

IN THE SUPREME COURT OF THE STATE OF IDAHO

Docket No. 53264-2025

COMMITTEE TO PROTECT AND PRESERVE THE IDAHO CONSTITUTION, INC.;
MORMON WOMEN FOR ETHICAL GOVERNMENT; SCHOOL DISTRICT NO. 281,
LATAH COUNTY, STATE OF IDAHO; IDAHO EDUCATION ASSOCIATION, INC.;
JERRY EVANS; MARTA HERNANDEZ; STEPHANIE MICKELSEN; ALEXIS MORGAN,
on behalf of herself and her minor children; KRISTINE ANDERSON, on behalf of herself and
her minor children; each of the foregoing individually and as private attorneys general on behalf
of the public of the State of Idaho,

Petitioners,

v.

STATE OF IDAHO, acting by and through the IDAHO STATE TAX COMMISSION,

Respondent

and

IDAHO STATE LEGISLATURE,

Intervenor/Respondent

**MOTION OF DR. PATRICK J. WOLF FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF
IN SUPPORT OF RESPONDENT**

Marvin M. Smith, ISB No. 2236
Marvin K. Smith, ISB No. 6978
Craig L. Meadows, ISB No. 1081
Brandon Helgeson, ISB No. 11615
Jean Schroeder, ISB No. 12205
HAWLEY TROXELL ENNIS & HAWLEY
LLP
2010 Jennie Lee Drive
Idaho Falls, ID 83404
877 W. Main St.
Boise, ID 83701-1617
Telephone: 208-529-3005
Facsimile: 208-529-3065
Email: mmsmith@hawleytroxell.com
mksmith@hawleytroxell.com
cmeadows@hawleytroxell.com
bhelgeson@hawleytroxell.com

Edward W. Dindinger, ISB No. 10144
RUNFT DINDINGER KOHLER, PLLC
1161 W. River St., Ste. 100
Boise, ID 83702
PO Box 6534
Boise, ID 83707
Telephone: 208-616-5459
Email: service@rdkboise.com

*Attorney for Proposed Amicus Curiae Dr.
Patrick J. Wolf in Support of Respondent*

Raúl R. Labrador
Attorney General
Alan M. Hurst, ISB No. 12425
James E.M. Craig, ISB No. 6365
Michael A. Zarian, ISB No. 12418

jschroeder@hawleytroxell.com
Attorneys for Petitioners

Sean M. Corkery, ISB No. 12350
OFFICE OF THE ATTORNEY GENERAL
PO Box 83720
Boise, ID 83720-0010
Telephone: 208-334-2400
Email: alan.hurst@ag.idaho.gov

Attorneys for Respondent State of Idaho

Jeremy C. Chou, ISB No. 5680
Morgan D. Goodin, ISB No. 11184
GIVENS PURSLEY LLP
601 W. Bannock St.
PO Box 2720
Boise, ID 83701-2720
Telephone: 208-388-1238
Email: jcc@givenspursley.com
morgangoodin@givenspursley.com

*Attorneys for Intervenor-Respondent Idaho
State Legislature*

Jason R. Mau, ISB No. 8440
PARSONS BEHLE & LATIMER
800 W. Main St., Ste. 1300
Boise, ID 83702
Telephone: 208-562-4900
Email: jmau@parsonsbehle.com

Thomas M. Fisher, *pro hac vice*
Bryan Cleveland, *pro hac vice*
EDCHOICE LEGAL ADVOCATES
111 Monument Circle, Ste. 2650
Indianapolis, IN 46204
Telephone: 317-681-0745
Email: tfisher@edchoice.org
bcleveland@edchoice.org

Renée Flaherty, *pro hac vice*
INSTITUTE FOR JUSTICE
901 N. Glebe Rd., Ste. 900
Arlington, VA 22203
Telephone: 703-682-9320
Email: rflaherty@ij.org

Attorneys for Amici Curiae Parent Petitioners

Dr. Patrick J. Wolf (“Dr. Wolf”), pursuant to Idaho Appellate Rule 8(b), respectfully requests leave to file his *Brief* as *amicus curiae* in support of Respondent State of Idaho, by and through the Idaho Tax Commission. Dr. Wolf only seeks leave to file his *Brief*; he does not seek to participate in oral argument in this matter.

Dr. Wolf’s proposed *Brief* is attached hereto. As a nationally recognized expert on school choice programs and empirical research regarding the same, Dr. Wolf has a specific and unique interest in this matter which is not fully represented by the parties or other *amici*. Dr. Wolf believes that his information and perspective will be helpful to this Court in considering the claims presented.

In addition to being a Distinguished Professor of Education Policy, he is also the 21st Century Endowed Chair in School Choice in the Department of Education Reform at the University of Arkansas. Further, Dr. Wolf directs the School Choice Demonstration Project, which produces research on and evaluations of various school choice programs throughout the United States. As a scholar who has specifically analyzed the efficacy of current public educational services provided to students with disabilities and how access to other options can benefit those student populations, Dr. Wolf has a unique interest in promoting and preserving such access through programs like the Idaho Parental Choice Tax Credit. Dr. Wolf’s brief details that specific interest and explains why the educational needs of many students with disabilities are currently underserved and how school choice programs can empower parents, students, and families with options to best serve those needs.

For the foregoing reasons, Dr. Wolf respectfully requests this Court grant him leave to file his *Brief*.

DATED this 10th day of November, 2025.

RUNFT DINDINGER KOHLER, PLLC

By: /s/ Edward W. Dindinger

Edward William Dindinger, Esq.

Attorney for Proposed Amicus Curiae Dr. Patrick J. Wolf

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November, 2025, a true and correct copy of the foregoing was served upon:

Marvin M. Smith
Marvin K. Smith
Craig L. Meadows
Brandon Helgeson
Jean Schroeder
HAWLEY TROXELL ENNIS & HAWLEY LLP
2010 Jennie Lee Drive
Idaho Falls, ID 83404
877 W. Main St.
Boise, ID 83701-1617
Attorneys for Petitioners

By iCourt: mmsmith@hawleytroxell.com
mksmith@hawleytroxell.com
cmeadows@hawleytroxell.com
bhelgeson@hawleytroxell.com
jschroeder@hawleytroxell.com

Raúl R. Labrador
Attorney General
Alan M. Hurst
James E.M. Craig
Michael A. Zarian
Sean M. Corkery
OFFICE OF THE ATTORNEY GENERAL
PO Box 83720
Boise, ID 83720-0010
Attorneys for Respondent State of Idaho

By iCourt: alan.hurst@ag.idaho.gov

Jeremy C. Chou
Morgan D. Goodin
GIVENS PURSLEY LLP
601 W. Bannock St.
PO Box 2720
Boise, ID 83701-2720
Attorneys for Intervenor-Respondent Idaho State Legislature

By iCourt: jcc@givenspursley.com
morgangoodin@givenspursley.com

Jason R. Mau
PARSONS BEHLE & LATIMER
800 W. Main St., Ste. 1300
Boise, ID 83702
Thomas M. Fisher, *pro hac vice*
Bryan Cleveland, *pro hac vice*
EDCHOICE LEGAL ADVOCATES
111 Monument Circle, Ste. 2650
Indianapolis, IN 46204
Renée Flaherty, *pro hac vice*
INSTITUTE FOR JUSTICE
901 N. Glebe Rd., Ste. 900
Arlington, VA 22203
Attorneys for Amici Curiae Parent Petitioners

By iCourt: jmau@parsonsbehle.com

By iCourt: tfisher@edchoice.org
bcleveland@edchoice.org

By iCourt: rflaherty@ij.org

RUNFT DINDINGER KOHLER, PLLC

By: /s/ Edward W. Dindinger
Edward William Dindinger, Esq.
Attorney for Proposed Amicus Curiae Dr. Patrick J. Wolf

ATTACHMENT

Proposed Brief of Dr. Patrick J. Wolf as Proposed Amicus Curiae in Support of Respondent

IN THE SUPREME COURT OF THE STATE OF IDAHO

Docket No. 53264-2025

COMMITTEE TO PROTECT AND PRESERVE THE IDAHO CONSTITUTION, INC.;
MORMON WOMEN FOR ETHICAL GOVERNMENT; SCHOOL DISTRICT NO. 281,
LATAH COUNTY, STATE OF IDAHO; IDAHO EDUCATION ASSOCIATION, INC.;
JERRY EVANS; MARTA HERNANDEZ; STEPHANIE MICKELSEN; ALEXIS MORGAN,
on behalf of herself and her minor children; KRISTINE ANDERSON, on behalf of herself and
her minor children; each of the foregoing individually and as private attorneys general on behalf
of the public of the State of Idaho,

Petitioners,

v.

STATE OF IDAHO, acting by and through the IDAHO STATE TAX COMMISSION,

Respondent

and

IDAHO STATE LEGISLATURE,

Intervenor/Respondent

**BRIEF OF DR. PATRICK J. WOLF AS PROPOSED *AMICUS CURIAE* IN SUPPORT
OF RESPONDENT**

Marvin M. Smith, ISB No. 2236
Marvin K. Smith, ISB No. 6978
Craig L. Meadows, ISB No. 1081
Brandon Helgeson, ISB No. 11615
Jean Schroeder, ISB No. 12205
HAWLEY TROXELL ENNIS & HAWLEY
LLP
2010 Jennie Lee Drive
Idaho Falls, ID 83404
877 W. Main St.
Boise, ID 83701-1617
Telephone: 208-529-3005
Facsimile: 208-529-3065
Email: mmsmith@hawleytroxell.com
mksmith@hawleytroxell.com
cmeadows@hawleytroxell.com
bhelgeson@hawleytroxell.com

Edward W. Dindinger, ISB No. 10144
RUNFT DINDINGER KOHLER, PLLC
1161 W. River St., Ste. 100
Boise, ID 83702
PO Box 6534
Boise, ID 83707
Telephone: 208-616-5459
Email: service@rdkboise.com

*Attorney for Proposed Amicus Curiae Dr.
Patrick J. Wolf in Support of Respondent*

Raúl R. Labrador
Attorney General
Alan M. Hurst, ISB No. 12425
James E.M. Craig, ISB No. 6365
Michael A. Zarian, ISB No. 12418

jschroeder@hawleytroxell.com
Attorneys for Petitioners

Sean M. Corkery, ISB No. 12350
OFFICE OF THE ATTORNEY GENERAL
PO Box 83720
Boise, ID 83720-0010
Telephone: 208-334-2400
Email: alan.hurst@ag.idaho.gov

Attorneys for Respondent State of Idaho

Jeremy C. Chou, ISB No. 5680
Morgan D. Goodin, ISB No. 11184
GIVENS PURSLEY LLP
601 W. Bannock St.
PO Box 2720
Boise, ID 83701-2720
Telephone: 208-388-1238
Email: jcc@givenspursley.com
morgangoodin@givenspursley.com

*Attorneys for Intervenor-Respondent Idaho
State Legislature*

Jason R. Mau, ISB No. 8440
PARSONS BEHLE & LATIMER
800 W. Main St., Ste. 1300
Boise, ID 83702
Telephone: 208-562-4900
Email: jmau@parsonsbehle.com

Thomas M. Fisher, *pro hac vice*
Bryan Cleveland, *pro hac vice*
EDCHOICE LEGAL ADVOCATES
111 Monument Circle, Ste. 2650
Indianapolis, IN 46204
Telephone: 317-681-0745
Email: tfisher@edchoice.org
bcleveland@edchoice.org

Renée Flaherty, *pro hac vice*
INSTITUTE FOR JUSTICE
901 N. Glebe Rd., Ste. 900
Arlington, VA 22203
Telephone: 703-682-9320
Email: rflaherty@ij.org

Attorneys for Amici Curiae Parent Petitioners

TABLE OF CONTENTS

<u>TABLE OF LEGAL AUTHORITIES</u>	ii
<u>INTRODUCTION</u>	1
<u>INTEREST OF PROPOSED AMICUS CURIAE</u>	2
<u>I.A.R. 8(c)(4) STATEMENT</u>	3
<u>ARGUMENT</u>	3
I. <u>NOT ALL STUDENTS WITH DISABILITIES ARE ADEQUATELY SERVED BY IDAHO’S PUBLIC EDUCATION SYSTEM</u>	3
II. <u>PRIVATE SCHOOL CHOICE PROGRAMS SUCH AS THE IDAHO PARENTAL CHOICE TAX CREDIT HAVE ENHANCED AND CONTINUE TO ENHANCE EDUCATIONAL OPPORTUNITIES AND OUTCOMES FOR STUDENTS WITH DISABILITIES</u>	10
<u>CONCLUSION</u>	14

TABLE OF LEGAL AUTHORITIES

Constitutional Provisions:

Idaho Constitution, Art. IX, § 1.....	11
---------------------------------------	----

Statutes:

Idaho Code § 63-3029N.....	1
Idaho Code § 67-1230.....	1
20 United States Code § 1400.....	3

Regulations:

34 Code of Federal Regulations § 300.307.....	5
34 Code of Federal Regulations § 300.309.....	4, 5

Rules:

Idaho Appellate Rule 8.....	2, 3
-----------------------------	------

Other:

Idaho House Bill 93 (2025).....	1
---------------------------------	---

INTRODUCTION

The Idaho State Legislature enacted House Bill 93 (“HB 93”)¹ to empower parents to choose educational services which will best serve the unique educational needs of their children. HB 93 implements a refundable tax credit (“Idaho Parental Choice Tax Credit”) that parents who are dissatisfied with the services provided in the public school can use toward qualified private educational expenses, such as tuition and fees. The program is open to all students, including those with disabilities, who incur such expenses, apply, and qualify.

The *Verified Petition for Writ of Prohibition* (“*Petition*”), and the *Declarations* of Petitioners in support, paint a grim picture of what they believe HB 93’s effect on students, and particularly those students with disabilities, will be. In so doing, Petitioners recite that the services students with disabilities receive in Idaho’s public schools are “legally guaranteed” to them, and that those students supposedly benefit from “oversight” of those programs (despite the lack of any explanation in Petitioners’ filings regarding the actual mechanisms, let alone effectiveness, of such oversight). Petitioners omit any mention whatsoever of the widespread and systemic problems plaguing Idaho public schools’ provision of educational services to students with disabilities. As will be shown below, these problems are not only pervasive, but well-known within Idaho’s education community.

Different students learn differently, and benefit from different educational environments. HB 93 merely provides a support for parents who care about their children’s education and want to be in a position to consider all options. As a nationally recognized education expert who specializes in research on school choice, Dr. Patrick J. Wolf has seen such programs produce

¹ Codified as Idaho Code §§ 63-3029N and 67-1230.

empirically superior outcomes, especially for students with disabilities, in other states, and he respectfully submits his *Brief* as proposed *amicus curiae* to this honorable Court as follows:

INTEREST OF PROPOSED *AMICUS CURIAE* PATRICK J. WOLF

Dr. Patrick J. Wolf (hereinafter also referred to as “Dr. Wolf”) is a Distinguished Professor of Education Policy and the 21st Century Endowed Chair in School Choice in the Department of Education Reform at the University of Arkansas. He has dedicated his career to the rigorous, empirical, and comparative study of public and private school choice programs, including their service to students with disabilities and effects on schools and civic outcomes. At the University of Arkansas, Dr. Wolf directs a research initiative which he founded in 2003 called the School Choice Demonstration Project (“SCDP”). The SCDP produces non-partisan, scholarly evaluations of private school choice programs and public charter schools across the United States. Dr. Wolf’s *curriculum vitae* is appended hereto as Exhibit A.

Dr. Wolf has a particular interest in educational options for students with disabilities. His research demonstrates that school choice programs consistently lead to higher rates of high school graduation and college enrollment for participating students while increasing parent satisfaction. As such, Dr. Wolf is uniquely positioned to provide this Court with his academic, evidence-based perspective regarding the conclusory assertions advanced by the Petitioners here, specifically with respect to how effectively the current federal and state public educational frameworks actually serve students with disabilities, and whether programs such as the Idaho Parental Choice Tax Credit tend to disadvantage or, in fact, benefit educational outcomes for students with disabilities.

Pursuant to his *Motion* submitted herewith, Dr. Wolf seeks leave of the Court to file this *Brief* as an *amicus curiae* under Idaho Appellate Rule 8.

I.A.R. 8(c)(4) STATEMENT

Undersigned counsel, in consultation with Dr. Wolf, authored this *Brief* in whole. No party or counsel for a party has contributed money which was intended to fund preparing or submitting this *Brief*. The Educational Promise Foundation contributed money which was intended to fund preparing and submitting this *Brief*.

ARGUMENT

I. Not All Students with Disabilities Are Adequately Served by Idaho's Public Education System.

The Petitioners complain that private schools “may refuse to admit a child with disabilities.” *Petitioner's Brief in Support of Verified Petition for Writ of Prohibition* (“*Petitioner's Brief*”), pg. 5. “...private schools can discriminate in admissions based on...disability status.” *Id.*, pg. 28. “Private schools typically do not accept children...with development or speech disabilities and even where admission may be possible, essential therapies, resources and legal safeguards are unavailable.” *Petition*, pg. 11. Notably, while Petitioners observe that public schools are “legally required to provide” “adequate specialized support” to all children (*Petition*, pg. 11), they do not even assert that Idaho's public schools currently meet the bare minimum legal requirement of “adequate” specialized support. The fact of the matter is that Idaho's public schools do not adequately serve all students with disabilities.

As an initial matter, it is not clear that Idaho's public schools are fulfilling their legal obligation, pursuant to the federal Individuals with Disabilities Education Act, 20 U.S.C. § 1400 *et seq.* (“IDEA”), to even *identify* students with disabilities (this is also known as the “Child Find” requirement). An April 2019 United States Government Accountability Office Report entitled “Special Education – Varied State Criteria May Contribute to Differences in Percentages of

Children Served” states that, “IDEA requires states to have policies and procedures to ensure that school districts identify, locate, and evaluate all children suspected of having a disability who need education and related services, regardless of the severity of their disability...” Exhibit B, pg. 9. However, “states have some flexibility to determine their own processes for identifying and evaluating children...,” with the result being that “a child eligible for IDEA services in one state might be ineligible in another.” *Id.* Indeed, the Report reflects that the percentage of the Idaho population receiving IDEA services is lower than the national average across all age groups. *Id.*, pg. 8, fig. 3. This fact indicates that there is a significant population of Idaho students with disabilities who have not been identified as such and are not receiving the services public schools are legally required to provide under federal law.

Further, the United States Department of Education (“DoE”) has confirmed that Idaho’s state laws and regulations regarding diagnosing students with one or more Specific Learning Disabilities (“SLDs”), its age restrictions regarding students’ eligibility to receive special education services for an SLD, and its Child Find procedures are all noncompliant with IDEA. On October 20, 2023, the DoE’s Office of Special Education Programs (OSEP) sent a letter to Idaho Superintendent of Public Instruction Debbie Critchfield outlining these deficiencies. “OSEP is concerned that requiring all three conditions [set forth in the 2018 Idaho Special Education Manual] to be met, as described above, could be inconsistent with IDEA and impermissibly narrow IDEA’s eligibility criteria for SLD found at 34 C.F.R. § 300.309.” Exhibit C, pg. 4.

For instance, OSEP took issue with Idaho’s criteria for determining whether a disability exists:

Under the state’s criteria for SLD, it is unclear to OSEP what evaluative data the group [responsible for making the eligibility determination] must obtain and review to determine whether the child demonstrates a pattern of strengths and weaknesses in psychological processing skills that impact learning. If the purpose of that

requirement is to meet the condition in 34 C.F.R. § 300.309(a)(2)(ii), it would be inconsistent with IDEA's eligibility provisions to impose this additional criterion as the State's eligibility criterion would be more narrow or strict than the criterion described under 34 C.F.R. § 300.309 and would not meet the standard for criteria to determine whether a child has an SLD described in 34 C.F.R. § 300.307(a).

Id.

Further, and contrary to the express purpose of Child Find (identifying, locating, and evaluating children with disabilities), Idaho's criteria completely and impermissibly excludes the youngest students who may have disabilities, but have not already been identified as having those disabilities, from being identified, located, and evaluated:

Regarding the State's definition of "school age," OSEP has determined that the State's definition is inconsistent with the IDEA Part B child find provisions in 34 C.F.R. § 300.111 because the definition would only include preschool-age children that have already been identified as children with disabilities "who qualify for special education and related services." The State's definition of "school age" does not include children who are also suspected of having a disability. Children, including preschool-age children, that are not yet considered "children with disabilities who qualify for special education and related services under the federal IDEA" would be excluded from being evaluated as a child with an SLD under the current State definition.

Id., pg. 5.

While Petitioners tout what they deem to be the "adequate oversight and guaranteed inclusive services" (*Declaration of Kathleen Ross*, ¶ 4) of Idaho's public school disability programs, the federal government itself has recognized that even the direct federal oversight exemplified by OSEP's letter to Superintendent Critchfield fails to ensure that students with disabilities actually receive these services. On February 7, 2018, the National Council on Disability (an independent federal agency) transmitted to President Donald J. Trump its report entitled "Federal Monitoring and Enforcement of IDEA Compliance." The Executive Summary of the report states that, "NCD found the current system of monitoring and enforcement, while moving toward a more balanced approach of compliance and results, **often fails to address**

noncompliance in a timely and effective manner, and utilize all of the options available to address issues” [emphasis added]. Exhibit D, pg. 9. The NCD report also notes that, as of 2017, OSEP determined that only half of the states were meeting IDEA’s requirements. *Id.*, pg. 24. Further, though it is authorized to do so when dealing with states that are not fully compliant with IDEA obligations, OSEP has not made any referrals to the Department of Justice for enforcement. *Id.*, pg. 27. OSEP does not even “provide a formal process through which to file a complaint regarding alleged violations of IDEA. While OSEP receives phone calls and written communications of complaints, how it handles these complaints is not directed by any formal process...This lack of a formal complaint process should be further investigated.” *Id.*, pg. 28.

Parents of Idaho students with disabilities are increasingly aware that Idaho public schools are not in compliance with federal law and are not meeting the needs of their children. A July 30, 2025 article written in collaboration between the Idaho Statesman and ProPublica noted that, “Parents of students with disabilities have increasingly resorted to filing complaints with the state over their schools’ failure to educate their children, alleging districts are violating federal law. Most of the time, state investigators have agreed and found that districts refuse to identify and evaluate children with disabilities...and fail to follow plans to educate them fairly.” ProPublica, *Idaho Schools Consistently Break Disability Laws. Parents Say They’re Not Doing Enough to Fix the Problem*, <https://www.propublica.org/article/idaho-special-education-disabilities-complaints> (July 30, 2025). “Idaho was among the states with **the most founded complaints per capita** in recent years, according to national center that analyzes data on complaints and provides support to states. Over the past five years, investigators found in over 70% of the complaints filed in Idaho that districts had broken the law” [emphasis added]. *Id.*

Sadly, Idaho's oversight over public school disability programs appears to be no more effective than that of OSEP. "...the state often closes cases without making sure the districts have fully solved the problems, parents across Idaho told the Statesman and ProPublica. Districts can resolve the violations without 'really changing their ways,' said Amy Martz, a Utah-based attorney who has worked with families in Idaho. 'There's no teeth.'" *Id.* "Parents of students with disabilities are increasingly having similar issues [with public school districts not complying with their obligations toward students with disabilities under federal law], and frustrations are mounting. Last school year, the number of statewide complaints and grievances were the highest they've been in the past six years." Idaho Education News, *Special education parents, who say the system is failing their kids, take matters into their own hands*, <https://www.idahoednews.org/top-news/special-education-parents-who-say-the-system-is-failing-their-kids-take-matters-into-their-own-hands/> (November 18, 2024).

Moreover, these complaints, the deficiencies which underlie them, and the lack of any effective state response are not mere technical problems. They have real world, adverse consequences for Idaho students with disabilities, who are arguably those students most in need of effective educational services. On an empirical basis, Idaho's students with disabilities do not merely perform worse academically than Idaho students without disabilities; they perform worse than students with disabilities across the country. "In Idaho, students with disabilities have performed worse in reading and math than many of their peers in other states, federal data shows." ProPublica, *Idaho Schools Consistently Break Disability Laws. Parents Say They're Not Doing Enough to Fix the Problem*, <https://www.propublica.org/article/idaho-special-education-disabilities-complaints> (July 30, 2025).

Despite increasing parent dissatisfaction with public schools' inability to comply with the requirements of federal law, let alone adequately serve the needs of their children, and their resort to making complaints to address the deficiencies, parents are disadvantaged in the resolution process. Parents bear the burden of proving that the services being provided to their children are inadequate, inappropriate, or inconsistent with the requirements of the child's Individualized Education Program ("IEP"). Because resolving complaints under IDEA involves only an administrative process, "Parents cannot engage in the full range of discovery options that are available during a court trial." Council of Parent Attorneys and Advocates, *Make Burden of Proof Fair and Equitable*, <https://www.copaa.org/page/BOP> (accessed November 5, 2025).

