voucher recipients and participating private schools.

Administrative Overview of the North Carolina Opportunity Scholarship Program

The section that follows is an overview of the general administrative aspects of the North Carolina Opportunity Scholarship Program (OSP). This section includes a list of the major responsibilities of the North Carolina State Education Assistance Authority (NCSEAA), the organization that has been charged with overseeing the OSP. This section also includes an outline of the eligibility criteria for students, followed by an outline of the eligibility requirements for participating nonpublic schools. Finally, this section concludes with the presentation of OSP recipient data that has been collected over the past four school years (from 2014-2015 to 2017-2018).

The NCSEAA oversees the North Carolina voucher program for students of low-income families, known as the Opportunity Scholarship Program (NCSEAA, 2018a). NCSEAA provided the following general overview of the program on their website:

The Opportunity Scholarship Program expands school choice in North Carolina through scholarship grants for eligible children in kindergarten through 12th grade. This program provides funding of up to \$4,200 per year for eligible children who choose to attend a participating nonpublic school. (NCSEAA, 2018b, para. 1)

The North Carolina voucher program is governed by North Carolina General Statute 115C, “Elementary and Secondary Education,” Subchapter 10, “Private and Proprietary Schools,” Article 39, “Nonpublic Schools,” Part 2A, “Scholarship Grants” (NCSEAA, 2018c). As the administrator of the program, NCSEAA (2018a) outlined its four main

responsibilities, including “[Managing] the application and award process, [ensuring] the school meets program requirements, [verifying] each student’s eligibility, [and disbursing] Opportunity Scholarship funds” (p. 4). The NCSEAA website includes several documents available for parents, school administrators, and other stakeholders designed to provide relevant and pertinent information in an easy-to-understand format for anyone interested in the state’s voucher program.

NCSEAA outlined the eligibility criteria for students to participate in the program in two parts. Within part one, an applicant must meet all six criteria. The criteria for part one are as follows:

- Applicant must “be a resident of North Carolina”
- Applicant must “live in a household that meets the Income Eligibility Guidelines”
- Applicant must “enroll in a participating nonpublic school in North Carolina”
- Applicant must “not have a high school diploma”
- Applicant must be “five years old on or before August 31”
- Applicant must be “younger than 22 years old at the beginning of the semester” (2018a, p. 8; 2018c, p. 6)

If the applicant meets all five criteria in part one, s/he moves on to part two, where s/he must meet at least one of six additional criteria. The criteria for part two are as follows:

- Applicant has “received Opportunity Scholarship funds during the previous school year”

- Applicant has been “assigned to and attended a North Carolina public school or a Department of Defense school located in North Carolina for the full prior spring semester”
- Applicant has a “parent or guardian on full time active military duty”
- Applicant “will be entering kindergarten or the first grade”
- Applicant “is a foster child”
- Applicant “has been adopted with the last year” (2018a, p. 9; 2018c, p. 6)

Once again, in order for a student to be deemed eligible for the program, s/he must meet *all* six criteria in part one and *at least* one of the six criteria in part two. One of the most significant eligibility guidelines pertains to a family’s income in determining if the student lives in a “household that meets the Income Eligibility Guidelines.” NCSEAA (2018c) stated that an applicant must live in a household that has an income “not in excess of one hundred thirty-three percent (133%) of the amount required for the student to qualify for the federal free or reduced-price lunch program” (p. 6).

NCSEAA (2018c) also outlined the eligibility requirements for participating nonpublic schools. Some of the most significant eligibility requirements for participating schools include:

- The school must be “physically located in North Carolina”
- The school must *not* be a “home school” as defined by G.S. § 115C-563(a)
- The school must complete an “initial registration process as established by the Authority”

- The school must “provide the Authority with a complete copy of its tuition and fee schedule for each Academic Year”
- The school must “conduct a criminal background check in a manner established by the Authority, national in scope and dated within one year of submission, for the staff member with the highest decision-making authority at the Eligible School”
- The school must “administer a Nationally Standardized Test, selected by the chief administrative officer of the Eligible School, to all students in grades three and higher whose tuition and fees are paid in whole or in part by the Program” (pp. 12–14)

In addition to the requirements listed above, schools that enroll more than 25 students through the voucher program must “report Nationally Standardized Test scores in the aggregate to the Authority” (NCSEAA, 2018c, p. 14). Moreover, if a participating school receives more than \$300,000 in funding from the program, that school must “contract with a CPA to perform a Financial Review consistent with generally accepted accounting principles” (NCSEAA, 2018c, p. 14).

Because the North Carolina Opportunity Scholarship Program went into effect during the 2014-2015 school year, 4 years of data are available related to the number of applications received, the number of scholarship recipients, the total monetary amount of the scholarships awarded, and the number of participating schools. Table 6 highlights these data from the 2014-2015 school year through the 2017-2018 school year.

Table 6

Opportunity Scholarship Program Data

	2014-2015	2015-2016	2016-2017	2017-2018
Total New Applicants	5,558	8,675	9,395	10,577
Eligible New Applicants	4,218	6,109	6,033	7,432
New Scholarships Offered	n/a	6,109	5,415	6,053
Recipients*	1,216	3,682	5,624	7,371
Amount of Scholarships	\$4,635,320	\$13,149,842	\$21,760,837	\$28,058,656
Total Participating Nonpublic Schools	333	429	437	457
Participating Schools with Recipients Enrolled	224	328	358	405

Note. Source: NCSEAA (2018d)

* “Recipients” defined as the “unduplicated count of students who received funds for fall, spring, or both”

There is a clear upward trend in the data as each category saw an increase through each of the 4 school years. As funding for the voucher program continued to increase, the number of new applicants, the number of new scholarships, and the total number of recipients continued to rise. Also, the number of participating nonpublic schools and the number of participating nonpublic schools that enrolled at least one scholarship recipient also increased every year from 2014 through 2018.

Table 7 provides an overview of the distribution of voucher recipients from the 2014-2015 school year through the 2017-2018 school year by ethnicity.

Table 7

Recipients by Ethnicity

	2014-2015		2015-2016		2016-2017		2017-2018	
American Indian/ Alaska Native	9	1%	23	1%	31	1%	59	1%
Asian	19	2%	56	2%	80	1%	124	2%
Black or African American	623	51%	1,386	38%	1,971	35%	2,361	32%
Hispanic	105	9%	311	8%	535	10%	678	9%
Native Hawaiian/ Pacific Islander	0	0%	1	0.03%	3	0.1%	4	0.1%
White	333	27%	1,431	39%	2,320	41%	3,225	44%
Other	127	10%	474	13%	684	12%	920	12%

Note. Source: NCSEAA (2018d)

Interestingly, the distribution of vouchers by ethnicity remained very consistent among American Indian/Alaskan Natives (1%), Asians (between 1% and 2%), Hispanics (between 8% and 10%) and Native Hawaiians/Pacific Islanders (between 0% and 0.1%). However, there is quite a bit of fluctuation between Black or African American students and White students. While the total number of Black or African American students participating in the program increased every year from 2014 to 2018, the ratio of participating Black or African American students compared to other ethnic groups decreased over the course of all four school years. The opposite has occurred for White students, whose ratio of participation relative to other ethnic groups has gone up every year, from a low of 27% in 2014-2015 to a high of 44% in 2017-2018.

Table 8 outlines the top five schools that have enrolled the most voucher students in each of the four school years across the state. Interestingly, Table 8 only contains eight unique schools. Most of the schools were in the top five in total recipients in more than one school year, and two schools—Greensboro Islamic Academy in Guilford County and Fayetteville Christian School in Cumberland County—have been in the top five in recipients each of the past 4 years. It is also worth noting that all of the schools on the above chart have a religious affiliation.

Table 8

Recipients by Nonpublic School

	2014-2015	2015-2016	2016-2017	2017-2018
1	Greensboro Islamic Academy (67)	Trinity Christian School (131)	Trinity Christian School (170)	Trinity Christian School (217)
2	Word of God Christian Academy (47)	Word of God Christian Academy (95)	Word of God Christian Academy (131)	Greensboro Islamic Academy (137)
3	Victory Christian Center School (37)	Greensboro Islamic Academy (94)	Fayetteville Christian School (126)	Berean Baptist Academy (135)
4	Concord First Assembly Academy (30)	Fayetteville Christian School (81)	Greensboro Islamic Academy (112)	Liberty Christian Academy (128)
5	Fayetteville Christian School (30)	Tabernacle Christian School (72)	Liberty Christian Academy (96)	Fayetteville Christian School (125)

Note. Source: NCSEAA (2018d)

Review of the Literature Specific to North Carolina's Voucher Program

Having discussed the relevant literature around private school vouchers in the United States in the previous chapter, I now present a short review of the most recent studies conducted specifically on North Carolina's young voucher program. Several of

these studies were also referenced in the previous chapter within the eight controversial voucher themes. Since the passage of North Carolina's voucher law in 2013, seven significant academic studies have been conducted on the program. Five of these studies were conducted as part of a comprehensive evaluation of North Carolina's Opportunity Scholarship Program by a research team from North Carolina State University (NCSU). The primary members of this research team include Anna J. Egalite, Dallas "Trip" Stallings, Stephen R. Porter, and Ashley Gray. These researchers published three reports in 2017 and two in 2018, covering a range of topics including parent and school leader perceptions of the voucher program, analysis of voucher applicants, and analysis of the program's academic impact.

Two additional studies have been conducted by outside organizations, the first by Jane R. Wettach and the Duke Children's Law Clinic in 2017 and the second by Bonnie Bechard and The League of Women Voters of the Lower Cape Fear in 2018. The report by Wettach (2017) focused primarily on the lack of accountability found in the state's voucher program, while the study by Bechard (2018) examined the differences in the curriculum used by most private schools compared to North Carolina public schools. The section that follows is a short literature review of these studies, beginning with the reports by Wettach and Bechard. I conclude with a review of four of the five studies prepared by the NCSU research team of Egalite, Stallings, Porter, and Gray. I have omitted the fifth study in my review, as it is essentially a more detailed summary of the first four reports published previously by the NCSU research team.

Reviewing the First Three Years: A Report by the Duke Children's Law Clinic

Wettach (2017) and the Duke Children's Law Clinic published a report in 2017 analyzing the first 3 years of the North Carolina Opportunity Scholarship Program. The report provided four key findings in its analysis of the voucher program. The first key finding from the report noted the limited accountability found in the program. Wettach (2017) stated, "Accountability measures for North Carolina private schools receiving vouchers are among the weakest in the country" (p. 2). Wettach (2017) noted that there is little test data available for review from private schools receiving vouchers and there is "no mechanism that allows the state to withhold vouchers from schools that produce poor test results" (p. 2). Wettach (2017) also stated that there is "no financial oversight of the vast majority of the schools receiving taxpayer money" since only a few schools receive enough voucher money (\$300,000) to be required to undergo a financial review by the state (p. 2). Lastly, Wettach (2017) pointed out that the voucher law "forbids discrimination . . . on the basis of race, color, or national origin," but not on the basis of "religion, disability, sex, sexual orientation, [or] gender identity" (p. 2).

The second key finding revealed that North Carolina's voucher program showed little academic gain for participating students. Wettach (2017) stated, "Based on limited and early data, the majority of the students using vouchers are performing below the 50th percentile on nationally-standardized reading, language, and math tests" (p. 1). The third key finding noted that the program increases parental school choice. In fact, Wettach (2017) wrote that the "most successful outcome of the program to date is increased parental choice, especially for parents who prefer religious education for their children"

(p. 3). The fourth key finding argued that assessing the effectiveness of the voucher program will be very difficult given the limited data available and the manner in which the program is set up. As Wettach (2017) summarized,

Because private schools receiving vouchers are not required to administer the state tests nor to publish detailed achievement data, researchers will be unable to develop thorough and valid conclusions about the success of the program at improving educational outcomes for participating students. This element also makes it more difficult for the public to gauge the value of this tax-supported investment. (p. 4)

Concluding her report, Wettach (2017) stated that “[increasing] parental choice for private schools and state support for religious education” are the most successful parts of the voucher program, but because of “very limited oversight” by the state, the program wields a “poor accountability scheme” (p. 5).

Studying the Curriculum: Comparing Public and Private Schools

Bechard and the League of Women Voters of the Lower Cape Fear embarked on a study of the private schools in North Carolina that participated in the voucher program from the 2014-2015 school year to the 2017-2018 school year. Analyzing school websites, Bechard (2018) determined the type of curriculum used by the different schools. While approximately 20% of schools were using some form of the North Carolina Course of Study (NCCOS), just under 77% were found to be using a “Christian literal biblical worldview” (Bechard, 2018, p. 5). Bechard (2018) then took a closer look at the Abeka curriculum, as it was used by most private schools accepting vouchers, comparing Abeka textbooks with other curricular materials. Bechard (2018) included a

number of professional reviews by professors and historians, all of whom were critical of various aspects of the Abeka curriculum.

For example, Stanford Professor Emeritus Donald Kennedy stated that the Abeka curriculum fails “to encourage critical thinking and the skills required for careful scientific analysis” (as cited in Bechard, 2018, p. 11). Moreover, UCLA Professor Gary Nash found that social studies and history texts with a Christian literal biblical worldview failed to encourage “historical thinking skills and analytical thinking,” while also failing to cover “major topics, themes, and components of United States history” (as cited in Bechard, 2018, p. 12). Bechard (2018) summarized the report by stating that the “Science, History, Government, and Literature textbooks in the Abeka curriculum do not prepare our students for college level courses or for 21st century careers in many fields” (p. 13). The report presented a recommendation that a commission be established to further study the curriculum used at private schools participating in the voucher program. Bechard (2018) wrote that she believes “school choice is a valued component of our state education system,” but she also stated that “all schools (public or private) receiving public funds must meet objective and measurable educational standards” (p. 13).

Examining Perspectives of the Program: Private School Leaders and Parents

In the summers of 2017 and 2018, a team of North Carolina State University researchers published five reports studying North Carolina’s voucher program. The first two reports were published in July of 2017. Egalite, Gray, and Stallings completed these reports, which analyzed outside perceptions of the voucher program from the perspective of two important stakeholder groups: private school leaders whose schools were eligible

to participate in the program and parents who applied for a private school voucher. The authors utilized data obtained from an online survey sent to every private school in North Carolina. The authors also conducted individual interviews and focus groups in different locations across the state, asking questions that covered a wide range of topics related to the Opportunity Scholarship Program. The first report, which focused on the perceptions of private school leaders, provided several significant findings.

First, Egalite, Gray, et al. (2017a) wrote that the private schools that decided to take part in the program were “more likely to be religious schools,” relative to the schools that choose not to participate (p. 1). Second, private school leaders indicated that their principal reason for participating in the program was to “help the school serve more disadvantaged students” (Egalite, Gray, et al., 2017a, p. 1). The next two highest reasons for participation given by private school leaders included “[providing] coursework or a curriculum that is an alternative to nearby public schools” and “[achieving] greater racial and socioeconomic integration in their schools” (p. 1). Third, Egalite, Gray, et al. (2017a) wrote that private school leaders had two major concerns about the program: the “possibility of future regulations that would change [participation] requirements,” and that the “value of the opportunity scholarship [would] not increase on pace with increases in the cost to educate students” (p. 1). Finally, Egalite, Gray, et al. (2017a) noted that private school leaders “appear to be very satisfied with parents involvement in their schools,” noting very little difference when comparing satisfaction rates of parents whose children are receiving a voucher and parents whose children are not (pp. 1–2).

