

The Trouble with Vouchers

Although the voucher debate has heated up in recent years, many of the strongest arguments against vouchers remain unchanged. In fact, evidence from existing voucher programs has strengthened the case against vouchers. This chapter examines a number of respects in which vouchers undermine public education and stand in the way of fulfilling a basic American ideal—providing all children with an excellent education in public schools. Specifically,

- Vouchers undermine public schools by draining public dollars, attention, and commitment from the schools.
- Vouchers do nothing to help the majority of America’s schoolchildren.
- Vouchers virtually eliminate public accountability because private schools operate without public oversight.
- Voucher programs have not raised academic achievement among their students.
- The American public, which must pay for voucher programs, has rejected voucher proposals many times over.
- Vouchers undermine public education’s role as a pillar of American society.

Vouchers Undermine Public Schools

Although the concept of school vouchers has numerous flaws, its central weakness as a public policy is a simple one: Vouchers drain critical dollars from the public schools. Year after year, in proposal after proposal, the public and lawmakers have rejected vouchers because of the negative financial impact vouchers have on public schools. Put simply, a dollar spent on a tuition voucher is a dollar drained from a neighborhood public school. Or, in the case of existing voucher programs, millions of dollars drained from many public schools.

For example, the Milwaukee voucher program, with 11,621 students in the 2002-03 school year, will cost state taxpayers an estimated \$65.6 million, and almost half the money (45 percent) will be diverted from the Milwaukee Public Schools and its 105,000 students.¹ While tens of millions of tax dollars have been flowing each year to private schools, the city’s public schools have faced multi-million-dollar budget shortfalls that have led to program cuts in recent years. But Milwaukee’s public schools are not the only ones to have suffered. During the 2000-01 school year, 237 other school districts lost \$2.7 million in state aid and raised local property taxes to help finance the Milwaukee voucher program.²

The Cleveland voucher program, which enrolled approximately 5,200 students for the 2002-03 school year, drains more than \$11 million a year from the Cleveland Public Schools.³ In Cleveland, it’s Disadvantaged Pupil Impact Aid that takes the hit—state money that is supposed to pay for preschool, all-day kindergarten, smaller class sizes, and reading improvement programs for disadvantaged public school students.

It's a bitter irony, then, that children already attending private schools have benefited more from vouchers than children in public schools: A recent analysis showed that, while 21 percent of students in the program were public school pupils when they applied for a voucher, 33 percent were already attending private schools, and 46 percent were just beginning kindergarten, which means that they, too, might have gone to private school even without a voucher.⁴ How can this be? The Cleveland law permits awarding up to half of its vouchers to students currently attending private school.⁵

Florida's voucher programs were expected to enroll an estimated 8,600 students in the 2002-03 school year. Had they done so, vouchers would have drained approximately \$56 million from the state's public schools.⁶ Meanwhile, public schools, which enroll almost 2.5 million students, were facing budget shortfalls.⁷

In addition to taking money away from public schools, voucher legislation is likely to draw the public's attention and energy away from public education and reduce the commitment to working to improve public schools. Relatively few students will get vouchers, but the fanfare surrounding voucher programs may encourage lawmakers—and the public—to believe they have done their bit for school reform. It can give them an excuse to avoid tackling the difficult challenges that continue to face public education, such as raising student achievement, ending the teacher shortage (particularly in high-need schools and subjects), investing in teacher training, helping school boards build and modernize schools, expanding early childhood education programs, and reducing class size. And although robbing public schools to pay for vouchers is a grave injustice to children who are currently in public schools, to the extent that voucher programs distract the public from the need to continue improving public education, these programs also will compromise the education of all children in public schools in years to come.

Vouchers Do Nothing for Most Children

The landmark education bill passed by Congress in 2002 created a slogan that should be a national creed: "No Child Left Behind." Voucher programs, which leave behind scores of children, including those with the greatest needs, will do nothing to help us live by these words.

