



CENTER FOR EVALUATION AND EDUCATION POLICY

June 19, 2025

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RE: Department of Education, 34 CFR Part 75: “Proposed Priorities and Definitions—Secretary’s Supplemental Priorities and Definitions on Evidence-Based Literacy, Education Choice, and Returning Education to the States”

Dear Secretary McMahon,

I appreciate the opportunity to comment on Proposed Priorities and Definitions—Secretary’s Supplemental Priorities and Definitions on Evidence-Based Literacy, Education Choice, and Returning Education to the States. I am a professor of education policy and an elected member of the National Academy of Education. I have done considerable, highly cited research on school choice issues for the past quarter century. I find the stated Priority 2 on education choice to be more of an ideological set of assumptions than an “evidence-based” statement of priorities. While this is, unfortunately, true throughout that statement of priorities, allow me to focus only on a few of the most concerning instances.

“Choice empowers parents and families” — Research shows that choice does not improve a disadvantaged child’s chances of attending a better school,¹ and evidence indicates that it tends to be the more affluent families, including ones already in private schools at their own expense,² who are better positioned to take advantage of taxpayer funded choice options.³ Less affluent families instead focus on the costs they must shoulder.⁴ Moreover, instead of families choosing schools for their children, schools are effectively choosing which families they serve.⁵

“Choice ensures that every child has the opportunity to access a high-quality education” — These programs have been shown to increase segregation, and limit opportunity for the least affluent families. A rigorous study of charter schools from the conservative Hoover Institution at Stanford finds that they increase segregation.⁶ Numerous studies of voucher programs — including universal programs in other countries, similar to what is proposed in Priority 2 — find increases in segregation, often with decreases in overall student performance.⁷

“Fostering innovation in education... Charter schools and other innovative school models” — Studies, including those by charter proponents, show a relative paucity of educational innovations in those schools, despite the fact that they were positioned as “laboratories” of innovation.⁸

“Homeschooling” — There is no evidence that homeschooling improves academic achievement.⁹

“More than a dozen states have enacted universal K-12 scholarship programs... These states have highlighted the most promising avenue for education reform... The growing body of rigorous research demonstrates that well-designed education-choice programs improve student achievement” — There are two significant problems with such assertions. First, there is no evidence that these programs are the “most promising avenue for educational reform.” That claim is relative; it is implicitly comparing these voucher programs to other programs. In his rigorous meta-analysis of thousands of studies covering over 250 influences on school outcomes, Professor John Hattie found that school choice and charter schools have very low impacts on student learning, far below things like “small group learning,” “socioeconomic status,” and “drama/arts programs” (but more beneficial than “teacher performance pay,” “summer vacation effect” and “lack of sleep”).¹⁰

Indeed, the “growing body of rigorous research,” including that conducted or funded by voucher proponents, actually shows the opposite: *large negative impacts on the achievement of students in these programs*. To support its erroneous assertion, the Proposed Priority 2 cites “EdChoice (2024).”¹¹ Of course, EdChoice is an advocacy organization that promotes vouchers. And its reports, such as the one cited, selectively ignore or dismiss rigorous research that undercuts its idealized view of vouchers,¹² as is illustrated in [this Policy Brief](#).¹³ In fact, even when conducted or commissioned by voucher proponents,¹⁴ every study of state-wide voucher programs — the closest proximation to the “universal K-12 scholarship programs promoted in Priority 2 — not only finds that this is not a “promising avenue,” but that these programs inflict significant academic harm on participants at levels similar to or greater than catastrophes such as Hurricane Katrina or COVID-19.¹⁵ Harvard Professor Martin West, who is affiliated with voucher-supporting organizations, noted that these negative impacts are “‘as large as any I’ve seen in the literature’ — not just compared with other voucher studies, but in the history of American education research.”¹⁶

Secondly, the observation that “more than a dozen states” have adopted such programs is true but neglects to note *which* states and *how* they have adopted such programs. In every case, these programs have been advanced through conservative state legislatures, rather than through voters, who always reject them, often by overwhelming margins, even in conservative states. While legislation is a completely legitimate way of advancing policies, it is important to note that voters in every case have rejected these proposals, and even over-ridden their legislatures when given the opportunity, as we show in [this Policy Brief](#).¹⁷ This is a particularly salient fact, given that Proposed Priority 3 purports to be “returning education to the states” in light of “one-size-fits-all mandates from the federal government.” Yet Priority 2 is certainly such a federal mandate that ignores the expressed wishes of many states, and voters across red and blue states, on this issue.