The second report published by Egalite, Gray, et al. in July of 2017 focused on the perceptions of the parents who applied for the voucher program. This report also provided a number of noteworthy findings. First, the authors indicated that most parents learned about the voucher program through “informal means, primarily from conversations with friends and relatives” (p. 1). Second, Egalite, Gray, et al. (2017b) noted some patterns among the reasons given by parents who were awarded a voucher but who chose *not* to participate. The authors (2017b) wrote that many parents “cited hidden or unanticipated costs, such as transportation, as well as breakfast and lunches, which would otherwise be provided free of charge at a traditional public school” (p. 1). Third, Egalite, Gray, et al. (2017b) found that 45% of the parents who turned down a private school voucher eventually “[enrolled] their children in private schools anyway,” covering the costs themselves or with the help of some other form of financial aid (p. 1). Fourth, the authors (2017b) stated that the parents who participated in the program appeared “very satisfied with their child’s new school environment” (p. 1). Looking at specific aspects of the school environment, Egalite, Gray, et al. (2017b) indicated that 71% of parents were “very satisfied with school safety,” 71% were “very satisfied with instruction in character or values,” but only 41% were “very satisfied with racial diversity at their chosen private school” (p. 1). Finally, Egalite, Gray, et al. (2017b) noted that 94% of parents said that the “educational quality of a private school was a ‘very important’ important consideration” when choosing a school; likewise, “school quality” was the top reason given by parents when asked why they wanted to leave the public school system (p. 2).

A Closer Look at the Program's Applicants

The third academic study of the North Carolina voucher program completed by the North Carolina State University research team was published in August of 2017 by Egalite, Porter, and Stallings. While the first two reports studied the program from the perspective of private school leaders and parents, this report analyzed demographic data related to the students who applied to receive a voucher during the 2016-2017 school year. The analysis by Egalite, Porter, and Stallings (2017) unveiled some interesting conclusions about the students and families participating in the state's voucher program. First, Egalite, Porter, et al. (2017) stated that over 25% of the first-time applicants in 2016-2017 were "deemed eligible for the program but were unresponsive to NCSEAA's attempts at communication" (p. 1). Egalite, Porter, et al. (2017) noted two possible reasons why over one-fourth of eligible students did not respond to the attempts by the NCSEAA to enroll them into the program:

It is possible that some of these students moved out of state or decided to stay in the public schools system. It could also be the case, however, that this population was hard to track down because they used an email address and/or cell phone number during the application process that subsequently became inactive. (p. 17)

There are other potential explanations, as noted by Egalite, Porter, et al. (2017), including the possibility that the student was not admitted to the private school in which they wanted to attend, or that the applicant may not have been able to afford to pay the remainder of the private school costs not covered by the voucher.

Second, Egalite, Porter, et al. (2017) stated that voucher recipients are "more likely to be in the elementary school grades of kindergarten through fifth grade and they

are less likely to be in high school” (p. 1). Third, Egalite, Porter, et al. (2017) found that the median household incomes for new recipients was \$16,213, and was \$15,000 for renewal recipients. As such, Egalite, Porter, et al. (2017) stated that the families “that receive vouchers are among the lowest-income households in the state” (p. 1). Finally, Egalite, Porter, et al. (2017) discovered that approximately 25% of families applying for a voucher for the first time were found ineligible, while approximately 3% of families renewing their voucher were found ineligible. The two main reasons first-time applicants were deemed ineligible, as Egalite, Porter, et al. (2017) stated, were that the “student did not currently attend a North Carolina public school (51 percent) and that family income exceeded the statutorily-defined income cap for their given household size (42 percent)” (p. 17). Of the small percentage of applicants renewing their voucher who were deemed ineligible, the main reason was a rise in income that brought the family above the maximize allowable income level to participate in the program (Egalite, Porter, et al., 2017).

Report Reveals Academic Growth for Voucher Students, But Not Without Controversy

The first academic study conducted with a focus on the potential academic achievement of North Carolina voucher recipients was released in June of 2018. The report, published by Egalite, Stallings, and Porter (2018), generated a great deal of media coverage. Egalite et al. (2018) analyzed test scores of 497 students, 245 of whom attended a North Carolina private school using a voucher, and 252 of whom attended a public school. The results of the analysis indicated, as Egalite et al. (2018) stated, “large positive impacts associated with voucher usage in North Carolina” (p. 25). While Egalite

et al. (2018) noted that the state's voucher program may "truly [have] a positive impact on student achievement," the authors also submit that challenges with the research design and the choice of test used for the study may be possible explanations for the results observed (p. 25). As to be expected, voucher advocates applauded the study, including Stoops (2018) of JLF, who stated that the positive results indicated that the "Opportunity Scholarship Program is a worthwhile investment in North Carolina's most disadvantaged children" (para. 9). Groups generally opposed to vouchers criticized the research design and the lack of generalizability of the study. Nordstrom (2018) of NCPW stated that the study lacks "external validity" and that the results "tell us nothing about the program as a whole" (paras. 4, 14).

In a separate article referencing their study, Egalite and Stallings (2018) outlined three major barriers that made their evaluation of the North Carolina voucher program—or any evaluation of the program—difficult. The first barrier is described by Egalite and Stallings (2018) as an "outcome-data" barrier. The authors note that it is difficult to compare test data between public and private schools since public schools use standardized tests tied to a specific set of standards, while private schools can use any nationally normed test that they choose (para. 3). The second barrier is a "participation" barrier, since private schools are not mandated or required to take part in any outside academic study. Because of this, Egalite and Stallings (2018) stated that "researchers . . . must negotiate student participation one student at a time, ruling out any hope of achieving a representative evaluation sample of voucher uses across the state" (para. 4). Finally, the third barrier is "funding," given that the General Assembly has not set aside

specific funding to assist researchers so they can conduct a rigorous program evaluation (Egalite & Stallings, 2018). Summarizing their argument, Egalite and Stallings (2018) stated,

If the intent of the North Carolina Opportunity Scholarship program is primarily to expand school choice options, then that goal has been accomplished . . . But if that goal includes the improvement of academic outcomes for participating students, then impacts have to be measured, which requires removing the barriers that prevent researchers from conducting a high-quality and comprehensive program evaluation. (para. 7)

Having provided an administrative overview of North Carolina's voucher program, as well as a review of the recent literature specific to North Carolina, I now move to a discussion of my research methodology and results.

CHAPTER V

DEBATING SCHOOL CHOICE IN NORTH CAROLINA: METHODOLOGY, DATA, AND RESULTS

In the two previous chapters, I examined and discussed the academic literature related to private school vouchers both nationally and specific to North Carolina. The eight major voucher concepts that emerged from this literature review were then used as I analyzed the various documents written or developed by two major North Carolina think-tanks, NC Policy Watch (NCPW) and the John Locke Foundation (JLF). In this chapter, I provide an overview of the results I gathered while analyzing the numerous articles, policy briefings, editorials, and research reports from NCPW and JLF, all of which are related to private school vouchers. NCPW and JLF were selected for this research because these two organizations generally represent the two major competing views on private school vouchers. The methodology I used to review the documents is discussed in more detail below, followed by the presentation of my data and results. I conclude this chapter with a brief summary of my research before transitioning to the final chapter of my dissertation.

Research Methodology and Results

As described in Chapter I, I used specific coding techniques within a historical document analysis approach as my main method of qualitative research for my dissertation. As outlined by Bowen (2009), the objective within my historical document analysis approach is to analyze and interpret the documents I am researching in such a

way as to reveal the meaning related to a specific topic—in this case, private school vouchers. Bowen (2009) also noted that utilizing carefully defined and intentionally determined coding techniques is necessary in order to properly engage in historical document analysis.

The coding procedures I used aligned with what Creswell (2016) described as a way of “analyzing qualitative text data by taking them apart to see what they yield before putting the data back together in a meaningful way” (p. 156). While my coding process followed the suggestions described by Merriam and Tisdell (2016) and Creswell (2016), the thematic categories for which I was searching as I was analyzing the documents were pre-determined from the themes that emerged during my literature review. After analyzing and coding each of the documents, I noted no more than two “major” themes and no more than three “minor” themes from each document. To find the major and minor themes for each article, I examined the coding utilized for each document and determined which themes were referenced most frequently in each document.

In total, I analyzed 137 articles; 52 from JLF and 85 by NCPW. After I determined the major and minor themes of each document, I then used a point system to determine the prevalence of each of the eight voucher themes over the course of a given year. “Major themes” were assigned 1.0 point while “minor themes” were assigned 0.5 points. This coding system allowed me to determine which of the eight voucher themes were used most often in the arguments made by NCPW and JLF. The overall results of my coding are displayed in Table 9.

Table 9

Coding Results

John Locke Foundation									
Year	# Arts	Theme 1	Theme 2	Theme 3	Theme 4	Theme 5	Theme 6	Theme 7	Theme 8
2012	5	3.0	3.0	3.0	0.0	2.5	0.0	0.0	0.0
2013	9	4.0	0.5	5.0	0.5	4.5	3.5	3.0	2.0
2014	9	1.5	2.0	8.0	0.0	4.0	0.5	1.0	0.0
2015	13	0.5	4.0	4.0	0.0	4.5	3.0	0.0	1.0
2016	5	0.0	2.0	4.0	0.0	1.0	2.0	0.5	0.0
2017	11	0.0	1.0	6.0	0.0	3.0	6.5	2.0	0.0
NC Policy Watch									
2012	5	0.5	0.0	2.0	0.0	1.0	1.0	2.0	3.0
2013	18	1.5	0.0	0.0	0.0	3.0	2.5	14.0	6.0
2014	18	0.0	0.0	0.0	1.0	1.0	4.0	14.0	9.0
2015	20	0.5	0.0	0.0	0.0	2.5	1.5	15.0	3.5
2016	8	1.0	0.0	0.0	0.0	2.5	0.0	6.5	7.0
2017	16	6.0	0.0	0.0	0.0	0.5	0.5	13.5	7.5

Note. Voucher Themes: 1=Academic Achievement, 2=Free-Market Competition, 3=Parental School Choice, 4=Racial Segregation, 5=Funding/Budget Issues, 6=Disadvantaged Students, 7=Oversight/Accountability, 8=Legal Concerns

In the following sections I present an overview of the various articles, policy briefings, editorials, and research reports related to private school vouchers that were written or developed by two of North Carolina's most significant and influential think-tanks, NCPW and JLF. First, however, I provide a short historical and organizational overview of JLF and NCPW.

John Locke Foundation and North Carolina Policy Watch: Historical Background and Organizational Overview

JLF and NCPW represent the two most common political viewpoints on both sides of the private school voucher debate. NCPW typically represents a more liberal or

progressive political stance on social issues; as such, all of their articles are generally critical of various aspects of North Carolina's private school voucher program. JLF typically represents a more conservative or libertarian political viewpoint in their publications; as such, all of their articles provide a generally favorable view of the voucher program. With only a few exceptions, the articles I analyzed from 2012 to 2017 were written by five people. The two main writers of educational policy, school choice, and vouchers for JLF were Terry Stoops and John Hood, while the three main writers for NCPW were Lindsay Wagner, Chris Fitzsimon, and Billy Ball.

JLF was created in 1990 and was named after English philosopher John Locke. As stated on the JLF website, the Foundation was created as an "independent, nonprofit think tank" that works "for truth, for freedom, and for the future of North Carolina" (JLF, 2019a, para. 1). The JLF website also stated that the organization is a "501(c)(3) research institute" that "does not accept government funds or contributions to influence its work or the outcomes of its research" (JLF, 2019a, para. 1).

JLF has a staff of 25, including the editors and analysts who write for the Carolina Journal, a publication produced by JLF (JLF, 2019b). Kory Swanson is the President and CEO of JLF and is therefore in charge of overseeing all three of JLF's divisions: research, outreach, and journalism (JLF, 2019c). The JLF website made it clear that the organization's guiding principles are conservative and libertarian. As stated on the JLF website,

The John Locke Foundation believes in free markets, limited constitutional government, and personal responsibility. In the modern American political context, those principles are labeled conservative. Historically, and in most other

countries today, those have been considered liberal or “classical liberal” principles. Some observers also consider those principles libertarian. If someone asks whether the John Locke Foundation is conservative, (classically) liberal, or libertarian, the appropriate answer is “yes.” (JLF, 2019d, paras. 3–4)

It is important to note that the JLF website also stated that the organization is nonpartisan and is not associated with the Republican Party (John Locke Foundation, 2019d).

However, given JLF’s stated principles, their publications and political commentaries often align with Republican policy initiatives, which is why JLF’s articles and policy briefings represent an overwhelmingly positive view of North Carolina’s private school voucher program.

NCPW is described as a “news and commentary outlet dedicated to informing the public—including elected officials as they debate important issues—and ultimately to improve the quality of life for all North Carolinians” (NCPW, 2019a, para. 1). NCPW is one of seven projects sponsored and overseen by the North Carolina Justice Center, an organization that provides “in-depth expertise in the major policy areas impacting poor and working North Carolinians” (North Carolina Justice Center, 2019b, para. 1).

NCPW consists of an eight-person staff, including Fitzsimon, the Founder and Executive Director of NCPW (NCPW, 2019a). NCPW has covered a variety of topics, with a particular focus on judicial, environmental, and educational issues. Some of the specific issues investigated by NCPW writers, according to their website, include “voting rights, health care policy, K-12 and higher education, LGBTW and immigration rights, racism and racial discrimination, . . . reproductive freedom, sexual discrimination, . . . gun violence, [and] criminal justice reform” (NCPW, 2019a, para. 4). The organization

has produced radio commentaries, videos, weekly briefings, and periodic articles through their blog, “The Progressive Pulse” (NCPW, 2019b).

While NCPW does not explicitly state that their work represents a liberal or progressive political viewpoint, the mission of the North Carolina Justice Center (2019a), according to their website, is to be “one of the state’s preeminent voices for economic and social justice” (para. 1). Moreover, the North Carolina Justice Center (2019a) has claimed to be a “leading progressive research and advocacy organization” with the goal of “[eliminating] poverty in North Carolina by ensuring that every household in the state has access to the resources, services, and fair treatment it needs to achieve economic security” (para. 2). Like JLF, NCPW is nonpartisan and is not associated with any specific political party. However, the progressive causes championed by NCPW often align the organization with the political views of the Democratic Party. As such, the articles and policy briefings published by NCPW related to private school vouchers have been consistently critical of the program.

Using historical document analysis to analyze the various documents published by JLF and NCPW, I connected the arguments made by both sides of the voucher debate with the eight major themes discussed in my literature review in the previous chapter. My research and findings are presented chronologically. Each year of my study from 2012 to 2017 is given its own section, with one exception—the data from 2012 and 2013 have been combined into one section as both JLF and NCPW only published five articles related to private school vouchers in 2012. It did not take long, however, for both sides of

the voucher debate to begin pushing arguments in favor of or in opposition to North Carolina's proposed—and later, established—private school voucher program.

The Birth of Private School Vouchers in North Carolina—2012-2013

Private school vouchers became a mainstream topic of debate in North Carolina in 2012. Interestingly, JLF and NCPW each published only five articles related to the topic of private school vouchers in 2012. Within those articles, the topics discussed by JLF related to four of the eight major voucher themes, including academic achievement, free-market competition, individual parental school choice, and issues of school funding. The articles by NCPW focused on two main voucher themes, both of which were different from the themes discussed by JLF. The work from NCPW focused mainly on oversight and accountability, as well as the separation of church and state and other potential legal issues. The 2012 NCPW articles included a small, but relevant focus on funding issues, at-risk students, and academic achievement related to vouchers.

A January press release from JLF highlighted the academic struggles of North Carolina's schools. Stoops, Director of Education Studies for JLF, was quoted in the 2012 release:

Despite ample resources, public school students in North Carolina fail to meet or exceed the performance of students in economically competitive European and Asian nations. . . . Simply put, the state has failed in its goal of producing 'globally competitive' students. That failure is cause for serious concern. (JLF, 2012b, para. 2)

The report also included several short- and long-term recommendations for reform, including “expanding public and private school choice” (JLF, 2012b, para. 5). A July

press release from JLF stated that, according to data compiled from 2001 to 2010, school choice poses “no threat to traditional public school enrollment” (JLF, 2012a, para. 1). According to Stoops, “The popularity of private, charter, and home schools has not produced a significant enrollment shift away from district schools” since the market share for traditional public schools was still 88% in 2011, representing only a slight drop over a 10-year period (JLF, 2012a, para. 10). In an August “CommenTerry,” Stoops (2012) mentioned the academic benefits of vouchers and school choice, pointing to a recently released study of Sweden’s voucher program. Stoops pointed out that the report found increased student performance regardless of student demographics and without raising per pupil spending.