The push for private school vouchers ignores two significant figures: 47 million and 90 percent. Forty-seven million is the number of children who attend public schools. They represent roughly nine out of every 10 students in the country. From a practical perspective, any serious effort to improve education must start with the public schools, for that is where the overwhelming majority of students are enrolled and will remain. The Florida program suggests that this would be the case even if voucher schools had enough seats to accommodate every student now in public schools: Better than 90 percent of Florida's parents keep their children in public schools even when they are eligible for vouchers.⁸ Beyond parental

preferences, however, the following key characteristics of voucher programs practically ensure that most children will be left behind.

Voucher schools do the choosing. Although voucher advocates make much of the notion that vouchers will give parents a chance to choose the schools their children attend, it is the private schools that decide whether to accept vouchers, how many students they will admit, and, in some cases, which students they admit.⁹

A public school, as we all know, admits any child from its attendance area if the child comes to the schoolhouse door and requests a seat. It's not that simple with vouchers. Private schools that agree to accept vouchers may limit the number of students they are willing to take. That's up to them. In Cleveland, schools that accept vouchers may use a student's past academic performance in their admissions decisions.¹⁰ In the Milwaukee voucher program, schools that have more applicants than places may hold a lottery to decide which students will be accepted and which ones denied admission.¹¹ This process, if properly conducted, does give all the applicants an equal chance to use a voucher, but it is a far cry from the American ideal, still embodied by the public schools, of a free education open to every student.

Private schools also might take advantage of interviews with prospective applicants to suggest that a child might not “fit in” and that parents should look elsewhere. Moreover, voucher schools are free to push out or refuse to readmit students they'd like to get rid of. In Milwaukee, the state's official evaluation found an annual attrition rate of 33 percent. The students who left—or were asked to leave—voucher schools were the lower-achieving students. The principal of one voucher school admitted that some students simply were shown the door: “By the end of the second year, it was clear they were not working out, and we let a number go.”¹²

Wisconsin State Representative Annette “Polly” Williams, the African-American lawmaker who helped to found the voucher program in Milwaukee, has since been critical of the fact that schools get to select the parents and students, instead of parents selecting the schools.¹³ She also has sharply criticized changes to policies for admitting and readmitting students that were made when religious schools began participating in the Milwaukee voucher program. Those changes make it easier for voucher schools to get rid of students they no longer want.¹⁴

Williams has told reporters that her office frequently gets complaints from parents who say their children—usually African-American males—were forced out for disciplinary reasons. “They find ways of rejecting students. They admit them, then they reject them. They take public dollars, but they don't want to give up their [rules],” Williams told a Florida newspaper.¹⁵

Voucher programs can exclude children with disabilities. The neediest children—particularly those with disabilities—often are disproportionately excluded from voucher schools.¹⁶

Schools in two of the nation's most prominent voucher programs, Milwaukee and Cleveland, do not have to educate children with disabilities, including learning disabilities.¹⁷

Voucher advocates sometimes attempt to obscure this shortcoming. For example, one voucher publication states that “no private school in Milwaukee may exclude any [voucher] eligible student based on specific education needs.”¹⁸ The publication fails to mention the fact that voucher schools do not have to offer services to assist students with special needs if it means making anything more than minor adjustments to their programs.¹⁹ The practical result of this policy is that few, if any, children with disabilities will enroll in such schools.

Some Milwaukee voucher schools are quite open about the fact that they will not accept special-needs children. The Agape Center for Academic Excellence, for example, indicates that it will not consider students who are “hearing disabled unless they can read lips.”²⁰ The Mount Calvary Lutheran School says that it “is unable to serve students who are unable to climb stairs, have severe emotional problems, are mentally disabled, or have other severe learning problems.”²¹ And the St. Bernadette School “cannot serve students who are severely learning disabled or emotionally disabled, or are more than one year below grade level.”²²

As for Cleveland's voucher program, the evidence that it denies equal opportunities for children with disabilities comes both from parents and from voucher advocates themselves. Many parents whose children have withdrawn from the Cleveland program have informed state officials of the program's shortcomings, and several have been specific in pointing out that it “does not provide for special needs students.”²³ One, whose child needs to spend half of each day in regular classes and half in special classes, wrote that she “couldn't find a school that would take him in.”²⁴