The school system has a great deal of information that may be presented in the form of testimony or in documents that the parent may receive only five days before a hearing. In the face of this information imbalance, having a parent have to face a school system lawyer at a hearing in order to exercise the parent and child's disagreement with a school-system proposed action, a statutorily-granted right, is a David and Goliath scenario, but it happens repeatedly. In many states, Goliath almost always wins, even when the parent is represented.

Id.

Unfortunately, the power disparity between parents who are dissatisfied with public school conduct and public school districts is exacerbated because of the correlation between a family's lack of financial resources and a family having a child with a disability:

In 2013, 12 percent of children living in families below the federal poverty line were identified as having a learning disability, compared with eight percent of other children. Twelve percent of children living in families that receive welfare benefits were identified as having a learning disability, compared with seven percent of other children. Children living in families that receive food stamps are also much more likely than other children to be identified as having a learning disability (11 percent, compared with six percent of other children in 2011).

Id.

Parents who lack financial means are less likely to be able to afford counsel, retain independent experts to evaluate their children and testify in the administrative hearing process, and obtain necessary information to support their position. Further, the acronyms and terminology used in IDEA and in special education generally can be confusing and intimidating to parents who are neither specifically trained nor attorneys practicing in the field. For instance, the National Council on Disability report referenced above and appended hereto as Exhibit D contains a full-page “Acronym Glossary” defining the 34 acronyms used in the report alone.

If parents of students with disabilities manage to navigate the IDEA complaint process and still believe the educational needs of their children are not being met, the final resort is to persuade the local school district to place their children in private schools, which those parents believe will better serve their children’s special needs. These district private placements, due to private schools being the best fit for certain children with disabilities, have become commonplace. They are so ubiquitous that a national organization, the National Association of Private Special Education Centers, exists to support them, representing hundreds of private schools and school networks across the country which specialize in serving students with disabilities.

Public school officials, reluctant to surrender control over a student’s education and absorb the cost of private placement, typically resist such efforts by parents. Most district private placements result from legal action taken by parents represented by counsel and are ordered by the courts. As discussed above, lower-income parents are less likely to be able to afford legal counsel, and parents of children with disabilities are more likely to be lower-income, thus placing these families at a greater disadvantage in seeking and obtaining private placement through their public school districts. This leads to a dual, separate-and-unequal system in which families without means are deprived of the educational services their children are guaranteed under federal law,

while more well-heeled families can access those services through private schools at public expense.

Despite whatever “oversight” and “legal guarantees” may exist under the current federal and Idaho educational frameworks, they are insufficient to actually deliver adequate services to many Idaho students with disabilities. And, to the extent some families (on their own initiative and often at their own significant expense) may be able to navigate the public school system bureaucracy and obtain those services, other families unjustly are deprived of the same.

II. Private School Choice Programs Such as the Idaho Parental Choice Tax Credit Have Enhanced and Continue to Enhance Educational Opportunities and Outcomes for Students with Disabilities.

Over the past twenty-five years, students with disabilities in some states have had the opportunity to enroll in private schools of their parents’ choosing with financial support from their state governments. These private school choice programs for students with disabilities take three distinct forms: vouchers, which are government payments to parents, later transferred to a private school of choice, which can only be used to cover certain educational expenses, such as tuition and academic fees; education savings accounts (ESAs), which are expenditure accounts created by the government with funds which parents can direct towards securing educational products, services, and therapies from approved vendors; and tax credits, such as Idaho’s Parental Choice Tax Credit, which allows parents to forego a certain portion of tax payments otherwise due to the state government and redirect those funds to private schools in support of their children’s education.

Students who participate in these private school choice programs are not foreclosed from reobtaining public school services under IDEA at a later date; if parents decide that a particular

private school program or service is not adequately serving the needs of their child, they are free to immediately transfer their child back into the public school system. Likewise, the fact that a private school choice program exists does not result in “the loss of IEP services,” as the Petitioners hyperbolically assert. *Declaration of Kristine Anderson (“Anderson Decl.”)*, ¶ 11. Students with disabilities receiving services through a private school choice program receive those services only while enrolled in the program, from which they can disenroll at any time. No children or families are conscripted or otherwise required to participate in private school choice programs, including the Idaho Parental Choice Tax Credit.

No state which has enacted a private school choice program has ceased to maintain a “general, uniform and thorough system of public, free common schools” (Idaho Const., Art. IX, § 1) and the same is always an option for parents, students, and families. However, when parents decide the public school system is no longer adequately serving their child’s needs, they are free to immediately make a change that they feel will benefit their child without fighting their way through a confusing bureaucratic process wherein many parents, especially those of limited means, are at a severe disadvantage.

Petitioners point to the fact that private schools are not legally required to accept students with disabilities, and Petitioner Kristine Anderson anecdotally claims that “Private schools typically do not accept children with developmental or speech disabilities...” *Anderson Decl.*, ¶ 10. Petitioners seem to infer from this that students with disabilities therefore cannot or will not benefit from private school choice programs. On the contrary, reliable estimates indicate that students with disabilities are at least proportionally represented, and likely overrepresented, in private school choice programs in the United States. Alone, the programs that are limited to students with disabilities enrolled 96,452, or 12.3%, of the 786,425 students participating in choice

programs in 2022-2023. EdChoice, *The ABCs of School Choice: The Comprehensive Guide to Every Private School Choice Program in America*, 2024 Edition, pgs. 25, 29, 33, 39, 43, 53, 57, 63, 69, 71, 79, 83, 87, 91, 101, 107, 111, 149, 153, 171, <https://www.edchoice.org/wp-content/uploads/2023/11/2024-ABCs-of-School-Choice.pdf> (2024).

Additionally, field research by Dr. Wolf and his colleagues, appended hereto as Exhibit E, suggests that of the 281,338 students enrolled in private school choice programs targeted to disadvantaged students, approximately 11% have a disability. This number is significant, especially considering that parents, and the private schools which they select for their children, often avoid classifying such students as having disabilities to avoid social stigma. *Id.* Even assuming conservatively that none of the 408,635 students enrolled in private school choice program with universal eligibility or eligibility restricted to students in rural areas have disabilities, that still would mean that at least 15.5% of the students served by private school choice programs in 2022-2023 did have disabilities, which actually is slightly higher than the overall student disability rate in public schools for the same year. National Center for Education Statistics, *Condition of Education: Students with Disabilities*, <https://nces.ed.gov/programs/coe/indicator/cgg/students-with-disabilities> (last updated May 2024).

Moreover, even if Petitioners are correct that Idaho private schools overwhelmingly will refuse to enroll students with disabilities (they are not), none of the harms Petitioners prophesy will, or even could, come to pass. If parents of a student with disabilities cannot find a private school willing to enroll their child, the child will remain in the public school system, with all of its current “legal guarantees” and “oversight.” No monies will flow to private institutions.

Further, even if some private school programs for students with disabilities do not measure up to parents' expectations, it is unreasonable to assume those programs will persist. Despite Petitioners' apparent assumptions, parents are careful consumers of educational services for their children. Heidi Holmes Erickson, *How Do Parents Choose Schools, and What Schools Do They Choose? A Literature Review of Private School Choice Programs in the United States*, 11:4 Journal of School Choice. 491, 506 (2017). When consuming educational products such as private school choice programs, these parents behave like rational consumers in the same manner they do when consuming other goods and services. *Id.* To that end, they tend to seek out high-quality schools, but may define "quality" in complicated and nuanced ways; for instance, some parents may be willing to trade academic quality for a value like child safety, which they perceive as being more fundamental. *Id.*

As careful consumers of educational services, parents will not long continue to direct money to those services which perform poorly. Logically speaking, a parent interested in his or her child's education is unlikely to continue to subject that child to an environment in which the parent perceives that, "essential therapies, resources and legal safeguards are unavailable" (*Anderson Decl.*, ¶ 9). This is backed up by empirical research: parents are much more likely to leave a private school voucher program and return their children to the public school system if the private school they had previously selected fails to meet their initial preferences and expectations (i.e.: they experience "brand disappointment"). Patrick J. Wolf, *School Choice and the Branding of Catholic Schools*, 6:2 Education Finance and Policy 202, 245 (2011). Bringing market forces to bear on the provision of educational services is, in fact, the surest way to ensure poor performers do not profit and eventually cease operation. Patrick J. Wolf and Corey A. DeAngelis, *Funding Students Instead of Systems: The Case for School Choice*, in *Challenges in Classical Liberalism*:

Debating the Policies of Today Versus Tomorrow 55, 76 (Joshua C. Hall and Alice L. Kassens eds., Palgrave Macmillan, 2023).

In fact, private school choice programs are more equitable for students with disabilities than district private placements inasmuch as they are not contingent upon contentious administrative proceedings in the public school system, wherein parents with resources are far better equipped to achieve their desired outcomes. The equitable nature of private school placement programs is borne out by real-world results. In association with the Arkansas Department of Education, Dr. Wolf and his team wrote a report, appended hereto as Exhibit F, regarding the Arkansas Education Freedom Accounts Program, which is similar in kind and scope to the Idaho program at issue before this Court. In just its second year of staged implementation, building toward universal eligibility this school year, there were eight ways for Arkansas students to qualify for the program. Exhibit F, pg. 6. Out of 14,256 qualifying students, 36%, or over 5,000 students, were certified as having a disability under IDEA criteria. *Id.*, pg. 9. This level of participation by students with disabilities in a small state shows what can be possible when parents are empowered with true agency in their children's educational programming.

CONCLUSION

Based upon his own research and that of other scholars in his field, Dr. Wolf is confident that, for the foregoing reasons, the Idaho Parental Choice Tax Credit can only enhance, rather than diminish, educational opportunities and outcomes for Idaho students with disabilities. Therefore, he respectfully urges this honorable Court to deny the *Verified Petition for Writ of Prohibition*.

DATED this 10th day of November, 2025.

RUNFT DINDINGER KOHLER, PLLC

By: /s/ Edward W. Dindinger

Edward William Dindinger, Esq.

Attorney for Proposed Amicus Curiae Dr. Patrick J. Wolf

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November, 2025, a true and correct copy of the foregoing was served upon:

Marvin M. Smith
Marvin K. Smith
Craig L. Meadows
Brandon Helgeson
Jean Schroeder
HAWLEY TROXELL ENNIS & HAWLEY LLP
2010 Jennie Lee Drive
Idaho Falls, ID 83404
877 W. Main St.
Boise, ID 83701-1617
Attorneys for Petitioners

By iCourt: mmsmith@hawleytroxell.com
mksmith@hawleytroxell.com
cmeadows@hawleytroxell.com
bhelgeson@hawleytroxell.com
jschroeder@hawleytroxell.com

Raúl R. Labrador
Attorney General
Alan M. Hurst
James E.M. Craig
Michael A. Zarian
Sean M. Corkery
OFFICE OF THE ATTORNEY GENERAL
PO Box 83720
Boise, ID 83720-0010
Attorneys for Respondent State of Idaho

By iCourt: alan.hurst@ag.idaho.gov

Jeremy C. Chou
Morgan D. Goodin
GIVENS PURSLEY LLP
601 W. Bannock St.
PO Box 2720
Boise, ID 83701-2720
Attorneys for Intervenor-Respondent Idaho State Legislature

By iCourt: jcc@givenspursley.com
morgangoodin@givenspursley.com

Jason R. Mau
PARSONS BEHLE & LATIMER
800 W. Main St., Ste. 1300
Boise, ID 83702
Thomas M. Fisher, *pro hac vice*
Bryan Cleveland, *pro hac vice*
EDCHOICE LEGAL ADVOCATES
111 Monument Circle, Ste. 2650
Indianapolis, IN 46204
Renée Flaherty, *pro hac vice*
INSTITUTE FOR JUSTICE
901 N. Glebe Rd., Ste. 900
Arlington, VA 22203
Attorneys for Amici Curiae Parent Petitioners

By iCourt: jmau@parsonsbehle.com

By iCourt: tfisher@edchoice.org
bcleveland@edchoice.org

By iCourt: rflaherty@ij.org

RUNFT DINDINGER KOHLER, PLLC

By: /s/ Edward W. Dindinger
Edward William Dindinger, Esq.
Attorney for Proposed Amicus Curiae Dr. Patrick J. Wolf

EXHIBIT A

Patrick J. Wolf, Ph.D.

Alison Department of Education Reform
College of Education and Health Professions
University of Arkansas
201 Graduate Education Building
Fayetteville, AR 72701

(479) 575-2084 Office
(479) 575-3196 FAX
pwolf@uark.edu
Twitter: @FlowTap1

Dr. Patrick J. Wolf is a Distinguished Professor and the 21st Century Endowed Chair in School Choice in the Department of Education Reform at the University of Arkansas College of Education and Health Professions. Previously, he taught at Columbia and Georgetown and served as a Visiting Scholar at the Brookings Institution. Wolf has worked as a pizza deliverer, a state government administrator, an advocate for people with hearing impairments, and a school janitor, though not necessarily in that order. As principal investigator of the School Choice Demonstration Project, he has led longitudinal evaluations of school voucher programs in Washington, DC; Milwaukee, WI; Louisiana; and Delhi, India. Research projects he has led or co-led have received 49 research grants and contracts totaling nearly \$24 million. He has authored, co-authored, edited, or co-edited five books and well over 200 journal articles, book chapters, book reviews, and policy reports on private school choice, public charter schools, civic values, and other topics. Most of his school choice research is at <http://scdp.uark.edu/>.

Dr. Wolf has testified before committees of the U.S. Congress five times and before federal commissions and committees of state legislatures 34 times. He has been interviewed on National Public Radio or its state affiliates 15 times. His school choice research has been discussed on ABC *World News Tonight*, NBC News, the CNN *Morning Show*, MSNBC, Fox News *Special Report*, *The News Hour*, CSPAN, *The New Republic*, *US News and World Report*, *The Economist*, *The Atlantic*, *The Chronicle of Higher Education*, *The Wall Street Journal*, *USA Today*, *The Washington Post*, *The Washington Times*, *The Washington Examiner*, *The Chicago Tribune*, *The New York Times*, *The New York Times Review of Books*, *Commentary*, *The New York Sun*, *The New York Post*, *Education Week*, *Education Post*, *The 74*, *The International Herald Tribune*, *The Sunday Times of London*, *The Milwaukee Journal-Sentinel*, *The New Orleans Times-Picayune*, *The St. Paul Pioneer Press*, *The St. Cloud Daily Times*, *The Arkansas Democrat-Gazette* and other media venues.

His research has received 12 awards and honors. Most recently, Wolf is one of 150 past and present scholars profiled in *The Palgrave Handbook of Educational Thinkers*. He ranks **tied for 5th** in the production of education studies informed by a large sample N. He received the 2021 Top Cited Article Award from *Social Science Quarterly* for his study of school choice regulation. He received the 2020 Best Paper Award from the Association for Private Enterprise Education for his co-authored article on the effects of the Milwaukee school choice program on the character outcomes of crime and out-of-wedlock births. His 1997 article on Reinventing Government won the national Best Article Award of the Academy of Management, Division on Public and Nonprofit Management. He received the 2011 Significant Research Award of the University of Arkansas College of Education and Health Professions and was one of the 10 Most Outstanding Faculty Members at the University of Arkansas in 2016. His papers have won prizes from the World Research Council, the Global Home Education Conference, and the International School Choice & Reform Conference (ISCRC). The annual Best Paper Award of the ISCRC is now named in his honor. *Education Week* consistently ranks him among the **most influential education scholars**, most recently 33rd. The Arkansas Senate passed a resolution **congratulating him and his departmental colleagues on their achievements** from 2020 to 2021. He is a Faculty Fellow of the Archbridge Institute.

Patrick J. Wolf, Ph.D.

EDUCATION:

1995	Ph.D.	Harvard University, Government (Political Science)
1993	M.A.	Harvard University, Government (Political Science)
1987	B.A.	University of St. Thomas, St. Paul, MN, Political Science and Philosophy

FACULTY POSITIONS:

2014-	Distinguished Professor of Education Policy and 21st Century Endowed Chair in School Choice , Education Reform, University of Arkansas
2021; 2022-24	Head of the Department of Education Reform (interim appointments) • Effectively steered the unit through a challenging period of transition • Guided the successful tenure, promotion, or endowed chair reappointment of all other faculty members of the Department • Oversaw the development and implementation of a strategic plan for the unit • Served on search committees that led to two outstanding new faculty hires • Helped recruit 17 new doctoral fellows to the program
2014-20; 2024-	Director of Graduate Studies , Education Policy, University of Arkansas
2006-2014	Professor and 21st Century Endowed Chair in School Choice , Education Reform, University of Arkansas
2004-2006	Associate Professor , Public Policy, Georgetown University
1998-2004	Assistant Professor , Public Policy, Georgetown University
1998-2001	Guest Lecturer , U.S. Dept. of Defense Leadership & Management Program
1995-1998	Assistant Professor , Political Science and Public Affairs, Columbia University
1994-1995	Lecturer , Political Science and Public Affairs, Columbia University

RESEARCH POSITIONS:

2004-	U.S. Federal Government: • Member, Researcher Forum on Redesigning the Institute for Education Sciences, U.S. Department of Education (2025) • Member, Technical Working Groups, IES, National Center for Education Evaluation (NCEE) (2012-23) • Co-Principal Investigator (via CRA -- Chesapeake Research Associates), Louisiana Charter School Alliance, U.S. Department of Education, Institute of Education Sciences (IES), Southwest Regional Education Lab (REL) (2013-2017) • Senior Research Associate (via CRA), Scientific Peer Review for the Northeast & Mid-Atlantic RELs, IES (2011-2015) • Member, Scientific Peer Review Boards, IES (2004-2010) • Senior Research Associate (via CRA), Analytic and Technical Support (ATS) to the IES (2006-11) • Member, Expert Advisory Panel, National Head Start Impact Study, U.S. Department of Health & Human Services (2011) • Presidential Nominee, Board of Directors of IES (2008-09) • Member, Methods Issues Working Group, IES, NCEE (2007-09) • Member, Technical Working Group, U.S. Department of Education, Office of Innovation and Improvement (OII) (2003-07)
-------	---

Patrick J. Wolf, Ph.D.

- **Senior Research Associate**, Data Analyses Addressing Teacher Compensation and Teacher Quality, IES (consultant to CRA) (2005-07)
 - **Member**, Advisory Board, *Parent Involvement in School Improvement Guide*, OII (2005-06)
- 2003- **Principal Investigator and Director**, School Choice Demonstration Project, Georgetown University (2003-06) and University of Arkansas (2006-), leading:
 - Meta-analyses on school choice & civic outcomes
 - National Charter School Finance Studies (2012-15; 2015-18; 2019-)
 - Longitudinal Evaluation of the Louisiana Student Scholarships for Excellence in Education Program (2013-2019)
 - Collaborative evaluation of the Absolute Return for Kids voucher pilot in Delhi, India (2010-14)
 - Longitudinal Evaluation of the Milwaukee Parental Choice Program mandated by the State of Wisconsin (2006-12)
 - Grant-supported supplemental evaluations of the DC OSP (2004-2010)
 - Initial Technical and Random Assignment Support (2004) and Longitudinal Impact Evaluation of the DC Opportunity Scholarship Program (OSP), U.S. Department of Education, Institute of Education Sciences (2004-2011)
- 2025- **Faculty Fellow**, Archbridge Institute
- 2024- **Member**, Advisory Board for the Center for Education and Public Service Incubator, University of Austin.
- 2024- **Member**, Academic Freedom Alliance
- 2023- **Member**, National Association of Scholars
- 2023-24 **Member**, Advisory Board, Tyton Partners descriptive study of ESAs
- 2023- **Member**, Academic Advisory Board of the [Pioneer Institute](#), Boston, MA
- 2022-23 **Member**, Scientific Advisory Board, *Admission Impossible? School Choice Politics and Policy in Scandanavia*, University of Bergen, Norway
- 2022- **Member**, Blue Ribbon Panel of Judges, [The Yass Prize](#), Center for Education Reform
- 2022- **Member**, Advisory Committee of the [Program on Education Policy & Governance](#) (PEPG), Harvard University
- 2021- **Member**, [Arkansas Education Policy Initiative](#), Winthrop Rockefeller Institute
- 2020- **Member**, [Conservative Education Reform Network](#), AEI
- 2020- **Member**, *Education Week* Edu-Scholar Rankings Advisory Committee
- 2008- **Member**, Future of American Education Project Working Group, AEI
- 2014-17 **Senior Research Associate**, New Orleans Education Research Association (ERA), Tulane University
- 2012-17 **External Advisor**, Voucher Participation, Parent Segmentation, & Ohio EdChoice Studies, Thomas B. Fordham Institute
- 2011-12 **Senior Research Associate**, Qwaku & Associates
- 2010 **Senior Consultant**, Public Impact
- 2003-06 **Member**, Natl. Working Commission on Choice in K-12 Education, Brookings
- 2000-01 **Visiting Scholar**, Governmental Studies, Brookings
- 1999-02 **Director of Field Research**, Washington Scholarship Fund Randomized Field Trial, Program on Education Policy and Governance, Harvard University

Patrick J. Wolf, Ph.D.

PROFESSIONAL AND SERVICE HONORS (37):

A. Research Awards (13)

EduScholar Top 200 Ranking, [Education Week/AEI](#), 2011-2025
Best Political Scientists in the U.S. Top 500 Ranking, [Research.com](#), 2024-
Patrick Wolf, subject of a chapter in [The Palgrave Handbook of Educational Thinkers](#), 2022
Tied for 5th, Large N in Education Leaderboard (for number of studies with N > 1000), 2023
Top Cited Article 2019-2020, *Social Science Quarterly*, 2021
Patrick J. Wolf Best Paper Award established in 2020 in association with the annual International School Choice & Reform Conference
Best Paper Award, *Journal of Private Enterprise*, Association for Private Enterprise Education, 2020
Best Research Award, World Research Council, 2019
Best Article Award, 1st Place, International School Choice & Reform Conference, 2017
Best Article Award, 2nd Place, Global Home Education Conference, 2015
Significant Research Award, University of Arkansas College of Education and Health Professions, 2011
Junior Faculty Research Fellowship, Georgetown University, 1999
Best Article Award, Academy of Management, Division on Public and Nonprofit Management, 1997-98

B. Editorial Board Memberships & Positions (8)

Member of the Editorial Board, *Live Handbook on Education Policy*, Association for Education Finance and Policy
Consulting Editor, *Journal of School Choice*, 2012- (**Member of the Editorial Board** 2007-)
Member of the Scientific Committee, *Dirigenti Scuola (Journal of School Leaders)*, 2020-
Member of the Editorial Board, *International Journal of Education Policy and Leadership*, 2019-
Senior Editor, *Education Working Paper Archives*, University of Arkansas, 2006-2010
Book Review Editor, *Journal of Public Administration Research and Theory*, 2001-2008
Newsletter Editor, Public Admin. Section, American Political Science Association, 2001-04
Member, Executive Committee of the Public Administration Division, American Political Science Association, 1999-2002

C. Professional Service Honors (9)

Member, [LEARNS Act Implementation Work Group, Parental Empowerment](#) – Charter School Subgroup, Arkansas Department of Education
Arkansas Senate Resolution 23: [To Congratulate Dr. Patrick J. Wolf and the Department of Education Reform at the College of Education and Health Professions of the University of Arkansas at Fayetteville for their Many Achievements](#), passed unanimously, February 16, 2022
Member, Council of Principal Investigators (for the 20 highest research grant recipients at the University of Arkansas), 2019-21
Mentor, Advanced Graduate Student Advising Program, Association for Policy Analysis and Management, 2019
Mentor, David L. Clark National Graduate Student Research Seminar in Educational Administration & Policy, American Education Research Association, 2019
Co-Chair, Planning Committee, International School Choice and Reform Conference, 2012-15, 2017-20 (**Fundraising Chair** in 2011, 2014, 2015, 2017-20; **Member** 2011-)
Finalist, *Most Outstanding Faculty Member*, University of Arkansas, 2016

Patrick J. Wolf, Ph.D.

Member, New Citizenship Working Group, American Enterprise Institute, 2010

Section Head, Public Administration, Annual Meeting of the Midwest Political Science Association, Chicago, IL, April 12-15, 2007

D. Graduate & Undergraduate Honors (7)

Mellon Graduate Fellow, Harvard University, 1993-94

Graduate Student Representative, Graduate Program Council, Harvard University Government Department, 1993-94

Jacob Javits Graduate Fellow, U.S. Department of Education, 1989-93

Vice-President, Delta Epsilon Sigma Honor Society, 1986-87

Aquinas Scholars Program, 1983-87

Public Service Award, Minnesota Foundation for Better Hearing and Speech, 1986

Special Service Award, Legislative Coalition for the Hearing Impaired, 1986

RESEARCH GRANTS/CONTRACTS RECEIVED (2002-):

Principal Investigator or Co-PI on 49 research grants or contracts totaling **\$23,900,177**. Grants of \$40,000 or more received from the U.S. Department of Education, Arkansas Department of Education, Accelerate, AFC Growth Fund, Annie E. Casey Foundation, City Fund, Gates Foundation, Joyce Foundation, Kern Family Foundation, Lynde and Harry Bradley Foundation, Robertson Foundation, Smith-Richardson Foundation, Urban Institute, and Walton Family Foundation. Also raised over \$600,000 in sponsorships for the International School Choice and Reform Conference, 2011-2020.