The first article from NCPW addressing the topic of vouchers was written in August of 2012 by Fitzsimon, Executive Director of NCPW. Fitzsimon (2012) focused on the legal issues surrounding vouchers, especially in regards to possible church/state separation concerns. Pointing to a report from the Louisiana voucher program, Fitzsimon stated that the “education at one school consisted of students watching religious DVDs for most of the day” and that “other schools refuse to mention evolution” (para. 16). Later in his editorial, Fitzsimon stated that there is “no evidence that vouchers improve student performance,” having noted that “in many cases students at public schools perform better than their private school counterparts” (para. 20). Later commentaries by Fitzsimon in September highlighted the same themes, expressing concerns over the lack of accountability and oversight found in other voucher programs that could lead to issues where taxpayers were funding religious schooling for students.

As the North Carolina legislature began considering a major voucher bill in 2013, the debate over private school vouchers began to heat up. JLF published 9 articles in 2013 related to private school vouchers or school choice, while NCPW published 18. The articles published by JLF all favored the proposed school voucher law, and the authors incorporated several different voucher themes, including individual parental choice, academic achievement, funding issues, and targeting at-risk or disadvantaged students. On the other hand, the articles published by NCPW in 2013 almost exclusively focused on the theme of accountability and oversight. There were several articles published by NCPW that also discussed church/state issues and other legal concerns, but there were still twice as many articles examining issues of accountability and oversight.

The first major research report published by JLF written almost exclusively about private school vouchers was titled *School Vouchers: From Friedman to the Finish Line*, compiled by Stoops in 2013. Stoops (2013b) described several of the potential benefits of vouchers, including transparency of such programs and the effects on student achievement. Stoops stated, “Vouchers tend to be more transparent and easier for parents to understand” compared to other school choice reforms” (p. 1). Moreover, Stoops wrote that there is a “consensus in the education research community that school choice raises student achievement for the average participating student” (p. 1). One of the major disadvantages of a voucher program, according to Stoops, is that such laws often lead to over-regulation by the government. This research report highlights several of the major voucher themes, including academic achievement and oversight/accountability issues.

Furthermore, Stoops also discussed the power of free-market competition and individual parent school choice.

In April, the issue of accountability and oversight became a major talking point for JLF and NCPW as two voucher bills were working their way through the North Carolina General Assembly. Wagner, an education report for NCPW during this time period, pointed to a number of nationwide examples of fraud and abuse that surfaced due to the lack of oversight of these programs. Wagner (2013a) stated that one principal in Milwaukee “used proceeds from state voucher payments to buy two Mercedes-Benz automobiles” (para. 7). Wagner found that another voucher school leader was “indicted by a federal grand jury on counts of mail fraud and money laundering” and the school “owed nearly \$500,000 for improperly cashed checks, improperly claimed summer school payments, . . . and other debts” (para. 9). Wagner was also critical of the textbooks often used by private schools receiving vouchers in Ohio and Florida. Wagner stated that one text intended for sixth-grade students made “repeated references to Noah and the flood, which it calls the reason for both the world’s petroleum reserves and the development of fossils” (para. 21).

Stoops attacked the “accountability” argument in a May editorial. Stoops (2013a) referenced remarks by State Superintendent June Atkinson, who criticized the proposed voucher law because it did not require private schools receiving vouchers to participate in the state’s testing program. Stoops noted that, in private schools, parents “will take their money and children elsewhere” if they “are not satisfied with the educational environment of [their] private school” (para. 11). Meanwhile, Stoops stated, “district

schools are monopolies and families have few alternatives” (para. 12). As such, “district schools need not worry about parental accountability, which is why our state legislature mandates that they adopt other forms of accountability, e.g., school grades and testing” (Stoops, 2013a, para. 12). Stoops also mentioned that he believes “in the ability of parents to make sound decisions about the education of their children,” but that many in education—including teachers, administrators, and school board members—believe “parents are problems, not partners” (para. 13). Stoops closed by arguing that “testing and grades are necessary [for district schools] because the state and nation have neutered an arguably more powerful and empowering form of accountability—parents” (para. 14).

As the “accountability” debate continued, Wagner (2013c) pointed out that parents do not always “possess perfect knowledge of the educational marketplace,” making it difficult for them to make informed choices about where their children should go to school (para. 5). Fitzsimon (2013) questioned the parental accountability argument by asking, “Is it okay for schools to teach that two plus two equals five, if the parents agree to it?” Atkinson (as cited in Wagner, 2013b) noted that parents could not “make comparisons” between schools because of the lack of accountability, having stated, “You’re asking parents to buy a pig and a poke” (para. 27). Atkinson argued, “If our end-of-grade and end-of-course tests are good enough for our public school students, then they should be good enough for our private schools receiving tax dollars” (as cited in Wagner, 2013b, para. 28).

Despite the protests of Atkinson and other public school supporters, the North Carolina General Assembly passed voucher legislation with their 2013 budget in July.

Sarah Curry, Director of Fiscal Policy Studies with JLF, stated, “Over time, incorporation of the opportunity scholarship has the potential to serve low-income students’ educational needs more effectively, while spending tax dollars more efficiently” (JLF Press Release, July, 2012a. Though private school vouchers became law in North Carolina in the summer of 2013, the debate over the program’s effectiveness, legality, and how it should be evaluated continued with full force in 2014.

Parental Choice vs. Accountability—2014

With North Carolina’s new voucher programs now in place, the focus of the articles written by JLF shifted slightly in 2014. In 2012 and 2013, JLF touched on a variety of voucher themes, including academic achievement, parental choice, the importance of free-market competition, and targeting at-risk students. In 2014, the nine articles written by JLF focused almost exclusively on the theme of individual parental school choice, specifically as a means of accountability. There was some discussion of academic achievement, free-market competition, and funding/budget issues, but the theme most commonly found in 2014 for JLF was parental choice. Meanwhile, NCPW published 18 articles related to vouchers in 2014, holding firm to the theme of oversight and accountability. As they did in 2012 and 2013, NCPW writers also discussed legal issues related to vouchers, discriminatory practices at some private voucher schools, and concerns about financial issues. However, the clear focus for NCPW in 2014 was highlighting the lack of oversight and accountability found in North Carolina’s new voucher program.

In February of 2014, Stoops praised the North Carolina voucher program and noted that school choice in the state was “thriving” (Stoops, 2014a). As Stoops pointed out, only 3 days into the application process there were about 2,100 children who had already applied for the approximately 2,400 voucher slots available. “This level of interest in the program is reason enough to expand it in subsequent years,” stated Stoops. “Get to it, legislators” (Stoops, 2014a, para. 11). Less than 2 weeks later, however, the future of North Carolina’s voucher program was up in the air after an injunction issued by state Superior Court Judge Robert Hobgood temporarily halted the funding of the program (McCloskey & Wagner, 2014). With his ruling, Hobgood stated, “The General Assembly fails the children of North Carolina when they are sent with public taxpayer money to private schools that have no legal obligation to teach them anything” (as cited in McCloskey & Wagner, 2014, para. 2). Hobgood also noted that the voucher legislation unconstitutionally created a “non-uniform system of education,” “appropriates education funds in a manner that does not accomplish a public purpose,” and appropriates “taxpayer funds to educational institutions that have no standards, curriculum, or requirements for teachers and principals to be certified” (as cited in McCloskey & Wagner, 2014, paras. 6–9). Finally, Hobgood criticized the General Assembly for “seeking to push at-risk students from low income families into non-public schools in order to avoid the cost of providing them a sound basic education” (as cited in McCloskey & Wagner, 2014, para. 22).

Stoops harshly criticized the decision by Hobgood and the perceived anti-school choice efforts of public school advocates. Stoops (2014c) wrote that the “Left won this

battle, but they will lose the war” (para. 11). Stoops (2014c) also stated, “These special interest groups may have slowed implementation of a voucher program for low-income children, but they have not curbed parents’ desire for expanded educational options” (para. 2). Stoops discussed the many ways in which school choice is expanding in North Carolina, pointing out that many parents are leaving the public school system because they are dissatisfied with their local district’s academic performance. Stoops (2014c) referenced low test scores in three North Carolina school systems—Halifax, Guilford, and Vance Counties—before asking, “How much longer will parents tolerate district schools that fail to adequately educate their children year after year?” (para. 21).

Building on the theme of promoting individual parent choice, JLF released a major report later that year highlighting a number of educational issues, including the growth of school choice nationally. In a May editorial, Stoops and Hood (2014) referenced this study, which consisted of a meta-analysis of 888 peer-reviewed articles since 1990. Stoops and Hood (2014) wrote that they believed “North Carolina has been moving in the right direction and school reform,” encouraging policymakers to “continue the momentum and resist attempts to backtrack from the significant accomplishments already achieved” (para. 5).

Following Hobgood’s ruling, which temporarily halted the voucher program, Wagner pointed out some of the discriminatory practices used by some private schools receiving vouchers. Wagner (2014b) noted that two highly preferred private schools—both of which are Islamic schools—do not allow students with disabilities or English language learners to be admitted. Additionally, Wagner (2014b) stated that Raleigh

Christian Academy does not allow those “who participate in cults, [including] Mormons, Jehovah’s Witnesses, Christian Scientists, [and] Buddhists,” to enroll at the school (para. 4). Wagner (2014b) also noted that some private schools—including Fayetteville Christian School—will not admit homosexual students or students of parents who are homosexual (para. 13).

As the debate over the future of vouchers in North Carolina moved through the state’s judicial system, Fitzsimon posted numerous audio blogs and articles criticizing the program. In August, Fitzsimon (2014b) countered the claim that vouchers were put in place to help poor children. “They [voucher supporters] are simply using low-income children to sell their privatization agenda,” stated Fitzsimon (2014b), who also added, “Their ultimate goal is the dismantling of the current public school system” (para 4). Fitzsimon (2014b) went on to describe the numerous ways public school funding had been cut while also pointing out the lack of accountability and oversight found in North Carolina’s voucher law. Fitzsimon (2014b) noted that many of the private schools eligible to receive vouchers use “fundamentalist textbooks that teach students that the earth is only a few thousand years old and that gay people have no more claims to civil rights than child molesters or rapists” (para 13). Fitzsimon (2014b) makes it clear that he does not believe the voucher program is about helping poor and disadvantaged children, having stated that the program serves “only private and ideological interests” (para. 17).

Other writers for NCPW described issues with the curriculum and textbooks often used by private schools. Snider (2014), Director of the Neuroscience Center at the University of North Carolina School of Medicine, compared a Biology book from the A

Beka Book publishing company, often used by private Christian schools, with a Biology book by Miller and Levine, often used as part of the state-adopted curriculum in public schools. Snider (2014) noted several strengths of the A Beka Book Biology textbook, having stated:

- “It is professionally assembled with attention to detail.”
- “The figures . . . present material in a clearly understandable format.”
- “. . . in my area, the nervous system, things are roughly comparable with major regions and function of the different parts of the nervous system clearly presented in both texts” (para. 3).

Snider’s (2014) criticisms of the A Beka Biology textbook include the fact that it does not talk about the reproductive system at all, that it does not go into enough detail about more recent topics in biology, including genetics and DNA, and that “religious teachings are interspersed in the text throughout” (para. 7). As one might expect, the chapter in which the A Beka Biology textbook discusses evolution comes under the greatest scrutiny by Snider (2014), who described it as “a major disservice to biology students” (para. 9). Snider’s (2014) critiques of the chapter on evolution included

- “. . . mixing in religious commentary that has no place in a biology text,” including statements like “Man is created in the image of God,” which are “not arguments that can be used against evolutionary theory, nor do they teach students biology” (para. 11).

- “Stating that the earth is ‘relatively young’ when scientists approximate the age of the earth as 4.5 billion years is misinformation that is harmful to students” (para. 12).
- “. . . misrepresentation of the fossil record” (para. 13).
- “. . . not pointing out the ways that evolutionary theory is central to modern biology” (para. 14).

Snider (2014) closed by stating, “It is difficult to envision the justification for using state funds to support curricula that do not prepare students for the modern workplace” (para. 16).

NCPW published several more articles throughout the fall of 2014, the vast majority of which continued to highlight the lack of accountability and oversight in private schools eligible to receive voucher funds. Wagner (2014a) wrote a feature about Greensboro Islamic Academy (GIA), North Carolina’s largest voucher recipient, who found itself in the midst of financial troubles thanks to a \$150,000 budget shortfall. For Fitzsimon (2014a), the situation at GIA served to highlight the lack of oversight within the voucher program; Fitzsimon (2014a) reminded readers that there is no mechanism in place to recover taxpayer funds if a private school closes.

The debate over the level of accountability and oversight embedded in North Carolina’s voucher law continued through the fall of 2014 and into the following year. Stoops (2014b) argued that parental accountability comes in two forms, that of testing and parental choice. While analyzing testing and graduation data from the previous school year, Stoops (2014b) stated that it would be ideal to have “a public school

accountability system that moderated our schools' dependence on testing and advanced parental choice opportunities" (para. 9). Stoops (2014b) blamed "well-funded public school advocacy groups" for blocking parental choice, thereby forcing "taxpayers to lean even more heavily on test-based accountability" (para. 9). Stoops did not discuss issues of private school oversight in this particular editorial, choosing instead to focus on accountability with regards to student academic achievement. As 2014 came to a close, the fate of the voucher law remained in judicial limbo, while writers with JLF and NCPW continued to debate the program's system of accountability, or lack thereof.

More Calls for Oversight in a Legislative Budget Year—2015

North Carolina's voucher law was firmly in place by 2015 with hundreds of students utilizing the program at the start of the year. Through the spring of 2015 there was some uncertainty about the future of the law, as the North Carolina Supreme Court was debating its constitutionality. In July of 2015, however, that uncertainty dissipated as the North Carolina Supreme Court declared the state's voucher law constitutional. For JLF, the themes highlighted in 2015 shifted slightly in the 13 articles published about vouchers that year. While the main focus of JLF continued to be competition and parental school choice, the themes of funding and budget issues were also prevalent. Given that 2015 was a budget year for the North Carolina General Assembly, it made sense that JLF would focus more heavily on how the voucher law would affect the state budget. Also, JLF included more references to low-income and at-risk students in their articles in 2015 than they had in previous years. By contrast, NCPW continued to focus on issues of accountability and oversight, as they had in previous years. Authors from NCPW also

touched on legal/constitutional issues, budget and funding concerns, and issues related to discrimination. However, of the 20 articles published by NCPW that were related to vouchers, almost every one of them highlighted examples of the lack of accountability and regulation found in North Carolina's voucher law.

One of the first articles published by JLF in 2015 was the "First in Freedom" index, which was posted in February. This report compared various aspects of government policies in North Carolina with all other U.S. states to determine the level of "freedom" available to North Carolinians. The "First in Freedom" index essentially analyzes the level at which current North Carolina laws and policies align with the free enterprise and limited government philosophies of JLF. The report considers a wide variety of governmental agencies, including fiscal, regulatory, and health care policies. The report also includes educational reform initiatives, where the index ranks North Carolina 18th in the nation. JLF touted North Carolina's "strong protections" of homeschooling, as well as the state's 2013 voucher law. However, JLF also noted that North Carolina is too restrictive in the school choice it allows parents to have within districts, at least compared to other U.S. states (JLF, 2015).

JLF's First in Freedom index provided the backdrop for the articles and reports published by JLF in 2015, the vast majority of which focused on the importance of parental school choice and competition. Additionally, JLF responded to critics who claimed that school choice reforms, like vouchers, were an attempt to dismantle North Carolina's public school system. In April, Hood published an editorial highlighting the importance of injecting competition into North Carolina's public schools. Hood (2015)

stated, “private schools often deliver better educational outcomes than public schools, particularly for disadvantaged students” (para. 6). Hood noted that choice and competition work very well in other governmental agencies, including Medicaid, financial aid, and child care vouchers; therefore, increasing choice and competition in North Carolina’s public school system will lead to higher student achievement (Hood, 2015).

In addition to higher student achievement, Stoops (2015c) also argued that school choice and competition is necessary to “accommodate parents’ desire to remove their children from harmful learning environments” (para. 1). Stoops (2015c) presented a number of statistics related to bullying, drugs, and student safety, before stating, “Threats, bullying, illegal drugs, and disruptive students in public schools are a few of the many reasons why school choice is thriving in North Carolina and beyond” (para. 7). This was the first article published by JLF or NCPW that specifically discussed issues of student safety. While student and/or parental satisfaction with schools has been a sub-theme sometimes found in voucher literature, it is often provided within the context of justifying the existence or expansion of parental school choice, similar to the manner in which it was used by Stoops in this article.