The one-time leader of the voucher campaign in Ohio, who was also a former operator of Cleveland voucher schools, made this comment in a memo to Ohio's governor: “Numerous scholarship [voucher] recipients were discouraged from taking their scholarships to private schools with the full knowledge that none of the existing private schools will be able to handle a seriously handicapped child.”²⁵ A state education official was even more blunt, noting that special education students “were actively counseled out of the program.”²⁶

Far from being unique, Cleveland and Milwaukee would probably be the norm if voucher programs were started elsewhere. A U.S. Department of Education survey of private schools in the inner cities of several large metropolitan areas revealed that 68 percent of those schools would “definitely or probably” *not* be willing to participate in a voucher program if they had to accept students with special needs, such as those with learning disabilities, limited English proficiency, or low academic achievement.²⁷ This lack of interest on the part of most private schools means that voucher programs would exclude an overwhelming majority of the nation's neediest students as they simultaneously drained critical resources from the public schools.

Of course, there is nothing illegal about private schools' excluding special-needs students, because private schools are exempt from many anti-discrimination laws. The Americans with Disabilities Act does not apply to private schools. Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination against the handicapped in education, applies only to programs receiving federal funds. And the nation's special education law, the Individuals with Disabilities Education Act (IDEA), places the responsibility of ensuring an adequate education to students with disabilities on *public*, not private, schools.²⁸ When all of these factors are combined, it is no surprise that a recent analysis by the RAND Corp. concluded that students with disabilities are underrepresented in voucher programs.²⁹

Vouchers Virtually Eliminate Public Accountability

Americans take for granted that any program they fund with tax money will be accountable to them. Accountability protects taxpayers from having their hard-earned money spent improperly, and it protects the individuals who use the tax-supported program, too. President Bush made clear where he stood on the subject of public accountability as he promoted the No Child Left Behind Act: "There are people who are afraid of accountability systems, and, therefore, I become suspicious," he said. "If you're afraid to be held accountable, something must be going wrong. That's how I view it."³⁰

President Bush was, of course, talking about public school accountability, but these sentiments should be equally applicable to private schools that accept public money.

But with vouchers, there is no public accountability, because voucher programs channel tax dollars into private schools that need not comply with open-meetings and open-records laws, adhere to state-approved academic standards, or publicly report on students' academic achievement. Thus, taxpayers have no way of discovering how their money is being spent.

Milwaukee voucher schools, for example, face no requirements for teacher certification, curriculum content, student testing, student discipline, enrollment diversity, or compliance with open meetings and open records laws. In Cleveland, voucher schools do not have to meet the state's student testing requirements, and schools with religious affiliations do not even need state accreditation.³¹ And in Florida, there are no regulations governing how voucher schools spend tax dollars or how they handle curriculum, student testing, and specialized services for students with disabilities. Nor do Florida's voucher schools have to employ teachers with state certification or even college degrees.³² It may not be a surprise, then, that Florida has not publicly released the test scores of its voucher students. Despite the fact that the public pays for the voucher program, the state education department has said, "This is not a public-needs-to-know issue."³³

There's an ironic footnote to the story of school accountability in Florida. As previously mentioned, Florida public schools receive grades based on student scores on state tests. If a

public school receives an “F” in two out of four years, students at that school are eligible to receive a voucher and may transfer to another school, either public or private. But the voucher can be used in a *public* school only if the school has received a “C” grade from the state. The rationale is simple: The state wants an official and objective measure of the public school’s quality. This concern about a school’s quality extends only to public schools, however. The state sends tax-funded vouchers to *private* schools without any reference to test scores—and without any official and objective measurement of the schools’ quality.