IMPACT OF PUBLICATIONS – SUMMARY STATISTICS (as of November 7, 2025):

Google Scholar Citations:	7,409
h-Index:	50
i10-Index:	129

SCHOLARLY PUBLICATIONS (235):

A. Books (5):

Wolf, P. (Ed.) (2019). [*School choice: Separating fact from fiction*](#). New York, NY: Routledge.

Stewart, T. & Wolf, P. (2014). [*The school choice journey: School vouchers and the empowerment of urban families*](#). New York, NY: Palgrave Macmillan US.

Howell, W. & Peterson, P. with Wolf, P. & Campbell, D. (2006). [*The education gap: Vouchers and urban schools*](#) (Rev.ed.). Washington, DC: Brookings Institution.

Wolf, P.J. & Macedo, S. (Eds.), with Ferrero, D. & Venegoni, C. (2004). [*Educating citizens: International perspectives on civic values and school choice*](#). Washington, DC: Brookings Institution.

Howell, W. & Peterson, P. with Wolf, P. & Campbell, D. (2002). *The education gap: Vouchers and urban schools*. Washington, DC: Brookings Institution.

Patrick J. Wolf, Ph.D.

B. Peer-Reviewed Journal Articles (50) (quality score, acceptance rate (AR) when available; * designates current or former graduate student):

- *Shakeel, M.D., Wolf, P.J., *Johnson, A.H., *Harris, M.A., *Morris, S.R. (2024). [The public purposes of private education: A civic outcomes meta-analysis](#). *Educational Psychology Review*, 36(40). [Impact Factor 10.1 (2024)]
- *Daniels, D.L., & Wolf, P.J. (2024). [Does private school choice threaten democracy? Evidence from private and public schools in New York City and Dallas/Fort Worth](#). *Education Sciences*, 14(4): 437. [Impact Factor 3.0 (2024)]
- Maranto, R.M., Reilly, W., & Wolf, P.J. (2024). [Which police departments make Black lives matter?](#) *Administration & Society*, 56(3): 282-303. [Impact Factor 2.3, AR 67%]
- Wolf, P.J., Greene, J.P., *Paul, J.D., & Ladner, M. (2023). [Education freedom and student achievement: Is more school choice associated with higher state-level performance on the NAEP?](#) *Journal of School Choice*, 18(1): 9-29. [Impact Factor 1.33 (2020), AR 30%]
- *DeAngelis, C.A., *Burke, L.M., Wolf, P.J., & Dills, A.K. (2023). [The effect of regulations on private school choice program participation: Experimental evidence from the United States](#). *Research in Educational Administration & Leadership*, 8(1): 142-186.
- Wolf, P. J., *Cheng, A., Wang, W., & Wilcox, W. B. (2022). [The school to family pipeline: What do religious, private, and public schooling have to do with family formation?](#) *Journal of Catholic Education*, 25(1): 206-233. [AR 25%]
- *Anderson, K. P., & Wolf, P. J. (2022). [How within-study comparisons can inform research and evaluation design for the third sector](#). *VOLUNTAS: International Journal of Voluntary and Nonprofit Organizations*, Online First. [Impact Factor 2.79, 2021].
- *Erickson, H.H., *Mills, J.N., & Wolf, P.J. (2021). [The effects of the Louisiana Scholarship Program on student achievement and college entrance](#). *Journal of Research on Educational Effectiveness*, 14(4): 861-899. [Impact Factor 3.38, 2019].
- *Shakeel, M.D., *Anderson, K.P., & Wolf, P.J. (2021). [The participant effects of private school vouchers around the globe: A meta-analytic and systematic review](#). *School Effectiveness and School Improvement*, 32(4): 509-542. [Impact Factor 2.25, 2019].
- Bearfield, D., Maranto, R., & Wolf, P.J. (2021). [Making violence transparent: Ranking police departments in major U.S. cities to make black lives matter](#). *Public Integrity* 23(2), 164-180. [Impact Factor 0.46, 2018].
- *DeAngelis, C.A., *Burke, L.M., & Wolf, P.J. (2021). [When being regulated is a choice: The impact of government policies on private school participation in voucher programs](#). *Journal of School Choice* 15(3), 417-440. [Impact Factor 1.33 (2020), AR 30%].
- *DeAngelis, C.A., & Wolf, P.J. (2020). [Private school choice and character: More evidence from Milwaukee](#). *Journal of Private Enterprise*, 35(3), 13-48. [Impact Factor 0.29 (2018)].
- *Lee, M.H., *Mills, J.N., & Wolf, P.J. (2020). [Heterogeneous achievement impacts across schools in the Louisiana Scholarship Program](#). *Journal of School Choice*, 14(2), 228-253. [Impact Factor 1.30 (2019), AR 30%].
- Dixon, P., *Egalite, A.J., Wolf, P.J., & Humble, S. (2019). [Experimental results from a four-year targeted education voucher program in the slums of Delhi, India](#). *World Development*, 124 (Suppl-C), 1-13. [Impact Factor 3.9 (2018), AR 12%].

Patrick J. Wolf, Ph.D.

- *DeAngelis, C.A., & Wolf, P.J. (2019). [Private school choice and crime: Evidence from Milwaukee](#). *Social Science Quarterly*, 100 (6), 2302-2315. [Impact Factor 1.204 (2019)].
- *DeAngelis, C.A., *Burke, L., & Wolf, P.J. (2019). [The effects of regulations on private school choice program participation: Experimental evidence from Florida](#). *Social Science Quarterly*, 100 (6), 2316-2336. [Impact Factor 1.204 (2019)].
- *Foreman, L., *Anderson, K.P., Ritter, G., Wolf, P.J. (2019, November). [Using “broken lotteries” to check the validity of charter school evaluations using matching designs](#). *Educational Policy*, 33(7), 977-1001. [Impact Factor 1.030 (2017)].
- *DeAngelis, C.A., & Wolf, P.J. (2019, Summer). [Will democracy endure private school choice? The effect of the Milwaukee Parental Choice Program on adult voting behavior](#). *Journal of Private Enterprise*, 34(3), 1-21. [Impact Factor 0.29 (2018)].
- *Sude, Y., *DeAngelis, C.A., & Wolf, P.J. (2018, Spring). [Supplying choice: An analysis of school participation decisions in three voucher programs in the United States](#). *Journal of School Choice* 12(1), 8-33. [Impact Factor 0.61 (2018), AR 30%].
- *Mills, J.N., & Wolf, P.J. (2017, February 17) [Vouchers in the bayou: The effects of the Louisiana scholarship program on student achievement after two years](#). *Education Evaluation and Policy Analysis*, 20 (10), 1-21. [Impact Factor 2.020 (2015), AR 9% (2013)].
- *Egalite, A.J., *Mills, J.N., & Wolf, P.J. (2017, Spring). [The impact of targeted school vouchers on racial stratification in Louisiana schools](#). *Education and Urban Society*, 49(3), 271-296. [Impact Factor 0.683].
- *Egalite, A.J., & Wolf, P.J. (2016, Fall). [A review of the empirical research on private school choice](#). *Peabody Journal of Education*, 91(4), 441-454.
- *Cheng, A., *Tuchman, S., & Wolf, P.J. (2016, Fall). [Homeschool parents and satisfaction with special education services](#). *Journal of School Choice*, 10(3), 381-398. [Impact Factor 0.260 (2016)].
- *Cheng, A., Trivitt J. R., & Wolf, P.J. (2016, June). [School choice and the branding of Milwaukee private schools](#). *Social Science Quarterly*, 97(2), 362-375. [Impact Factor 0.791 (2016)].
- Fleming, D.J., *Cowen, J.M., Witte, J.F., & Wolf, P.J. (2015, November). [Similar students, different choices: Who uses a school voucher in an otherwise similar population of students?](#) *Education and Urban Society*, 47(7), 785-812. [Impact Factor 0.373 (2013), AR 25% (2013)].
- Bækgaard, M., Baethge, C., Blom-Hansen, J., Dunlop, C., Esteve, M., Jakobsen, M.,... Wolf, P. J. (2015, Spring). [Conducting experiments in public management research: A practical guide](#). *International Public Management Journal*, 18(2), 323-342. [Impact Factor 1.200 (2012)].
- *Kisida, B., & Wolf, P.J. (2015, Spring). [Customer satisfaction and educational outcomes: Experimental impacts of the market-based delivery of public education](#). *International Public Management Journal*, 18(2), 265-285. [Impact Factor 1.200 (2012)].
- Witte, J.F., Wolf, P.J., *Cowen, J.M., Carlson, D., & Fleming, D.F. (2014, December). [High stakes choice: Achievement and accountability in the nation’s oldest urban voucher program](#). *Education Evaluation and Policy Analysis*, 36(4), 437-456. [Impact Factor 2.020 (2016), AR 9% (2013)].
- *Egalite, A.J., Jensen, L.I., Stewart, T., & Wolf, P.J. (2014, March). [Finding the right fit: Recruiting and retaining teachers in Milwaukee choice schools](#). *Journal of School Choice*, 8(1), 113-140. [Impact Factor 0.20 (2014), AR 50% (2013)].
- Wolf, P.J., *Kisida, B., Gutmann, B., Puma, M., Eissa, N.O., & Rizzo, L. (2013). [School vouchers and student outcomes: Experimental evidence from Washington, DC](#). *Journal of Policy Analysis and Management*, 32(2), 246-270. [Impact Factor 1.541 (2012), AR 12% (2012)].

Patrick J. Wolf, Ph.D.

- Maranto, R., & Wolf, P.J. (2013, March/April). [Cops, teachers, and the art of the impossible: Explaining the lack of diffusion of innovations that make impossible jobs possible](#). *Public Administration Review*, 73(2), 230-240. [Impact Factor 0.9 (2012), AR 15% (2012)].
- *Cowen, J.M., Fleming, D.J., Witte, J.F., Wolf, P.J., & *Kisida, B. (2013, Winter). [School vouchers and student attainment: Evidence from a state-mandated study of Milwaukee's parental choice program](#). *Policy Studies Journal*, 41(1), 147-167. [Impact Factor 1.014 (2012), AR 13% (2012)].
- Wolf, P.J., & *McShane, M. (2013, Winter). [Is the juice worth the squeeze? A benefit/cost analysis of the District of Columbia opportunity scholarship program](#). *Education Finance and Policy*, 8(1), 74-99. [Impact Factor 1.07 (2012), AR 20% (2013)].
- *Cowen, J.M., Fleming, D.J., Witte, J.F., & Wolf, P.J. (2012, Spring). [Going public: Who leaves a large, longstanding, and widely available urban voucher program?](#) *American Educational Research Journal*, 49(2), 231-256. [Impact Factor 3.104 (2012), AR 7% (2012)].
- Wolf, P.J., & *Boccardo, J. (2011, Spring). [Vouchers escolares y justicia social: Evidencia de Washington, D.C.](#) *Revista Iberoamericana de Evaluación Educativa*, 4(1), 109-134.
- Trivitt, J., & Wolf, P.J. (2011, Spring). [School choice and the branding of Catholic schools](#). *Education Finance and Policy*, 6(2), 202-245. [Impact Factor 1.07 (2012), AR 20% (2013)].
- *Kisida, B., & Wolf, P.J. (2010, September). [School governance and information: Does choice lead to better-informed parents?](#) *American Politics Research* 38(5), 783-805. [Impact Factor 0.716 (2012), AR 21% (2011)].
- Wolf, P.J. (2010, Spring). [School vouchers in Washington, DC: Achievement impacts and their implications for social justice](#). *Educational Research and Evaluation* 16(2), 131-150. [AR 21-30% (2013)].
- Wolf, P.J. (2009, Fall). [Lost opportunities](#). *Education Next* 9(4), 48-56.
- Wolf, P.J. (2007). [Academic improvement through regular assessment](#). *Peabody Journal of Education*, 82(4), 690-702.
- Wolf, P.J. (2007, Summer). [Civics exam: Schools of choice boost civic values](#). *Education Next* 7(3), 66-72.
- Stewart, T., Wolf, P.J., & *Cornman, S.Q. (2007). [Parent and student voices on the first year of the Opportunity Scholarship Program](#). *Peabody Journal of Education* 82(2-3), 311-386.
- Wolf, P.J., & *Hoople, D.S. (2006). [Looking inside the black box: What schooling factors explain voucher gains in Washington, DC](#). *Peabody Journal of Education* 81(1), 7-26.
- *Fellows, M.C., & Wolf, P.J. (2004, June). [Funding mechanisms and policy instruments: How business campaign contributions influence congressional votes](#). *Political Research Quarterly*, 57(2), 315-24. [Impact Factor 1.116 (2006), AR 12% (2011)].
- Howell, W.G., Wolf, P.J., Campbell, D.E., & Peterson, P.E. (2002, April). [School vouchers and academic performance: Results from three randomized field trials](#). *Journal of Policy Analysis and Management*, 21(2), 191-217. [Impact Factor 1.198 (2006), AR 12% (2012)].
- Howell, W.G., Wolf, P.J., Peterson, P.E., & Campbell, D.E. (2001, May). [Vouchers in New York, Dayton, and D.C.](#) *Education Next*, 1(2), 46-54.
- Nielsen, L.B., & Wolf, P.J. (2001, May). [Representative bureaucracy and harder questions: A response to Meier, Wrinkle, and Polinard](#). *Journal of Politics*, 63(2), 598-615. [Impact Factor 1.055 (2006), AR 12% (2011)].

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (1999, March 1). [Neutral and responsive competence: The U.S. Bureau of the Budget, 1939-48, re-visited](#). *Administration & Society*, 31(1), 143-67. [Impact Factor 0.774 (2006), AR 20% (2012)].
- Wolf, P.J. (1997, July). [Why must we reinvent the federal government? Putting historical developmental claims to the test](#). *Journal of Public Administration Research and Theory*, 7(3), 353-88. [Impact Factor 1.655 (2006), AR 11% (2012)].
- Wolf, P.J. (1993, April). [A case survey of bureaucratic effectiveness in U.S. cabinet agencies: Preliminary results](#). *Journal of Public Administration Research and Theory*, 3(2), 161-81. [Impact Factor 1.655 (2006), AR 11% (2012)].

C. Peer-Reviewed Book Chapters and Working Papers (11) (* designates current or former graduate student):

- *Cheng, A., *Tuchman, S., & Wolf, P.J. (2017). Homeschool parents and satisfaction with special education services (pp. 144-161). In R. Maranto & D. A. Bell (Eds.), *Homeschooling in the 21st Century: Research and prospects*. New York, NY: Routledge.
- Wolf, P.J., & *Cheng, A. (2017). Religious school brands as a school choice communication tool. In D. Hiatt-Michael (Ed.), *Family involvement in faith-based schools* (pp. 15-32). Charlotte, NC: Information Age Publishing.
- Wolf, P., *Kisida, B., Gutmann, B., Puma, M., Eissa, N., & Rizzo, L. (2011). [School vouchers in the nation's capital: Summary of experimental impacts](#). In M. Berends, M. Cannata, & E. Goldring (Eds.), *School choice and school improvement* (pp. 17-33). Cambridge, MA: Harvard Education Press.
- Stewart, T., & Wolf, P.J. (2011). The evolution of parental school choice. In F.M. Hess, & B. Manno (Eds.), *Customized schooling* (pp. 91-106). Cambridge, MA: Harvard Education Press.
- Witte, J.F., Wolf, P.J., *Cowen, J.M., Fleming, D.J., & Lucas-McLean, J. (2008, April 7). MPCP longitudinal educational growth study baseline report. Unpublished manuscript, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Wolf, P.J., Eissa, N., & Gutmann, B. (2006). [Who chooses, who uses? Initial evidence from the D.C. opportunity scholarship program](#). Unpublished manuscript, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2005). School choice by mortgage or by design: Implications for the black-white test-score gap in one generation. In P.E. Peterson (Ed.), *Generational change: Closing the test score gap* (pp. 167-97). New York, NY: Rowman and Littlefield.
- Wolf, P.J. (2005). School choice and civic values. In J. Betts, & T. Loveless (Eds.), *Getting choice right: Ensuring equity and efficiency in education policy* (pp. 210-44). Washington DC: Brookings Institution Press.
- Macedo, S., & Wolf, P.J. (2004). [Introduction: School choice, civic values, and problems of policy comparison](#). In P. Wolf, S. Macedo, D.J. Ferrero, & C. Venegoni (Eds.), *Educating citizens: International perspectives on civic values and school choice* (pp. 1-27). Washington DC: Brookings Institution Press.
- Wolf, P.J., Greene, J.P., Kleitz, B., & Thalhammer, K. (2001). [Private schooling and political tolerance: Evidence from college students in Texas](#). In P. E. Peterson, & D. E. Campbell (Eds.), *Charters, vouchers, and public education* (pp. 268-89). Washington DC: Brookings Institution Press.

Patrick J. Wolf, Ph.D.

Howell, W.G., Wolf, P.J., Peterson, P.E., & Campbell, D.E. (2001). [Test score effects of school vouchers in New York City, Dayton, Ohio, and Washington, DC](#). In P. E. Peterson, & D. E. Campbell (Eds.), *Charters, vouchers, and public education* (pp. 136-59). Washington DC: Brookings Institution Press.

D. Invited Journal Articles, Handbook & Encyclopedia Entries (33) (* designates current or former graduate student):

Wolf, P. J. (2025, October). [Universal school vouchers and Education Savings Accounts are good policies](#). *Journal of Policy Analysis and Management*, 45:1.

Wolf, P. J. (2025, October). [Private school choice programs should and will continue to expand](#). *Journal of Policy Analysis and Management*, 45:1.

Wolf, P. J., & Zimmer, R. (2025, March). [Vouchers and similar private school choice programs](#). *AEFP Live Handbook*.

Wolf, P. J. (2024, January 22). [Summary of research findings regarding the effects of private school choice programs](#). *The Journalist's Resource*. Harvard University, Cambridge, MA.

Wolf, P. J. (2023, October 26). [Private school choice programs are delivering and not just on test scores](#). *Oklahoma Education Journal*, 1:2.

Wolf, P. J. (2023, May 24). [Realizing school choice](#). *Law & Liberty*.

Wolf, P. J. (2023). [Benjamin Franklin: Lover of liberty and learning](#). In Greir, B. A. (Ed.), *The Palgrave handbook of educational thinkers*. New York: Palgrave Macmillan.

Reilly, W., Maranto, R., & Wolf, P.J. (2022, September). [Did Black Lives Matter save black lives? The data say no](#). *Commentary*, 154(2), pp. 22-25.

Fox, R. A., Buchanan, N., & Wolf, P. J. (2021). [The history of ISCRC from Nova Southeastern to Dublin](#). *Journal of School Choice*, 15(4): 489-495.

Wolf, P.J. (2020). The political perspective on school choice. In M. Berends, A. Primus, & M. G. Springer (Eds.), *Handbook of research on school choice* (pp. 17-31). New York: Routledge.

Wolf, P.J. (2019). [What happened in the bayou? Examining the effects of the Louisiana Scholarship Program](#). *Education Next*, 19(4): 48-56.

*Shakeel, M. D. & Wolf, P. J. (2018). [Does private Islamic schooling promote terrorism? An analysis of the educational background of successful American homegrown terrorists](#). *Hungarian Educational Research Journal*, 8(1), 37-54.

Wolf, P.J. (2018). [Taking stock of private-school choice: Programs benefit disadvantaged students](#), *Education Next*, 18(2), 46-51.

Wolf, P.J. (2017). [Introduction to the special issue—School choice: Separating fact from fiction](#). *Journal of School Choice*, 11(4), 487-490. Open access [here](#).

Wolf, P.J., & *Egalite, A. (2017). [The case for school vouchers](#). In R. Fox, & N. Buchanan (Eds.), *School Choice: A Handbook for Researchers, Practitioners, Policy-Makers and Journalists* (pp. 287-302). Wiley-Blackwell.

Wolf, P.J. (2016). [In tribute: Jaap Dronkers, 1945-2016](#). *Journal of School Choice*, 10(2), 137-139.

Fox, R.A., & Wolf, P.J. (2015). [Introduction to the special issue](#). *Journal of School Choice*, 9(3), 325-29.

Patrick J. Wolf, Ph.D.

- *Egalite, A.J., & Wolf, P.J. (2015). [Opportunity essay: Achieving economic mobility through school choice](#). In J.A. Marshall, & C.Kim (Eds.), *2015 Index of Culture and Opportunity*. Washington, DC: Heritage Foundation.
- Wolf, P.J., *Egalite, A.J., & Dixon, P. (2015). Private school choice in developing countries: experimental results from Delhi, India. In P. Dixon, C. Counihan, & S. Humble (Eds.), *Handbook of International Development and Education* (pp. 456-71). Cheltenham, UK: Edward Elgar.
- Fox, R.A., & Wolf, P.J. (2014). [Introduction to the special issue](#). *Journal of School Choice*, 8(3), 357-61.
- Wolf, P.J., & *Egalite, A. (2014). Tuition tax credits. In D.J. Brewer, & L.O. Picus (Eds.), *Encyclopedia of Education Economics and Finance* (pp. 814-17). Newbury Park, CA: Sage.
- Wolf, P.J., & *Cheng, A. (2014). Measurement error. In D. J. Brewer, & L.O. Picus (Eds.), *Encyclopedia of Education Economics and Finance* (pp. 457-58). Newbury Park, CA: Sage.
- Fox, R.A., & Wolf, P.J. (2013). [Introduction to the special issue](#). *Journal of School Choice*, 7(3), 255-59.
- Wolf, P.J., Fleming, D.J., & Witte, J.F. (2012, Summer). [Special choices: Do voucher schools serve students with disabilities?](#) *Education Next*, 12(3), 16-22.
- Campbell, K., DiPerna, P., Enlow, R.C., Forster, G., Greene, J.P., Hess, F.M., Ladner, M., Petrilli, M., & Wolf, P. (2012, Summer). What the research says about school choice. *Leadership Information*, 10(4), 54-56.
- Wolf, P.J. (2009). [The passing of a gentle giant: A personal tribute to John Brandl](#). *Education Next*, 9(2), 80.
- Wolf, P.J. (2008). [School voucher programs: What the research says about parental school choice](#). *Brigham Young University Law Review*, 2008(2), 415-46.
- Wolf, P.J. (2008). Vouchers. In G. McCulloch, & D.Crook (Eds.), *The International Encyclopedia of Education* (pp. 635-36). London: Routledge.
- Wolf, P.J. (2005, Spring). [Evaluation of the DC opportunity scholarship program: A summary of the first year report on participation](#). *Georgetown Public Policy Review*, 10(2), 85-88.
- Viteritti, J.P., Walberg, H.J., & Wolf, P.J. (2005). School choice: How an abstract idea became a political reality. *Brookings Papers on Education Policy* 8, 137-173.
- Wolf, P.J. (2003, Winter). [Sisyphean tasks](#). *Education Next*, 3(1), 24-31.
- Wolf, P.J. (2001). Authority, delegation. In N. J. Smelser, & P. B. Baltes (Eds.) *The International Encyclopedia of the Social and Behavioral Sciences*, In I. Katznelson, & K. Prewitt (Eds.) volume on *Public Policy* (pp. 972-78). Oxford, England: Pergamon Press.
- Wolf, P.J. (1999, Winter). The school voucher debate: An assessment. *Metropolitics* 3(1), 31-34.

E. Invited Book Chapters (15) (* designates current or former graduate student):

- Wolf, P. J., & *DeAngelis, C. A. (2023). [Funding students instead of systems: The case for school choice](#). In Hall, J. C., & Kassens, A. L., *Challenges in classical liberalism: Debating the policies of today versus tomorrow* (pp. 55-76). New York: Palgrave Macmillan.
- Wolf, P. J. (2021). Conclusions and recommendations. In Sinicola, C., & Candel, C. S. (Eds.), *A vision of hope: Catholic schooling in Massachusetts* (pp. 151-163). Boston, MA: Pioneer Institute.
- Wolf, P. J. (2020). Myth: Public schools are necessary for a stable democracy. In C. A. DeAngelis & N. P. McCluskey (Eds.), *School choice myths: Setting the record straight on education freedom* (pp. 39-57). Washington, DC: Cato Institute.

Patrick J. Wolf, Ph.D.