While JLF continued to explore issues of parental school choice and competition, NCPW relentlessly focused on themes of accountability and oversight. In January, Fitzsimon published a radio commentary, once again criticizing what he called North Carolina’s “absurd voucher scheme” (Fitzsimon, 2015a). Fitzsimon (2015a) stated that many of the private schools accepting voucher funds “teach things that are simply not

true, like the claim that dinosaurs and humans co-existed on earth, or that most slaves were treated fairly well.” Later in the year, Fitzsimon (2015b) again highlighted the lack of accountability found in private schools eligible for vouchers, having noted that there are “no guidelines for curriculum at vouchers schools” and “no credentials or minimum education requirements for teachers” (para. 13). Fitzsimon (2015b) also stated that pro-voucher proponents have mastered the “public relations game” by using “adorable children as part of the defense of their sketchy scheme” (para. 23). However, Fitzsimon (2015b) wondered, “what are those adorable children going to be learning?” (para. 24).

As the North Carolina General Assembly looked to expand the state’s voucher programs during the early part of the budget process in 2015, Wagner of NCPW wrote about some of the potential discriminatory aspects of the law. For example, Wagner (2015a) noted that Berean Baptist Academy in Fayetteville, which had received almost \$40,000 in voucher funding at that time, has strict admissions standards that essentially require students to profess their Christian faith before they can be admitted. As Wagner (2015a) wrote, “Even though private religious schools are now able to accept public dollars, they continue to be free to discriminate in their admissions policies on the basis of race, gender, religious faith, sexual orientation, or disability” (para. 18). Wagner (2015a) also reported that several members of the General Assembly were unhappy with the proposed expansion of North Carolina’s voucher program specifically targeted for students with disabilities. Wagner (2015a) reported that Representative Paul Luebke asked legislative staff if private schools receiving vouchers must have special education programs in place. When he found out that they do not, nor do they have to follow the

requirements of federal education law or Individual Education Programs for students with disabilities, Luebke stated, “I think that’s a serious problem with the bill. Where are we sending these children with disabilities? It just seems wrong to me” (as cited in Wagner, 2015a, para. 38).

As the budget-building process began to heat up in March and April of 2015, Stoops of JLF provided commentary on the different budget proposals. While he mostly approved of Governor Pat McCrory’s budget proposal in March, Stoops was disappointed that McCrory’s proposal did not include an increase to North Carolina’s voucher program. Stoops (2015a) stated,

According to Civitas Institute polls of likely North Carolina voters, vouchers continue to enjoy support across the state. More importantly, low-income children finally have opportunities previously only available to their wealthy peers, that is, to attend private schools that better meet their social, moral, and intellectual needs. Surely scholarships for low-income children are a better use of taxpayer money than maintaining teacher assistant funding, which would receive an additional \$64 million a year under the governor’s plan. (para. 9)

Stoops also approved of the budget proposed by the North Carolina House in May of 2015. Stoops (2015b) wrote, “I am pleased that the House chose to increase Opportunity Scholarship funding,” later adding that the House budget “would add \$6.8 million to the Opportunity Scholarship Program, which provides private school vouchers to low-income children” (paras. 2, 9). While the main themes presented by Stoops and JLF continues to be the importance of parental school choice and competition, these articles represent a slight shift in perspective. For the first time, JLF focuses slightly more attention to the

fact that the voucher program helps at-risk students, including children who are socioeconomically disadvantaged and students with disabilities.

Throughout the spring and summer of 2015, NCPW’s main argument against the voucher program, and its proposed expansion, remained consistent. NCPW writers criticized the law’s lack of accountability and oversight in almost every editorial, article, or radio commentary published in 2015. Wagner (2015b) reminded readers that Greensboro Islamic Academy—a private school that had received \$93,000 in voucher money as of 2014, the highest amount among all North Carolina schools—was in “serious financial trouble, threatening to close its doors the year prior thanks to a \$150,000 [budget] shortfall” (para. 10). In the summer of 2015, Fitzsimon of NCPW critiqued North Carolina’s voucher law from multiple angles. Fitzsimon (2015b) criticized the program’s lack of accountability, pointing to approximately 700 voucher-eligible private schools in North Carolina that utilize a textbook curriculum that presents “wildly inaccurate versions of history” (para. 9). Fitzsimon (2015b) was describing the A-Beka curriculum, stating that A-Beka textbooks tell students that “the KKK fought a decline in morality and that gay men and lesbians have no more claims to special rights than child molesters or rapists” (paras. 3-4).

Additionally, Fitzsimon (2015b) pointed out that private schools are not subject to North Carolina’s A-F accountability program, which evaluates all North Carolina public schools using standardized test scores. Without test scores and other assessment data available, voucher opponents argue that it is hard for parents to make an informed choice about what schools may be best for their children. Ellinwood (2015), a guest writer for

NCPW, noted several examples of how it was difficult for voucher schools to be held accountable, the most significant being that voucher students do not take the same tests as students in public schools, making performance comparisons essentially impossible. Ellinwood (2015) noted additional “accountability shortcomings,” including the “lack of a requirement that voucher schools teach [a] . . . set curricula, the absence of class size regulations . . . , and the lack of a requirement that voucher schools provide information publicly on their websites” (para. 7). While public schools in North Carolina are subject to a detailed A-F School Performance Grade system in order to provide valuable information to parents about how their children’s school is performing, Ellinwood (2015) and Fitzsimon (2015b) argued that no such measures of accountability or oversight exist for private schools receiving voucher funding.

Arguably the biggest voucher-related news story of the year occurred in July when the North Carolina Supreme Court ruled that North Carolina’s voucher law was constitutional by a narrow 4-3 margin. When Stoops (2015d) reported the story, he did not add much commentary, other than stating that he was “pleased with the outcome” (para. 2). Stoops (2015d) did point out that Public Schools First, Democratic State Senator Tricia Cotham, and Fitzsimon did not agree with the ruling, while many “Republicans, conservative activists, and school choice advocates applauded the NC Supreme Court majority” (para. 6).

While the case was still being argued in the spring of 2015, Sharon McCloskey of NCPW posted an article outlining the questions that were being debated by the justices. The first question faced by the Court, wrote McCloskey (2015), asked, “does the

funneling of public school funds to private schools violate provisions of the state constitution that require such funds to be used ‘exclusively’ for public schools?” (para. 10). Those in favor of the law argued that the funds used for the voucher program were taken from the General Fund and were not appropriated for public schools. Those challenging the law pointed out, as McCloskey (2015) stated, “lawmakers went out of their way to move that public money around, appropriated it from the General Fund and then putting it in the budget for the state university system” (para. 15).

The Court also debated the “public purpose” provision of the state constitution, hearing arguments for how this provision applied to the voucher law. Burton Craige, the attorney for those challenging the voucher program, noted,

We have 700 private schools in North Carolina [and] 50,000 home schools. But what the public purpose clause says is when taxpayer funds are flowing in to those schools, the state has an affirmative obligation to see that those funds are actually educating children. (as cited in McCloskey, 2015, para. 28)

Nevertheless, the NC Supreme Court ruled the program constitutional, much to the chagrin of NCPW writer Steve Ford, who criticized the decision in an editorial written in August. Ford (August, 2015) summarized the claims of the majority opinion, stating that their “whole take on the matter . . . boiled down to a finding that the program might pass constitutional muster in some instances, so what choice did they have but to let it continue?” (para 10). Ford (August, 2015) also stated, “If a 30-page ruling ever conjured up an image of eight upturned palms and a shrug of eight shoulders, this was the time” (para. 10). Remaining consistent with what they have done since 2011, NCPW writers

focused on the lack of accountability and oversight within the voucher program in their critique of the NC Supreme Court ruling.

Statewide School Choice Growth Amid Claims of Discrimination—2016

Coming off the heels of their major victory in the NC Supreme Court, voucher supporters at JLF celebrated National School Choice with a press release in January of 2016 that highlighted the rapid growth of school choice options in North Carolina. JLF (2016) noted that over 280,000 North Carolina students are now utilizing “nontraditional education options,” including charter schools, private schools, and homeschools (para. 1). Most of this JLF press release highlighted the growth and success of charter schools in North Carolina, noting that North Carolina charter schools enroll about 5% of the state’s public school students. Stoops pointed out that “nearly half of the state’s charter schools received an A or B performance grade in 2015, compared to less than one-third of the traditional district schools” (as cited in JLF, 2016, para. 9). Stoops went on to mention the growth of the state’s voucher program, stating that over “7,700 students applied for the scholarships during the last application period,” and that another “770 students benefit . . . from the special-needs grant” (as cited in JLF, 2016, para. 12).

Interestingly, while Stoops noted some of the academic accolades of the state’s charter schools, he did not discuss the academic performance of the state’s private schools that participated in the voucher program; those schools are not required to, and do not participate in, the state’s testing and accountability program. Stoops encouraged the state legislature to continue pushing school choice reforms, having stated that North Carolina needs to affirm its “commitment to families with disadvantaged and special-

needs children by investing greater resources in private-school scholarship programs” (as cited in JLF, 2016, para. 16).

This was one of only five articles related to vouchers published by JLF in 2016. The main theme of those articles, however, continued to focus on parental choice and the value of free-market competition, though JLF also discussed the value of school choice options for at-risk student populations. As JLF continued to tout the success of North Carolina’s voucher program, writers at NCPW consistently pushed back against the program’s lack of accountability. Of the eight voucher-related articles published by NCPW in 2016, all of them touched on the theme of oversight and regulation. However, NCPW also began to place a heavier focus on potentially discriminatory admissions practices at some voucher-eligible private schools. In the early months of 2016, NCPW pointed out examples of how the law’s lack of regulation had led to discriminatory practices by the private schools receiving voucher funds.

Ball (2016) reported on a small Christian private school in Lee County that requires its students and parents to sign a “lifestyles statement and covenant” before they can be considered for admission (para. 1). The document mentions “gender confusion” as a “state of depravity” and homosexuality as “immoral and sinful,” going on to state that the school can refuse to admit, or later expel a student if the “atmosphere or conduct within” the home is not consistent with the philosophy of the private school (paras. 2, 4, 5). Ball (2016) does state that while this private school is *eligible* to receive voucher funding, it had *not* received any such funding as of the time of his article. Nevertheless, Ball (2016) noted that many voucher opponents believe that the state’s law, which “only

bars discrimination in participating schools based on race, color or national origin—the federal Title VI standard—falls short of what’s necessary” (para. 12).

Two months later, Wagner investigated another private school, one that was receiving state funding through the voucher program. Wagner (2016) highlighted Star Christian Academy, a small K-12 school with approximately 20 students, located in two rooms in the back of a church in Smithfield, North Carolina. Though Star Christian had received over \$75,000 in state funds since 2014, Wagner (2016) wrote that the three teachers at the school “provide minimal active instruction,” according to a former student (para. 1). Wagner (2016) also noted that “the head of the school, Mohammad Haleem, and his wife, Alicia Allen, have filed for bankruptcy three times since 1997,” but the lack of transparency within North Carolina’s voucher law kept this information from coming to light (para. 4).

In May, Fitzsimon (2016a) of NCPW once again highlighted what he felt were the biggest problems with the voucher law. Fitzsimon’s (2016a) message was consistent with previous years, as he railed against the program’s lack of oversight that allows private schools to “refuse to admit gay or transgender students” and utilizes textbooks that say “slaves were treated well” and “gay men and lesbians have no more claims to special rights than child molesters or rapists” (paras. 1, 5). Fitzsimon (2016a) also noted that the schools receiving voucher funding do not participating in the “A-F grading system that is now used to evaluate public schools based on test scores, even though many voucher supporters in the General Assembly are also the leading voices for the accountability system” (para. 10).

In the summer of 2016, Stoops wrote an op-ed related to vouchers, touting a slightly different aspect of the program. Stoops (2016b) estimated that home and private schools saved North Carolina taxpayers between \$1.35 and 1.58 billion in 2015. Though private school student enrollment constituted slightly less than half of Stoops's savings calculation compared to home schools, the tax savings estimated by Stoops due to private school enrollment is quite significant. In September, Stoops wrote another op-ed that focused on a very different subject: the low achievement of African-American male students in North Carolina. With only about one-third of all African-American boys proficient in reading or math, Stoops (2016a) called for a number of reform efforts to help raise African-American achievement, including options for private school choice. Stoops (2016a) stated, "Many schools are doing a marvelous job of educating African-American males [and many] of the best are schools of choice" (para. 10).

These two articles mark a slight shift in the focus placed by JLF related to the state's voucher program. Examining taxpayer savings through school choice reforms is one of the eight major themes found in the academic literature related to vouchers; however, this is not a theme that JLF has often utilized in its support of North Carolina's voucher law over the last several years. Analyzing the effect of school choice reforms on disadvantaged groups, however, *has* been a theme of several JLF articles since the passage of the state law, though most previous JLF articles have focused on students living in poverty and students with disabilities, rather than African-American male students.

NCPW also wrote a few articles in the summer discussing the effect of vouchers on at-risk students, once again highlighting the potentially discriminating admissions requirements of some voucher-eligible private schools. In a June podcast, Fitzsimon (2016b) criticized North Carolina lawmakers for pushing an expansion of the voucher law that does not provide safeguards against private schools that “openly discriminate against LGBT students.” Fitzsimon (2016b) noted that the proposed budget calls for an additional “\$10 million a year for vouchers for the next 10 years until the state is spending \$135 million on a program with no idea how its working or what students are actually learning.” Fitzsimon followed that podcast with an op-ed in July that discussed a specific private school with a discriminatory admissions policy. Bible Baptist Christian School collected over \$100,000 in taxpayer funding through the voucher program in 2015, but as Fitzsimon (2016c) pointed out, “not all taxpayers have access to the school” (para. 3). As outlined in the school’s “Homosexual Conduct Policy” in the student handbook, students who identify as homosexual or transgender, and even students with gay parents, can be barred from attending the school. The school policy reads,

The school reserves the right, in its sole discretion, to refuse admission to an applicant or to discontinue enrollment of a current student. This includes, but is not limited to, living in, condoning, or supporting any form of sexual immorality; practicing or promoting a homosexual lifestyle or alternative gender identity. (as cited in Fitzsimon, 2016c, para. 6)

Fitzsimon (2016c) reminded readers that the General Assembly’s budget passed over the summer “increased funding for the voucher program” with the goal of eventually

spending just under \$145 million a year on the program (para. 20). As Fitzsimon (2016c) stated, “That is a lot of public money paying for discrimination” (para. 21).

While the articles released by JLF in 2016 did not address the NCPW claims of discrimination against LGBT students and families, Stoops did discuss the calls for more accountability within the voucher program through a research brief released in October. Stoops (2016c) outlined the different types of accountability models that are often used in American K-12 education, including rule-based accountability, market-based accountability, and professional accountability. Stoops (2016c) argued that adopting more “student-centered approaches” to accountability, including the increased use of student growth data and including greater detail about student scores, would ultimately improve the state’s accountability model (para. 8). Stoops (2016c) also noted that “market-based accountability is often constrained by rule-based . . . accountability systems,” adding that it is “often difficult to strike a balance between rule- and market-based accountability, given that most elected bodies will not establish school choice without some form of regulation or oversight” (para. 5). This statement by Stoops is noteworthy since most voucher opponents, especially those who write for NCPW, had argued for the last 3 years that there is very little oversight, regulation, or accountability in North Carolina’s current voucher program.

A Slight Shift in Focus: Disadvantaged Students and Calls for Transparency—2017

Debate over North Carolina’s voucher program and the existence of accountability measures within the law continued into 2017 as the Opportunity Scholarship program slowly grew. JLF solidified their stance in support of the program

with 11 voucher-related articles in 2017. JLF focused overwhelmingly on the themes of individual parental school choice and targeting at-risk and disadvantaged youth. There were also several references within the JLF articles that stated the importance of parents holding schools accountable, rather than relying on government regulations and oversight. By contrast, the 16 articles published by NCPW once again overwhelmingly focused on the theme of accountability and oversight. To a lesser, but still significant extent, NCPW emphasized the theme of church-state separation and legal concerns in 2017. Interestingly, the theme of academic achievement also became prevalent in numerous articles written by NCPW in 2017. Overall, however, NCPW continued to emphasize many of the same talking points with regards to oversight and accountability that they had consistently shared since 2013.