The lack of oversight and accountability that characterizes the Milwaukee, Cleveland, and Florida voucher programs was also true of the California and Michigan voucher proposals that were defeated in 2000. The California proposal required no audit of voucher school finances, nor would the schools have had to submit financial statements to the state.³⁴ In Michigan, the voucher schools would not have had to make financial or academic records available to the public.³⁵

Sloppiness and scams. The loose regulations and lack of public oversight that characterize voucher programs have contributed to instances in which taxpayers have simply been scammed. Two Milwaukee voucher schools inflated their student enrollment numbers to overcharge taxpayers \$390,000.³⁶ Ohio taxpayers were charged \$3.5 million in taxicab fees to send children to voucher schools, including nearly half a million dollars in erroneous overpayments for students who were absent or not even enrolled in the schools.³⁷

A pair of Cleveland journalists revealed that a city voucher school enrolling 100 students and claiming \$268,000 in taxpayer money was not fit to be called a school. The 110-year-old building had no fire alarm or sprinkler system, and it had broken windows, lead paint flaking off the walls at dangerous levels, and little, if any, heat in the winter. Moreover, two-thirds of the school’s teachers were unlicensed, including one who had been convicted of first-degree murder for a barroom shooting.³⁸

Florida’s voucher programs, although relatively new compared to Cleveland’s and Milwaukee’s, also have had their share of scandals. To give just one example, the state sent \$424,000 in tax money to the W. J. Redmond Christian Academy in Palm Beach County despite a laundry list of problems. For one thing, the state had been given five different mailing addresses for the school, including the school owner’s home, a motel, and an empty church hall. For another, the state was unable to verify the enrollment of a large number of the voucher students, possibly because as many as a third of them had returned to public schools.³⁹ A grocery store clerk even complained to the state that the school’s principal was trying to cash voucher checks. Parents repeatedly told state officials that the school had no textbooks and that all the children, from kindergartners to twelfth-graders, shared a single classroom. Nevertheless, the state continued to mail out the voucher checks. A spokesperson for the state department of education explained the state’s actions with a casual, “We don’t ask for an accounting of how the money was spent.”⁴⁰

President Bush and the American people are quite right to require that public schools be accountable for how they spend taxpayer money, but the public's right to know does not stop there. The same kind of accountability must extend to private schools when they accept public money.

Vouchers Have Not Raised Academic Achievement

For a number of years after Milton Friedman first floated his voucher proposal, supporters—and opponents—could only speculate about the effects, if any, of vouchers on student achievement. However, now that we have results from the voucher programs in Milwaukee and Cleveland and a few small programs elsewhere, we are in a position to see that voucher programs have little effect on student achievement.

In 2001, a U.S. General Accounting Office (GAO) report to Congress confirmed that the official evaluations of the Milwaukee and Cleveland voucher programs have “found little or no difference in voucher and public school students’ performance.” This same GAO review found that some research claiming positive results for vouchers had flaws significant enough to preclude their inclusion in the GAO report.⁴¹

Kim Metcalf, the researcher who prepared the official state study of the Cleveland voucher program, found that students who attended private schools that were established to take advantage of the voucher program scored lower than their public school peers in all academic subjects.⁴² This is particularly significant given the frequent claims that, when vouchers are available, entrepreneurs will be led to create excellent new schools well suited to the needs of the students eligible for vouchers.

(For a more detailed review of the research on voucher programs, see Chapter 4.)

The Public Rejects Vouchers

The public—which would have to pay for voucher programs—has repeatedly and overwhelmingly demonstrated its opposition to school vouchers. Voters have rejected every voucher proposal put before them in the last 30 years. Public opinion polls and ballot initiatives show that the more the public learns about vouchers, the less it likes them.

Seven times since 1970, voters in various states have been asked to approve a school voucher program, and they have soundly rejected every single one. Voters also have rejected “back-door voucher” proposals, defeating every tuition tax credit initiative put before them. (See Appendix 8 for vote totals.)