- *DeAngelis, C. A., & Wolf, P. J. (2019). What does the evidence say about education choice? A comprehensive review of the literature. In L. M. Burke & J. Butcher (Eds.), *The not-so-great society* (pp. 175-185). Washington, DC: Heritage Foundation.
- *Shakeel, M. D., & Wolf, P. J. (2019). Poor parents are careful choosers: Dispelling the myth that school choice harms the poor. In P. Dixon & S. Humble (Eds.), [*School choice around the world: ... and the lessons we can learn*](#) (pp. 131-153). Amsterdam, The Netherlands: IEA Publications.
- *DeAngelis, C. A., & Wolf, P. J. (2019). Improving civil society through private school choice: A review of the U.S. evidence. In P. Dixon & S. Humble (Eds.), [*School choice around the world: ... and the lessons we can learn*](#) (pp. 71-93). Amsterdam, The Netherlands: IEA Publications.
- *Hitt, C., Wolf, P.J., & *McShane, M.Q. (2018). Achievement versus attainment: Are school choice evaluators looking for impacts in the wrong place? In Berends, M., Waddington, R.J., & Schoenig, J.A. (eds.), *School choice at the crossroads: Research perspectives* (pp. 173-185). New York: Routledge.
- Wolf, P.J., & *Egalite, A.J. (2018). Does private school choice improve student achievement? A review of the evidence. In Berends, M., Waddington, R.J., & Schoenig, J.A. (eds.), *School choice at the crossroads: Research perspectives* (pp. 54-68). New York: Routledge.
- Wolf, P.J. (2014). The school choice program-research nexus. In M.Q. McShane (Ed.), *The supply side of school choice* (pp. 209-34). Lanham, MD: Rowman & Littlefield.
- Wolf, P.J., & *Jacob, A.M. (2013). School choice. In R.S. Rycroft (Ed.), *The economics of inequality, poverty, and discrimination in the 21st century*. Santa Barbara, CA: ABC-CLIO Books.
- Howell, W.G., Wolf, P.J., Peterson, P.E., & Campbell, D.E. (2006). The impact of vouchers on student performance. In P.E. Peterson (Ed.), *Choice and competition in American education*. Lanham, MD: Rowman & Littlefield.
- Wolf, P.J. (2005). Special education in the San Diego city schools. In F.M. Hess (Ed.), *Urban school reform: Lessons from San Diego* (pp. 283-98). Cambridge, MA: Harvard Education Press.
- Wolf, P.J. (2004). Comment on 'school choice: How an abstract idea became a political reality. In D. Ravitch (Ed.), *The Brookings papers on education policy* (pp. 162-68). Washington DC: Brookings.
- Peterson, P.E., Howell, W.G., Wolf, P.J., & Campbell, D.E. (2003). School vouchers: Results from randomized experiments. In C.M. Hoxby (Ed.), *The economics of school choice* (pp. 107-44). National Bureau of Economic Research and the University of Chicago Press.
- Hassel, B.C., & Wolf, P.J. (2001). [Effectiveness and accountability \(Part 2\): Alternatives to the compliance model](#). In C.E. Finn, Jr., A.J. Rotherham, & C.R. Hokanson, Jr. (Eds.), *Rethinking special education for a new century* (pp. 309-33). Washington: Thomas B. Fordham Foundation and Progressive Policy Institute.
- Wolf, P.J., & Hassel, B.C. (2001). [Effectiveness and accountability \(Part 1\): The compliance model](#). In C.E. Finn, Jr., A.J. Rotherham, & C. R. Hokanson, Jr. (Eds.), *Rethinking special education for a new century* (pp. 53-75). Washington DC: Thomas B. Fordham Foundation and Progressive Policy Institute.

F. Book Reviews (11):

- Wolf, P.J., (2021, Summer). Review of [The Politics of Institutional Reform: Katrina, Education, and the Second Face of Power](#) by T. M. Moe. *Political Science Quarterly*, 136(3).

Patrick J. Wolf, Ph.D.

- Wolf, P.J., (2015, Summer). [Tracking is a district problem: Schools of choice are actually less likely to sue ability tracking](#). Review of *On the same track: How schools can join the Twenty-First-Century Struggle against resegregation* by C. C. Burris. *Education Next*, 15(4).
- Wolf, P.J. (2014, Summer). [Comparing public schools to private](#). Review of *The public school advantage: Why public schools outperform private schools* by C.A. Lubienski & S.T. Lubienski. *Education Next*, 14(3).
- Wolf, P.J. (2013, Spring). Review of [Zero chance of passage: The pioneering charter school story](#) by E.R. Junge. *Journal of School Choice* 7(2), 249-252.
- Wolf, P.J. (2011, June). [Missing religion](#). Review of *Does God make a difference? Taking religion seriously in our schools and universities* by W.A. Nord. *First Things*, 214, 57-59.
- Wolf, P.J. (2002, June). Review of *Market-based governance: Supply side, demand side, upside, and downside*. Edited by J.D. Donahue & J.S. Nye Jr. *Georgetown Public Policy Review*, 9(1).
- Wolf, P.J. (2002). Review of *Government failure: A primer on public choice* by G. Tullock, A. Seldon, & G.L. Brady. *Georgetown Public Policy Review*, 8(1).
- Wolf, P.J. (2002, Winter). [Democracy in education: America's latest voluntary organization – the charter school](#). Review of *Inside charter schools: The paradox of radical reform* edited by B. Fuller. *Education Next*, 2(1).
- Wolf, P.J. (2000). Review of *City schools and city politics: Institutions and leadership in Pittsburgh, Boston, and St. Louis* by J. Portz, L. Stein, & R.R. Jones. *Political Science Quarterly*, 115(3), 480-481.
- Wolf, P.J. (1997). Review of *Leaders and leadership: An appraisal of theory and research* by M. Rejai & K. Phillips.
- Wolf, P.J. (1993). Review of *Politics and bureaucracy in the modern presidency* by R. Maranto. *Political Science Quarterly*, 110(2), 340-342.

G. Policy Reports (110):

- Daniels, D.L., Johnson, A.H., McGee, J.B., & Wolf, P.J. (2025, October). 2024-25 [Arkansas Education Freedom Accounts Program annual report](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Gallo, M., Ritter, C., & Wolf, P.J. (2025, July). [If you build it this way, they will come](#). Working Paper #18, EdChoice.
- Wolf, P.J. (2025, February). [What school choice could do for North Dakota](#). White paper. Sheila and Robert Challey Institute for Global Innovation and Growth, North Dakota State University, Fargo, North Dakota.
- Johnson, A. H., McGee, J. B., Wolf, P. J., May, J. F., & Maloney, L. D. (2023, December). [Charter school funding: Did initial pandemic relief advance equity in the city?](#) School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Johnson, A. H., McGee, J. B., Wolf, P. J., May, J. F., & Maloney, L. D. (2023, November). [Still a good investment: Charter school productivity in nine cities](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Johnson, A. H., McGee, J. B., Wolf, P. J., May, J. F., & Maloney, L. D. (2023, August). [Charter school funding: Little progress towards equity in the city](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.

Patrick J. Wolf, Ph.D.

- Johnson, A. H., McGee, J. B., Wolf, P. J., Maloney, L. D., & May, J. F. (2023, March). [Charter school funding disparities: Los Angeles, California](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Maranto, R., Reilly, W., Wolf, P., Harris, M. (2022, May). [Which police departments make black lives matter, which don't, and why don't most social scientists care?](#) EDRE Working Paper 2022-05, University of Arkansas, Fayetteville, AR.
- McGee, J. B., Wolf, P. J., & Maloney, L. D. (2022, January). [Charter school funding inequities: Rochester, New York](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Sude, Y., & Wolf, P. J. (2021, December). [Whose turn now? The enactment & expansion of private school choice programs across the U.S.](#) EdWorkPaper No. 21-498, Brown University, Providence, RI.
- Rhames, M. A., & Wolf, P. J. (2021, November). [One or the Other: Parent Religiosity or Private School Choice May Reduce Crime and Paternity Disputes in Milwaukee](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Dills, A., Wolf, P. J., DeAngelis, C. A., May, J. F., Maloney, L. D., & Syftestad, C. (2021, October). [Charter school funding: Dispelling myths about EMOs, expenditure patterns, and nonpublic dollars](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Syftestad, C., Wolf, P. J., Tucker, W., & Rhim, L. M. (2021, July). [Charter school funding: Support for students with disabilities](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P. J., Greene, J.P., Ladner, M., & Paul, J.D. (2021, March). [Education freedom and student achievement: Is more school choice associated with higher state-level performance on the NAEP?](#) School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- DeAngelis, C.A., Wolf, P.J., Syftestad, C. Maloney, L.D., May, J.F. (2021, February). [Making it Count: The productivity of public charter schools in seven U.S. cities](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- DeAngelis, C.A., Wolf, P.J., Maloney, L.D., May, J.F. (2020, November). [Charter school funding: Inequity surges in the cities](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Paul, J.D., & Wolf, P.J. (2020, October). [Moving on Up? A virtual school, student mobility, and achievement](#). EdWorkingPapers. Annenberg, Brown University, Providence, RI.
- Cheng, A., Wolf, P.J., Wang, W., & Wilcox, W.B. (2020, September). [The Protestant family ethic: What do Protestant, Catholic, private, and public schooling have to do with marriage, divorce, and non-marital childbearing?](#) Institute for Family Studies, American Enterprise Institute, Washington, DC.
- Wolf, P.J. (2020, July 1). [Private school choice programs: What do we know about their effects on outcomes for disadvantaged students?](#) A background paper for the Hoover Education Success Initiative, Stanford University, Palo Alto, CA.
- Wolf, P.J., Witte, J.F., Kisida, B. (2019, August). [Do voucher students attain higher levels of education? Extended evidence from the Milwaukee Parental Choice Program](#). EdWorkingPaper: 19-115. Annenberg, Brown University, Providence, RI.

Patrick J. Wolf, Ph.D.

- Chingos, M.M., Kuehn, D., Monarrez, T., Wolf, P.J., Witte, J.F., & Kisida, B. (2019, July). [*The effects of means-tested private school choice programs on college enrollment and graduation*](#). Urban Institute Research Report, Washington, DC.
- Wolf, P.J., Mills, J.N., Sude, Y., Erickson, H.H., & Lee, M.L. (2019, April). [*How has the Louisiana Scholarship Program Affected Students? A Comprehensive Summary of Effects after Four Years*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Sude, Y., & Wolf, P.J. (2019, April). [*Do you get cream with your choice? Characteristics of students who moved into or out of the Louisiana Scholarship Program*](#). EDRE working paper no. 2019-13. Social Science Research Network, April 23.
- Erickson, H.H., Mills, J.N., & Wolf, P.J. (2019, April). [*The effect of the Louisiana Scholarship Program on college entrance*](#). EDRE working paper no. 2019-12. Social Science Research Network, April 23.
- Lee, M.H., Mills, J.N., & Wolf, P.J. (2019, April). [*Heterogeneous impacts across schools in the first four years of the Louisiana Scholarship Program*](#). EDRE working paper no. 2019-11. Social Science Research Network, April 23.
- Mills, J.N., & Wolf, P.J. (2019, April). [*The effects of the Louisiana Scholarship Program on student achievement after four years*](#). EDRE working paper no. 2019-10. Social Science Research Network, April 23.
- DeAngelis, C.A., Wolf, P.J., Maloney, L.D., & May, J.F. (2019). [*A good investment: The updated productivity of public charter schools in eight U.S. cities*](#). EDRE working paper no. 2019-09. Social Science Research Network, April 8.
- DeAngelis, C.A., Burke, L., & Wolf, P.J. (2019). [*The effects of regulations on private school choice program participation: Experimental evidence from California and New York*](#). EDRE working paper no. 2019-07. Social Science Research Network, March 12.
- DeAngelis, C.A., & Wolf, P.J. (2019, February). [*Private school choice and character: More evidence from Milwaukee*](#). EDRE working paper no. 2019-03. Social Science Research Network, February 26.
- DeAngelis, C.A., Wolf, P.J., Maloney, L.D., May, J.F. (2018, November). [*Charter school funding: \(More\) inequity in the city*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- DeAngelis, C.A., Burke, L., & Wolf, P.J. (2018). [*The effects of regulations on private school choice program participation: Experimental evidence from Florida*](#). EDRE working paper no. 2018-08. Social Science Research Network, October 22.
- Rebarber, T., McCluskey, N., & Wolf, P.J. (2018, September). [*Common Core, school choice & rethinking standards-based reform*](#). White paper #186. Pioneer Institute for Public Policy Research, Boston, MA.
- DeAngelis, C.A., & Wolf, P.J. (2018). [*Will democracy endure private school choice? The effect of the Milwaukee Parental Choice Program on adult voting behavior*](#). EDRE working paper no. 2018-03. Social Science Research Network, May 14.
- Hitt, C., McShane, M.Q., & Wolf, P.J. (2018, March). [*Do impacts on test scores even matter? Lessons from long-run outcomes in school choice research*](#). White paper. American Enterprise Institute, Washington, DC.

Patrick J. Wolf, Ph.D.

- Wolf, P.J., Witte, J.F., Kisida, B. (2018, February). [*Do voucher students attain higher levels of education? Extended evidence from the Milwaukee Parental Choice Program*](#). Research report. Urban Institute, Washington, DC.
- DeAngelis, C.A., Wolf, P.J., Maloney L.D., May, J.F. (2018, February). [*Bigger bang, fewer bucks? The productivity of public charter schools in eight U.S. cities*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR. Also [*EDRE Working Paper No. 2018-01*](#) via Economics Research Network.
- Wolf, P.J., & Lasserre-Cortez, S. (2018, January). [*Special education enrollment and classification in Louisiana charter schools and traditional schools*](#) (REL 2018–288). Washington, DC: U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Regional Educational Laboratory Southwest.
- Wolf, P.J., & Lasserre-Cortez, S. (2018, January). [*An exploratory analysis of features of New Orleans charter schools associated with student achievement growth*](#) (REL 2018–287). Washington, DC: U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Regional Educational Laboratory Southwest.
- Shakeel, M.D., & Wolf, P.J. (2017, November). [*Does private Islamic schooling promote terrorism? An analysis of the educational background of successful American homegrown terrorists*](#). (EDRE Working Paper No. 2017-20). Economics Research Network, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Maloney, L.D., & Wolf, P.J. (2017, August). [*Charter school funding: Inequity in New York City*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Mills, J.N., & Wolf, P.J. (2017, June 26). [*How has the Louisiana Scholarship Program affected students? A comprehensive summary of effects after three years*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Mills, J.N., & Wolf, P.J. (2017, June 26). [*The effects of the Louisiana Scholarship Program on student achievement after three years*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Tuchman, S., & Wolf, P.J. (2017, June 26). [*Special education identification in the Louisiana Scholarship Program*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Sude, Y., DeAngelis, C., & Wolf, J.P. (2017, June 26). [*Supplying choice: An analysis of school participation decisions in voucher programs in DC, Indiana, and Louisiana*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P.J., Maloney, L.D., May, J.F., & DeAngelis, C.A. (2017, May). [*Charter school funding: Inequity in the city*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Witte, J.F., & Wolf, P. J. (2017). [*The Wisconsin role in the school choice movement*](#) (EDRE Working Paper No. 2017-12). Economics Research Network, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Anderson, K.P., & Wolf, P.J. (2017). [*Does method matter? Assessing the correspondence between experimental and nonexperimental results from a school voucher program evaluation*](#). (EDRE Working Paper No. 2017-10). Economics Research Network, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.

Patrick J. Wolf, Ph.D.

- DeAngelis, C., & Wolf, P.J. (2016). [*Whether to approve an education savings account program in Texas: Preventing crime does pay*](#) (EDRE Working Paper No. 2016-20). Economics Research Network, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2016, October). [*Boosting graduation rates in Texas through education savings accounts*](#) (EDRE Working Paper 2016-13). Economics Research Network, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Shakeel, M.D., Anderson, K.P., & Wolf, P.J. (2016). [*The participant effects of private school vouchers across the globe: A meta-analytic and systematic review*](#) (Working Paper 2016-07). Economics Research Network, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Wolf, P.J., & Egalite, A.J. (2016, April). [*Pursuing innovation: How can educational choice transform K-12 education in the U.S.*](#) Indianapolis, IN: Friedman Foundation for Education Choice.
- DeAngelis, C., & Wolf, P.J. (2016). [*The school choice voucher: A 'get out of jail' card?*](#) (EDRE Working Paper 2016-03). Economics Research Network, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Mills, J.N., Egalite, A.J., & Wolf, P.J. (2016, February). [*How has the Louisiana scholarship program affected students? A comprehensive summary of effects after two years*](#) (LSP Policy Brief). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Mills, J.N., & Wolf, P.J. (2016, February). [*The effects of the Louisiana scholarship program on student achievement after two years*](#) (LSP Report #1). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Mills, J.N., Cheng, A., Hitt, C.E., Wolf, P.J., & Greene, J.P. (2016, February). [*Measures of student non-cognitive skills and political tolerance after two years of the Louisiana scholarship program*](#) (LSP Report #2). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Egalite, A.J., Mills, J.N., & Wolf, P.J. (2016). [*The impact of the Louisiana scholarship program on racial segregation in Louisiana schools*](#) (LSP Report #3). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Batdorff, M., Cheng, A., Maloney, L., May, J.F., & Wolf, P.J. (2015). [*Buckets of water into the ocean: Non-public revenue in public charter and traditional public schools*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Kisida, B., Wolf, P.J., & Rhinesmith, E. (2015, January). [*Views from private schools: Attitudes about school choice programs in three states*](#). Washington, DC: American Enterprise Institute.
- Stewart, T., & Wolf, P.J. (2015, January). [*The school choice journey: Parents experiencing more than improved test scores*](#). Washington, DC: American Enterprise Institute Research Brief.
- Wolf, P.J., Cheng, A., Batdorff, M., Maloney, L., May, J., & Speakman, S. T. (2014, July). [*The productivity of public charter schools*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Batdorff, M., Maloney, L., May, J., Speakman, S., Wolf, P.J., & Cheng, A. (2014). [*Charter school funding: Inequity expands*](#). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2014, January). [*The school choice program – Research Nexus*](#). Washington, DC: American Enterprise Institute Research Paper.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2013, October). *School vouchers in Washington, D.C.: Lessons for Massachusetts* (White Paper No. 105). Boston, MA: Pioneer Institute.
- Stewart, T., & Wolf, P.J. (2012, September). [*Understanding school shoppers in Detroit*](#). Detroit, MI: Qwaku & Associates for Michigan Future Inc.
- Wolf, P.J. (2012, February). [*The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of final reports*](#) (Milwaukee Evaluation Report #36). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P.J., Witte, J., & Fleming, D.J. (2012, February). [*Special education and the Milwaukee parental choice program*](#) (Milwaukee Evaluation Report #35) School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- McShane, M.Q., Kisida, B., Jensen, L.I., & Wolf, P.J. (2012, February). [*Milwaukee parental choice program: Descriptive report on participating schools 2010-11*](#) (Milwaukee Evaluation Report #33). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Egalite, A.J., & Wolf, P.J. (2012). [*Milwaukee longitudinal school choice evaluation: Annual school testing summary report 2010-11*](#) (Milwaukee Evaluation Report #32). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Witte, J.F., Wolf, P.J., Carlson, D., & Dean, A. (2012, February). [*Milwaukee independent charter schools study: Final report on four-year achievement gains*](#) (Milwaukee Evaluation Report #31). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Cowen, J.M., Fleming, D.J., Witte, J.F., Wolf, P.J., & Kisida, B. (2012). [*Student attainment and the Milwaukee parental choice program: Final follow-up analysis*](#) (Milwaukee Evaluation Report #30). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Witte, J.F., Carlson, D., Cowen, J.M., Fleming, D.J., & Wolf, P.J. (2012, February). [*The MPCP longitudinal educational growth study fifth year report*](#) (Milwaukee Evaluation Report #29). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2011, April). *Promueven la justicia social los vouchers escolares? Estudio de caso en Washington, DC* (Documentos #53). Programa de Promocion de la Reforma Educativa en American Latina y el Caribe (PREAL), Washington, DC.
- Wolf, P.J. (2011, March). [*The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of fourth year reports*](#) (Milwaukee Evaluation Report #28). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Kisida, B., Jensen, L., & Wolf, P.J. (2011, March). [*The Milwaukee parental choice program: Descriptive report on participating schools 2009-2010*](#) (Milwaukee Evaluation Report #27) School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- McShane, M.Q., & Wolf, P.J. (2011, March). [*Milwaukee longitudinal school choice evaluation: Annual school testing summary report 2009-10*](#) (Milwaukee Evaluation Report #26). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Witte, J.F., Wolf, P.J., Dean, A., & Carlson, D. (2011, March). [*Milwaukee independent charter schools study: Report on two- and three-year academic gains*](#) (Milwaukee Evaluation Report #25). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Cowen, J.M., Fleming, D.J., Witte, J.F., & Wolf, P.J. (2011, March). [*Student attainment and the Milwaukee parental choice program*](#) (Milwaukee Evaluation Report #24). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.

Patrick J. Wolf, Ph.D.

- Witte, J.F., Carlson, D., Cowen, J.M., Fleming, D.J., & Wolf, P.J. (2011, March). [*The MPCP longitudinal educational growth study fourth year report*](#) (Milwaukee Evaluation Report #23). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Witte, J.F., Wolf, P.J., Dean, A., & Carlson, D. (2010, December). [*Milwaukee independent charter schools study: Report on one year of student growth*](#) (Milwaukee Evaluation Report #21). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O., & Carr, M. (2010, June). [*Evaluation of the DC opportunity scholarship program: Final report*](#) (NCEE 2010-4018). U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance: Washington, DC: U.S. Government Printing Office.
- Wolf, P.J. (2010, April). [*The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of third year reports*](#) (Milwaukee Evaluation Report #14). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Witte, J.F., Cowen, J.M., Fleming, D.J., Wolf, P.J., Condon, M.R., & Lucas-McLean, J. (2010, April). [*The MPCP longitudinal educational growth study third year report*](#) (Milwaukee Evaluation Report #15). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Cowen, J.M., Fleming, D.J., Witte, J.F., & Wolf, P.J. (2010, April). [*School and sector switching in Milwaukee*](#) (Milwaukee Evaluation Report #16). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Kisida, B., Jensen, L., & Wolf, P.J. (2010, April). [*The Milwaukee parental choice program: Descriptive report on participating schools 2008-2009*](#) (Milwaukee Evaluation Report #17). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Dean, J.R., & Wolf, P.J. (2010, April). [*Milwaukee longitudinal school choice evaluation: Annual school testing summary report 2008-09*](#) (Milwaukee Evaluation Report #18). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2009, March). [*Evaluation of the DC opportunity scholarship program: Impacts after three years*](#) (NCEE 2009-4050). U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance: Washington, DC: U.S. Government Printing Office.
- Wolf, P.J. (2009, March). [*The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of second year reports*](#) (Milwaukee Evaluation Report #6). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Kisida, B., Jensen, L., & Wolf, P.J. (2009, March). [*The Milwaukee parental choice program: Descriptive report on participating schools*](#) (Milwaukee Evaluation Report #8). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Gray, N.L., Wolf, P.J., & Jensen, L.I. (2009, March). [*Milwaukee longitudinal school choice evaluation: Annual school testing summary report 2007-08*](#) (Milwaukee Evaluation Report #9). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Witte, J.F., Wolf, P.J., Cowen, J.M., Fleming, D.J., & Lucas-McLean, J. (2009, March). [*MPCP longitudinal educational growth study second year report*](#), (Milwaukee Evaluation Report #10). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Stewart, T., & Wolf, P.J. (2009, March). [*Parent and student experiences with choice in Milwaukee, Wisconsin*](#) (Milwaukee Evaluation Report #13). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.

Patrick J. Wolf, Ph.D.