One of the first articles published in 2017 consisted of an “accountability and transparency wish list” for North Carolina’s voucher program, written by Wagner in January. Wagner (2017a) noted that, while not perfect, North Carolina’s system for public school accountability is a “pretty robust apparatus that allows the public to understand how their tax dollars are being spent in our local public schools” (para. 7). Wagner (2017a) stated,

North Carolina has worked long and hard at achieving for our local public schools a strong system of accountability and transparency. . . . It also includes curricular standards that hold our students to high academic goals and works to ensure that our students are not discriminated against and kept safe. The accountability system also provides a public record of how each public school is performing—graduation rates, standardized test scores, teacher quality and school safety are all measured and reported each year. There are some flaws with how this system has recently evolved; . . . But, at least, parents can get a sense from the start how their local public school stacks up against other local public schools. (paras. 7–8)

Wagner (2017a) went on to include four main concepts on her “wish list,” including:

- Prevent publicly funded private voucher schools from discriminating against anyone.
- Require publicly funded private voucher schools to reveal how they spend taxpayer dollars.
- Require publicly funded private voucher schools to be transparent about their students’ academic progress and adhere to standards of high quality education.
- Require private voucher schools to employ licensed and vetted teachers and be accredited.

In a 2017 Spotlight Report titled Freedom in North Carolina, JLF (2017) noted that the state ranked sixth in the nation in “Educational Freedom.” In contrast to Wagner’s claims, JLF recommended that lawmakers continue to “keep private, homeschool, and voucher regulations in check” (p. 11). The report by JLF (2017) also stated, “Parental choice, not rules and regulations, should serve as the primary means of accountability for non-public schools in North Carolina” (p. 11).

When the North Carolina House education budget was released in May, Stoops gave it mostly positive reviews. However, Stoops (2017c) was critical of one part of the legislation, having stated, “members of the House included an ill-conceived plan to evaluate the Opportunity Scholarship Program, disregarding accountability measures already prescribed by state law” (para. 5). Stoops, and others within JLF, consistently called for *parents* to serve as the main measure of accountability for private schools, rather than any sort of outside government regulation. Meanwhile, Fitzsimon (2017)

pointed to a report from the Children’s Law Clinic at Duke Law School, calling North Carolina’s voucher program “poorly designed with one of the weakest accountability systems in the nation” (para. 3). Fitzsimon (2017) also noted that the report from the Children’s Law Clinic, as well as two other recent national reports, showed discouraging academic results for students participating in voucher programs. Referring to North Carolina’s voucher program, Fitzsimon (2017) wrote,

More than half of the voucher students tested below the national average in reading, math and language and overall performed below their peers in public schools though it is not a precise comparison because the law allows voucher schools to select their own national tests. (para. 6)

Fitzsimon (2017) closed his editorial by reminding readers that taxpayers should not have to pay for parents to send their children to private schools. “It is time to pull the plug [on vouchers], not expand them,” stated Fitzsimon (2017, para. 19).

As the legislative session came to a close and budgets were finalized, Stoops (2017a) proclaimed 2017 a “banner year” for North Carolina. “Allow me to recommend a new state nickname for North Carolina,” Stoops (2017a) wrote, “The School Choice State” (para. 1). Stoops (2017a) noted significant increases in homeschool, charter school, private school, and online virtual school enrollment in the state over the last several years, pointing to the Opportunity Scholarship and Disability Grant programs as major factors in the growth of private school attendance. Stoops (2017a) stated that over 5,600 Opportunity Scholarships and over 1,200 Disability grants were awarded to “families who wanted to improve the educational environment for their children” (para. 8). Stoops (2017a) also heralded the passage of the Personal Education Savings Account

(PESA) program, which he stated will give families “the flexibility to use a state-funded account to select any combination of qualifying expenses for their special needs children” (para. 8). “In the end,” Stoops (2017a) stated, “an estimated 17 percent of North Carolina families will select a home, private, or charter school this year [2017-18 school year]” (para. 10).

As one can imagine, writers at NCPW did not view the state’s recent school choice expansion in the same manner. Ball (2017) described the PESA program as “vouchers on steroids” with few, if any, regulatory safeguards for taxpayers (para. 2). The concerns brought up regarding PESA are similar to those noted by other NCPW writers with regards to vouchers, namely that the program has very limited accountability on its own, while potentially funding private schools that *also* are not held accountable by any government agency. As an example of the accountability concerns within North Carolina’s voucher program, Wagner (2017b) reported on Trinity Christian School, a private school in Fayetteville that was the state’s largest voucher recipient in 2015-2016 and has been entangled in financial issues over the last few years. In addition to not properly submitting their financial paperwork for a financial review from the state, the school’s athletic director was charged in February of 2017 with embezzling almost \$400,000 between 2008 and 2015 (Wagner, 2017b).

Wagner (2017c) highlighted other accountability concerns with the state’s voucher law, noting that “despite the fact that North Carolina spends millions of taxpayers’ dollars each year on vouchers, we have no meaningful data that can tell us if this is an effective way to help poor students who deserve a high quality education” (para.

2). Wagner (2017c) listed what she described as the “next-to-nothing” accountability system in place for North Carolina’s voucher program, beginning with the fact that “only 11 percent of all voucher schools were required to publicize their students’ test results at the end of 2016” because they enrolled at least 25 students through vouchers (paras. 4, 5). Wagner (2017c) also reminded readers that these private schools can use any “nationally normed test of their choosing,” which makes it “impossible to compare one of these schools with another, much less make comparisons with local public schools” (para. 6).

Aware that many voucher supporters believe parents should be the ones holding private schools accountable, Wagner (2017c) offered a “milk carton metaphor” for the argument that parents should simply leave a voucher school if it fails their kids. Wagner (2017c) wrote,

Isn’t that like saying we should get rid of food safety regulations in the name of “choice?” Just open the carton of milk, sniff and hope for the best. If it’s spoiled you can throw it away, right? It’s your “choice.” Is that the best approach to take when it comes to the education of our children? (paras. 9–10)

While voucher proponents would likely view Wagner’s metaphor as an oversimplification of school choice, the crux of her argument regarding accountability and oversight highlights the major divide between those who support and those who are against private school vouchers.

Stoops and others at JLF believe in the power of parental choice, and the North Carolina legislature has pushed forward numerous school choice initiatives, including private school vouchers. Writers with NCPW, on the other hand, were consistently critical—from 2012 through 2017—of the voucher program’s lack of accountability. As

Wagner (2017c) wrote, “The public deserves to know whether or not their tax dollars are being spent on programs that help kids do better. Lawmakers need to increase transparency and accountability for the . . . program, and the public needs to demand it” (para. 15).

Conclusion

In January 2012, JLF published a press release that lamented the academic struggles of North Carolina’s public schools and encouraged the state legislature to expand school choice options. By the late summer of that same year, the private school voucher debate was in full swing in North Carolina, and writers with JLF and NCPW were publishing articles and pushing arguments for and against vouchers. When the North Carolina legislature began working on a voucher bill in 2013, JLF published articles in support of the proposed program, touting the ways in which vouchers would bring increased parental school choice and improved academic achievement for participating students. NCPW argued that the proposed law would lack oversight, which could lead to abuse and corruption at the expense of the taxpayer.

In 2014, with North Carolina’s voucher program signed into law, JLF shifted the thematic focus of their articles to the manner in which vouchers improved parental school choice. NCPW continued to focus on the lack of accountability and oversight found in North Carolina’s voucher law while also citing examples of discriminatory admissions practices at some private voucher schools. The voucher debate came to a momentary standstill in 2014 when North Carolina’s voucher law was ruled unconstitutional by

Superior Court Judge Hobgood. Voucher supporters were highly critical of the ruling but remained confident that, on appeal, the ruling would be overturned.

In the summer of 2015, the North Carolina Supreme Court declared the voucher law constitutional and the last major legal hurdle for voucher supporters was cleared. NCPW continued to argue that the voucher law needed more measures of accountability and oversight, reminding readers that some of the content being taught in private voucher schools was well out of step with the research-based curriculum approved for local public schools. JLF, on the other hand, continued to praise the program for protecting parental school choice and enabling market-based school reform efforts.

As more families took advantage of the voucher program in 2016, JLF praised the law's commitment to helping disadvantaged families, specifically those with low incomes and those with students with special needs. JLF also estimated that home and private schools in North Carolina saved taxpayers over \$1.35 billion, highlighting the argument that school choice initiatives are a more efficient use of taxpayer dollars. Meanwhile, NCPW published several articles in 2016 that contained examples of potentially discriminatory admissions requirements at voucher-eligible schools. Discriminatory admissions guidelines at some private schools was just one reason North Carolina's voucher law needed more government oversight, according to NCPW.

By 2017, JLF and NCPW had solidified their positions regarding vouchers, focusing on many of the same major themes. JLF continued to discuss the benefits of parental school choice while also highlighting how North Carolina's voucher program assisted at-risk and disadvantaged students. NCPW continued to criticize the lack of

transparency and accountability found within the program, though writers also referenced research reports that showed declines in academic achievement for students participating in voucher programs in other states. While writers with JLF celebrated the state's expansion of school choice reforms, NCPW reminded readers that recent reports claimed that North Carolina's voucher program had some of the weakest accountability measures of any voucher law in the nation. For NCPW and voucher critics, this was a major problem that had to be fixed, but for JLF and voucher supporters, the lack of regulation and oversight was the most beneficial part of the state's voucher program.

The final chapter of my dissertation is the culmination of my research and analysis. I summarize the research I have conducted up to this point, including the history of vouchers in the United States, the review of voucher literature, and the historical document analysis of the articles written by NCPW and JLF. I also return to my research questions and discuss the key findings of my research and analysis. I conclude the final chapter of my dissertation by connecting my research and findings to my theoretical framework, while also providing several policy recommendations based on my overall analysis of vouchers in North Carolina and nationwide.

CHAPTER VI

FINDINGS, DISCUSSION, AND RECOMMENDATIONS

The final chapter of my dissertation outlines my findings and includes a discussion of the results of my research. This chapter consists of several sections, beginning with a review of the research I presented in the previous five chapters of this dissertation. The four major research questions at the center of this work were:

1. How and why have vouchers developed into a widespread reform in many states, including North Carolina?
2. Which of the eight voucher themes was most prevalent in the North Carolina voucher debate?
3. Did the arguments made by both sides remain consistent through the years, or was there a noticeable shift in the focus of their arguments?
4. What were the key findings within the arguments made by each side of the voucher debate?

To answer my first research question, a review of the history of vouchers in the United States—discussed in Chapter II—is included in this chapter. That section is followed by a summary of my review of the literature on vouchers from Chapters III and IV. Having addressed my first research question, the next section of this chapter includes a summary of my research design and methodology as well as a summary of the results from my research, previously discussed in Chapter V. Following this summary of results,

I review my final three research questions and discuss how the results of my research helped me answer these questions specific to North Carolina's voucher program.

Following the discussion of my second and third research questions, I present two key findings from my research and analysis as I answer my fourth research question. My first key finding discusses the concept of parental choice, analyzing if parental choice should exist for a specific purpose or if it is a beneficial idea on its own merits. My second key finding analyzes the role of accountability, examining how this concept is viewed by both sides of the voucher debate and discussing the significance that accountability plays in the larger context of voucher policy.

Following a summary discussion of my research questions and key findings, I revisit my theoretical framework outlined in the opening chapter of my dissertation and discuss some of the implications of my research. I also provide several policy recommendations based on my research analysis. I developed these policy recommendations through the combined analysis of both my individual research of North Carolina's voucher programs and my extensive literature review of previous voucher laws, programs, and research. I conclude this chapter with a section outlining the limitations of my research as well as recommendations for future research opportunities.

RQ #1—How and Why Have Vouchers Developed into a Widespread Reform in Many States, Including North Carolina?

My first research question is the most broad and comprehensive of the four. The content from the first five chapters of my dissertation helps to answer this question, particularly the voucher history presented in Chapter II and the literature review from Chapter III. To summarize my research from those two chapters and to answer my first

research question, the sections that follow provide a review of the history of vouchers in the United States, followed by a summary of the literature on private school vouchers.

A Review of the History of Vouchers in the United States

The first modern private school voucher program began in Milwaukee in 1990, but the origin of vouchers in the United States dates back to the early days of the country. Vermont and Maine are credited with creating the nation's first voucher laws in the mid- to late-1800s, calling them "town-tuitioning" programs (Hammonds, 2002). The voucher laws in Vermont and Maine were specifically designed to help children living in poor, rural areas of the state that did not have nearby local schools in which students could receive an education (Hammonds, 2002). While these voucher laws were created with a very positive objective in mind, the same could not be said for the voucher programs that were created in the mid- to late-20th century.

Following the landmark Supreme Court decision in *Brown v. Board* that ordered the desegregation of America's public schools, policymakers in many Southern states used voucher programs to evade the federal mandate. Officials in North Carolina passed the Pearsall Plan and several other "tuition grant" programs were created in Southern states, including Louisiana and Arkansas (Carl, 2011; Dunn, 2016; Fairclough, 1997; Inger, 1969; Sokol, 2006; Thuesen, 2006). The voucher program created in Prince Edward County, Virginia was one of the most egregious attempts to maintain the status quo. This voucher program was part of a law that completely defunded the district's public schools but allowed White children to attend private, segregated academies using vouchers.

Meanwhile, the region's African-American children received no formal education from 1959 to 1963 (*Griffin v. School Board of Prince Edward County*, 1964a).

By the 1970s and 1980s, after the Southern voucher laws were ruled unconstitutional, only a few small, federally-operated pilot programs were instituted in different parts of the country (Carl, 2011; Donaldson, 1977; Jencks, 1966, 1970; Welsh, 1973). Following the release of “A Nation at Risk” in 1983, however, vouchers reentered the educational reform conversation as a possible means of addressing the issues America's urban public schools face (Weil, 2002). African-American leaders in urban areas—like Wisconsin state representative Polly Williams—began to embrace vouchers as a reform effort, and Milwaukee's voucher program was born in 1990 (Carl, 2011; EdChoice, 2016g; Olson, 1990). Cleveland installed its own voucher law in 1995 and Florida created the nation's first statewide voucher program in 1999 (Carl, 2011; EdChoice, 2016a, 2016c; FDOE, 2017c; Voinovich Papers, 1995; Weil, 2002).

The legality of Cleveland's voucher law was challenged and the case reached the Supreme Court in 2002. The ruling in *Zelman v. Simmons-Harris* declared vouchers constitutional, marking the most significant legal ruling in the history of voucher law and opening the door for additional voucher programs to be created across the country (*Zelman v. Simmons-Harris*, 2002b). From 2002 to 2017, over 20 voucher programs were created or expanded in numerous states, including Colorado, Mississippi, Maryland, Washington DC, and Indiana (EdChoice, 2017a, 2017b; School Vouchers, 2017). North Carolina passed its voucher law in 2013, which contained two different voucher

programs, one intended for children from low-income families and the other aimed at helping students with disabilities (NCSEAA, 2018a).

A Summary of the Literature on Private School Vouchers

Private school voucher programs have been heavily researched and analyzed over the last 30 years. Studies of vouchers became increasingly common following the passage of Milwaukee's voucher law in 1990. In my review of the literature pertaining to vouchers, presented in the third chapter of this dissertation, I observed eight major themes emerge related to voucher programs and policies. These eight themes include (a) academic achievement, (b) free-market competition, (c) individual parental school choice, (d) racial segregation, (e) funding and state budget issues, (f) targeting at-risk and disadvantaged student populations, (g) oversight and accountability, and (h) church-state separation and other legal concerns.