The most recent initiatives reveal the breadth of the opposition to vouchers. In November 2000, voters in California and Michigan overwhelmingly rejected both of the two main types of vouchers. California's was a universal proposal. Michigan's was targeted initially to students

in failing school districts, although it would have allowed vouchers to be expanded to other communities later on. In California, 71 percent of the voters rejected the voucher proposal. It failed overwhelmingly among all demographic groups: 77 percent of Latinos voted against it, as did 68 percent of African Americans. It lost among Democrats, Independents, and Republicans, in every income and education level and every age group, and among men and women.⁴³ In Michigan, 69 percent of the voters rejected vouchers. The proposal failed in each of Michigan's 83 counties, and voters of every demographic and socioeconomic group rejected it: 78 percent of African Americans voted against it, and so did 62 percent of Catholic voters, despite a strong endorsement and campaign contributions from the state Catholic conference.⁴⁴

It is also notable that voters in Los Angeles and Detroit soundly rejected the voucher initiatives despite campaigns that made much of how helpful vouchers would be to impoverished students "stuck" in the public schools of those cities. On Election Day, 73 percent of Los Angeles County voters rejected the voucher initiative; 82 percent of voters in Detroit did the same.⁴⁵

Elected lawmakers also have overwhelmingly rejected vouchers. In the last decade, 37 state legislatures and the U.S. House and Senate have done so.⁴⁶

Public opinion polls continue to show widespread opposition to vouchers, and pollsters find that the more details people learn about vouchers, the less likely they are to support them. The 2002 edition of the annual Phi Delta Kappa/Gallup Poll of the Public's Attitudes Toward the Public Schools found that 52 percent of Americans oppose vouchers. Two national polls, one by the Associated Press, conducted after the U.S. Supreme Court decision on the Cleveland program in June 2002, found that people opposed vouchers by a 2-to-1 margin when they learned that vouchers take money away from public schools.⁴⁷

An ABCNEWS.com poll in July 2002 measured opinion for a targeted voucher program and found that 68 percent of those polled opposed vouchers for low-income families if it meant a cut in public school funds. This mirrored the findings of an October 2000 poll by ABC-NEWS and *The Washington Post*, which found that 70 percent of Americans opposed vouchers if instituting them meant that public schools would lose money.⁴⁸

What about people in states that have voucher programs? They are likely to be familiar with vouchers as a reality rather than just a concept. In fact, they also oppose vouchers. In Florida, 53 percent of voters oppose the state's voucher program, according to a *St. Petersburg Times/Miami Herald* 2002 poll.⁴⁹ Likewise, a 2000 poll by the *Milwaukee Journal Sentinel* and the Public Policy Forum found that 60 percent of Wisconsin residents oppose tax-funded vouchers for low-income families, while just 34 percent support them.⁵⁰ (See also the findings of the NSBA/Zogby International opinion poll in Appendix 1.)

Vouchers Undermine the Role of Public Education

Often lost in the debate over vouchers is the important issue of public education's unique and critical role in the success of the United States as a nation. Simply stated, our economic success, our democracy, and our very culture rest solidly on a system of public schools that have been available to all. The fact that the United States has been the democratic and economic leader of the world is perhaps the strongest testament to the success of our public schools—particularly since 90 percent of the nation's students are educated in those schools.

Furthering individual opportunity. The “common” or public school emerged as the hallmark of American education in the nineteenth century. Horace Mann, who championed the public school as the first state superintendent of Massachusetts, envisioned a system of schools that would be open to all people. His conception took root. Supported by public funds, overseen by state authorities, and open to every child, the common school has become the birthright of every American child.⁵¹

To ensure that every child can take advantage of this birthright, the nation has a system of public schools funded by tax dollars, and no student can be denied admission on the basis of academic ability, income, race, religion, gender, disability, knowledge of English, or other special need. In addition, state laws and court decisions call for adequacy and equity in educational opportunity in public education, though such goals continue to be a work-in-progress in many locations. Private schools, on the other hand, do not accept all students, and they are not tuition-free.

Promoting democracy and common culture. Public education defines and advances our nation's goals of equity, fairness, and opportunity for all. Public schools strive to ensure that all schoolchildren are prepared for the workplace and that the common values and principles of citizenship needed for a unified nation are taught to all students. While public schools guarantee that the nation's common values are taught, sectarian schools, whose goal is to promote their own beliefs, can make no similar guarantee. Nor can other private schools, which often are devoted to the interests and principles of a particular socioeconomic or ethnic group.