- Stewart, T., & Wolf, P.J., Cornman, S.Q., McKenzie-Thompson, K., & Butcher, J. (2009, January). [*Family reflections on the District of Columbia opportunity scholarship program: Final summary report*](#) (SCDP 09-01). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2008, June). [*Evaluation of the DC opportunity scholarship program: Impacts after two years*](#) (NCEE 2008-4023). U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance: Washington, DC: U.S. Government Printing Office.
- Witte, J.F., Wolf, P.J., Cowen, J.M., Fleming, D.J., & Lucas-McLean, J. (2008, February). [*MPCP longitudinal educational growth study baseline report*](#) (Milwaukee Evaluation Report #5). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Gray, N.L., Wolf, P.J., & Jensen, L.I. (2008, February). [*Milwaukee longitudinal school choice evaluation: Annual school testing summary report*](#) (Milwaukee Evaluation Report #4). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Kisida, B., Jensen, L., Rahn, J.C., & Wolf, P.J. (2008, February). [*The Milwaukee parental choice program: Baseline descriptive report on participating schools*](#) (Milwaukee Evaluation Report #3). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2008, February). [*The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of baseline reports*](#) (Milwaukee Evaluation Report #1). School Choice Demonstration Project, University of Arkansas, Fayetteville, AR.
- Stewart, T., Wolf, P.J., Cornman, S.Q., & McKenzie-Thompson, K. (2007, December). [*Satisfied, optimistic, yet concerned: Parent and student voices on the third year of the D.C. opportunity scholarship program*](#) (SCDP 07-02). School Choice Demonstration Project, Georgetown University, Washington, DC.
- Wolf, P., Gutmann, B., Puma, M., Rizzo, L., Eissa, N.O., & Silverberg, M. (2007). [*Evaluation of the DC opportunity scholarship program: Impacts after one year*](#). U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance: Washington, DC: U.S. Government Printing Office.
- Wolf, P.J. (2007, May). [*Civics exam: Schools of choice boost civic values*](#) (PEPG/07-05). Program on Education Policy and Governance, Harvard University, Cambridge, MA.
- Cornman, S.Q., Wolf, P.J., & Stewart, T. (2007, May). [*The evolution of school choice consumers: Parent and student voices on the second year of the D.C. opportunity scholarship program*](#) (SCDP 07-01). School Choice Demonstration Project, Georgetown University, Washington, DC.
- Wolf, P., Gutmann, B., Puma, M., & Silverberg, M. (2006). [*Evaluation of the DC opportunity scholarship program: Second year report on participation*](#). U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance: Washington, DC: GPO.
- Glazerman, S., Silva, T., Addy, N., Avellar, S., Max, J., McKie, A., Natzke, B., ... Ungerer Greszler, R. (2006, March). [*Options for studying teacher pay reform using natural experiments*](#), No. 6212-200, Mathematica Policy Research, Princeton, New Jersey.
- Stewart, T., Wolf, P.J., & Cornman, S.Q. (2005, October). [*Parent and student voices on the first year of the D.C. opportunity scholarship program*](#) (SCDP 05-01). School Choice Demonstration Project, Georgetown University, Washington, DC.

Patrick J. Wolf, Ph.D.

- Wolf, P., Gutmann, B., Eissa, N., Puma, M., & Silverberg, M. (2005, April). [*Evaluation of the DC opportunity scholarship program: First year report on participation*](#) (ED-01-CO-0082/0016). U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance: Washington, DC: GPO.
- Hill, P.T. (Chair) (2003, November). [*School choice: Doing it the right way makes a difference*](#), National Working Commission on Choice in K-12 Education, Washington DC: The Brookings Institution.
- Wolf, P.J., Peterson, P.E., & West, M.R. (2001, August). [*Results of a school voucher experiment: The case of Washington, D.C. after two years*](#) (PEPG/01-05). Program on Education Policy and Governance, Harvard University, Cambridge, MA.
- Howell, W.G., Wolf, P.J., Peterson, P.E., & Campbell, D.E. (2000, September). [*Test score effects of school vouchers in Dayton, Ohio, New York City, and Washington, D.C.: Evidence from randomized field trials*](#) (PEPG/00-16). Program on Education Policy and Governance, Harvard University, Cambridge, MA.
- Wolf, P.J., Howell, W.G., & Peterson, P.E. (2000, February). [*School choice in Washington, D.C.: An evaluation after one year*](#) (PEPG/00-08). Program on Education Policy and Governance, Harvard University, Cambridge, MA.
- Wolf, P.J., et al. (1998, April). *Democratic values in New York City schools*. Workshop in applied policy analysis final report. School of International and Public Affairs, Columbia University, New York, NY.

COMPLETED DISSERTATIONS SUPERVISED (35)

A. Committee Chair (9) (with initial job placement):

- Rhames, M. A. (2023, July). *The hidden role of religiosity in contemporary public education in the United States of America*. (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Post-Doctoral Fellow, Baylor University).
- Sude, Y. (2018, June). [*Participation patterns in private school choice programs in the U.S.: States, schools, students*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Clinical Assistant Professor, Walton College of Business, University of Arkansas).
- DeAngelis, C. A. (2018, May). [*The societal impacts of private school choice around the world*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Education Policy Fellow, Cato Institute).
- Tuchman, S. (2017, April). [*Education policy factors contributing to special education identification*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Senior Research Analyst, University of Washington).
- Cheng, A. (2016, April). [*Teachers and the development of student noncognitive skills*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Post-Doctoral Fellow, Harvard University).

Patrick J. Wolf, Ph.D.

- Kisida, B. (2015, June). [*The educational benefits of cultural institutions*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Senior Research Associate, University of Missouri).
- Egalite, A.J. (2014, August). [*Means-tested vouchers: Impacts on public school performance & racial integration*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Post-Doctoral Fellow, Harvard University).
- McShane, M. (2013, May). [*Does mission matter? Examining the role of organizational mission and religious identity in schools participating in the Milwaukee parental choice program*](#), (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Policy Fellow, American Enterprise Institute).
- Gray, N. (2009, May). [*The systemic effects of the Ohio charter school policy*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR. (Assistant Professor, Young Harris College).

B. Committee Member (26):

- Johnson, A. H. (2025, June). [*Backpack funding: What happens when dollars follow the student?*](#) (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Klutts, C.S. (2024, August). [*The growth and governance of American classical and Christian schools*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Camp, A. (2024, April). [*The educator labor market in times of change: Lessons from the COVID-19 pandemic*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Harris, M. (2024, April). [*Countering antisemitism through education initiatives*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Lee, M. H. (2021, March). [*Faith-based education and value formation*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Cornman, S. Q. (2020, November). *Do equity and adequacy court decisions and policies make a difference for at-risk students? Longitudinal evidence from New Jersey*. (Unpublished doctoral dissertation). Teachers College, Columbia University, New York, NY.
- Kingsbury, I. (2019, June). [*Schooling and civic behavior: A global perspective*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Holmes, H. (2019, April). [*Expanding outcomes in educational program evaluation: Student outcomes, systemic effects, and policy implications*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.

Patrick J. Wolf, Ph.D.

- Burke, L. M. (2018, October). *Principal perspectives on school participation and non-participation in the D.C. Opportunity Scholarship Program: An institutional theory analysis*. (Unpublished doctoral dissertation). College of Education and Human Development, George Mason University, Fairfax, VA.
- Foreman, L. (2018, June). [*Localized teacher supply and demand in Arkansas: An exploration of the supply and demand of teachers in Arkansas school districts*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Shakeel, M. D. (2018, May). [*The private school advantage: Evidence from school vouchers and educational leadership*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Boyd, A. M. (2018, May). [*Who teaches where? A descriptive analysis of similarities and differences between teachers in traditional and charter schools in Pulaski County, Arkansas*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Anderson, K. (2017, August). [*Implementation fidelity and outcomes of school discipline policy: Three studies from Arkansas*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Rhinesmith, E. (2017, April). [*An evaluation of Arkansas' developmental coursework policy at postsecondary institutions*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Hitt, C. (2016, April). [*Character assessment: Three essays*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Moore, S.B. (2015, July). [*A random assignment evaluation of a college and career coaching program*](#), (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Mills, J. (2015, June). [*The effectiveness of cash transfers as a policy instrument in K-16 education*](#), (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Ash, J. (2015, April). [*A promise kept in El Dorado? An evaluation of the impact of the El Dorado promise on K-12 achievement and high school graduation*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Dean, J. (2015, April). [*Comparing schools: From value added to sound policy*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Lueken, M.F. (2014, August). [*Cash on the table? A behavioral analysis of refund claimants and annuitants in the Illinois teachers' retirement system*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Bowen, D. (2013, August). [*Risky business? An analysis of teacher characteristics and compensation preferences*](#). (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.

Patrick J. Wolf, Ph.D.

- Shuls, J. (2013, May). [*Do teacher characteristics affect student achievement? Evidence from a rural state.*](#) (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- McClusky, N. (2013, May). [*Education and social capital maximization: Does decentralization hold the key?*](#) (Unpublished doctoral dissertation). School of Public Policy, George Mason University, Fairfax, VA.
- Jensen, N.C. (2012, May). [*Merit pay in Arkansas: An evaluation of the cobra pride incentive program in the Foundation Lake school district.*](#) (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Carr, M. (2009, May). [*An evaluation of the systemic effects of the Ohio educational choice scholarship program.*](#) (Unpublished doctoral dissertation). Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Ross, L. (2005). *Bureaucratic responsiveness and the administrative presidency.* (Unpublished doctoral dissertation). Department of Political Science, Georgetown University, Washington, DC.

GOVERNMENT TESTIMONY (39):

A. United States Congress (5)

- D.C. opportunity scholarship program: Making the American dream possible: Hearing of the Full U.S. House Committee on Oversight and Government Reform, Archbishop Carroll High School, Washington, DC, (May 14, 2015).*
- The DC opportunity scholarship program: Keeping the door open: Testimony before the U.S. House Committee on Oversight and Reform, Subcommittee on Health Care, DC, Census, and the National Archives, (March 1, 2011).*
- The value of education choices: Saving the D.C. opportunity scholarship program: Testimony before the U.S. Senate Committee on Homeland Security and Governmental Affairs, (February 16, 2011).*
- [*The DC opportunity scholarship program: Preserving school choice for all: Testimony before the U.S. Senate Committee on Homeland Security and Governmental Affairs, \(May 13, 2009\).*](#)
- Rethinking special education: How to reform the Individuals with Disabilities Education Act: Testimony before the U.S. House Committee on Education and the Workforce, Subcommittee on Education Reform, Rayburn House Office Building, Washington, DC, (May 2, 2002).*

B. Federal Commissions, State Legislatures & City Councils (34)

- The Evidence is In: School Choice Works, Testimony to the Mississippi House Select Committee on Education Freedom, September 25, 2025 (virtual).*
- Testimony Regarding LB 624: Effects of Private School Choice, Testimony to the Nebraska Senate Appropriations Committee (February 24, 2025).*
- Implementing Education Savings Account Programs, Testimony to the Texas House Education Committee (August 12, 2024).*
- Exploring Educational Opportunities in North Dakota, Testimony to the North Dakota Educational Opportunities Task Force (May 30, 2024).*

Patrick J. Wolf, Ph.D.

Improving Access to Special Education and Related Transportation Services in D.C. for Students with Disabilities, Testimony to the District of Columbia Advisory Committee of the U.S. Civil Rights Commission (May 10, 2024)

The Academic and Civic Effects of Private School Choice, Testimony to the Kansas Special Committee on Education (October 3, 2023)

The Effects of Private School Choice Programs: Written Testimony Submitted to the Texas House Public Education Committee (April 11, 2023).

The Effects of Private School Choice Programs: Written Testimony Submitted to the Texas Senate Committee on Education (March 22, 2023).

[Ensuring that Money Follows the Child, Testimony before the Texas Special Education Funding Commission](#), (May 23, 2022)

[The University of Arkansas Department of Education Reform: Its research and policy implications for Arkansas](#), Testimony before the Education Committee of the Arkansas State Senate, (February 16, 2022)

The Scholarly Research Regarding Private School Choice Programs: Written Testimony Submitted to the Minnesota Senate E-12 Committee, (March 2, 2021).

The research record on private school choice: Testimony before the Revenue Committee of the Nebraska Legislature, (March 7, 2019).

Test-based accountability provisions for private school choice programs: Testimony before the Tennessee House Education Committee, (April 5, 2017).

The Arkansas Parental Empowerment for education Choice Act of 2017: Testimony before the Arkansas House Education Committee, (March 9, 2017).

Private school choice: Higher test scores, more graduates & less crime at lower cost: Hearing of the Texas Senate Committee on Education, (September 14, 2016).

The value of school choice: Hearing of the Tennessee Senate Education Committee, (November 2, 2015).

Arkansas charter schools: Best practices and parental involvement: Interim Study Report to the Joint Committee on Education of the Arkansas Legislature, (December 17, 2014).

The productivity of public charter schools: Interim Study Report to the Joint Committee on Education of the Oklahoma Legislature, (October 15, 2014).

The effects of private school choice: Interim Study Report to the Joint Committee on Education of the Arkansas Legislature, (October 13, 2014).

The academic effects of private school choice programs: Testimony before the Interim Joint Committee on Education, Kentucky State Legislature, (November 10, 2014).

[The research on private school choice](#): Testimony before the Arkansas House Education Committee, (April 2, 2013).

The research on private school choice: Testimony before the Arkansas Senate Tax and Revenue Committee, (March 20, 2013).

The research on private school choice: Testimony before the Alaska Senate Education Committee, (March 29, 2013).

The research on private school choice: Testimony before the Alaska Senate Joint Education, Judiciary, and Fiscal Committee, (February 13, 2013).

The research facts about school vouchers: Testimony before the Georgia Legislative Study Committee, Atlanta, GA, (December 7, 2012).

Patrick J. Wolf, Ph.D.

The latest evidence on private school choice: Testimony before the Minnesota Senate Education Committee, St. Paul, MN, (February 29, 2012).

The research facts about private school choice: Testimony before the Minnesota House Education Finance Committee, St. Paul, MN, (February 29, 2012).

Successful school choice programs nationwide: Testimony before the Texas Senate Education Committee, University of Houston Hilton, Houston, Texas, (October 13, 2006).

What research says about school choice: Testimony before the Select Committee on Public School Finance, Subcommittee on Alternative Methods, Texas House of Representatives, Austin, Texas, (August 22, 2003).

Improving K-12 education in the District of Columbia: Testimony at a Public Roundtable, DC City Council Committee on Education, Libraries, and Recreations, Washington, DC, (March 15, 2003).

Improving the Telecommunications Access for Communicatively Impaired Persons Program: Testimony before the Minnesota House Public Utilities Committee, St. Paul, MN, (February 27, 1988).

Improving the Telecommunications Access for Communicatively Impaired Persons Program: Testimony before the Minnesota Senate Public Utilities Committee, St. Paul, MN, (February 25, 1988).

Providing Telecommunications Access for People with Communication Impairments: Testimony before the Minnesota House Public Utilities Committee, St. Paul, MN, (March 17, 1988).

Providing Telecommunications Access for People with Communication Impairments: Testimony before the Minnesota Senate Public Utilities Committee, St. Paul, MN, (March 10, 1988).

COURT AFFIDAVITS, ADVISORIES, AND PUBLIC COMMENTS (5):

Wolf, P.J., *Comment on the Request for Information and Feedback on Redesigning the Institute of Education Sciences (IES)*, ED-2025-IES-0844-0001, U.S. Department of Education, Washington, DC, September 27, 2025.

Wolf, P.J., Expert Report on Ohio K-12 Enrollment and Funding Trends Related to Claims Involving the Case of *Columbus City School District et al. vs. State of Ohio*, Court of Common Pleas, Franklin County, Ohio, Case No. 22CV000067, February 11, 2024.

Affidavit of Dr. Patrick J. Wolf in Support of Parent-Intervenors' Response to Plaintiffs' Motion for Preliminary Injunction, *Travis Beaver, et al., v. Riley Moore, et al.*, Circuit Court of Kanawha County, WV, Case Nos. 22-P-24, 22-P-26, June 15, 2022.

Wolf, P.J., [*Comment on the Notice of Proposed Priorities, Requirements, Definitions, and Selection Criteria \(NPP\) for the Charter Schools Program \(CSP\)*](#), ED-2022-OESE-0006-26413, U.S. Department of Education, Washington, DC, April 18, 2022.

Wolf, P.J., Expert Report on the Performance, Funding, and Fiscal Effects of Public Charter Schools in Shelby County and Metropolitan Nashville, Tennessee, *Shelby County Board of Education, et al., v. William Byron Lee, et al.*, Chancery Court for Davidson County, TN, Case No. 15-1048-III, May 25, 2021.

PODCASTS, WEBINARS & VIDEOS (Selective List)

[Lessons and Encouragements from Arkansas School Choice Research: Conversation with Patrick Wolf](#) (2025, October 27). Digical Education.

Patrick J. Wolf, Ph.D.

[Making Choice Programs Effective and Sustainable](#) (2025, September 26). Conference on Emerging School Models, Harvard University.

[The Archimedes Standards: Model PreK-12 State Mathematics Standards](#) (2025, June 10). National Association of Scholars.

[Civics, Civility & Measuring What Matters in Our Schools](#) (2025). Sienkiewicz, C., & Mitchell, S., *Quality Matters*, Episode 6.

[School Choice in North Dakota](#) (2024, November 1). Human Progress and Flourishing Workshop, Challey Institute for Global Innovation and Growth, North Dakota State University.

[The School Choice Journey](#) (2024). Gentles, G., *Students Over Systems Podcast*, Independent Women's Forum.

[Three Empirical Studies on School Choice and Student Outcomes](#) (2021, April 23). *IDEAS Workshop*, Challey Institute for Global Innovation and Growth, North Dakota State University.

[School Choice](#) (2017, March 10). *The Paul Harrell Program*, Conduit News.

[Reform School](#) (2014, March 31). Bowden, B., Choice Media.

ACADEMIC PAPERS PRESENTED AT PEER-REVIEWED CONFERENCES (141):

A. International (45):

Shakeel, M.D., Gallo, M., & Wolf, P.J. (2025, January 17-20). *The nation's achievement inequality report card: An assessment of traditional public, charter, Department of Defense, and Catholic schools*. Paper presented at the 13th International School Choice & Reform Conference, Fort Lauderdale, FL.

Gallo, M., Wolf, P.J., & Ritter, C. (2025, January 17-20). *If you build it like this, will they come? Design features of private school choice programs that encourage student participation*. Paper presented at the 13th International School Choice & Reform Conference, Fort Lauderdale, FL.

Daniels, D., & P.J. Wolf (2025, January 17-20). *Education freedom and COVID learning loss*. Paper presented at the 13th International School Choice & Reform Conference, Fort Lauderdale, FL.

Wolf, P.J., McGee, J.B., Johnson, A.H., Maloney, L.D., & May, J.F. (2023, January 13-16). *Charter school funding: Inequity at the dawn of the pandemic*. Paper presented at the 11th International School Choice & Reform Conference, Fort Lauderdale, FL.

Rhames, M., Wolf, P.J. (2023, January 13-16). *One or the other: Parent religiosity or private school choice may reduce crime in Milwaukee*. Paper presented at the 11th International School Choice & Reform Conference, Fort Lauderdale, FL.

Shakeel, M.D., Wolf, P.J., Johnson, A.H., Harris, M., Morris, S. (2023, January 13-16). *The public benefits of private schooling: A civic outcomes meta-analysis*. Paper presented at the 11th International School Choice & Reform Conference, Fort Lauderdale, FL.

DeAngelis, C.A., Burke, L.M., Wolf, P.J., & Dills, A.K. (2022, January 6-9). *The effects of regulations on private school choice program participation: Experimental evidence from the United States*. Paper presented at the 10th International School Choice & Reform Conference, Dublin, Ireland.

Wolf, P.J. (2021, January 16-18). *Myth: Public schools are necessary for a stable democracy*. Paper presented at the 9th International School Choice & Reform Conference, Virtual.

Patrick J. Wolf, Ph.D.

- Paul, J.P., & Wolf, P.J. (2021, January 16-18). *Moving on up? A virtual school, student mobility, and achievement*. Paper presented at the 9th International School Choice & Reform Conference, Virtual.
- Wolf, P.J., Maloney, L.D., DeAngelis, C.A., & May, J.F. (2021, January 16-18). *Public charter school funding inequities across U.S. cities and over time*. Paper presented at the 9th International School Choice & Reform Conference, Virtual.
- Wolf, P.J., Witte, J.F., & Kisida, B. (2020, January 17-20). *Do voucher students attain higher levels of education? Extended evidence from the Milwaukee Parental Choice Program*. Paper presented at the 8th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Erickson, H.H., Mills, J.N., & Wolf, P.J. (2020, January 17-20). *Effect of the Louisiana Scholarship Program on student achievement and college entrance after four years*. Paper presented at the 8th International School Choice & Reform Conference, Fort Lauderdale, FL.
- DeAngelis, C.A., Burke, L.M., & Wolf, P.J. (2020, January 17-20). *The effects of regulations on private school choice program participation in California and New York*. Paper presented at the 8th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Lee, M.L., Mills, J.N., & Wolf, P.J. (2020, January 17-20). *Heterogeneous achievement impacts across schools in the Louisiana Scholarship Program*. Paper presented at the 8th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Wolf, P.J. (2019, January 10-13). *Charter school funding inequity: Magnitude, causes & solutions*. Paper presented at the 7th International School Choice & Reform Conference, Lisbon, Portugal.
- Wolf, P.J., Mills, J.N., Sude, Y., Erickson, H.H., & Lee, M. (2019, January 10-13). *Intermediate results of the Louisiana Scholarship Program: Achievement, attainment, impact heterogeneity, and selection*. Paper presented at the 7th International School Choice & Reform Conference, Lisbon, Portugal.
- DeAngelis, C.A., & Wolf, P.J. (2019, January 10-13). *The effects of regulations on private school choice program participation: Experimental evidence from Florida*. Paper presented at the 7th International School Choice & Reform Conference, Lisbon, Portugal.
- DeAngelis, C.A., & Wolf, P.J. (2018, January 12-15). *The school choice voucher: A “get out of jail” card?* Paper presented at the 6th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Holmes, H., & Wolf, P.J. (2018, January 12-15). *The effects of the Louisiana Scholarship Program on high school graduation and college entrance*. Paper presented at the 6th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Mills, J.N., & Wolf, P.J. (2018, January 12-15). *The effects of the Louisiana Scholarship Program on student achievement after three years*. Paper presented at the 6th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Kisida, B., Witte, J.F., & Wolf, P.J. (2018, January 12-15). *Do voucher students attain higher levels of education? Extended evidence from the Milwaukee Parental Choice Program*. Paper presented at the 6th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Shakeel, M.D., Anderson, K., & Wolf, P.J. (2017, July 13-14). *The juice is worth the squeeze: A cost-effectiveness analysis of the experimental evidence on private school vouchers around the globe*. Paper presented at the International Conference of the Association for Policy Analysis and Management, Brussels, Belgium.

Patrick J. Wolf, Ph.D.

- Mills, J.N., & Wolf, P.J. (2017, January 3-5). *The effects of the Louisiana scholarship program on student achievement after three years*. Paper presented at the 5th International School Choice & Reform Conference, Honolulu, HI.
- Sude, Y., DeAngelis, C. & Wolf, P.J. (2017, January 3-5). *Who are the participants? Characteristics of schools participating in multi-city private school voucher programs*. Paper presented at the 5th International School Choice & Reform Conference, Honolulu, HI.
- Tuchman, S., & Wolf, P.J. (2017, January 3-5). *Do students with disabilities benefit from the Louisiana scholarship program? Third year results*. Paper presented at the 5th International School Choice & Reform Conference, Honolulu, HI.
- Sude, Y., & Wolf, P.J. (2017, January 3-5). *Going private: Political factors shaping the enactment or continuation of private school choice programs*. Paper presented at the 5th International School Choice & Reform Conference, Honolulu, HI.
- Wolf, P.J., Egalite, A.J., & Dixon, P. (2016, June 13-14). *Educational equality for Indian girls: Impacts of a private school voucher experiment in Delhi*. Paper presented at the International Conference of the Association for Policy Analysis and Management, London School of Economics, London, England.
- Sude, Y., & Wolf, P.J. (2016, May 5). *Going private: Political factors shaping the enactment and continuation of private school choice programs*. Paper presented at the workshop on Public Opinion and the Political Economy of Education, Ifo Institute for Economic Research at the University of Munich and the Program on Education Policy and Governance (PEPG) at Harvard University, Cambridge, MA.
- Shuls, J.V., & Wolf, P.J. (2015, May 9). *School vouchers and racial politics in the U.S.: Explaining the strange bedfellows supporting and opposing private school choice*. Paper presented at the workshop on Public Opinion and the Political Economy of Education, Ifo Institute for Economic Research at the University of Munich and the Program on Education Policy and Governance (PEPG) at Harvard University.
- Mills, J.N., Wolf, P.J., & Greene, J.P. (2015, January 16-19). *Revised first year participant effects of the Louisiana scholarship program*. Paper presented at the 4th Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Kisida, B., Wolf, P.J., & Greene, J.P. (2015, January 16-19). *Views from private schools: Attitudes about school choice programs in three states*. Paper presented at the 4th Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Mills, J.N., Wolf, P.J., & Greene, J.P. (2014, September 29-30). *Private school choice for the lower middle class: Initial participant effects of the Louisiana scholarship program*. Paper presented at the International Conference of the Association for Public Policy Analysis and Management, Segovia, Spain.
- Wolf, P.J., & Mills, J.N. (2014, January 17-20). *I won the lottery! The initial participant effects of the Louisiana school voucher program*. Paper presented at the 3rd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Cheng, A., Trivitt, J. & Wolf, P.J. (2014, January 17-20). *School choice and the branding of Milwaukee private schools*, Paper presented at the 3rd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.

Patrick J. Wolf, Ph.D.