Few of the themes listed above generates more discussion and controversy than the concept of academic achievement. As private school voucher programs have gained popularity over the last 3 decades, researchers have tried to determine if utilizing a voucher to attend a private school increases academic achievement for the student using the voucher. The results have been mixed, as some reports have revealed positive academic outcomes for students participating in voucher programs (Barnard et al., 2003; Cowen, 2008; Rouse, 1998; Witte, 2000; Wolf & McShane, 2013), while others have observed drops in tests scores (Abdulkadiroglu et al., 2015; Dynarski et al., 2018; Martire, 2015; Mills et al., 2016; Waddington & Berends, 2018). In some cases, results have shown no discernable difference in academic outcomes between the students

participating in a voucher program and those who were not (Bitler et al., 2014; Epple, Romano, & Urquiola, 2015; Figlio, 2009; Zimmer & Bettinger, 2015). Overall, it is simply impossible for researchers or policymakers to conclusively determine if voucher programs improve, decrease, or have no effect on the academic performance of the students who use them.

The themes of free-market competition and individual parental school choice can be traced back to the early free-market philosophy of Friedman and his original voucher proposal (Friedman, 1955, 1962). These themes are also found in more recent voucher theories, including those created by Chubb and Moe (1990). Some researchers have found evidence that free-market competition can improve educational outcomes for all schools (Epple et al., 2015; Figlio & Hart, 2014), but some worry that creating a fully market-driven education system will disproportionately hurt disadvantaged students and families (Finnegan, 2007; Grigg, 2012; Henig, 1995; Hess, 2002; Levin, 1998). Voucher supporters believe greater parental school choice—a concept often associated with free-market educational philosophy—will improve student outcomes (Bolick, 2003; Levin, 2002). There is some research to support this claim, but there is also research claiming private schools do not offer an inherent educational advantage over public schools (Cowen, 2010; Egalite, Gray, et al., 2017b; Pianta & Ansari, 2018).

Voucher critics often argue that such policies will lead to schools becoming increasingly segregated, pointing out that many voucher programs were created in the 1950s and 1960s in a blatant attempt to avoid federally-mandated school desegregation efforts (Carl, 2011; Dunn, 2016; *Griffin v. School Board of Prince Edward County*,

1964b; Inger, 1969; Thuesen, 2006). While these claims are historically accurate—as outlined in the second chapter of my dissertation—there is also very little research to support the claim that more recent voucher laws lead to increased racial segregation in schools (Egalite & Mills, 2014; Fuller & Caire, 2001; Greene et al., 2010; McGroarty, 2001; Walberg, 2007).

Another major theme found in the research relates to how vouchers affect public school funding. Research on this topic has also yielded mixed results. Some information has revealed that vouchers may be a more efficient use of taxpayer dollars (Epple et al., 2017; Levin, 2002; Wolf & McShane, 2013). However, voucher detractors often point out that many private schools receiving vouchers do not provide special education services, which can be quite costly for public schools, even with federal assistance (Iver, 2000; Miner, 2003). The effect of vouchers on at-risk student populations, including students with special needs, was another significant topic discussed in the literature. The voucher programs in place across the country today are “means-tested,” meaning that they target a specific group of students and are not open to all. Most of these programs—including the two in North Carolina—target students from low-income families and/or students with disabilities (Altonji et al., 2015; Bast et al., 1997; Egalite, Gray, et al., 2017a). Because these student groups in particular are often recognized as “at-risk,” research has paid a great amount of attention to how these students are affected by voucher programs.

Accountability and oversight is another important voucher theme that has generated much controversy. Voucher proponents believe such programs should have

maximum autonomy and minimum government regulation to be most effective (Forster, 2016). Critics believe voucher programs should be monitored and held accountable since taxpayer dollars are being used to fund participating private schools (Kemerer & Maloney, 2001). The issue of accountability and oversight has been heavily debated, especially in North Carolina, where researchers have claimed the state's voucher program has some of the weakest measures of oversight in the nation (Wettach, 2017).

Research has shown that legal and constitutional arguments have been common within the larger voucher debate. Voucher detractors have argued that such laws violate the Establishment Clause because they do not maintain a separation between church and state. At the federal level, the 2002 Supreme Court case *Zelman v Simmons-Harris* found vouchers not to be in conflict with the Establishment Clause, which led to a steady increase of voucher programs nationwide (*Zelman v. Simmons-Harris*, 2002b). There have been several state-level legal challenges to voucher laws, some of which have been successful (Dycus, 2006; Lovett, 2017; Supreme Court of Florida, 2006). In most cases, the outcomes of state-level challenges to voucher laws are determined by the manner in which the law is written and how it may potentially conflict with the wording of the state's constitution (Dycus, 2006).

Having addressed my first research question by reviewing the history of vouchers in the United States and summarizing the literature on private school vouchers, I now move to my final three research questions, all of which are specific to North Carolina's voucher program. Before discussing these research questions and my key findings, the

sections that follow provide a review of my research design and methodology, followed by a summary of my results.

Review of Research Design and Methodology

Qualitative research design and methodological techniques were used in this dissertation studying North Carolina's private school voucher program (Merriam & Tisdell, 2016; Patton, 1985). Specifically, I utilized coding techniques and historical document analysis as I identified the major themes present in numerous primary source documents related to vouchers. As described in detail in the first chapter of my dissertation, I utilized the processes outlined by Bowen (2009), O'Leary (2014), and Creswell (2016) while completing the coding and analysis of the various documents.

The 8-step process that I used to analyze my textual documents, as outlined by O'Leary (2014), included (a) building a list of documents, (b) determining the level of accessibility of documents, (c) considering potential biases, (d) ensuring the researcher has the necessary research skills, (e) ensure research credibility, (f) understanding the data for which the researcher is searching, (g) taking into consideration potential ethical issues or issues of confidentiality, and (h) developing a potential backup plan in case one becomes necessary. In order to properly code these historical documents, I implemented the techniques described by Creswell (2016). In total, I analyzed 137 documents, including press releases, research reports, editorials, and other relevant news articles. For each of these documents, I completed an initial reading, recorded relevant notes, began bracketing significant portions of text, and then noted specific themes that emerged. As I

analyzed each document, I grouped the codes before determining the major and minor thematic categories most applicable to each document.

Having completed an extensive literature review in the third chapter of my dissertation, I utilized the eight major voucher themes found in the literature as I analyzed each document related to vouchers. Using the coding procedures and historical document analysis techniques previously described, my goal was to determine no more than two “major” themes and no more than three “minor” themes from each of the documents analyzed during the specified time frame (from 2012 to 2017). Major themes were assigned one point and minor themes were assigned half of a point. I built a year-by-year chart to track the trend of the voucher themes used by each side of the debate on a month-by-month and year-by-year basis. I also actively looked for additional voucher themes to emerge from my analysis of the North Carolina documents, but none such new themes were found.

I chose documents produced by two of North Carolina’s most influential policy organizations—the John Locke Foundation and NC Policy Watch—to conduct my research. Because these two organizations represent both ends of the political spectrum, they provide opinions both in support of and staunchly against North Carolina’s voucher program and, therefore, provide the best opportunity for research. The John Locke Foundation (JLF) is often considered a more “conservative” or “libertarian” organization, while NC Policy Watch (NCPW) is typically described as more “liberal” or “progressive.” As such, both organizations published documents from 2012 to 2017 that provided arguments on both sides of the voucher debate, as JLF is clearly in support of

the voucher law, and NCPW strongly disagrees with the state's voucher plan. The section that follows is a brief summary of the results of my research.

Summary of Results

In 2012 and 2013, John Locke Foundation (JLF) published 14 articles about vouchers, all of which supported the North Carolina General Assembly's eventual enactment of this policy effort. Five of the eight main voucher themes were prevalent in the writings of JLF during this time period. The main arguments made in support of vouchers included vouchers increase achievement for the students who use them (Theme 1), competition caused by vouchers leads to higher achievement for district schools (Theme 2), vouchers increase parental school choice (Theme 3), vouchers save the state money and are a more efficient use of taxpayer dollars (Theme 5), and vouchers will help disadvantaged student populations (Theme 6). In 2014, the main theme of the nine articles published by JLF is parental school choice. Issues of competition, funding, and disadvantaged student populations take a back seat until 2015 and 2016, when these themes are highlighted frequently within the 18 articles published during that 2-year span. The theme of academic achievement, however, is referenced only once after 2014. By 2017, two main themes emerge within the 11 articles published that year—parental choice and disadvantaged student populations. Interestingly, the theme of parental choice is the only theme that was prevalent in every year since 2012, while disadvantaged student populations was not a theme that was consistently at the forefront of JLF's arguments in favor of North Carolina's private school voucher program.

The main themes of the articles written by NCPW remained relatively consistent compared to JLF, especially from 2012 through 2015. Almost all of the 61 articles written by NCPW during that time span focused on the theme of accountability and oversight. The main argument posited by NCPW matching this theme criticized the lack of private school accountability found in North Carolina's voucher law. NCPW writers consistently complained about the fact that private schools could—and did—utilize any set of curricular standards they chose. Moreover, NCPW mentioned that private schools did not have to follow the state's testing guidelines, publish their testing results (unless they enrolled over 40 students receiving vouchers), and had very lax financial oversight. To a lesser extent, the theme of legal concerns was found during this time period as NCPW discussed the potential church/state separation issues brought about by vouchers. In 2016 and 2017, NCPW continued their call for increased oversight and accountability, but also focused more heavily on the research showing poor achievement results for voucher schools (Theme 1), while also citing specific examples of discrimination, which touches on the themes of accountability (Theme 7) and legal concerns (Theme 8).

Discussion and Key Findings

Having briefly summarized the results of my research, the section that follows is a discussion of my final three research questions. While my first research question addressed the development and expansion of private school vouchers nationwide, my final three research questions are specific to North Carolina's voucher program. My final three research questions include:

2. Which of the eight voucher themes was most prevalent in the North Carolina voucher debate?
3. Did the arguments made by both sides remain consistent through the years, or was there a noticeable shift in the focus of their arguments?
4. What were the key findings within the arguments made by each side of the voucher debate?

Following a discussion of Research Questions 2 and 3, I present two key findings from my research and analysis as I answer my final research question.

RQ #2—Which of the Eight Voucher Themes Was Most Prevalent in the North Carolina Voucher Debate?

Of the eight major themes identified in my review of the literature related to educational voucher programs, each of the eight themes was referenced at least once, by one organization or the other, during the time period I examined (2012 to 2017). Of course, some themes were referenced more heavily than others, but all were referenced at some point. Moreover, no new significant voucher themes, beyond the initial eight that I identified, emerged during my research.

The voucher theme most prominently featured in my research was “accountability and oversight,” represented as Theme #7 in my research and coding notes. While JLF discussed accountability and oversight on occasion in their articles, this theme was referenced repeatedly and consistently by NCPW. In most cases, NCPW writers discussed the lack of a set curriculum or standards for private schools to follow, which would make it difficult for parents of students using vouchers to hold those schools accountable for student learning. Fitzsimon (2015a), who often described the program as

an “absurd voucher scheme,” once criticized the program because it taught “things that are simply not true, like the claim that dinosaurs and humans co-existed on earth, or that most slaves were treated fairly well.” Fitzsimon (2015b) also pointed out that there are “no guidelines for curriculum at vouchers schools” and “no credentials or minimum education requirements for teachers,” highlighting the lack of oversight that exists over the private schools receiving vouchers (para. 13). NCPW writers also pointed out that public schools, both traditional and charter, were required to participate in the state’s A-F “School Performance Grade” accountability system, but private schools were not. At a time when increasing school choice has become a major goal of the North Carolina General Assembly, NCPW argued that parents did not have the information they needed—namely, test score data from private schools providing evidence of student achievement—in order to make an informed choice.

The theme referenced the second-most, which was also featured almost exclusively in documents written by NCPW, was Theme #8, “church/state and legal concerns.” During the early years of the voucher law’s development, NCPW focused on the potential legal issues related to sending taxpayer money to religious schools. Over time, however, the argument about using taxpayer money to teach religious content began to evolve more into an argument about accountability and oversight, rather than separating church and state. Nevertheless, NCPW did discuss other legal concerns related to the voucher program, including financial issues and potentially discriminatory admissions practices at some schools. Wagner (2015b) wrote about the \$150,000 budget shortfall facing Greensboro Islamic Academy, a private school that, as of 2014, had

received the most voucher money of any school in North Carolina. In 2016, Fitzsimon quoted a portion of one private school's "Homosexual Conduct Policy" that could potentially bar a student's admission if that student or a direct family member identified as homosexual or transgender. Interestingly, Wettach (2017) noted that North Carolina's voucher law "forbids discrimination . . . on the basis of race, color, or national origin," but it does not address discrimination on the basis of "religion, disability, sex, sexual orientation, [or] gender identity" (p. 2).

The most prevalent theme found in the documents from JLF was "individual parental choice," represented as Theme #3 in my coding system. While JLF discussed other themes secondarily throughout the time frame I studied, the theme of "individual parent choice" was the most often referenced concept each and every year. In short, JLF writers believed that parents should have the right to choose the school their child attends. For JLF, the North Carolina voucher program gives historically underserved students from low socioeconomic families the opportunity to choose a different, non-public school to attend. Responding to charges that private schools receiving vouchers are not held accountable, JLF argued that parental accountability through choice is more powerful than utilizing high stakes tests. In an article written in 2014, Stoops (2014b) noted that he preferred parental choice over accountability through testing, but stated that "well-funded public school advocacy groups" have blocked parental choice and have forced "taxpayers to lean even more heavily on test-based accountability" (para. 9). For Stoops and other JLF writers, the issue of parental choice and accountability go hand-in-

hand; if parents have a variety of schools from which to choose, those parents will be able to hold those schools accountable for the academic performance of their children.

While parental choice was the main theme discussed by JLF, other themes were present during the voucher debate that took place between 2012 and 2017. Additionally, JLF writers discussed voucher funding and the overall efficiency of voucher programs, believing these programs will, in the end, save taxpayers money. In a 2012 JLF Press Release, Curry (as cited in JLF, 2013a) wrote that the North Carolina voucher program has the “potential to serve low-income students’ educational needs more effectively, while spending tax dollars more efficiently” (para. 8). JLF also focused on the theme of “free market competition,” pushing the narrative that increasing parental choice will subsequently increase competition, which will push all schools to increase performance.

Interestingly, the voucher theme referenced the least was Theme #4, “racial segregation.” From a historical context, one would think this theme would be much more prevalent, since most voucher programs that were first created in the South during the “*Brown v. Board*” era were put in place in an attempt to bypass federal desegregation orders. Since this theme is referenced so rarely from 2012 to 2017, it appears neither JLF nor NCPW is concerned about issues of racial segregation. This is likely because the North Carolina voucher program is means-tested and not universal, allowing only low-income families to participate. As of 2018, most of the voucher programs across the country are means-tested. It is important to note, however, that participation in North Carolina’s voucher program by White students has increased significantly since the program’s inception. In 2014-2015, 51% of voucher recipients were African-American,

compared to 27% who were White. By 2017-2018, the ratio had changed dramatically: 32% African-American compared to 44% White.

RQ #3—Did the Arguments Made by Both Sides Remain Consistent through the Years, or Was There a Noticeable Shift in the Focus of Their Arguments?

For both NCPW and JLF, a noticeable primary theme was consistently evident throughout the 6-year span. For NCPW, that theme was “accountability and oversight,” and for JLF, that theme was “parental choice.” Main secondary themes were also evident for both organizations, though JLF showed much more variance in both the number of secondary themes discussed and the level of depth in which they were explored. For NCPW, the secondary focus on “legal concerns” was consistently discussed, but JLF touched on a number of secondary themes, especially from 2012 to 2014.

Though documents written by NCPW consistently touched on the theme of “accountability and oversight,” there was a minor shift in focus in 2017 when a number of articles were published referencing Theme #1, “academic performance.” Though NCPW published a few articles in 2012 and 2013 discussing the academic performance of private schools receiving vouchers, the emergence of a few new studies nationwide—which revealed poor academic outcomes for students using vouchers—put this topic back in the forefront of the voucher discussion in 2017. In general, however, issues of accountability and oversight remained the primary focus. For NCPW, the biggest shift in their argument over the 6-year span came within the context of the “accountability and oversight” theme itself.