In advancing these democratic goals, public schools clearly belong to the people. The rights of parents, taxpayers, and the public at large to guide public schools are guaranteed through the ballot box, representative school boards, community involvement in public schools, and public accountability.

Among the many shared values taught in public schools is an appreciation of the importance of civil rights. Public schools do not just teach about these rights; they expose students to their application on a personal level so that students learn to exercise, respect, and value them responsibly. But merely teaching about constitutional rights and the protection they afford is not enough. Students need a chance to participate in the application of those rights in

institutions that actually extend to them such rights as freedom of religion and expression, equal protection, and due process. Voucher programs, in contrast, take the curious position that the best way to further the values behind public education is to send students to institutions that need not guarantee these basic rights.

America's common schools were developed to provide the education necessary for the citizens of a healthy democracy. As the nation's founding fathers recognized, education and effective self-government go hand in hand. In his Farewell Address, President George Washington exhorted the country to "Promote, then, as an object of primary importance, institutions for the general diffusion of knowledge. In proportion as the structure of a government gives force to public opinion, it is essential that public opinion be enlightened."⁵²

Thomas Jefferson, likewise, recognized the importance of public and publicly funded education: "I think by far the most important bill in our whole code is that for the diffusion of knowledge among the people. No other sure foundation can be devised for the preservation of freedom and happiness."⁵³

Note: For periodic updates to "The Trouble with Vouchers," please visit NSBA's Voucher Strategy Center Web site at www.nsba.org/novouchers and look under NSBA Voucher Reports.

Endnotes

- ¹ “MPCP Facts and Figures for 2002-03, Wisconsin Department of Public Instruction; Milwaukee Public Schools Web site.
- ² “Funding for the Milwaukee Parental Choice Program,” Wisconsin Legislative Fiscal Bureau, May 2001.
- ³ Ohio State Board of Education, “Budget and Policy Recommendations,” School Choice summary, FY 2003-04.
- ⁴ “Cleveland School Vouchers: Where the Students Come From,” Policy Matters Ohio, 2001.
- ⁵ *Ibid.*
- ⁶ “Disabled are Top Voucher Users,” *St. Petersburg Times*, Sept. 13, 2002.
- ⁷ “Fewer Students Equals Budget Shortfall,” *St. Petersburg Times*, Dec. 31, 2002.
- ⁸ “Disabled are Top Voucher Users,” *St. Petersburg Times*, Sept. 13, 2002.
- ⁹ “Obstacle Course,” *Education Week*, June 9, 1999.
- ¹⁰ *Ibid.*
- ¹¹ “Publicly Funded School Choice Options in Milwaukee,” Public Policy Forum, June 2000.
- ¹² John F. Witte, *The Market Approach to Education: An Analysis of America’s First Voucher Program*, 2000.
- ¹³ “Voucher Plan’s Creator Says it Has Become a Monster,” *Florida Times-Union*, March 21, 1999.
- ¹⁴ “Publicly Funded School Choice Options in Milwaukee,” Public Policy Forum, June 2000.
- ¹⁵ “Questions Linger Over Vouchers,” [South Florida] *Sun-Sentinel*, May 9, 1999.
- ¹⁶ *Rhetoric Versus Reality: What We Know and What We Need to Know About Vouchers and Charter Schools*, RAND Education, 2001; “Study Finds Skimpy Evidence on Vouchers,” *USA Today*, Dec. 6, 2001.
- ¹⁷ John F. Witte, *The Market Approach to Education: An Analysis of America’s First Voucher Program*, 2000; R. Kenneth Godwin & Frank R. Kemerer, *School Choice Tradeoffs: Liberty, Equity and Diversity*, University of Texas Press, 2002.
- ¹⁸ “Lies and Distortions: The Campaign Against School Vouchers,” Marquette University, Institute for the Transformation of Learning, April 2001.
- ¹⁹ “Milwaukee Parental Choice Program: Frequently Asked Questions,” Wisconsin Department of Public Instruction Web site, accessed Aug. 28, 2001.
- ²⁰ Empowering Parents for Informed Choices in Education Web site, University of Wisconsin—Milwaukee Center for Urban Initiatives and Research (<http://epic.cuir.uwm.edu>).
- ²¹ *Ibid.*
- ²² *Ibid.*
- ²³ Exit Interview Surveys, Cleveland Scholarship and Tutoring Program, received by NSBA, June 26, 2001.
- ²⁴ *Ibid.*
- ²⁵ “Voucher Plan Leaves Long List of Broken Vows,” *Akron Beacon-Journal*, Dec. 14, 1999.
- ²⁶ “Whose Choice?” series, *Akron Beacon-Journal*, Dec. 13-15, 1999.