- Wolf, P.J., & Kisida, B. (2013, November 18-19). *Customer satisfaction and educational outcomes: Experimental impacts of the market-based delivery of public education*. Workshop on Experiments in Public Management Research sponsored by the International Journal of Public Management, Aarhus, Denmark, November 18-19, 2013.
- Wolf, P.J. (2013, June 20-22). *Is the juice worth the squeeze? A benefit/cost analysis of the District of Columbia opportunity scholarship program*. Paper presented at the 3rd Annual Conference of the European Political Science Association, Barcelona, Spain.
- Witte, J.F., Cowen, J., Fleming, D., Wolf, P.J., & Kisida, B. (2013, June 20-22). *School vouchers and student attainment: New evidence from a state-mandated study of Milwaukee's parental choice program*. Paper presented at the 3rd Annual Conference of the European Political Science Association, Barcelona, Spain.
- Wolf, P.J., Komer, R.D., & McShane, M.Q. (2013, January 18-21). *Blaine it on politics: The (non-) effect of anti-aid amendments on private school choice programs in the U.S. States*. Paper presented at the 2nd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Wolf, P.J., Witte, J.F., & Fleming, D.J. (2013, January 18-21). *When rights, incentives, and institutions all clash: The case of school vouchers and special education in Milwaukee*. Paper presented at the 2nd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Wolf, P.J., & Stewart, T. (2012, January 14-17). *Exercising parental choice: Understanding the complexity of school shopping*. Paper presented at the International School Choice and Reform Academic Conference, Nova Southeastern University, Fort Lauderdale, FL.
- Wolf, P.J., Witte, J.F., Dean, A., & Carlson, D. (2012, January 14-17). *Milwaukee independent charter schools study: Report on two- and three-year achievement gains*. Paper presented at the Inaugural International School Choice and Reform Academic Conference, Nova Southeastern University, Fort Lauderdale, FL.
- Wolf, P.J., & McShane, M. (2011, September 8). *Is the juice worth the squeeze: A benefit/cost analysis of the District of Columbia opportunity scholarship program*. Paper presented at the Intl. Workshop on Economics of Education, University of Barcelona, Spain.
- Wolf, P.J., & Kisida, B. (2011, July 16). *School vouchers and student outcomes: Experimental evidence*. Paper presented at the European Political Science Association Conference, Dublin, Ireland.
- Wolf, P.J. (2010, August 25-27). *The effectiveness of private school vouchers: Final results from an experiment in Washington, DC*. Paper presented at the Second Biennial Meeting of the Special Interest Research Group on Educational Effectiveness of the European Association for Research on Learning and Instruction (EARLI), Catholic University, Leuven, Belgium.
- Wolf, P.J. (2009, Marcy 12-14). *The Washington, DC school voucher program: The pattern of achievement impacts and its implications for social justice*. Paper presented at the International Seminar on Education Markets, University of Geneva, Geneva, Switzerland.
- Wolf, P.J. (1998, July 10-11). *The politics of public administration in the U.S. federal government: Lessons from the twentieth century*. Paper presented at the Public Policy and Administration at the Turn of the Century, Lady Margaret Hall, Oxford University, Oxford, England.

B. National (91):

- Wolf, P.J., & Zimmer, R. (2025, March 12). *Vouchers and similar private school choice programs*. Flash talk presented at the 50th Annual Conference of the Association for Education Finance & Policy, Washington, DC.

Patrick J. Wolf, Ph.D.

- Shakeel, M.D., Gallo, M., & Wolf, P.J. (2025, March 12). *The nation's achievement inequality report card: An assessment of traditional public, charter, Department of Defense, and Catholic schools*. Poster presented at the 50th Annual Conference of the Association for Education Finance & Policy, Washington, DC.
- Gallo, M., Ritter, C., & Wolf, P.J. (2025, March 12). *If you build it this way they will come: What are the determinant features that impact take up rates for school choice policies*. Paper presented at the 50th Annual Conference of the Association for Education Finance & Policy, Washington, DC.
- Johnson, A.H., McGee, J.B., & Wolf, P.J. (2024, November 23). *Comparing apples to oranges? Examining funding and resources available to traditional public and public charter schools*. Presentation to the 46th Annual Fall Research Meetings of the Association for Policy Analysis & Management, National Harbor, MD.
- Wolf, P.J., & Daniels, D.L. (2024, November 23). *Who jumps at educational freedom? Early enrollment patterns in the Arkansas Education Freedom Accounts Program*. Presentation to the 46th Annual Fall Research Meetings of the Association for Policy Analysis & Management, National Harbor, MD.
- Daniels, D.L., & Wolf, P.J. (2023, November 10). Does private school choice threaten democracy? Evidence from private and public schools in New York and Dallas. Presentation to the 45th Annual Fall Research Meetings of the Association for Policy Analysis & Management, Atlanta, GA.
- Maranto, R., Wolf, P.J., & Reilly, W. (2023, September 2). *Ranking police departments to make black lives matter*. Paper presented at the 119th annual meeting of the American Political Science Association, Los Angeles, CA.
- Shakeel, M.D., Wolf, P.J., Johnson, A.H., Harris, M., Morris, S., Paul, J.D. (2023, April 13-16). *The public purposes of private education: A civic outcomes meta-analysis*. Paper presented at the 80th Annual Meeting of the Midwest Political Science Association, Chicago, IL.
- Wolf, P.J., McGee, J.B., Maloney, L.D., May, J.F., & Heape, A. (2022, November 17-20). *Charter school funding: Inequity at the dawn of the pandemic*. Presentation to the 44th Annual Fall Research Meetings of the Association for Policy Analysis & Management, Washington, DC.
- Wolf, P.J., Shakeel, M.D., Heape, A., Harris, M., Morris, S., Paul, J.D. (2022, September 15-18). *A meta-analysis of private schooling effects on civic outcomes around the globe*. Paper presented at the 118th Annual Meeting of the American Political Science Association, Montreal, Canada.
- Sude, Y., & Wolf, P.J. (2022, September 15-18). [Whose turn now? The enactment & expansion of private school choice programs across the U.S.](#) Paper presented at the 118th Annual Meeting of the American Political Science Association, Montreal, Canada.
- Syftestad, C., Wolf, P.J., DeAngelis, C., & Dills, A. (2022, April 11). *Charter school funding: Dispelling myths about EMOs, expenditure patterns, & nonpublic dollars*. Paper presented at the 47th Annual Conference of the Association for Education Finance & Policy, Denver, CO.
- Rhames, M.A., & Wolf, P.J. (2022, April 11). *One or the other: Parent religiosity or private school choice may reduce crime in Milwaukee*. Paper presented at the 47th Annual Conference of the Association for Education Finance & Policy, Denver, CO.
- Wolf, P.J., Greene, J.P., Ladner, M., & Paul, J.D. (2021, April 11-13). *Education freedom and student achievement: Is more school choice associated with higher state-level performance on the NAEP?* Paper presented at the 45th Annual Meeting of the Association for Private Enterprise Education, Fort Lauderdale, FL.

Patrick J. Wolf, Ph.D.

- Paul, J.D., & Wolf, P.J. (2020, November 11-14). *Moving on up? Virtual schooling, mobility, and student achievement*. Paper presented at the 42nd Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, staged virtually.
- Erickson, H.H., Mills, J.N. & Wolf, P.J. (2020, Apr 17-21). *Effect of the Louisiana Scholarship Program on Student Achievement and College Entrance After Four Years* [Roundtable Session]. AERA Annual Meeting San Francisco, CA <http://tinyurl.com/td6zfx5> (Conference Canceled)
- Witte, J.F., Kisida, B. & Wolf, P.J. (2020, Apr 17-21) *Do Voucher Students Attain Higher Levels of Education? Evidence From the Milwaukee Parental Choice Program* [Roundtable Session]. AERA Annual Meeting San Francisco, CA <http://tinyurl.com/t9pcld9> (Conference Canceled)
- Erickson, H.H., Mills, J.N., Wolf, P.J. (2019, November 7-9). *The effects of the Louisiana Scholarship Program after four years on student achievement and college entrance*. Paper presented at the 41st Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Denver, CO.
- DeAngelis, C.A., & Wolf, P.J. (2019, November 7-9). *Private school choice and character: More evidence from Milwaukee*. Paper presented at the 41st Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Denver, CO.
- Erickson, H.H., Mills, J.N., Wolf, P.J. (2018, November 8-10). *The effects of the Louisiana Scholarship Program on high school graduation and college entrance*. Paper presented at the 40th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Washington, DC.
- Lee, M., Mills, J.N., Wolf, P.J. (2018, November 8-10). *Heterogeneous impacts across schools in the first three years of the Louisiana Scholarship Program*. Paper presented at the 40th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Washington, DC.
- Wolf, P.J., & Maranto, R.M. (2018, August 30-September 2). *What's in a word? Meanings of educational accountability in a post-modern age*. Paper presented at the 114th Annual Meeting of the American Political Science Association, Boston, MA.
- Bearfield, D., Maranto, R.M., & Wolf, P.J. (2018, August 30-September 2). *Can police professionalism make black lives matter more?* Paper presented at the 114th Annual Meeting of the American Political Science Association, Boston, MA.
- Mills, J. N., & Wolf, P. J. (2018, April 14-17). *The effects of the Louisiana Scholarship Program on student achievement after three years*. Paper presented at the 2018 American Education Research Association Annual Meeting & Exhibition, New York, NY.
- Wolf, P.J., & Lasserre-Cortez, S. (2018, April 14-17). *Special education longitudinal enrollment study for Louisiana public charter schools*. Paper presented at the 2018 American Education Research Association Annual Meeting & Exhibition, New York, NY.
- Lee, M., Mills, J.N., Wolf, P.J. (2018, March 16-18). [*Heterogeneous effects across schools in the first year of the Louisiana Scholarship Program*](#). Paper presented at the 43rd Annual Conference of the Association for Education Finance and Policy, Portland, OR.
- Erickson, H.H., Mills, J.N., & Wolf, P.J. (2018, March 16-18). [*The preliminary effects of the Louisiana Scholarship Program on college entrance*](#). Paper presented at the 43rd Annual Conference of the Association for Education Finance and Policy, Portland, OR.

Patrick J. Wolf, Ph.D.

- Mills, J. N., & Wolf, P.J. (2017, November 2-4). *The experimental effects of the Louisiana Scholarship Program on student achievement after three years*. Paper presented at the 39th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Chicago, IL.
- Anderson, K. P., & Wolf, P. J. (2017, November 2-4). *Evaluating school vouchers: Evidence from a within-study comparison*. Paper presented at the 39th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Chicago, IL.
- Mills, J. N., & Wolf, P. J. (2017, March 16-18). *Preliminary Effects of the Louisiana Scholarship Program on student achievement after three years*. Paper presented at the 42nd Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Tuchman, S., & Wolf, P. J. (2017, March 16-18). *Students with disabilities and the Louisiana Scholarship Program: Effects on academic achievement and identification*. Paper presented at the 42nd Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Anderson, K.P., & Wolf, P.J. (2017, March 16-18). *The experimental-quasi-experimental divide: Can quasi-experimental design methods approximate randomized controlled trial impacts in a school voucher study*. Paper presented at the 42nd Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Sude, Y., & Wolf, P.J. (2017, March 16-18). *Stayers and leavers: Characteristics of students who move into or out of a school choice program*. Paper presented at the 42nd Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Shakeel, M.D., Anderson, K.P., & Wolf, P.J. (2017, March 2-4). *A benefit/cost analysis of the experimental evidence on private school vouchers across the globe*. Paper presented at the Society for Research on Educational Effectiveness, Spring 2017, Washington, DC.
- Anderson, K.P., & Wolf, P.J. (2017, March 2-4). *The experimental-quasi-experimental divide: Can quasi-experimental design methods approximate randomized controlled trial impacts in a school voucher study*. Paper presented at the Society for Research on Educational Effectiveness, Spring 2017, Washington, DC.
- Wolf, P.J. (2016, March 17-19). *Using student matching strategies to approximate intent-to-treat and treatment on treated effects of school choice: A case study from the evaluation of the Milwaukee parental choice program*. Paper presented at the 41st Annual Conference of the Association for Education Finance and Policy, Denver, CO.
- Ritter, G., Wolf, P.J., Anderson, K.P., & Foreman, L. (2016, March 17-19). *Analyzing the impacts of charter schools using matching designs: Evidence from a U.S. state*. Paper presented at the 41st Annual Conference of the Association for Education Finance and Policy, Denver, CO.
- Tuchman, S., & Wolf, P.J. (2016, March 17-19). *Do students with disabilities benefit academically from the Louisiana scholarship program? Second year results*. Paper presented at the 41st Annual Conference of the Association for Education Finance and Policy, Denver, CO.
- Anderson, K.P., Shakeel, M.D., & Wolf, P.J. (2016, March 17-19). *The participant effects of private school vouchers across the globe: A meta-analytic and systematic review*. Paper presented at the 41st Annual Conference of the Association for Education Finance and Policy, Denver, CO.
- Sude, Y., & Wolf, P.J. (2016, March 17-19). *Who are the participants? Characteristics of schools participating in the Louisiana scholarship program*. Paper presented at the 41st Annual Conference of the Association for Education Finance and Policy, Denver, CO.

Patrick J. Wolf, Ph.D.

- Shakeel, M.D., Anderson, K.P., & Wolf, P.J. (2016, March 3-5). *A meta-analysis of the literature on the effect of charter schools on student achievement*. Paper presented at the Society for Research on Educational Effectiveness, Spring 2016, Washington, DC.
- Mills, J.N., Sude, Y., & Wolf, P.J. (2015, November 12-14). *An evaluation of cognitive and non-cognitive skills in the Louisiana scholarship program*. Paper presented at the 37th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Miami, FL.
- Witte, J.F., Kisida, B., & Wolf, P.J. (2015, November 12-14). *School choice, college enrollment, and persistence: Evidence from the Milwaukee parental choice program*. Paper presented at the 37th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Miami, FL.
- Wolf, P.J., Anderson, K., Ritter, G.W., & Foreman, L. (2015, November 12-14). *The sensitivity of charter school effect estimates to sampling and analysis choices: Evidence from a U.S. state*. Paper presented at the 37th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Miami, FL.
- Tuchman, S., & Wolf, P.J. (2015, February 26-28). *Do students with disabilities benefit academically from the Louisiana scholarship program?* Paper presented at the 40th Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Kisida, B., Wolf, P.J., & Rhinesmith, E.T. (2015, February 26-28). *The supply side of school choice: A survey of school leaders in three states*. Paper presented at the 40th Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Rhinesmith, E.T., & Wolf, P.J. (2015, February 26-28). *Do parents get what they choose for?* Paper presented at the 40th Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Egalite, A.J., Wolf, P.J., Mills, J.N., & Greene, J.P. (2014, November 6-8). *Effects of a Statewide Targeted School Voucher Program on Racial Integration*. Paper presented at the 36th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Albuquerque, NM.
- Mills, J.N., Wolf, P.J., & Greene, J.P. (2014, November 6-8). *Updated achievement impacts of the Louisiana scholarship program after one year*. Paper presented at the 36th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Albuquerque, NM.
- Mills, J.N., Wolf, P.J., & Greene, J.P. (2014, August 28-September 2). *When outsourcing fails: An experimental evaluation of the Louisiana scholarship program first-year impacts on student achievement*. Paper presented at the 110th Annual Meetings of the American Political Science Association, Washington, DC.
- Shuls, J.V., & Wolf, P.J. (2014, August 28-September 2). *School vouchers and racial politics in the U.S.: Explaining the strange bedfellows supporting and opposing private school choice*. Paper presented at the 110th Annual Meetings of the American Political Science Association, Washington, DC.
- Egalite, A.J., Wolf, P.J., Mills, J.N., & Greene, J.P. (2014, April 3-7). *Systemic effects of the Louisiana scholarship program: Updated analyses of competitive effects and impacts on racial integration*. Paper presented at the Annual Meeting of the American Education Research Association, Philadelphia, PA.
- Batdorff, M., Maloney, L., May, J., Wolf, P.J., & Cheng, A. (2014, April 3-7). *Charter school funding: A decade of inadequacy*. Paper presented at the Annual Meeting of the American Education Research Association, Philadelphia, PA.

Patrick J. Wolf, Ph.D.

- Egalite, A.J., Mills, J.N., Greene, J.P., & Wolf, P.J. (2014, March 13-15). *Systemic effects of the Louisiana scholarship program: Competitive effects and impacts on racial integration*. Paper presented at the 39th Annual Conference of the Association for Education Finance and Policy, San Antonio, TX.
- Mills, J.N., & Wolf, P.J. (2014, March 13-15). *First year participant effects of the Louisiana scholarship program*. Paper presented at the 39th Annual Conference of the Association for Education Finance and Policy, San Antonio, TX.
- Cheng, A., & Wolf, P.J. (2014, March 13-15). *A return-on-investment calculation of U.S. charter schools*. Paper presented at the 39th Annual Conference of the Association for Education Finance and Policy, San Antonio, TX.
- Tuchman, S., Mills, J.N., & Wolf, P.J. (2014, March 13-15). *First year participant effects for students with disabilities in the Louisiana scholarship program*. Paper presented at the 39th Annual Conference of the Association for Education Finance and Policy, San Antonio, TX.
- Wolf, P.J., & Cowen, J.M. (2014, March 13-15). *Who chooses what & how? School shopping in Detroit*. Paper presented at the 39th Annual Conference of the Association for Education Finance and Policy, San Antonio, TX.
- Cowen, J.M., Witte, J.F., Wolf, P.J., Fleming, D.F., & Kisida, B. (2013, November 7-9). *Does choosing change your choices? An analysis of educational attainment differences between school voucher students and students in public schools*. Paper presented at the 35th Annual Meetings of the Association for Public Policy Analysis and Management, Washington, DC.
- Egalite, A.J., Mills, J.N., Wolf, P.J., & Greene, J.P. (2013, November 7-9). *Competitive and participant effects of the Louisiana scholarships program: First year impacts*. Paper presented at the 35th Annual Meetings of the Association for Public Policy Analysis and Management, Washington, DC.
- Wolf, P.J., & Cowen, J.M., Fleming, D.J., Witte, J.F., & Kisida, B. (2013, March 14-16). *School vouchers and student attainment: Evidence from a state-mandated study of Milwaukee's parental choice program*. Paper presented at the 38th Annual Conference of the Association for Education Finance & Policy, New Orleans, LA.
- Wolf, P.J., Witte, J.F., & Fleming, D.J. (2013, March 14-16). *When rights, incentives, and institutions all clash: The case of school vouchers and special education in Milwaukee*. Paper presented at the 38th Annual Conference of the Association for Education Finance & Policy, New Orleans, LA.
- Wolf, P.J., Komer, R.D., & McShane, M.Q. (2012, August 29-September 2). *Blaine it on politics: The (non-) effect of anti-aid amendments on private school choice programs in the U.S. states*. Paper to be presented at the Annual Meeting of the American Political Science Association, New Orleans, LA. (Cancelled due to hurricane).
- Wolf, P.J., Witte, J.F., & Fleming, D.J. (2012, August 29-September 2). *When rights, incentives, and institutions all clash: The case of school vouchers and special education in Milwaukee*. Paper to be presented at the Annual Meeting of the American Political Science Association, New Orleans, LA. (Cancelled due to hurricane).
- Wolf, P.J., & Kisida, B. (2011, November 3-5). *Oh the places you'll go: School vouchers and educational attainment in Washington, DC*. Paper presented at the 33rd Annual Research Conference of the Association for Public Policy Analysis and Management, Washington, DC.
- Wolf, P.J., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2011, April 10). *Evaluation of the DC opportunity scholarship program: Final report*. Paper presented at the Annual Meeting of the American Education Research Association, New Orleans, LA.

Patrick J. Wolf, Ph.D.

- Maranto, R., & Wolf, P.J. (2010, September 2-5). *Cops, teachers, and the art of the impossible: Explaining the lack of diffusion of innovations that seem to make impossible jobs possible*. Paper presented to the Annual Meetings of the American Political Science Association, Washington, DC.
- Wolf, P.J., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2010, April 30-May 4). *Evaluation of the DC opportunity scholarship program: Summary of experimental impacts after three years*. Paper presented at the Annual Meeting of the American Education Research Association, Denver, CO.
- Wolf, P.J. (2010, April 30-May 4). *The Washington, DC school voucher program: The pattern of achievement impacts and their implications for social justice*. Paper presented at the Annual Meeting of the American Education Research Association, Denver, CO.
- Wolf, P.J., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2009, November 5-7). *Evaluation of the DC opportunity scholarship program: Summary of experimental impacts after three years*. Paper presented at the 31st Annual Research Conference of the Association for Public Policy Analysis and Management, Washington, DC.
- Wolf, P.J., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2008, November 6-8). *Evaluation of the DC opportunity scholarship program: Summary of experimental impacts after two years*. Paper presented at the Annual Research Conference of the Association for Public Policy and Management, Los Angeles, CA.
- Witte, J.F., Cowen, J., Fleming, D., & Wolf, P.J. (2008, November 6-8). *The 'effect' of parental choice on student outcomes: Methodological approaches in a new longitudinal study of school vouchers in Milwaukee*. Paper presented at the Annual Research Conference of the Association for Public Policy and Management, Los Angeles, CA.
- Wolf, P.J., Gutmann, B., Puma, B., Rizzo, L., & Eissa, N.O., & Silverberg, M. (2007, November 8). *Evaluation of the DC opportunity scholarship program: Summary of experimental impacts after one year*. Paper presented at the Annual Research Conference of the Association for Public Policy Analysis and Management, Washington, DC, November 8, 2007.
- Wolf, P.J., Eissa, N., & Gutmann, B. (2005, November 3-5). *Who chooses, who uses? Initial evidence from the D.C. opportunity scholarship program*. Paper presented at the Annual Research Conference of the Association for Policy Analysis and Management, Washington, DC.
- Wolf, P.J., & Fellowes, M. (2004, September 2-5). *On-the-take at any margin? Seniority, electoral marginality and vote-buying in the U.S. Congress*. Paper presented at the Annual Meetings of the American Political Science Association, Chicago, IL.
- Wolf, P.J. (2003, August 28-31). *Looking inside the black box: What school factors explain voucher gains in Washington, D.C.?* Paper presented at the Annual Meetings of the American Political Science Association, Philadelphia, PA.
- Wolf, P.J. (2002, August 29-September 1). *School choice and civic values: A Review of the Empirical Evidence*. Paper presented at the Annual Meetings of the American Political Science Association, Boston, MA.
- Wolf, P.J., & Nielsen, L. (2002, August 29-September 1). *Assessing educational achievement gaps for Blacks and Hispanics: What are the relevant public policies?* Paper presented at the Annual Meetings of the American Political Science Association, Boston, MA.
- Kim, L., & Wolf, P.J. (2002, March 23-26). *Reinvention vs. general management: Which approach has the largest positive effect on employee morale?* Paper presented at the Annual Conference of the American Society for Public Administration, Phoenix, AZ.

Patrick J. Wolf, Ph.D.

- Moini, J., & Wolf, P.J. (2002, March 23-26). *GPRA: The more you know, the more you wonder*. Paper presented at the Annual Conference of the American Society for Public Administration, Phoenix, AZ.
- Wolf, P.J. (2001, August 30-September 2). *We should have known: Political environments and the contingency of agency reinvention*. Paper presented at the Annual Meetings of the American Political Science Association, San Francisco, CA.
- Wolf, P.J. (2000, August 31-September 2). *The difference that independent status makes for U.S. federal agencies: A preliminary analysis*. Paper presented at the Annual Meetings of the American Political Science Association, Washington, D.C.
- Howell, W.G., Wolf, P.J., Peterson, P.E., & Campbell, D.E. (2000, August 31-September 2). *Test-score effects of school vouchers in Dayton, Ohio, New York City, and Washington, D.C.: Evidence from randomized field trials*. Paper presented at the Annual Meetings of the American Political Science Association, Washington, DC.
- Wolf, P.J. (1999, December 4-5). *The outcome-operations-measurement problem in the scientific study of bureaucracy*. Paper presented at the Fifth National Public Management Conference, Texas A & M University, College Station, TX.
- Wolf, P.J. (1998, October 29-31). *Private schooling and political tolerance*. Paper presented at the Annual Research Conference of the Association for Public Policy Analysis and Management, New York, New York.
- Wolf, P.J. (1998, September 3-6). *Explaining political autonomy in U.S. federal agencies: The relative importance of leadership, professionalism, and specialization*. Paper presented at the Annual Meeting of the American Political Science Association, Boston, MA.
- Wolf, P.J. (1997, November 6-8). *Case meta-analysis: Systematically learning by example*. Paper presented at the Annual Research Conference of the Association for Public Policy Analysis and Management, Washington D.C.
- Wolf, P.J. (1997, August 28-31). *Rethinking the leadership-institutional nexus: A meta-analytical analysis of agency effectiveness*. Paper presented at the Annual Meeting of the American Political Science Association, Washington, DC.
- Wolf, P.J. (1997, April). *Institutions, information, and budgetary politics in New York City*. Paper presented at the Annual Meeting of the Midwest Political Science Association, Palmer House Hilton, Chicago, IL.
- Wolf, P.J. (1995, November). *Iron triangles, issue networks, and the budgetary process: The case of New York City*. Paper presented at the Annual Research Conference of the Association for Policy Analysis and Management, Washington D.C.
- Wolf, P.J. (1995, August). *Politics, institutions, and bureaucratic development in the United States: Old theories meet new data*. Paper presented at the Annual Meeting of the American Political Science Association, Hilton Towers, Chicago, IL.