In the first few years, NCPW writers argued that the lack of accountability within North Carolina’s voucher program would lead to schools teaching inaccurate content, a

prediction which many NCPW writers believe has proven true. Fitzsimon (2014b) was consistently critical of the textbooks used by many voucher-eligible schools, many of which stated that “the earth is only a few thousand years old and that gay people have no more claims to civil rights than child molesters or rapists” (para 13). While the curriculum used by private schools receiving vouchers continued to be a point of discussion and contention, by 2016 and 2017 NCPW writers were making a slightly different argument for why increased accountability would be a good thing. For parents to make an informed choice, they need data and information about the schools they are considering. As Wagner (2017c) wrote, there is “no meaningful data that can tell us if this is an effective way to help poor students who deserve a high quality education” (para. 2). Why is this the case? Wagner (2017c) reminded us that private schools receiving vouchers in North Carolina can use any “nationally normed test of their choosing,” making it essentially “impossible to compare one of these schools with another, much less make comparisons with local public schools” (para. 6). Furthermore, voucher schools only have to publicize their students’ test data if 25 or more students are enrolled in the school using a voucher. In 2016, this meant only 11% of voucher schools were required to make their test data available to the public (Wagner, 2017c).

While the theme of “parental choice” was discussed most often by JLF writers and was clearly the most prevalent theme within the 6-year span for this organization, there was a great deal of variance over the years with regards to the secondary themes. In 2012 and 2013, JLF touched on several voucher themes while trying to make arguments in favor of North Carolina’s proposed voucher law. JLF writers promoted the merits of

competition in the educational environment and also presented studies that showed voucher students making academic gains relative to their public school peers. Stoops (2013b) stated that there was a “consensus in the education research community that school choice raises student achievement for the average participating student” (p. 1). After 2013, however, the theme of “academic achievement” is rarely discussed by JLF, likely because several nationwide studies showed mixed results with regard to student achievement within voucher programs (Abdulkadiroglu et al., 2015; Dynarski et al., 2017; Egalite et al., 2018; Figlio & Karbownik, 2016; Martire, 2015; Mills et al., 2016; Wettach, 2017).

As the focus shifts away from the theme of academic achievement, JLF writers instead begin to more heavily referenced Theme #6, “at-risk and disadvantaged students.” For example, Stoops (2015a) criticized McCrory’s 2015 budget proposal for not including an increase to the voucher program which, as Stoops stated, gives socioeconomically disadvantaged children “opportunities previously only available to their wealthy peers, that is, to attend private schools that better meet their social, moral, and intellectual needs” (para. 9). Moving into 2016, JLF writers continued to reference how North Carolina’s voucher law helps our state’s at-risk students; NCPW joined the discussion as well, except from a very different angle. Ball (2016) reported on potentially discriminatory admissions practices at one small, voucher-eligible private school. As Ball (2016) noted, this school, located in Lee County, required its students and parents to sign a “lifestyles statement and covenant” before they could be considered for admission (para. 1). Ball (2016) stated that this “covenant” mentioned “gender confusion” as a

“state of depravity” and homosexuality as “immoral and sinful,” while having also pointed out that the school reserves the right *not* to admit a student if the “atmosphere or conduct within” the home is not consistent with the philosophy of the private school (paras. 2, 4, 5).

It makes sense that JLF shifted the focus of their argument for school vouchers slightly away from student achievement and more toward at-risk and disadvantaged student populations. The program has been consistently popular among African-Americans, an often marginalized minority group in North Carolina and nationwide. Over 2,300 African-American children used a voucher to attend a North Carolina private school in 2017-2018. However, while North Carolina’s voucher program may provide school choice opportunities for some disadvantaged groups—including children from low SES families and racial minority groups—other at-risk student populations are effectively locked out of this choice opportunity because of the way this program is constructed. Non-Christian students and LGBTQ students face the real possibility of being denied admission to a private school because of their religious affiliation, sexual orientation, or gender identity.

RQ #4—What Were the Key Findings within the Arguments Made by Each Side of the Voucher Debate?

My analysis of the arguments made by both NCPW and JLF, and the voucher themes referenced by these two organizations both in support of and against North Carolina’s voucher program, helped me develop two key findings which I believe encapsulate my overall research. These key findings are significant because each represents a clear, specific philosophical disagreement between those who support and

those who oppose vouchers. My two key findings are discussed in the sections that follow.

Key Finding #1—The Concept of “Parental Choice” is Quite Nuanced, its Definition is Often Misunderstood, and its Purpose Can Vary

The concept of parental school choice is in some way embedded in every argument for or against vouchers. The term “parental choice” has become so widely used in educational circles that policymakers, school leaders, journalists, and parents often make two key assumptions about the concept: first, that all of those groups *understand* exactly what parental school choice means, and second, that parental school choice is inherently a *positive* reform model for education. What those groups do not always agree on, however, is whether or not parental school choice should be put in place in order to achieve a specific purpose (i.e., increase student achievement, allow students to leave failing and/or schools perceived to be unsafe, etc.) or if it is beneficial on its own merits, simply because it gives parents some additional educational choices for their students, regardless if any other tangible benefit is realized. While I will discuss—and challenge—the first two assumptions about parental school choice later in this section, I will begin by unpacking this concept of whether or not parental choice needs to have an underlying purpose, as my research revealed that journalists on both sides of the voucher debate strongly disagree on this topic.

Having analyzed the articles and editorials written from 2012 to 2017 by those on both sides of the voucher debate, I have developed two interesting conclusions. First, the writers of NCPW—who largely oppose vouchers—are not necessarily *against* the idea of “parental choice,” but they do believe this type of reform effort should be tied to some

sort of underlying purpose. For example, parental choice should allow parents with students who have special education needs to receive specialized services, or low-income families should be able to let their children attend a school that has a track record of high academic achievement. To be clear, these are not the only stipulations often placed on “parental choice” efforts, but this is the starting point. NCPW, however, is strongly against a system of completely unregulated parental choice, believing it will lead to segregated schools (by race, social class, or both) and general inequity. Second, the writers of JLF—who largely support vouchers—believe in parental choice on its own merits, with or without a specific purpose or objective. Ironically, JLF did not clearly express this opinion until 2014; for the first 2 years of my research, JLF held up what they believed were the tangible benefits of vouchers, specifically the data stating that students using vouchers had higher academic achievement than students in comparable public schools. However, as reports and studies were published from 2014 through 2017 that often showed mixed results regarding the academic impact of vouchers, JLF no longer focused exclusively on the need for parental choice to increase academic outputs for students. Instead, parental choice became a positive reform effort *simply because* parents now had a choice. The purpose or objective behind the choice was no longer relevant.

If the overarching goal of North Carolina’s voucher program was simply to increase *school choice*, then it is hard to argue that this goal has not been achieved. Many, though not all, at-risk and disadvantaged students now have more options of schools, public and private. There is no doubt about that. However, I do not believe the

goal of the North Carolina voucher program was simply to increase choice, but also to increase academic achievement for students. Pushing that philosophical debate aside, the larger question that should be asked is, what are we sacrificing as a democracy when we pursue reform efforts like parental choice, which are often vaguely explained by politicians and misunderstood by constituents? This question returns me to the two assumptions I shared earlier in this section that I believe should be challenged—that all stakeholders *understand* what parental school choice means and that parental school choice is inherently a *positive* educational reform effort.

There is no doubt that school choice reform efforts have increased across the country over the last 2 decades. From vouchers, charter schools, online educational options, and homeschooling, there are exponentially more school choice options for parents available now than ever before. But it is important for stakeholders to understand that the idea of “school choice” is a misnomer; reform efforts, like vouchers, *only* allow school choice for those with the means to *make* said choice. Within North Carolina’s voucher system, school choice exists for the parents who can take advantage of the program, meaning, for example, that they have an income high enough to transport their children to and from school (private schools are not required to provide bus transportation, and most do not) and can provide breakfast and lunch for their child (private schools are not required to provide meals for low-income students, and most do not). Moreover, the monetary amount of the voucher only covers the cost of tuition at a small number of private schools, most of which have religious affiliations or are tied directly to a local church. While there is nothing inherently wrong with students attending

private religious schools, there is also very little strong evidence that these schools provide higher academic achievement for students. What we have as a result of this voucher system is the creation of a *perception* of school choice, which misleads parents and community members into believing our government is providing *more* and *better* educational opportunities for *all*. The reality, however, is that very few actually have the social and economic resources to take advantage of the perceived benefits of this school choice program, the “benefits” of which arguably do not exist anyway! Meanwhile—and this is the most important part—the resources that are being poured into this “school choice” reform efforts have been funneled away from the public school system that, more times than not, actually has the best chance of increasing academic achievement for *all* students. So, while politicians and school reformists push forward the “perception of school choice,” these efforts often end up harming the very families and children they are intended to help.

Key Finding #2—Accountability is Viewed as Important, But There is Significant Disagreement in How it Should Be Applied and What it Should Entail

The second key finding that arose from the analysis of my research pertains to the topic of accountability and oversight. Those on both sides of the voucher debate held very different opinions regarding the role of accountability in the state’s voucher law, which lends itself to a very interesting philosophical debate about this topic. The theme of accountability was found consistently in the articles and documents written by those on both sides of the voucher debate, though the topic was discussed most often by the writers with NCPW. Even before the voucher law was put into place, NCPW writers raised concerns about a lack of accountability and oversight within the proposed law.

Once the voucher program was signed into law, the calls for greater accountability became a weekly occurrence.

At first, NCPW called for greater accountability with regard to the curriculum used by private schools. NCPW took issue with the fact that many private schools receiving vouchers or eligible to receive vouchers used textbooks that most professors and academic scholars believed were, at best, misrepresentations of topics and, at worst, dangerously inaccurate. Writers with JLF often responded by saying that parents are the ones holding schools accountable for the curriculum being used and the level of academic success achieved by the students under the care of the school. If parents are not happy, JLF writers claimed, they will take their children—and the funding associated with those children—elsewhere. Unfortunately for those parents, the private schools accepting vouchers do not participate in the same testing system as public schools, so there is no comparable testing data available for parents to make informed decisions about which schools are performing better than others. NCPW correctly points out that accountability structures were greatly increased for public schools during this time period (the School Performance Grade system was created for all public schools), but private schools accepting public voucher money essentially came into existence with no accountability measures in place whatsoever.

In 2014, Stoops presented an interesting take on the accountability argument for schools, both public and private. Stoops (2014b) argued that our state's accountability system should rely less on testing and more on parental choice. Stoops (2014b) stated that “well-funded public school advocacy groups” were primarily at fault for blocking

parental choice efforts, thereby forcing “taxpayers to lean even more heavily on test-based accountability” (para. 9). In essence, Stoops believed that accountability can be achieved simply by shifting all of that accountability to the parents. While this appears to be a noble gesture, as it would reduce the testing burden on all schools as a means of accountability, parents are not the only citizens who are paying taxes and, therefore, have the responsibility of holding schools accountable. Moreover, parents are most likely only concerned about holding schools accountable for the safety and educational achievement of *their* child(ren), not the welfare of all of the remaining students in the state.

One of the major accountability issues brought to light by NCPW in 2017 involved potentially discriminatory admissions practices by private voucher schools. This is clearly an area where a certain level of governmental oversight is necessary to make sure minority groups, including non-Christian and LGBTQ students, will not face discrimination when trying to attend the private school of their choice. Lastly, there are issues of accountability that must be considered beyond simply student achievement, including the fiscal management of the school. Needless to say, holding schools accountable for student achievement is very important, but schools also use taxpayer dollars in a variety of ways, and ensuring that school officials utilize those monies in the most efficient and responsible manner as possible is of paramount importance. With the way the voucher law is currently constructed, it is essentially impossible for taxpayers to recoup monies from private schools that mismanage funds or are forced to close, for whatever reason. Public schools, on the other hand, have to submit numerous reports to

auditors on a consistent basis, which helps hold those schools accountable for the taxpayer funds they receive while also providing safeguards to make sure tax dollars are used appropriately.

It is my belief that the call by Stoops and other JLF writers for parental accountability in lieu of high-stakes testing is disingenuous at best, especially given the simultaneous push by the General Assembly to incorporate an oversimplified School Performance Grade system for public schools that almost exclusively relies on high-stakes, standardized assessments. While educators have often complained about high-stakes testing and its negative effects on students and in schools, at least these assessments provide some information to parents about how well their students are doing academically. In addition to the individual information provided by these assessments, parents can also use testing data to gather some information about the academic performance of schools as a whole. While I do not believe that students or schools should be judged solely on their performance on standardized tests, I do believe these assessments provide *some* valuable information for parents and stakeholders. While these measures are not perfect, having *some* comparable information is better than having *no* such information, which is precisely what parents with students attending private voucher schools are receiving. Those parents are left to their own devices to judge the academic well-being of their child(ren), which is no small feat for even the most advantaged parents, and would likely prove incredibly difficult for low-income, highly disadvantaged families.

Key Findings Summary

The key findings just discussed represent two significant voucher-related concepts where reaching a compromise between both sides of the debate may prove quite difficult. The issues of parental school choice and accountability are complex and multi-layered. The findings I have presented, and the discussion that surrounds these two key themes, represent the core of the philosophical disagreement between both sides of the school choice and voucher debate. At its essence, those who support school reforms like vouchers and charters generally believe that allowing the concepts of a free market economy—competition, choice, deregulation, etc.—to permeate the system of education will ultimately lead to greater academic outcomes for all students.

Of course, on the opposite end of the spectrum, there are those who believe doing so will increase racial and socioeconomic disparities, creating an educational system even more segregated and inequitable than the one that currently exists. In the end, this debate largely comes down to not only how best to improve public education, but how one views the *purpose* of public education altogether. Some who oppose market-based school reform believe those who support these efforts are actively trying to destroy our nation's system of public education. While I do not believe that is the *intent* of market-based school reformists, I do believe their efforts, if fully realized, could ultimately damage this public institution so severely that it will have long-term and far-reaching negative consequences on the fabric of American democracy.

Analysis

As I established the theoretical framework for my dissertation, I incorporated two main theories into the research I conducted: Social Justice Theory and Critical Theory. As you recall, I stated that the theoretical framework, as Merriam and Tisdell (2016) wrote, is “derived from the orientation or stance that you bring to your study” (p. 85). The theoretical framework of qualitative research is described by Merriam and Tisdell (2016) as the “underlying structure, the scaffolding or frame” of the study (p. 85). In my research of vouchers in North Carolina, elements of Social Justice Theory and Critical Theory were embedded and incorporated into my discussion and analysis. Sensoy and DiAngelo (2017) described social justice as the “principles of ‘fairness’ and ‘equality’ for all people and respect for their basic human rights” (p. xix). Horkheimer (1972) believed that a “critical” theory must provide a “liberating influence” free from domination while also increasing freedom and delivering “emancipation” for groups of citizens (p. 246). These two theories are utilized throughout my dissertation, though the prevalence of one theory may be much higher in one chapter relative to another.

Because the second chapter consists of a detailed history of the birth and expansion of private school vouchers in the United States, I was able to take a critical view of the various vouchers that emerged, as well as how and why they passed. Issues of social justice were much more prevalent in my third chapter as I reviewed the research of voucher programs across the United States. Some of the eight major themes are more specifically tied to social justice than others, including racial segregation and targeting at-risk and disadvantaged student populations. As you recall, I mentioned that several

academic scholars have studied the importance of social justice and its impact on education and school choice reforms. Specifically, Wolf (2010) researched the voucher program in Washington, DC to determine if the program advanced the cause of justice. While Wolf (2010) stated that a universal voucher system might better advance the cause of justice, he also stated that families who face great socioeconomic disadvantages may have difficulty participating in a universal voucher system. As such, Wolf (2010) suggested using targeted voucher plans instead, having stated that targeted voucher plans were a “low-risk and socially just public policy” (p. 148).