- ²⁷ “Barriers, Benefits and Costs of Using Private Schools to Alleviate Overcrowding in Public Schools,” U.S. Department of Education, 1998.
- ²⁸ See 42 U.S.C. § 12113; See 19 U.S.C. § 794; See 20 U.S.C. § 1414.
- ²⁹ “Study Finds Skimpy Evidence on Vouchers,” *USA Today*, Dec. 6, 2001.
- ³⁰ “Bush Pushes Education Accountability,” United Press International, May 6, 2002.
- ³¹ Godwin & Kemerer, 2002; Ohio Rev. Code Ann. §3313.976(A)(3).
- ³² “Disabled Voucher Program,” *St. Petersburg Times*, March 24, 2002.
- ³³ “State Refuses to Release School Vouchers Test Scores,” Associated Press, June 8, 2000.
- ³⁴ “Are Vouchers the Way to Improve California’s Schools?” California Budget Project, Aug. 2000.
- ³⁵ “Other Voices: Vouchers — Good for Kids?” *Detroit Free Press*, Oct. 31, 2000; “Frequently Asked Questions,” campaign literature distributed by the All Kids First Campaign, 2000.
- ³⁶ “Reality Check on School Vouchers,” *Dayton Daily News*, March 18, 1996.
- ³⁷ Cleveland Scholarship and Tutoring Program Special Audit Report, State of Ohio, 1998.
- ³⁸ “Murderer on Staff of State-Funded Private School,” (Cleveland) *Plain Dealer*, July 1, 1999.
- ³⁹ “Control Limited in State Voucher Program,” (South Florida) *Sun-Sentinel*, Oct. 14, 2001.
- ⁴⁰ *Ibid.*
- ⁴¹ “School Vouchers: Publicly Funded Programs in Cleveland and Milwaukee,” U.S. General Accounting Office, 2001.
- ⁴² Kim Metcalf, “A Comparative Evaluation of the Cleveland Scholarship and Tutoring Program,” Indiana Center for Evaluation, 1998.
- ⁴³ Exit Polls for California, CNN.com, Nov. 7, 2000.
- ⁴⁴ “The Voucher Vote,” *Palm Beach Post*, Nov. 13, 2000; “Michigan Election Results 2000,” Michigan Department of State.
- ⁴⁵ *Los Angeles Times* exit polling, November 2000; CBS exit polling, November 2000.
- ⁴⁶ “School Choice 2000: What’s Happening in the States,” Heritage Foundation; NSBA, Voucher Strategy Center Web site (www.nsba.org/novouchers).
- ⁴⁷ “Vouchers Poll Method,” Associated Press, Aug. 7, 2002.
- ⁴⁸ “Public Balks if Vouchers Cut Public School,” ABCNEWS.com, July 16, 2002.
- ⁴⁹ “Bush Remains State’s Top Pick,” *St. Petersburg Times*, April 1, 2002.
- ⁵⁰ “Taking the State Political Pulse,” Public Policy Forum/*Milwaukee Journal Sentinel*, March 2000.
- ⁵¹ See generally *Education Law* § 1.01[3][c], James A. Rapp, 2001; Lawrence A. Cremin, *The American Common School: An Historic Conception*, Teachers College Press, 1951; also *Illinois ex rel. McCollum v Board of Educ.*, 333 U.S. 203, 1948.
- ⁵² George Washington, *Writings*, John Rhodehamel ed., 1997.
- ⁵³ *The Papers of Thomas Jefferson*, Julian P. Boyd, ed., 1954.