C. Regional (5):

- Sude, Y., & Wolf, P. J. (2023, January 11-14). *Whose turn now? The enactment and expansion of private school choice programs across the U.S.* Paper presented at the Southern Political Science Association Annual Conference, St. Pete Beach, FL.

Patrick J. Wolf, Ph.D.

- Rhames, M.A. & Wolf, P.J. (2021). [*One or the Other: Parent Religiosity or Private School Choice May Reduce Crime and Paternity Disputes in Milwaukee*](#). Paper prepared for presentation at the Mid-South Education Research Association Annual Conference, November 9-12, 2021.
- DeAngelis, C., & Wolf, P.J. (2016, January 7-9). *School vouchers: A 'get out of jail' card?* Paper presented at the Annual Meetings of the Southern Political Science Association, San Juan, PR.
- Wolf, P.J., & Kisida, B. (2007, April 12-15). *School governance and information: Does choice lead to informed parents?* Paper presented at the Annual Meetings of the Midwest Political Science Association, Chicago, IL.
- Wolf, P.J. (1995, April). *What history advises about reinventing government: A case meta-analysis of bureaucratic effectiveness*. Paper presented at the Annual Meeting of the Midwest Political Science Association, Palmer House Hilton, Chicago, IL.

SERVICE AT PEER-REVIEWED ACADEMIC CONFERENCES (66):

A. International (24):

- Moderator. (2025, January 17-20). *Critical conversation – Regulating private school choice*. Panel at the 13th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Moderator. (2025, January 17-20). *The parent revolution*. Book forum at the 13th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Moderator. (2023, January 13-16). *Raising the impact factor of a journal*. Panel at the 11th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Discussant. (2023, January 13-16). *Systemic effects of charter schools and effectiveness of virtual charter schools*. Panel at the 11th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Moderator. (2021, January 16-18). *America's voucher politics: How elites learned to hide the state*. Book roundtable at the 9th International School Choice & Reform Conference, Virtual.
- Discussant. (2020, January 17-20). *A comparative analysis of trends in achievement gaps*. Panel at the 8th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Chair. (2020, January 17-20). *A comparative analysis of trends in achievement gaps*. Panel at the 8th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Chair. (2020, January 17-20). *Unpacking the effects of private school vouchers on student achievement using school effectiveness indicators*. Panel at the 8th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Discussant. (2019, January 10-13). *The geneology of school choice policies in the west*. 7th International School Choice & Reform Conference, Lisbon, Portugal.
- Discussant. (2019, January 10-13). *Charter schools II*. 7th International School Choice & Reform Conference, Lisbon, Portugal.
- Chair. (2019, January 10-13). *Symposium on the future of school funding in the United States: Creating a more equitable system and expanding educational freedom*. 7th International School Choice & Reform Conference, Lisbon, Portugal.
- Chair. (2018, January 12-15). *Symposium on school choice and non-cognitive skills*. 6th International School Choice & Reform Conference, Fort Lauderdale, FL.
- Moderator. (2017, January 3-5). *Symposium on the politics of education reform in the U.S.* 5th International School Choice & Reform Conference, Honolulu, HI.

Patrick J. Wolf, Ph.D.

- Discussant. (2016, May 5). *The comparative politics of education: Teachers unions and education systems around the world*. Workshop on Public Opinion and the Political Economy of Education, Ifo Institute for Economic Research at the University of Munich and the Program on Education Policy and Governance (PEPG) at Harvard University, Cambridge, MA.
- Discussant. (2015, May 9). *Trade-offs between social investment and passive transfers in the new welfare state: New political coalitions in European welfare states?* Workshop on Public Opinion and the Political Economy of Education, Ifo Institute for Economic Research at the University of Munich and the Program on Education Policy and Governance (PEPG) at Harvard University.
- Chair (2015, January 16-19). *Regulating voucher schools*. 4th Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Chair (2015, January 16-19). *A city of choice: Research perspectives from post-Katrina New Orleans*. 4th Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Chair (Plenary Session). (2014, January 17-20). *The many forms of school choice*. 3rd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Discussant (2013, November 18-19). *Putting public policy defaults to the test: A survey experiment in organ donor registration*. Workshop on Experiments in Public Policy Research, Aarhus, Denmark.
- Chair & Discussant. (2013, June 20-22). *The political economy of taxation*. 3rd Annual Conference of the European Political Science Association, Barcelona, Spain.
- Chair (Plenary Session). (2013, January 18-21). *The politics of school choice*. 2nd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Chair (2013, January 18-21). *Public and private school choice*. 2nd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Chair (Plenary Session). (2012, January 14-17). *School vouchers at a crossroads: What's next for policy and evaluation?* Inaugural International School Choice and Reform Academic Conference, Nova Southeastern University, Fort Lauderdale, FL.
- Discussant. (2011, July 18). *Health care and politics*. European Political Science Association Conference, Dublin, Ireland.

B. National (39):

- Discussant. (2024, November 23). *Charter school finance and impacts during times of stability and shocks*. Panel at the 46th Annual Fall Research Meetings of the Association for Policy Analysis & Management, National Harbor, MD.
- Discussant. (2024, November 22). *The who, where, and when of American homeschool participation*. Panel at the 46th Annual Fall Research Meetings of the Association for Policy Analysis & Management, National Harbor, MD.
- Discussant. (2023, November 10). *Social capital and public policy*. Panel at the 45th Annual Fall Research Meetings of the Association for Policy Analysis & Management, Atlanta, GA.
- Chair. (2023, November 10). *The civic and systemic effects of school choice*. Panel at the 45th Annual Fall Research Meetings of the Association for Policy Analysis & Management, Atlanta, GA.
- Chair. (2023, April 13-16). *Schools, society, and educational opportunities*. Panel at the 80th Annual Research Conference of the Midwest Political Science Association, Chicago, IL.

Patrick J. Wolf, Ph.D.

- Chair. (2022, November 17-20). *Public school finance equity in the era of Covid*. Panel at the 44th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Washington, DC.
- Chair. (2020, November 11-14). *Virtual schooling before, during, and after the Covid Crisis: Student outcomes, school approaches, and public opinion*. Panel at the 42nd Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, staged virtually.
- Chair. (2020, November 11-14). *Inputs and outputs of school choice*. Panel at the 42nd Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, staged virtually.
- Chair. (2020, April 5-9). *Making sense out of recent mixed results from private school voucher evaluations*. Roundtable accepted to the Annual Meeting of the American Education Research Association (cancelled due to Covid-19).
- Faculty Mentor. (2019, November 7-9). Doctoral Student Advisory Workshop. 41st Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Denver, CO.
- Chair. (2019, November 7-9). *Examining the consequences of school choice*. Paper presented at the 41st Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Denver, CO.
- Chair. (2019, November 7-9). *The latest evidence on private school choice: Cognitive and non-cognitive outcomes*. 41st Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Denver, CO.
- Discussant. (2018, August 30-September 2). *Corruption and public administration*. 114th Annual Meeting of the American Political Science Association, Boston, MA.
- Chair. (2017, March 16-18). *Information and school choice*. 42nd Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Chair. (2017, March 2-4). *Effects of educational policies: Two paths to change: school turnaround and student choice*. Society for Research on Educational Effectiveness, Spring 2017, Washington, DC.
- Chair. (2017, March 2-4). *Effects of educational policies symposium: Social effects of school choice programs*. Society for Research on Educational Effectiveness, Spring 2017, Washington, DC.
- Chair. (2016, March 17-19). *The community effects of school intervention programs*. 41st Annual Conference of the Association for Education Finance and Policy, Denver, CO.
- Discussant. (2016, March 17-19). *School choice, enrollment policies and impacts*. 41st Annual Conference of the Association for Education Finance and Policy, Denver, CO.
- Chair. (2016, March 3-5). *Summaries of the latest research on charter schools, school vouchers, and magnet school choice*. Society for Research on Educational Effectiveness, Spring 2016 Conference, Washington, DC.
- Senior Scholar Advisor. (2015, February 26-28). *Junior scholar network advising*. 40th Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Discussant. (2015, February 26-18). *School governance and choice*. 40th Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Chair. (2015, February 26-18). *School governance and choice*. 40th Annual Conference of the Association for Education Finance and Policy, Washington, DC.

Patrick J. Wolf, Ph.D.

- Chair. (2015, February 26-28). *Parental school choice: Supply meets demand?* 40th Annual Conference of the Association for Education Finance and Policy, Washington, DC.
- Chair. (2014, November 6-8). *Schooling and character: Non-cognitive skills and educational outcomes.* 36th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Albuquerque, NM.
- Chair. (2014, November 6-8). *New perspectives on school choice.* 36th Annual Fall Research Meetings of the Association for Public Policy Analysis and Management, Albuquerque, NM.
- Discussant. (2014, April 3-7). *School voucher policy & implementation: Lessons from Indiana & Tennessee.* Annual Meeting of the American Education Research Association, Philadelphia, PA.
- Chair & Discussant. (2014, March 13-15). *School choice and charter schools.* 39th Annual Conference of the Association for Education Finance and Policy, San Antonio, TX.
- Chair & Discussant. (2013, November 7-9). *A comprehensive view on school choice.* 35th Annual Meetings of the Association for Public Policy Analysis and Management, Washington, DC.
- Discussant. (2013, November 7-9). *Charter schools and school choice.* 35th Annual Meetings of the Association for Public Policy Analysis and Management, Washington, DC.
- Discussant. (2013, March 14-16). *Funding policy and disadvantaged students.* 38th Annual Conference of the Association for Education Finance & Policy, New Orleans, LA.
- Chair. (2013, January 18-21). *The politics of school choice in the U.S.* 2nd Annual International School Choice & Reform Conference, Ft. Lauderdale, FL.
- Discussant. (2009, November 5-7). *School choice and student outcomes.* 31st Annual Research Conference of the Association for Public Policy Analysis and Management, Washington, DC.
- Discussant. (2008, November 6-8). *Accountability as incentives: Understanding the effects of accountability regimes.* Annual Research Conference of the Association for Public Policy and Management, Los Angeles, CA.
- Discussant. (2008, August 28-31). *Does better administration lead to better governance?* Annual Meetings of the American Political Science Association, Boston, MA.
- Chair. (2005, September 1-4). *Challenges in achieving a representative bureaucracy.* Annual Meetings of the American Political Science Association, Washington, DC.
- Discussant & Chair. (2004, September 2-5). *Education policy and politics.* Annual Meetings of the American Political Science Association, Chicago, IL.
- Discussant. (2004, April 12-16). *Re-conceptualizing equity through promoting choice: Findings from federal evaluations examining four choice programs.* Annual Meeting of the American Education Research Association, San Diego, CA.
- Discussant. (2003, November 7). *Test-based accountability and student outcomes.* Annual Research Conference of the Association for Policy Analysis and Management, Washington, DC.
- Chair. (2003, August 31). *The changing demography of the American bureaucracy.* Annual Meeting of the American Political Science Association, Philadelphia, PA.
- Discussant. (1998, October 29-31). *When implementation works and when it doesn't.* Annual Research Conference of the Association for Public Policy Analysis and Management, New York, New York.

Patrick J. Wolf, Ph.D.

C. Regional (3):

Panel Discussant. (2016, January 7-9). *Education policy, politics, and practice*. Annual Meetings of the Southern Political Science Association, San Juan, PR.

Panel Discussant. (2007, April 12-15). *Networking: Implications for agency behavior*. Annual Meetings of the Midwest Political Association, Chicago, IL.

Panel Discussant. (2007, April 12-15). *The Civil Service: Careers, motivations, and reform*. Annual Meetings of the Midwest Political Association, Chicago, IL.

INVITED/SPECIAL CONFERENCE PARTICIPATION (54):

Wolf, P.J., Presentater (2025, September 26), *The Supply-Side Response to Demand for Private School Choice*. Emerging School Models: Scaling for Success, Program on Education Policy and Governance, Harvard University, Cambridge, MA.

Wolf, P.J., Presenter (2025, June 18-21). Catholic PK-12 education: Challenges and opportunities. The 2nd Adeodatus National Conference, Belmont Abbey College, Charlotte, NC.

Wolf, P.J., Non-Presenting Co-Author (2025, May 8-9). Arkansas Education Freedom Accounts ESA program. *School Choice Tradeoffs and Evidence-Based Policy Making*. Program on Education Policy and Governance, Harvard University, Cambridge, MA.

Wolf, P.J., Participant (2024, November 20). Annual conference. Office of the Chief Economist, U.S. Department of Education, Washington, DC.

Wolf, P.J., Presenter (2024, October 25). The public purposes of private schooling: A civic outcomes meta-analysis. Program on Education Policy & Governance Advisory Board Meeting, New York, NY.

Wolf, P.J., Panel Participant (2024, September 12). Will universal choice programs be captured by the affluent or will they open up opportunities for all? *Emerging school models: Maintaining the momentum!* Program on Education Policy and Governance, Harvard University, Cambridge, MA.

Wolf, P.J., Panel Moderator (2024, February 7). Arkansas Education Freedom Accounts: Where we are, where we plan to go, and what it means for parents and students. *Educate to elevate: A year of change and growth*, University of Arkansas Department of Education Reform/Office of Education Policy, Little Rock, AR.

Wolf, P.J., Panel Participant (2023, March 30). *The case for parental choice: God, family, and educational liberty*. Book launch sponsored by University of Notre Dame Press, virtual.

Wolf, P.J., Session Presenter (2022, September 29). What happens when parents have more choices? *Student Focused Teacher Led Conference*, Little Rock, AR.

Wolf, P.J., Panel Participant (2022, May 19). School choice and school reform. *Conversations about education in a federal system*, Program on Education Policy & Governance, Harvard University, Cambridge, MA.

Wolf, P.J., Presenter (2022, April 29). Exigencies, incrementalism, equity & experimentation: The development and effects of private school choice in the U.S. *Admission impossible: School choice in Northern Europe*, University of Bergen, Bergen, Norway.

Wolf, P.J., Panel Participant (2021, November 19). What does the latest research tell us about school choice in the United States? *School choice in the post-pandemic era*, Program on Education Policy & Governance, Harvard University, Cambridge, MA.

Patrick J. Wolf, Ph.D.

- Wolf, P.J., Panel Participant (2020, November 20). Charter school funding inequities: Resources, facilities, and policy change. Independent Charter School Virtual Conference.
- Wolf, P.J., Panel Participant (2020, March 3). Studying the Effectiveness of Classical Education. National Classical Education Symposium. Institute for Classical Education, Phoenix, AZ.
- Wolf, P.J., Panel Participant (2018, November 14-15). Making schools work for all children: The debate on education reform in the South. The Politics of Equity: Navigating a Path for Public Education. The Southern Education Foundation, Little Rock, AR.
- Wolf, P.J., Panel Participant (2018, November 14-15). Money matters: Ensuring resource equity in public education. The Politics of Equity: Navigating a Path for Public Education. The Southern Education Foundation, Little Rock, AR.
- Wolf, P.J., Hitt, C., & McShane, M.Q. (2018, April 19). [Exploring the achievement-attainment disconnect in the effects of private school choice programs](#). Learning from the long-term effects of school choice in America. Program on Education Policy and Governance, Harvard University, Cambridge, MA.
- Wolf, P.J., Discussant (2017, September 29). Empirical research on school choice. *The Future of School Choice*. Harvard University, Cambridge, MA.
- Wolf, P.J., Panel Participant. (2017, June 27). Making sense of new evidence on private school vouchers. The Urban Institute, Washington, DC.
- Wolf, P.J., Keynote Address. (2017, January 26). *School choice in the U.S.* School Choice & Education Funding Summit, The College of New Jersey, Ewing Township, NJ.
- Wolf, P.J., Panel Roundtable Participant. (2017, January 26). *Education savings accounts in New Jersey*. School Choice & Education Funding Summit, The College of New Jersey, Ewing Township, NJ.
- Wolf, P.J., Panel Roundtable Participant. (2017, January 24). The Center for Education Policy. The Heritage Foundation, Washington, DC.
- Wolf, P.J., Panel Discussant. (2017, January 11-13). *Education savings accounts: A solution for Texas?* Texas Public Policy Foundation Annual Conference, Austin, TX.
- Wolf, P.J., Panel Discussant. (2016, November 14). *The life you save: Catholic schooling & the liberal arts in the 21st century*. Pioneer Institute, Boston, MA.
- Maranto, R., Bearfield, D., Wolf, P.J., & Matthews, A. (2016, January 29-30). *Can police professionalism make Black lives matter more?* Mini-conference on Policing and Race, Cincinnati, OH.
- Wolf, P.J., Panel Discussant. (2015, June 18-20). *Competition between charter, private, and traditional public schools*. The urban education future? Lessons from New Orleans 10 years after Hurricane Katrina, New Orleans, LA.
- Wolf, P.J. (2015, February 26). *The transformative power of private school choice*. Conservative Political Action Committee Annual Policy Conference, National Harbor, MD.
- Wolf, P.J. (2014, June 9-10). *School choice research: Are we looking for love in all the wrong places?* Crossroads of America: The Intersection of Research and Policy in the Indiana School Choice Ecosystem, University of Notre Dame, South Bend, IN.
- Wolf, P.J. (2014, January 30). *The school choice – Research nexus*. Conference on School Choice Markets, American Enterprise Institute, Washington, DC.
- Wolf, P.J. (2012, September 20-21). *Competition in K-12 education in the U.S. in 2012: Status and impact*. Conference on School Productivity, Bush Center for Public Policy, Dallas, TX.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2012, March 8-10). *Who is likely to benefit from school vouchers? An exploration of theory and evidence*. Annual Conference of the Society for Research on Educational Effectiveness, Washington, DC.
- Wolf, P.J. (2012, February 27). *The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of final year reports*. Presentation at a paper release conference, Milwaukee, WI.
- Wolf, P.J., Chair. (2011, February 26). *Creating intentional choice environments: Identifying need and building supply*. Voluntary Public School Choice Project Directors Conference, Washington, DC.
- Wolf, P.J., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2010, November 11). [Evaluation of the DC opportunity scholarship program: Experimental impacts after at least four years](#). Education Program Meeting of the National Bureau of Economic Research, Federal Reserve Bank, Chicago, IL.
- Wolf, P.J. (2010, June 28-30). *Evaluation of the DC opportunity scholarship program: Final report*. Presentation to the Fifth Annual Institute of Education Sciences Research Conference, National Harbor, MD.
- Wolf, P.J., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2009, October 26-27). *Evaluation of the DC opportunity scholarship program: Summary of experimental impacts after three years*. Conference on School Choice and School Improvement: What have we learned? Sponsored by the National Center on School Choice at Vanderbilt University, Nashville, TN.
- Wolf, P.J., Gutmann, B., Puma, M., Kisida, B., Rizzo, L., & Eissa, N.O. (2009, June 7-9). *Evaluation of the DC opportunity scholarship program: Impacts after three years*. Annual Research Conference of the Institute for Education Sciences, Washington, DC.
- Wolf, P.J. (2009, March 28). *Religion and citizenship: Who's afraid of American religious schools?* Presentation to the Conference on Religion and the State, Lubar Institute for the Study of the Abrahamic Religions, University of Wisconsin, Madison, WI.
- Wolf, P.J. (2007, October 23). *Research findings on school voucher programs: Applications to Utah*. Presentation to the Conference on Educational Choice: Emerging Legal and Policy Issues, Brigham Young University, Provo, UT.
- Wolf, P.J., Gutmann, B., Puma, M., Rizzo, L., Eissa, N.O., & Silverberg, M. (2007, July 19). *The DC opportunity scholarship program: Impacts after one year*. Conference on School Choice in the Nation's Capital, Georgetown University, Washington, DC.
- Eissa, N.O., Wolf, P.J., & Marsh, R. (2007, July 19). *Who chooses and uses? Evidence from the opportunity scholarship program*. Conference on School Choice in the Nation's Capital, Georgetown University, Washington, DC.
- Wolf, P.J. (2006, October 20). *Academic improvement through regular assessment*. Annual Conference of the Department of Education Reform, College of Education and Health Professions, University of Arkansas, Kauffman Conference Center, Kansas City, MO.
- Wolf, P.J., Discussant. (2006, May 22). *The influence of class size research on state and local education policy*. Brookings Papers on Education Policy, Washington, DC.
- Wolf, P.J., Panel Discussant. (2005, July 21). *What America can learn from school choice in other countries*. CATO book forum, Washington, DC.
- Wolf, P.J., Panel Discussant. (2004, May 12). *School choice: How an abstract idea became a political reality*. Brookings Papers on Education Policy, Washington, DC.

Patrick J. Wolf, Ph.D.

- Wolf, P.J., Roundtable Presenter. (2003, November 6). *The integrated policy exercise and the thesis/practicum in the MPP core curriculum*. Annual Research Conference of the Association for Policy Analysis and Management, Washington, DC.
- Wolf, P.J., Discussant. (2002, October 17-18). *Government and religious schools in historical and comparative perspective*. Conference on “What’s next for school vouchers?” Program on Education Policy and Governance, Harvard University, Cambridge, MA.
- Wolf, P.J., Peterson, P.E., & West, M.R. (2001, August 30-September 2). *Results of a school voucher experiment: The case of Washington, D.C. after two years*. Poster session presented at the Annual Meetings of the American Political Science Association, San Francisco, CA.
- Wolf, P.J. (2001, January 27). *The state of research on school vouchers*. Presentation to the National Invitational Conference on School Choice & Urban Education Reform, Institute on Education Law & Policy, Rutgers University, Newark, NJ.
- Wolf, P.J., Howell, W.G., & Peterson, P.E. (2000, March 9). *School choice in Washington, D.C.: An evaluation after one year*. Conference on Vouchers, Charters, and Public Education, Program on Education Policy and Governance, Harvard University, Cambridge, MA. Released as PEPG/00-08, February 2000.
- Wolf, P.J., Greene, J.P., Kleitz, B., & Thalhhammer, K. (2000, March 10). *Private schooling and political tolerance: Evidence from college students in Texas*. Conference on Vouchers, Charters, and Public Education, Program on Education Policy and Governance, Harvard University, Cambridge, MA. Released as PEPG/00-14, February 2000.
- Wolf, P.J., Roundtable Presenter. (1999, September 1-4). *Public administration in the twenty-first century*. Annual Meeting of the American Political Science Association, Atlanta, GA.
- Wolf, P.J. (1998, February 20). *Hercules or Prometheus? The influence of administrative leadership on agency effectiveness*. Distinguished Visiting Lecture Series in Public Policy, Department of Political Science and Bush School of Government and Public Service, Texas A & M University, College Station, TX.
- Wolf, P.J. (1996, February 29). *What history advises about reinventing government*. Research presentation to the Political Science Department, MIT, Cambridge, MA.