One other issue deserve mention but was not discussed in your Proposed Priority 2. These programs create additional costs for taxpayers. Funding a parallel system, whether with charters or vouchers, necessarily duplicates costs. The research bears out this point. Administrative costs at charter schools are rising rapidly, replicating the central office bureaucracies of districts they were supposed to improve upon.¹⁸ Similarly, when they are able to collect public funds through voucher programs, private schools often raise tuition for families.¹⁹ Further research has shown that these programs then become a huge drain on the public treasury, as affluent families already paying for their children’s private schooling accept a taxpayer-funded voucher instead.²⁰

Sincerely,



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¹ Burgess, S., & Briggs, A. (2010). School assignment, school choice and social mobility. *Economics of Education Review*, 29(4), 639–649.

² Atterbury, A. (2023, November 22). GOP states are embracing vouchers. Wealthy parents are benefitting. *POLITICO*. <https://www.politico.com/news/2023/11/22/inside-school-voucher-debate-00128377>. EdTrust. (2024). *Who Really Benefits from School Vouchers*. EdTrust. <https://edtrust.org/wp-content/uploads/2024/10/Who-Really-Benefits-from-School-Voucher-Programs-FINAL.pdf>

Lieberman, M. (2023, October 4). Most Students Getting New School Choice Funds Aren’t Ditching Public Schools. *Education Week*. <https://www.edweek.org/policy-politics/most-students-getting-new-school-choice-funds-arent-ditching-public-schools/2023/10>

³ Jheng, Y., Lin, C., Chang, J. C., & Liao, Y. (2022). Who is able to choose? A meta-analysis and systematic review of the effects of family socioeconomic status on school choice. *International Journal of Educational Research*, 112, 101943.

⁴ Avvisati, F. (2014). *When is competition between schools beneficial?* (PISA in Focus No. 42). Organisation for Economic Co-Operation and Development. https://www.oecd.org/en/publications/when-is-competition-between-schools-beneficial_5jz0v4zzbcmv-en.html

⁵ Mommandi, W., & Welner, K. (2021). *School’s Choice: How Charter Schools Control Access and Shape Enrollment*. Teachers College Press.

⁶ Chingos, M. M., & Monarrez, T. E. (2020). *Does School Choice Make Segregation Better or Worse?* (p. 24) [Hoover Education Success Initiative]. Hoover Institution, Stanford University.

⁷ Potter, H. (2017). *Do Private School Vouchers Pose a Threat to Integration?* The Century Foundation. <https://tcf.org/content/report/private-school-vouchers-pose-threat-integration/> Elacqua, G. (2012). The impact of school choice and public policy on segregation: Evidence from Chile. *International Journal of Educational Development*, 32(3), 444–453.

Valenzuela, J. P., Bellei, C., & Ríos, D. de los. (2014). Socioeconomic school segregation in a market-oriented educational system. The case of Chile. *Journal of Education Policy*, 29(2), 217–241. Tapia, E. (2024). Understanding school segregation through micro-changes: Evidence from upper secondary education in Stockholm. *Journal of Education Policy*,

