

Statement on Priorities, Requirements, Definitions, and Selection Criteria: Evidence-Based Literacy, Education Choice, and Returning Education to the States

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Thank you for the opportunity to provide public 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 an associate professor of education policy and leadership. I have conducted research on elected school boards, community and family engagement, school district leadership, school desegregation, and school choice. I am also the parent of two school-aged children enrolled in public schools in Arizona, which is one of the most hyper-competitive education choice states in the nation.

I am writing to express my deep concern regarding the Department of Education's proposed "Education Choice" expansion priorities outlined in ED-2025-OS-0020-0001. This proposal would systematically undermine public education and exacerbate educational inequities.

The Arizona state legislature first established education choice policies in 1994 and expanded them significantly since then. After more than 30 years of these policies, the state has experienced a proliferation of charter schools. The state has also instituted open enrollment—allowing families to enroll their children in schools outside of their residential school district. Arizona also serves as ground zero for the universal Education Savings Account (ESA) policies the Department seeks to expand nationally. The evidence from our state's implementation of education choice policies and priorities serves as a cautionary tale of the harmful consequences of such expansion of education choice.

Since Arizona’s implementation of ESAs in 2022, at least 20 traditional public schools have closed or are scheduled to close. Critically, 75% of schools facing closure are Title I institutions serving low-income students, compared to only 35% district-wide Title I representation.ⁱ

As a parent, I witnessed two of these schools (both Title I schools serving mostly students of color) close in the school district that my child attends. It was heartbreaking to see the impact on families whose children will no longer be able to attend their neighborhood public school. These families pleaded, cried, and fought for their neighborhood public school to remain open. Their choice was their neighborhood public school. Yet, given budget shortfalls due largely to declining enrollments because of school choice policies, the school district could no longer financially support these schools.ⁱⁱ

Although the expansion of education choice policies claims to give more choices to families, these policies stripped the choice from these families who wanted their children to attend their neighborhood public schools. In other words, they were given no choice.

School closures not only narrow families' choices but also fragment communities by eliminating institutions that serve as civic anchors—community centers, voting locations, emergency shelters, and gathering spaces that bind neighborhoods together.

As a researcher, I am co-leading a study examining the impact of ESAs on Arizona school districts. Our preliminary findings from interview data with district leaders in Arizona highlight the extensive challenges that education choice policies have ushered in. In addition to millions of dollars lost due to families leaving (many who return after poor experiences), these policies have forced school districts to invest considerably money and time in marketing to remain competitive. We are also finding that state policies require districts to provide expensive special education evaluations for children who will never actually enroll in public schools

Larger concerns include the fact that ESA participation requires parents to waive federal protections for students with disabilities, English learners, and LGBTQ students, leading to documented instances of state-funded discrimination. Additionally, ESA vouchers are disproportionately used by affluent families in suburban areas, creating a systematic transfer of public funds from low-income and rural communities to wealthier communities.ⁱⁱⁱ This pattern contradicts claims about expanding access for disadvantaged students.

Public schools serve as democratic institutions providing community voice through elected school boards. The proposed priorities systematically undermine local democratic control by redirecting public funds to private entities without community accountability.

My scholarship on governance shifts under open-enrollment policies reveals additional concerns. For example, families who send their children to schools outside of their school district forgo their rights to vote for the school board that represents their children's school. They also have less incentive to vote in favor of bonds and other laws that would support their residential school district.^{iv} This exacerbates the decline of sufficient and adequate support and resources needed for public schools to remain a viable option for families.

Recommendations

1. Withdraw the proposed priorities and redirect federal resources toward evidence-based public-school improvement
2. Invest in addressing root causes of educational challenges rather than abandoning struggling schools
3. Maintain civil rights protections for all students in federally-funded programs

The proposed "Education Choice" expansion would accelerate educational segregation, weaken democratic governance, and harm the students it purports to help. Arizona's experience provides definitive evidence that universal voucher programs benefit wealthy families at the expense of public education systems serving the majority of students.

Rather than expanding failed policies nationally, the Department should recommit to strengthening public education for all students through evidence-based investments and reforms.

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ⁱ Are Universal Vouchers Causing School Closures in Arizona?

<https://www.sosaznetwork.org/2025/are-universal-vouchers-causing-school-closures-in-arizona/>

ⁱⁱ Phoenix Elementary School District votes to close 2 schools, cut dozens of positions

<https://www.azcentral.com/story/news/local/phoenix-education/2025/03/27/phoenix-elementary-school-district-closing-schools/82658045007/>

ⁱⁱⁱ Arizona's 'universal' education savings account program has become a handout to the wealthy
<https://www.brookings.edu/articles/arizonas-universal-education-savings-account-program-has-become-a-handout-to-the-wealthy/>

^{iv} Sampson, Carrie, David R. Garcia, Matthew O. Hom, and Melanie Bertrand. 2022. "Open Enrollment and Disrupting the Political Ecology of U.S. Public Education." *Peabody Journal of Education* 97 (1): 62–73. <https://doi.org/10.1080/0161956X.2022.2026721>.