The fourth and fifth chapters of my dissertation, consisting of the results of my research into North Carolina’s voucher program and how it was framed by JLF and NCPW from 2012 to 2017, allowed me to critically analyze the claims made by both sides of the debate. There were also major social justice implications, as one would expect for a program that is only open to students from low-income households and students with learning disabilities. For some of the private school leaders who accepted students using the voucher program, the fact that the program allowed disadvantaged youth more educational opportunities was a major reason they decided to participate. Egalite, Gray, et al. (2017a) reported that two of the main reasons private school leaders took part in the voucher program was to “help the school serve more disadvantaged students” and help their school achieve “greater racial and socioeconomic integration” (p. 1). JLF writer Hood (2015) praised the voucher program, having claimed that “private schools often deliver better educational outcomes than public schools, particularly for disadvantaged students” (para. 6). Those critical of the program did not agree. NCPW

writer Fitzsimon (2014b) stated that he believed the voucher program was only serving “private and ideological interests” and was not established to help poor and disadvantaged students (para. 17). Moreover, NCPW writers published stories in 2016 and 2017 noting the potential for discrimination within the admissions policies of private voucher schools (Fitzsimon, 2016b, 2016c; Wagner, 2017a).

As I determined and discussed the key findings of my research, I used elements of Social Justice Theory and Critical Theory to analyze the concepts of parental choice and school accountability. While those who support vouchers would likely argue that the idea of parental choice is socially just, oftentimes that is not the case. For families on a limited income, parental choice may not truly exist, since many low-income families often do not have the means to participate in school choice initiatives (including voucher programs). Oftentimes, this is an issue of transportation; without the availability of a school bus, the parent is unable to take their child to the school. The limitations of parental choice can also be caused by having limited knowledge of the “choice” process for their community. Other times the barrier is as simple as not being able to provide their child with a meal if the “school of choice” does not provide free- or reduced-priced breakfast and lunch. In these cases, it is difficult to argue that these school choice policies are “socially just” since they disproportionately harm low-income families, a segment of society often treated inequitably by society already. By viewing vouchers and school choice programs through a critical lens and examining how these programs serve, or fail to serve, certain groups, the shortcomings of such policies become much more apparent.

Though both voucher supporters and critics believe accountability should be an important part of any school reform initiative, there is great disagreement about how much accountability there should be and how it should be applied. Schools that are not held accountable in some form have the potential to harm the academic prospects of students and communities. While parents are one form of accountability for schools, not all parents have the knowledge, time, or resources to appropriately advocate for their children. Families from lower socioeconomic backgrounds will likely suffer the most in an accountability system that puts the responsibility on the parents, especially since they most likely will not have the means to simply remove their child from an “underperforming” school and move to another one.

Therein lies the social justice implications of the accountability debate, since already disadvantaged citizens will be even less likely to have the information, resources, or political capital they need to appropriately hold accountable the school their child attends. Accountability is an important aspect of any reform program, and vouchers are no exception. Exploring the accountability argument from a critical perspective reveals that North Carolina’s voucher law, as it is currently written, does not require private voucher schools to provide anything close to the amount of information required by public schools. Fixing this aspect of the program would make it much more socially just as it would better serve the needs of students and families from low socioeconomic backgrounds. I discuss possible changes to the accountability structure of the voucher program, as well as several other recommendations for policymakers, in an upcoming

section. First, however, I discuss the implications of my research and the effect of neoliberalism in public education policy.

Implications: The Effect of Neoliberalism on Public Education

The belief that all public institutions should exist within a market-based system of consumer choice and exchange is a concept known as “neoliberalism” (Harvey, 2005).

The idea of neoliberalism has only grown in popularity since it first emerged in the early-1970s (Harvey, 2005). A growing number of Americans believe the concepts of neoliberalism should be applied to public education, but these citizens are not considering the negative impact such policies will have on what I believe is one of our nation’s last, great public institutions. It is important to remember that markets inherently have “winners” and “losers.” The market forces present in businesses in the private sector usually lead to positive outcomes for consumers. Products created by companies either improve—in efficiency and use or in cost relative to other products—or consumers do not buy those products. If the sale of a product is discontinued or an upstart business folds, only those directly associated with the business are affected.

However, what happens to a community when a school closes? Not only are students and families affected, but the entire community suffers in the short- and long-term. Students must find new schools, often traveling long distances, and students from disadvantaged families are much more likely to have less and worse schooling options than those who have the resources to make other choices. In essence, neoliberalism in education creates a model where the schools that are “winning” continue to get even more resources, while the schools that are “losing” continue to get less and less.

The bigger issue, however, is that education cannot and should not be viewed as just another product that is bought and sold like groceries at the local store. Trying to force education into a neoliberal paradigm assumes that the level of education received by a person only affects that one person. That is not the case. An entire community is affected when students are—or are not—properly educated, because communities need citizens who can think critically, debate, discuss, analyze, vote, and make decisions. These are the key elements of democratic participation, and communities, small and large, will either grow or flounder depending on how well their children are educated. It is for this reason that *all* citizens pay taxes that support public schools, and not just the citizens who have school-aged children at that point in time. It is for this reason that Americans chose to fund education as a public institution; there is simply too much at stake.

There is no doubt that public schools across our nation need to work harder to incorporate more innovative practices that better meet the needs of today's students. Much like businesses, schools should be in a constant search for ways to grow and improve. However, pushing public education into a full neoliberal model, allowing it to be viewed like any other commodity that can be bought and sold, will only lead to great socioeconomic disparities that, in time, will do great harm to the democratic fabric of our nation.

Nevertheless, it is important for those on both sides of this education debate to look for areas where compromise may be possible. School choice reforms, including vouchers, do not appear to be going away. As such, educational advocates should explore

ways to meet the school choice goals of those who support those reforms while protecting the elements of public education that work for racial and socioeconomic equity. In the section that follows, I provide several recommendations for policymakers to consider based on my research and analysis of North Carolina's voucher program.

Policy Recommendations

North Carolina's voucher law, created in 2013, is set to expand over the next several years, barring a major change in the political makeup of the state's legislative body. As such, I would like to offer some policy recommendations for improving the law as it is currently constructed. My three policy recommendations include (a) keeping the program "means-tested" for at-risk students, (b) requiring private schools to provide more information to parents to help them make a more informed choice, and (c) incorporating more regulatory safeguards on private voucher schools in order to protect students and their families.

Most of the voucher programs currently in place across the United States are "means-tested," meaning they are intended for a specific group of students or families. North Carolina's voucher law meets this criterion, as it is only available for students with disabilities and for students in low-income households. A recent study by Hungerman and Rinz (2016) revealed that means-tested school choice programs that target certain groups of disadvantaged students did lead to an increase in private school enrollment, but nonrestrictive, "universal" programs did not have the same effect. Choice programs with few or no eligibility requirements did *not* cause more students to enter private schools, mainly because many of those eligible private schools simply raised their tuition rates. If

voucher supporters truly believe in expanding school choice options for at-risk students and families, the state's voucher law must remain "restricted" in this manner. North Carolina legislators have recently tried to expand school choice options to make them less restrictive, including the creation of Educational Savings Accounts (ESAs) that would distribute greater tax dollars with even less accountability (Stoops, June, 2017b). These types of programs are a potential stepping stone toward universal programs that will likely undermine the efforts of the current voucher law attempting to help socioeconomically disadvantaged families. There is little chance of maintaining any semblance of equity if North Carolina's voucher law does not remain means-tested.

While it may appear difficult to argue against the merits of "choice" in theory, a fair criticism of North Carolina's voucher program has been that parents have not been given the information they need to make a well-informed school choice. It is fair and reasonable to believe that parents make educational decisions for their children based on a variety of reasons, from academic achievement and extracurricular opportunities, to campus safety and the curricular offerings available for students. Unfortunately, North Carolina's voucher law requires very little from private voucher schools in the way of information and data to help parents make an informed choice, rather than a blind one. Obviously, it is safe to assume that private schools will publish their own information to help recruit students and families to attend. However, all private schools are different, so having some common data published would be quite valuable to parents and families. Some potential common school data that could be published by all eligible private voucher schools could include school safety information, graduation data, standardized

assessment information, the percentage of programs for students with special needs, and extracurricular opportunities available for students. Having this information readily available would help parents make a more informed decision about their child's schooling.

Finally, it is important that additional safeguards be put in place to increase accountability and oversight for North Carolina's voucher program. As Wettach (2017) reported, North Carolina's voucher law has some of the weakest measures of oversight in the nation. Many states with voucher programs require private schools receiving vouchers to have some sort of accreditation or state approval, follow guidelines regarding the courses needed to advance grade levels, require certain teacher qualifications, and are required to participate in some sort of state testing program. North Carolina does not have any of these requirements in place, and they should. I understand that private schools may not want to follow the exact curriculum outlined by the state, but private schools should be required to follow a general outline of courses, especially at the high school level. Additional oversight is needed by the North Carolina Department of Public Instruction—possibly by the Division of Non-Public Education—to help meet the requirements listed above. Moreover, safeguards must be put in place to make sure voucher schools are utilizing taxpayer dollars appropriately. This may include financial reviews of all voucher schools, with much more extensive reviews for schools receiving greater amounts of funding. Lastly, policymakers must ensure that discrimination of any kind—especially in the admissions process—is prohibited within schools accepting voucher money. North Carolina's current voucher law contains too many loopholes that essentially allow private

schools to discriminate against LGBTQ youth. All of these recommendations will help make our state's voucher program more equitable and ensure a greater amount of accountability for taxpayer dollars. Having these additional safeguards in place will ultimately be most beneficial for the disadvantaged students and families the voucher law intends to assist.

Limitations

As with any research study, not every element of a particular topic can be studied exhaustively. As such, this study of North Carolina's private school voucher program has its limitations. However, limitations in a research study can also provide opportunities for future research. In the section that follows, I have included some of the potential limitations of my study.

One of the main limitations of this study involves the methods in which data were collected, specifically as it relates to which voucher-related articles were analyzed and how those articles were chosen. My study only utilized two major news outlets, one of which represented a more conservative political viewpoint, the other representing a more liberal political viewpoint. The decision to analyze articles from just these two outlets was made intentionally, as both NCPW and JLF regularly comment on educational topics (though not exclusively). Other media outlets could have been selected instead of NCPW and/or JLF, which may have led to a different analysis of the manner in which vouchers were popularized in North Carolina.

Another possible limitation of my study could exist within my data collection methods and the coding system in which I used to analyze the various articles. While I

believe I made every effort to analyze the articles in a fair and consistent manner, the nature of this type of qualitative research always lends itself to the possibility of human error. As I read through the numerous articles published by NCPW and JLF, my goal was to determine no more than two main themes and three minor themes of each article. I only analyzed articles that specifically discussed private school vouchers, so there were some articles that were based on educational topics but did not reference vouchers in any way. Those articles were not used in my research. Again, while I believe I did a good job of studying and analyzing the articles in a consistent manner, there is always the possibility that an article may have been miscoded in some way. Thankfully the high number of articles analyzed helped to mitigate possible shifts in the overall themes used in the coding, but this does not negate the fact that analytical and coding mistakes could have occurred.

Another possible limitation of this study includes the fact that my research focuses solely on North Carolina's current voucher laws, with an emphasis on the program intended for students from low-income families (though my research also studies and references the North Carolina voucher program intended for students with special needs). My research does not, however, reference, discuss, or analyze North Carolina's newest "school choice" endeavor, the Personal Education Savings Account program. These types of programs are commonly called "ESAs" and are becoming more common across the country.

North Carolina's ESA law was created in 2017 and went into effect with the 2018-2019 school year. I did not include North Carolina's ESA program in my research

for two reasons, the first and most obvious being that the law just recently went into effect and there is not enough current data available to analyze it. Had valid data been available, however, it still would have been difficult to include an ESA program in my research given the key differences between most ESAs and voucher programs. For example, voucher programs are meant to open up school choice options for students to attend private schools only. ESAs, in theory, are intended to allow students other educational choice options, including private schools, but also including home schools, online schools, other public schools, or additional educational assistance (like tutoring or remediation). In addition to ESAs, other types of choice initiatives are not included in my research, including tax-credit voucher programs and others that utilize vouchers through individual tax deductions. As discussed earlier in my dissertation, these types of initiatives are similar to voucher programs like the ones in North Carolina, but some of their key differences convinced me not to include these types of programs in my research.

Finally, there were a number of school choice initiatives that are very relevant to my research, but were either addressed in a limited fashion or not at all. I intentionally kept the focus on my research on private school vouchers, resisting the urge to delve into other school reform efforts including charter schools, online schools, and homeschooling. All of these school reform efforts have interesting histories and are viewed differently across North Carolina, as well as nationally. For example, charter schools share many characteristics of traditional public schools, including being held to the same accountability model. However, charter schools also have increased administrative flexibility and tend to be more socioeconomically segregated, much like many private

schools. School reform efforts like charter schools and homeschooling could provide ample opportunities for future research. In the section that follows, I discuss other possible areas of future research.

Recommendations for Future Research

Given the increase in school choice reform initiatives across the United States over the last 20 years, there are great possibilities for future research of this topic. As previously stated, my dissertation did not analyze or discuss school choice initiatives often seen as similar to private school vouchers, including charter schools, home schools, online educational programs, and ESAs. All of these programs provide ample opportunities for future research, though the research base surrounding some of these initiatives is larger than others. For example, because charter schools have been in existence for over 2 decades and continue to expand nationwide, the research opportunities, while still numerous, are likely not as prevalent for charter schools as they are for other programs, including home schools and ESAs.

The increase in home-schooling provides a possible avenue for future research, as does the establishment of the new ESA program in North Carolina. The ESA law will most likely open the door for eligible North Carolinians to receive voucher-like funding that they can use to attend a private school, a home school, or an online school. The effect that ESA programs will have on students, families, schools, and school districts is yet to be seen, but the potential expansion of ESA-like laws will likely provide great opportunities for future research in the field of school choice reform.

For researchers looking to study private school voucher reform efforts more closely, taking a closer look at some of the voucher programs that I did not include in my study could offer a great possibility. I focused my research on private school voucher programs that were directly funded by the government. I did not include voucher initiatives that utilized funding through private business or individual tax credits or deductions. Analyzing these types of voucher programs could provide research opportunities for those looking to expand upon my private school voucher research.

Conclusion

School choice reform initiatives have grown significantly in North Carolina over the last decade, of that we can be sure. Whether or not one agrees with the current trajectory of educational policy in our state and nationally, it neither appears that school choice reforms are going away nor will be fully reversed any time soon. The intent of my research was never to declare school choice reforms, in whole or in part, as an overwhelmingly positive or negative public policy. There are aspects of many school choice reform efforts that I feel can benefit public education, while I also believe there are others that could do great harm to one of our nation's greatest democratic endeavors.

The significance of the school choice debate in public education cannot be overstated. Arguments over the usefulness, viability, and effectiveness of school choice reform efforts, especially private school voucher programs, are currently some of the most hotly debated and controversial in education. There are major issues of social justice and equity at stake, which is why the topic of education has become increasingly partisan over the last several years. Education, however, does not need to be a partisan

issue. There is simply too much at stake for policymakers to use education as another political punching bag for their own personal gain. The debate over the direction of education in North Carolina and nationwide needs to return to one of honesty, civility, and respect.

It is my hope that the research I have conducted and analyzed will add to the respectful, philosophical debate surrounding vouchers. If the two sides of this argument are ever going to reach any sort of compromise on the future direction of public education, both sides will have to make an effort to understand the viewpoint and perspective of the other. Moreover, if the true goal of education is to be realized—namely that academic achievement is maximized for all students, regardless of socioeconomic or racial background—neither side of the “school choice” debate can afford to demonize the other, whether for political gain or any other purpose.

Education need not become yet another topic that divides us; therefore, it is my hope that the research I have conducted allows everyone to see all sides of this complex debate, while also ensuring citizens take a critical look at all aspects of the state’s voucher program. The voucher program created in North Carolina aims to help some of our most disadvantaged youth. Most voucher laws passed recently in other states claim to have a similar objective; however, this has not always been the case for voucher programs historically. Nevertheless, the current goal of private school vouchers in North Carolina is a noble one, even if the program has notable weaknesses. Despite good intentions, however, it is possible that the desired objective of the state’s voucher program will *not* be met. Under such circumstances, blindly continuing or expanding the

voucher program would be highly irresponsible and could cause irreparable damage to North Carolina's public education system, arguably our state's most important democratic institution.

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