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- 39(5), 797–816. Yang Hansen, K., & Gustafsson, J.-E. (2016). Causes of educational segregation in Sweden – school choice or residential segregation. *Educational Research and Evaluation*, 22(1–2), 23–44. Brandén, M., & Bygren, M. (2018). *School Choice and School Segregation: Lessons from Sweden's School Voucher System* (The IAS Working Paper Series No. 1; p. 43). Linköping University, Department of Management and Engineering, The Institute for Analytical Sociology. Gonzalez, J. (2017). Putting social rights at risk: Assessing the impact of education market reforms in Chile. In B. S. Ndimande & C. Lubienski (Eds.), *Privatization and the education of marginalized children: Policies, impacts, and global lessons* (pp. 143–160). Routledge.
- ⁸ Lake, R. J. (2008). In the Eye of the Beholder: Charter Schools and Innovation. *Journal of School Choice*, 2(2), 115–127. Lubienski, C. (2003). Innovation in Education Markets: Theory and Evidence on the Impact of Competition and Choice in Charter Schools. *American Educational Research Journal*, 40(2), 395–443.
- ⁹ Brewer, T. J., & Lubienski, C. (2017). Homeschooling in the United States: Examining the Rationales for Individualizing Education. *Pro-Posições*, 28(2), 21–38. <https://doi.org/10.1590/1980-6248-2016-0040> Lubienski, C., Puckett, T., & Brewer, T. J. (2013). Does Homeschooling Work? An Assessment of the Empirical Evidence. *Peabody Journal of Education*, 88(3), 378–392.
- ¹⁰ Hattie, J. (2018). *Hattie effect size list—256 Influences Related to Achievement*. Visible Learning. <https://visible-learning.org/hattie-ranking-influences-effect-sizes-learning-achievement/>
- ¹¹ EdChoice. (2024). *The 123s of School Choice: What the Research Says about Private School Choice Programs in America, 2024 edition*. EdChoice. <https://www.edchoice.org/wp-content/uploads/2024/06/2024-123s-of-School-Choice.pdf>
- ¹² Lubienski, C. (2023). *NEPC review: The 123s of school choice: What the research says about private school choice programs, 2023 edition*. Boulder, CO: National Education Policy Center. Retrieved [date] from <http://nepc.colorado.edu/review/school-choice>
- ¹³ Lubienski, C., & Canbolat, Y. (2022). Evolving Evidence on School Voucher Effects. (Policy Brief #22-4). Center for Evaluation and Education Policy, Indiana University, Bloomington. <https://education.indiana.edu/ceep/education-policy/policy-briefs/2022/evolving-evidence-on-school-voucher-effects.html>
- ¹⁴ Wolf, P. J. (2019, August 13). *What Happened in the Bayou? Examining the Effects of the Louisiana Scholarship Program*. Education Next. <https://www.educationnext.org/what-happened-bayou-examing-effects-louisiana-scholarship-program/> Figlio, D. N., & Karbownik, K. (2016). *Evaluation of Ohio's EdChoice Scholarship Program: Selection, Competition, and Performance Effects*. Thomas B. Fordham Institute.
- ¹⁵ Cowen, J. (2024). *The Privateers: How Billionaires Created a Culture War and Sold School Vouchers*. Harvard Education Press.
- ¹⁶ Carey, K. (2017, February 23). Dismal Voucher Results Surprise Researchers as DeVos Era Begins. *The New York Times*. <https://www.nytimes.com/2017/02/23/upshot/dismal-results-from-vouchers-surprise-researchers-as-devos-era-begins.html>
- ¹⁷ Lubienski, C. (2023). (Un)Successful Strategies for Implementing School Choice. (Policy Brief #23-1). Center for Evaluation and Education Policy, Indiana University, Bloomington. <https://ceep.indiana.edu/education-policy/policy-briefs/2023/voters-and-vouchers.pdf>
- ¹⁸ Arsen, D. D., & Ni, Y. (2012). Is Administration Leaner in Charter Schools? Resource Allocation in Charter and Traditional Public Schools. *Education Policy Analysis Archives*, 20(0), 31. <https://doi.org/10.14507/epaa.v20n31.2012> Miron, G., & Urschel, J. L. (2010). *Equal or Fair? A Study of Revenues and Expenditures in American Charter Schools*. Education and the Public Interest Center & Education Policy Research Unit. <https://nepc.colorado.edu/sites/default/files/EMO-RevExp.pdf> Buerger, C., & Harris, D. N. (2017). *Does School Reform = Spending Reform? The Effect of the New Orleans School Reforms on the Use and Level of School Expenditures*. Tulane University. <https://educationresearchalliance.org/files/publications/011717-Buerger-Harris-Does-School-Reform-Equal-Spending-Reform.pdf>
- ¹⁹ Fontana, Jason & Jennings, Jennifer L. (n.d.). *The Effect of Taxpayer-Funded Education Savings Accounts on Private School Tuition: Evidence from Iowa*. <https://doi.org/10.26300/7QCB-9056> Schlemmer, L. (2025, June 19). *NC made vouchers open to any family, then many private schools raised tuition*. WHQR. <https://www.whqr.org/2025-06-19/nc-vouchers-opportunity-scholarships-private-schools-raise-tuition>
- ²⁰ Dollard, N., & McKillip, M. (2025). *Florida Continues to Drain Much-Needed Funds Away from Public Schools to Private and Home-School Students*. Florida Policy Institute. <https://www.floridapolicy.org/posts/florida-continues-to-drain-much-needed-funds-away-from-public-schools-to-private-and-home-school-students> EdTrust. (2024). *The Financial Impact of School Vouchers: Lessons from Arizona*. EdTrust. <https://edtrust.org/wp-content/uploads/2024/10/Lessons-From-Arizona-1-Pager-FINAL.pdf> Hager, E. (2024, July 16). *School Vouchers Were Supposed to Save Taxpayer Money. Instead They Blew a Massive Hole in Arizona's Budget*. ProPublica. <https://www.propublica.org/article/arizona-school-vouchers-budget-meltdown>