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Re: U.S. Department of Education; ED-2025-OS-0020-000; Priorities, Requirements, Definitions, and Selection Criteria: Evidence-Based Literacy, Education Choice, and Returning Education to the States.

Dear Secretary McMahon:

Thank you for the opportunity to comment on “Priorities, Requirements, Definitions, and Selection Criteria: Evidence-Based Literacy, Education Choice, and Returning Education to the States.” I am Dr. Kendall Deas, an Assistant Professor of Education Policy, Law, and Politics in the Department of African American Studies with the McCausland College of Arts and Sciences at the University of South Carolina. As a scholar of education policy and law, I have engaged in research regarding best practice models for reading and mathematics instruction at middle school grade levels along with school choice and voucher programs. I have also written about the adverse effects school voucher programs can have on public schools serving Black students most recently “[How School Choice Policies Evolved from Supporting Black Students to Subsidizing Middle-Class Families](#)”.

While I support the use of evidence-based literacy instruction to improve student outcomes, I urge the U.S. Department of Education to approach its expansion with caution as the model’s standardized approach may not meet the needs of all learners. With National Assessment of Educational Progress (NAEP) test results indicating that 4<sup>th</sup> and 8<sup>th</sup> graders in our nation’s schools are lagging far behind in basic reading skills, solid research does show that evidence-based literacy instruction does in fact move the needle regarding student achievement in literacy. The approach to reading instruction does draw upon various studies that have been rigorously reviewed showing that the instructional method has reliably improved students’ reading skills. In fact, improvement can be seen across the board, from increasing students’ understanding of phonics to enhancing their phonemic awareness, fluency, vocabulary and comprehension. Further, this instructional method to improve performance in reading is especially effective when it is utilized by educators teaching students in earlier grades. significantly improve. Moreover, existing studies do reveal that evidence-based literacy is particularly effective at closing achievement gaps in reading for students who struggle with reading or have dyslexia. However, though widely effective based upon the results of existing studies, evidence-based literacy does face limitations in the context of today’s classrooms. It is these limitations that should give the U.S. Department of Education some pause in terms of making it a top priority for expansion.

One significant concern is that evidence-based literacy utilizes a “one-size-fits-all” approach that may not work best for some individual students in classrooms that have unique learning needs or have multilingual backgrounds. These students often require more flexible or personalized approaches which is increasingly the case in our traditional American schools with growing levels of cultural, linguistic, and cognitive diversity within their student populations. When instruction fails to meet these needs, students may fall further behind, experience increased frustration, or disengage from learning altogether.

Moreover, research also shows that the success of this method for reading instruction depends quite heavily on how it is used. For instance, if teachers lack resources, which is often the case today in our nation’s underfunded and underinvested in public schools, or they lack proper training, the teaching approach may be less effective at enhancing student literacy. This can result in inconsistent or superficial implementation, leading to uneven literacy gains and exacerbating existing opportunity gaps. Further, with this instructional approach for reading being so structured and evidence-based, it tends to limit more holistic and exploratory experiences that are needed to address the wide range of students’ learning needs in today’s classrooms. For this learning approach to work, teachers and schools must stay current regarding teaching pedagogies. However, this is a challenge given the limited resources for public schools and increasingly so if school vouchers are made a priority which siphon money away from public school systems. When you consider that many of these public schools exist in areas where there is a low tax base to fund public schools, this further compounds the challenges facing our traditional public schools. I urge the U.S. Department of Education to pair any expansion of evidence-based literacy efforts with meaningful support for equitable implementation. This includes funding for teacher preparation and development, resources for culturally and linguistically responsive instruction, and flexibility for schools to adapt models to meet their students’ specific needs.

There should also be a reassessment by your agency of making education choice (i.e. school choice and school voucher programs) and returning education to the states a top priority. Recently, school choice and voucher programs [have been presented as a viable policy approach](#) to provide children from low-income families with greater access to various options for a quality education. However, over time, as school voucher programs have grown in popularity, [they have evolved into subsidies for middle-class families to send their children to private and parochial schools](#). Further, these [vouchers can redirect money from public schools](#) that often serve Black students. In fact, the impact of voucher programs that siphon money away from public school systems [disproportionately affects schools in predominantly Black communities](#) with lower tax bases to fund public schools

Research from the Economic Policy Institute, a nonpartisan, nonprofit think tank based in Washington, DC shows that voucher programs in Ohio result in majority Black school systems such as Cleveland Metropolitan School District losing millions in education funding. Another example is the Marion County School District, a South Carolina system where about [77% of students are Black](#). Marion County is in the heart of the region of the state known as the “[Corridor of Shame](#)” known for its inadequate funding and its levels of poor student achievement. The 17 counties along the corridor are [predominantly minority communities with high poverty rates](#) and poor public-school funding because of the area’s low tax base due to lack of industry. Further, school voucher programs tend to [exacerbate both racial and economic segregation](#) which is a trend that continues today.

School voucher programs can also [negatively impact the quality of public schools serving Black students](#). For instance, when many of the best and brightest students leave what some would

call “failing” public schools to attend private or parochial ones, public schools in communities serving Black students often experience [declining enrollments and reduced resources](#). For example, in the city of Macon, Georgia, families contend that majority Black schools lack adequate resources because so many families use the state’s voucher-style program to attend predominantly White private schools. Moreover, it should be noted that the cost of attending a private or parochial school can be so expensive for Black families that even with a school voucher they struggle to afford the cost of sending their children to these schools.

Given the evidence, your agency should reconsider making the expansion of school choice and voucher programs a top priority [which take money away from public schools](#) and instead place a focus upon addressing systemic inequalities in education to ensure that all students have access to a quality education. Further, establishing restrictions on the use of funds and requiring preferences for low-income Black students could help direct school voucher policies back toward their original civil rights intent which was to assist Black students in gaining access to a quality education. It would also be beneficial to expand and enforce civil rights laws to prevent discrimination against Black students. These measures would help ensure that all students regardless of background have access to quality education. Finally, I urge your agency to refrain from efforts to move policy efforts to address education issues back to the states. Given the complexity and challenges our nation faces regarding PK-12 education and the variance between states in terms of their capacity financially to address challenges, we need all levels of government working in tandem to solve them.

Sincerely,

A handwritten signature in cursive script that reads "Kendall D. Deas".

Kendall Deas, Ph.D