INVITED LECTURES & POLICY BRIEFINGS (Selected List – **Featured Events in Bold**) (154):

- Wolf, P.J. (August 9, 2025). Choosing a truly Christian school in Arkansas in our age of school choice. Presentation to the Men’s Ministry of Balboa Baptist Church, Hot Springs Village, AR.
- Wolf, P.J. (2025, April 29). Higher education’s role in preparing teachers. *New Pathways for Teachers in the Age of School Choice*. American Enterprise Institute, Washington, DC.
- Wolf, P.J. (2025, April 23). Panel on education. *The Future of Arkansas*. Turning Point USA at the University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2025, January 29). The evidence is in: School choice works for Wisconsin. **Keynote lecture for National School Choice Week. School Choice Wisconsin, Wisconsin State Capitol, Madison, WI.**
- Wolf, P.J. (2025, January 13). Education savings accounts and new schooling models – The rise of micro and alternative schooling. iCivics, virtual.
- Wolf, P.J. (2024, November 4). Improving national education systems after COVID-19. Presenter for webinar on book release, Springer Press, virtual.
- Wolf, P.J. (2024, November 1). What school choice can do for North Dakota. **Challey Institute for Global Innovation & Growth, North Dakota State University, Fargo, ND.**

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2024, October 31). The public purposes of private schooling: Evidence from a civic outcomes meta-analysis. Guest lecture to the Department of Economics, North Dakota State University, Fargo, ND.
- Wolf, P.J. (2024, April 11). Exigencies, incrementalism, equity and experimentation: The development of private school choice in the U.S. Future Leaders Fellowship Conference, American Federation for Children, Little Rock, AR.
- Johnson, A.H., & Wolf, P.J. (2024, January 19). Still a good investment: The productivity of public charter schools in nine cities. School Choice Collaborative Call, ExcelinEd, virtual.
- Wolf, P.J. (2024, January 18). Public dollars, private choices: School choice in 2024. Homeroom with Education Leaders Webinar, The Hunt Institute, NC.
- Wolf, P.J. (2023, November 2). The benefits of school choice: What does the research say? Presentation to the Van Lunen 2.0 Conference, Grand Rapids, MI.
- Wolf, P.J. (2023, October 24). Learn about LEARNS: Education Freedom Act Q & A. Webinar sponsored by The Reform Alliance, Little Rock, AR.
- Wolf, P.J. (2023, August 26). School choice myths debunked. ACE Scholarships Founders Circle Summit, Denver, CO.
- Wolf, P.J. (2023, June 12). LEARNS Act Town Hall with **Governor Sanders & Secretary Oliva**. Participant/questioner. Siloam Springs, AR.
- Wolf, P.J. (2023, May 4). The academic and civic effects of school choice. **Briefing to Illinois Legislators**, Springfield, IL.
- Wolf, P.J. (2023, April 27). Exigencies, incrementalism, equity and experimentation: The development of private school choice in the U.S. Guest lecture at the Institute of Education, **University College London**, United Kingdom.
- Wolf, P.J. (2023, February 13). Dispelling myths about school choice. Empower education tour, sponsored by Americans for Prosperity, Gravette, AR.
- Wolf, P.J. (2023, February 9). Dispelling myths about school choice. Empower education tour, sponsored by Americans for Prosperity, DeQueen, AR.
- Wolf, P.J. (2023, February 7). Dispelling myths about school choice. Empower education tour, sponsored by Americans for Prosperity, Benton, AR.
- Wolf, P.J. (2023, February 6). School choice facts. Dinner discussion for Members of the Education Committees, sponsored by EdChoice, Little Rock, AR.
- Wolf, P.J. (2023, January 13). [School choice: Past, present and future](#). Panel moderated by Director Condoleezza Rice, Hoover Institution, **Stanford University**, Stanford, CA.
- Wolf, P.J. (2022, December 5). Discussing school choice. Americans for Prosperity, Fayetteville, AR.
- Wolf, P.J. (2022, October 18). Dispelling myths about school choice. Arkansas Coalition for Racial Equity in Education, Fayetteville, AR.
- Wolf, P.J. (2022, May 20). The five miracles of Ozark Catholic Academy: A graduation address. The Jones Center, Springdale, AR.
- Wolf, P.J. (2022, March 24). A tale of two classical schools: The founding of Anthem Classical Academy and Ozark Catholic Academy with a focus on the appreciation of beauty. *National Symposium for Classical Education*, Phoenix, AZ.
- Wolf, P.J. (2022, March 22). The effects of private school choice. Presentation to The City Fund (virtual).
- Wolf, P.J. (2022, March 14). The character effects of school choice. Annual Board Meeting of the Council for American Private Education, Washington, DC.
- Wolf, P. J., & Rees, N. S. (2022, January 26). [The year of school choice](#). *The Report Card Podcast*. American Enterprise Institute.
- Wolf, P.J. (2022, January 11). What school choice is and could do for Arkansas. Conservative Women of Washington County, Springdale, AR.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2021, September 30). The character effects of school choice. American Federation for Children National Policy Summit, Nashville, TN.
- Wolf, P.J. (2021, September 14). The academic & civic effects of school choice. School Choice in America Legislature Training, EdChoice, Charleston, NC.
- Wolf, P.J. (2021, September 9). [Research deep dive: The impact of school voucher programs](#). *The Education Gadfly Show*, Ep. #786, Fordham Institute.
- Wolf, P.J. (2021, August 16). The academic & civic effects of school choice. School Choice in America Legislature Training, EdChoice, Charleston, NC.
- Wolf, P.J. (2021, April 23). [Three empirical studies on school choice and student outcomes](#). Challey Institute, College of Business, **North Dakota State University**, virtual.
- Wolf, P.J. (2021, January 27). [A vision of hope: Catholic schooling in Massachusetts](#). Panelist for book release webinar, Pioneer Institute, virtual.
- Wolf, P.J. (2020, December 2). [Staying up-to-date on the education choice literature – A review from leading experts](#). *EdPalooza*, Foundation for Excellence in Education, virtual.
- Wolf, P.J. (2020, November 25). [The Protestant school-to-family pipeline](#). *Are You Kidding Me?* Podcast Episode 26. American Enterprise Institute.
- Wolf, P.J. (2020, November 23). [Gap in funding grows between charters, traditional public schools](#). *Education Exchange Podcast*, *Education Next*.
- Wolf, P.J. (2020, July 20). The challenges facing private schools due to Covid. *The C4 and Bryan Nehman Podcast*. WBAL Radio.
- Wolf, P.J. (2020, July 2). [Has the Supreme Court just ended religious discrimination in public education funding?](#) Citizen Ed, virtual.
- Wolf, P.J. (2020, June 26). [School choice, Espinoza, & student civic prep](#). The Learning Curve podcast. Pioneer Institute, Boston, MA, virtual.
- Wolf, P.J. & Sikkink, D. (2020, June 11). [Webinar on homeschooling](#). Institute for Family Studies, University of Virginia, virtual.
- Wolf, P.J. (2019). The civic effects of private school choice programs. American Federation for Children Policy Summit, May 2, Chicago, IL.
- Wolf, P.J. (2019, March 21). *School choice and crime*. Political Open-Mic Forum on Crime and Social Justice. Bridge the City, Milwaukee, WI.
- Wolf, P.J. (2019, March 20). *Homeschooling students with special needs*. The Spectrum of Developmental Disabilities XLI. Continuing education for care providers. **The Johns Hopkins University School of Medicine**, Baltimore, MD.
- Wolf, P.J. (2019, January 23). [The D.C. Opportunity Scholarship Program at 15: Impacts, Experiences, and the Path Forward](#), **Featuring the Honorable Betsy DeVos, 11th U.S. Secretary of Education**. Panel discussion. Heritage Foundation, Washington, DC.
- Wolf, P.J. (2019, January 21). *Partner with me community meeting on school choice*. Panel discussion. The Reform Alliance, Friendship Aspire Academy, Little Rock, AR.
- Wolf, P.J., & Lasserre-Cortez, S. (2018, October 12). [The special education enrollment gap in Louisiana: Charter versus traditional schools](#). Research-to-Practice Bridge Event, **Regional Educational Laboratory Southwest**, Institute of Education Sciences, U.S. Department of Education, Washington, DC.
- Wolf, P.J. (2018, May 16). *Understanding public school segregation data. Panel discussion*. 71st National Seminar of the Education Writers Association, Los Angeles, CA.
- Wolf, P.J. (2018, April 18). *School choice in urban America: Prospects and challenges*. Keynote debate speaker. Sesquicentennial Event College of Education Symposium, Wayne State University, Detroit, MI.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2018, April 4). *Do impacts on test scores even matter? Lessons from long-run outcomes in school choice research*. Facebook Live Presentation, CATO Institute, Washington, DC.
- Wolf, P.J. (2018, February 28). *The research on school choice*. The Future of Education, Institute for Humane Studies, Charleston, SC.
- Wolf, P. J. (2018, January 23). National School Choice Week town hall. Mosaic Church, Little Rock, AR.
- Wolf, P. J. (2018, January 23). National School Choice Week Lunch and Learn. Association of County Governments, Little Rock, AR.
- Wolf, P. J. (2017, December 1). *The academic, civic, & integration effects of private school choice*. Foundation for Excellence in Education 10th Annual Policy Summit, Nashville, TN.
- Wolf, P. J. (2017, June 26). [Making sense of new evidence on private school vouchers](#). Presentation and panel discussion, The Urban Institute, Washington, DC.
- Mills, J. N., & Wolf, P. J. (2017, June 23). [How has the Louisiana Scholarship Program affected students? A comprehensive summary of effects after three years](#). Report Release and Panel Discussion, Education Research Alliance for New Orleans and School Choice Demonstration Project, Baton Rouge, LA.
- Wolf, P.J. (2017, May 1). [School vouchers: Friend or foe?](#) Askwith Debate, **Harvard University Graduate School of Education**, Cambridge, MA.
- Wolf, P.J. (2017, March 20). *Benefits of norm-referenced over criterion-referenced tests for private school choice accountability*. Briefing to Tennessee House Education Committee Chairman Harry Brooks, (via speakerphone).
- Wolf, P.J. (2017, March 14). *Benefits of norm-referenced over criterion-referenced tests for private school choice accountability*. Briefing to Tennessee Speaker of the House Beth Harwell, (via speakerphone).
- Wolf, P.J. (2017, January 13). *Private school choice: Effects and policy design issues*. **U.S. Office of Management & Budget**, Washington, DC.
- Wolf, P.J. (2016, August 18). *Private school choice: What we know and don't know*. Nicole Stelle Garnett Lecture Series on Education Policy, Notre Dame University.
- Wolf, P.J. (2016, August 12). *State charter school funding model: How other states fund*. Ohio Charter School Summit, Office of State Auditor Dave Yost, Columbus, OH.
- Wolf, P.J. (2016, August 3). *Private school choice: Higher test scores, empowerment, more graduates & less crime*. **School Choice Briefing on Enhancing Education Opportunity**, Republican Policy Committee, Washington, DC.
- Wolf, P.J. (2016, August 2). *Private school choice: Higher test scores, more graduates & less crime*. [Milton Friedman's Voucher Idea at 61](#), Heritage Foundation, Washington, DC. Broadcast live on CSPAN.
- Wolf, P.J. (2016, July 29). *Private school choice: Higher test scores, empowerment & less crime*. Milton Friedman Day Celebration, Americans for Prosperity Foundation, Rogers, AR.
- Wolf, P.J. (2016, March 4). *School choice regulation: Friend or foe?* Policy Forum, Cato Institute, Washington, DC.
- Wolf, P.J. (2016, February 22). *The future of school vouchers in Louisiana*. Report Release and Panel Discussion, Education Research Alliance for New Orleans and School Choice Demonstration Project, Baton Rouge, LA.
- Wolf, P.J. (2016, January 28). *School choice as an alternative model in urban education*. Alternative Models in Urban Education, **Johns Hopkins University Institute for Education Policy**, Baltimore, MD.
- Wolf, P.J. (2016, January 28). *Effect of school choice on parental satisfaction with special education services*. New Research on School Choice: Considerations for Scholars and Policymakers, Heritage Foundation, Washington, DC.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2015, June 21). *Research findings on private school choice*. Advocates for Parental choice Symposium of the Alliance for Catholic Education, Notre Dame University, New Orleans, LA.
- Wolf, P.J. (2015, January 28). *Lessons from the school choice journey*. Presentation at the Heritage Foundation, Washington, DC.
- Wolf, P.J. (2015, January 27). *The school choice journey: School vouchers & the empowerment of urban families*. American Enterprise Institute, Washington, DC.
- Wolf, P.J. (2015, January 12-14). *School choice, How far have we come and where are we going?* Panel for the Portfolio Network Meeting, Center for Reinventing Public Education, Memphis, TN.
- Wolf, P.J. (2014, October 17). *School choice*. Presentation to the Workshop on Education Reform 101, Thomas B. Fordham Foundation and 50CAN.
- Wolf, P.J. (2014, August 18). *The civic & attainment effects of private school choice programs*. Presentation to State Legislators at Workshop on School Choice in the Midwest, Friedman Foundation, Minneapolis, MN.
- Wolf, P.J. (2014, August 11). *The civic & attainment effects of private school choice programs*. Presentation to State Legislators at Workshop on School Choice in the Far West, Friedman Foundation, Salt Lake City, UT.
- Wolf, P.J. (2014, June 22). *Research findings on private school choice*. Advocates for Parental choice Symposium of the Alliance for Catholic Education, Notre Dame University, New Orleans, LA.
- Wolf, P.J. (2014, June 12). *What the research says about school choice*. **Briefing to Bruce Rauner, candidate for Governor of Illinois**, Chicago, IL.
- Wolf, P.J. (2014, May 20-21). *School choice research: Are we looking for love in all the wrong places?* Presentation at the national policy summit #EdRevolution: Breaking down barriers to choice, American Federation for Children, Orlando, FL.
- Wolf, P.J. (2013, October 14). *School vouchers in Washington, DC: Lessons for Massachusetts*. Presentation at the symposium on Urban School Models: Choice and Charter Lessons from DC and New Orleans, Pioneer Institute, Boston, MA.
- Wolf, P.J. (2013, September 22-24). *The research facts about private school choice*. Presentation to the Conference on Catholic School Financing, University of Notre Dame, South Bend, IN.
- Wolf, P.J. (2013, July 30). *The research facts about school choice*. Presentation to AEI Education Policy Academy, Denver, CO.
- Wolf, P.J. (2013, June 17). *Latest research findings on school vouchers*. Alliance for Catholic Education Parental Choice Symposium, Notre Dame University, Milwaukee, WI.
- Wolf, P.J. (2013, May 2). *Who chooses what & how? School shopping in Detroit*. Presentation at Great Schools Summit, San Francisco, CA.
- Wolf, P.J. (2013, January 30). *The research facts about school choice*. Keynote address to the Minnesota School Choice Coalition, Minneapolis, MN.
- Wolf, P.J. (2013, January 29). *What we know about school choice*. **Panel presentation at the School Choice Summit, Little Rock, AR.**
- Wolf, P.J. (2012, August 16). *The school choice experience in Washington, DC*. Briefing to the Governor's Task Force on Opportunity Scholarships, Nashville, TN.
- Wolf, P.J. (2012, August 16). *The research record on school vouchers*. **Briefing to Honorable Bill Haslam, Governor of Tennessee, State Capitol, Nashville, TN.**
- Wolf, P.J. (2012, June 17). *Latest research findings on school vouchers*. Alliance for Catholic Education Parental Choice Symposium, Notre Dame University, Milwaukee, WI.
- Wolf, P.J. (2012, June 14). *Three state-level education reform recommendations*. Presentation to the Women in Government K-12 Education Reform Task Force, Memphis, TN.
- Wolf, P.J. (2012, June 13). *The research facts about charter schools and vouchers*. Presentation at School Choice in America's Great Northwest, Missoula, MT.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2012, May 3). *Recent research findings on school vouchers*. Presentation to the American Federation for Children 2012 Policy Summit, Jersey City, NJ.
- Wolf, P.J. (2012, January 31). *School choice: A speech and commentary*. With Clark Neily of the Institute for Justice, Federalist Society, University of Arkansas Law School, Fayetteville, AR.
- Wolf, P.J. (2012, January 27). *The research facts about school choice*. Presentation for National School Choice Week to the Arkansas Parent Network, Little Rock, AR.
- Wolf, P.J. (2011, December 1). *Experimental evaluation of the DC opportunity scholarship program*. Presentation to the CLASS Seminar Series, College of Education and Health Professions, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2011, November 15). *The research facts about charter schools and vouchers*. **Presentation to the Mayor's Education Summit, Anchorage, AK.**
- Wolf, P.J. (2011, October 24-25). *School choice roundtable*. Friedman Foundation for Educational Choice, Indianapolis, IN.
- Wolf, P.J. (2011, August 22). *The research facts about school vouchers*. **Briefing to Honorable Bill Haslam, Governor of Tennessee, State Capitol, Nashville, TN.** (via speakerphone).
- Wolf, P.J. (2011, July 12). *Four star debate: School vouchers*. National Center for Policy Analysis, Oklahoma Christian University, Edmond, OK.
- Wolf, P.J. (2011, June 26). *Research findings on school vouchers in DC and Milwaukee*. Advocates for Parental Choice Symposium, Notre Dame University, South Bend, IN.
- Wolf, P.J. (2011, May 5). *An overview of charter schooling in the United States*. **Presentation to the Arkansas Department of Education Conference on "Quality Leadership for Quality Choice,"** North Little Rock, AR.
- Wolf, P.J. (2011, April 28). *What educators need to know about school choice*. Presentation to the National Catholic Education Association Annual Conference, New Orleans, LA.
- Wolf, P.J. (2011, March 30). *The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of fourth year reports*. Presentation at the Center for the Study of Liberal Democracy, University of Wisconsin, Madison, WI.
- Wolf, P.J. (2011, March 16). *The anti-aid amendments and school choice*. Presentation to the forum on "Dumping the know-nothing amendments: Church, state, and school reform," Pioneer Institute for Public Policy Research, Boston, MA.
- Wolf, P.J. (2010, November 5). *Effective grant writing*. Guest Lecture, Education Technology Graduate Program, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2010, October 1). *What the research says about public charter schools*. **Presentation to the 62nd Annual Conference of Southwest Foundations,** Vail, CO.
- Wolf, P.J. (2010, August 17). *Governmental and philanthropic grants*. Guest Lecture, Education Technology Graduate Program, University of Arkansas, Fayetteville, AR.
- Wolf, P.J. (2010, June 28). *The DC opportunity scholarship program: What the research shows*. Presentation sponsored by the American Federation for Children, United States Capitol, Washington, DC.
- Wolf, P.J. (2010, June 27). *New quantitative research on school vouchers in DC and Milwaukee*. Guest Lecture, Notre Dame University, South Bend, IN.
- Wolf, P.J. (2010, April 7). *The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of third year reports*. Presentation at the Lafollette School of Public Policy, University of Wisconsin, Madison, WI.
- Wolf, P.J. (2009, July 8). *New research on school vouchers in DC and Milwaukee*. Guest Lecture, Notre Dame University, South Bend, IN.
- Wolf, P.J. (2009, May 28). *New lessons about school vouchers from DC and Milwaukee*. **Panel Presentation of the Alliance for School Choice, National Press Club,** Washington, DC.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2009, March 26). *The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of second year reports*. Presentation to the Public Policy Forum Eye Opener Breakfast, Milwaukee, WI.
- Wolf, P.J. (2008, November 19). *The policy implications of school vouchers*. Guest Lecture, Notre Dame University, South Bend, IN.
- Wolf, P.J. (2008, September 10). *The latest school voucher research: DC and Milwaukee*. Presentation to the State Policy Network Summit on K-12 Education, Scottsdale, AZ.
- Wolf, P.J. (2008, April 7). *Road map for school voucher programs*. **Briefing to the South Carolina State Superintendent of Education**, Columbia, SC.
- Wolf, P.J. (2007, February 25). *The comprehensive longitudinal evaluation of the Milwaukee parental choice program: Summary of baseline reports*. Presentation at the Wisconsin State Capitol, Madison, WI.
- Wolf, P.J. (2007, December 5). *Evaluation of the DC opportunity scholarship program: Summary of experimental impacts after one year*. **Presentation to the Program in Education Policy and Governance, Education Policy Colloquia Series, Harvard University**, Cambridge, MA.
- Wolf, P.J. (2007, November 5). *Evaluation of the DC opportunity scholarship program: Strategies, challenges, and results after one year*. **Presentation to the University of Pennsylvania Graduate School of Education**, Philadelphia, PA.
- Wolf, P.J. (2007, October 19). *The opportunity scholarship program: Second year impacts*. **Briefing to the senior staff of the Institute for Education Sciences, U.S. Department of Education**, Washington, DC.
- Wolf, P.J. (2007, July 24). *Evaluation of the DC opportunity scholarship program: Strategies, challenges, and results after one year*. Presentation to the U.S. Department of Education Regional Education Labs Director's Meeting, Washington, DC.
- Wolf, P.J. (2007, June 5). *The U.S. experience with education accountability*. **Keynote address to the International Seminar on Education Accountability, PREAL**, Mexico City, Mexico.
- Wolf, P.J. (2006, December 1). *New education consumers: Second year report on parent and student voices on the opportunity scholarship program*. Georgetown University, Washington, DC.
- Wolf, P.J. (2006, November). *The opportunity scholarship program evaluation: An update*. **Briefing to the Senior Staff of the Senate Education and the Workforce Committee**, Washington, DC. (via conference call).
- Wolf, P.J. (2006, October 12). *The opportunity scholarship program: First year impacts*. Briefing to the senior staff of the Institute for Education Sciences, U.S. Department of Education, Washington, DC.
- Wolf, P.J. (2006, September 19). *The U.S. experience with education reform*. **Dinner discussion with the Right Honorable Alan Johnson, Secretary of State for Education and Skills, Great Britain, hosted by Sir David Manning, Ambassador to the United States**, British Embassy, Washington, DC.
- Wolf, P.J. (2006, March 29). *Student achievement in Milwaukee: Our plan for a hard look at the data*. Presentation to the Philanthropy Roundtable, Milwaukee, WI.
- Wolf, P.J. (2006, March 11). *Responsible research and reporting on school vouchers*. Presentation to the Knight Seminar for Education Editors and Supervisors, sponsored by the Hechinger Institute on Education and the Media, The Johnson Foundation, Racine, WI.
- Wolf, P.J. (2006, January 26). *School choice and civic values*. Panel presentation on Getting choice right: Ensuring equity and efficiency in education policy, Brookings Institution, Washington, DC.
- Wolf, P.J. (2006, January 19). *Plan for an independent evaluation of the Milwaukee parental choice program*. Briefing to legislators and staff, Wisconsin State Capitol, Madison, WI.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2005, September 28). *The effect of private schooling on student achievement*. **Keynote address to the Private School Leadership Conference, U.S. Department of Education, Office of Innovation and Improvement**, Washington, DC.
- Wolf, P.J. (2005, May 18). *Special education in the San Diego city schools*. Panel presentation on urban school reform: Lessons from San Diego, American Enterprise Institute for Public Policy Research, Washington, DC.
- Wolf, P.J. (2005, May 11). *Key issues in U.S. education reform*. **Keynote address to the Annual Advisory Board Dinner of the Inter-American Dialogue**, Coral Gables, FL.
- Wolf, P.J. (2005, April 21). *Evaluation of the DC opportunity scholarship program: First year report on participation*. Georgetown Education Awareness Day, Georgetown University, Washington, DC.
- Wolf, P.J. (2005, March 16). *School vouchers*. Debate sponsored by the Society for Civic Engagement, University of Loyola, New Orleans, LA.
- Wolf, P.J. (2005, November 16). *The politics of the budgetary process*. Presentation to executive officials of the U.S. Department of Commerce, Washington, DC.
- Wolf, P.J. (2004, November 9). *Education policy and politics*. Panel presentation to a delegation of students from the College of William and Mary, Washington, DC.
- Wolf, P.J. (2004, June 3). *Community colleges and vocation education in the U.S.* **Lunch discussion with Rt Hon Alan Johnson, MP, Minister of State for Great Britain for Lifelong Learning and Higher Education**, British Embassy, Washington, DC.
- Wolf, P.J. (2004, March 1). *Doing school choice right*. Presentation to the Congressional Advocacy Days Conference, U.S. Conference of Catholic Bishops, Washington, DC.
- Wolf, P.J. (2004, January 8). *The latest evidence on the effects of school choice*. Presentation to the Parental Options Meeting, U.S. Department of Education, Washington, DC.
- Wolf, P.J. (2003, July 30). *The real impact of school choice: What does the research say?* Presentation to the 30th Annual Meeting of the American Legislative Exchange Council, Washington, DC.
- Wolf, P.J. (2003, March 26). *Narrowing the education gap: Vouchers and urban schools*. Presentation to the Math 10/Public Policy Consortium, Macalester College, St. Paul, MN.
- Wolf, P.J. (2003, March 18). *Will school vouchers make low-income students in high poverty schools better off?* Third Annual Public Policy Symposium/Debate (with John Witte), St. John's University, Collegeville, MN.
- Wolf, P.J. (2003, January 29). *School choice*. **Panel Presentation for the 78th Legislature Policy Orientation, Texas Public Policy Foundation**, Four Seasons Hotel, Austin, TX.
- Wolf, P.J. (2002, October 11). *Funding the individuals with disabilities education act*. Meet the Experts Policy Lunch, sponsored by the Heritage Foundation, Rayburn House Office Building, Washington, DC.
- Wolf, P.J. (2002, July 25). *Narrowing the education gap: Final results of the voucher experiments in New York, Dayton, and DC*. Presentation to the U.S. Department of Education, National Center for Education Statistics, Annual Data Conference, Mayflower Hotel, Washington, DC.
- Wolf, P.J. (2002, July 22). *How to successfully implement a results-based accountability system in special education*. Presentation to the Workshop on Maximizing Accountability and Performance of Charter and Public Schools, National Institute for Government Innovation, Washington Plaza Hotel, Washington, DC.
- Wolf, P.J. (2002, June 25). *No child left behind: Moving beyond compliance*. Public Forum of the District of Columbia State Education Agency, The World Bank, Washington, DC.
- Wolf, P.J. (2002, May 17). *Education reform in the U.S.: Lessons for Britain*. **Policy briefing delivered to Dr. David Halpern, Senior Policy Advisor in the Forward Strategy Unit of Prime Minister Tony Blair of Great Britain**, Georgetown University, Washington, DC.

Patrick J. Wolf, Ph.D.

- Wolf, P.J. (2002, March 4). *School choice: What does the research show?* Presenter on a Congressional Advocacy Days panel sponsored by the U.S. Conference of Catholic Bishops, Capital Hill Hyatt, Washington, DC.
- Wolf, P.J. (2002, February 26). *Education reform in the U.S. Briefing delivered to the Rt. Hon. Stephen Timms, MP and Minister for Schools in Great Britain*, Washington, DC.
- Wolf, P.J. (2001, October 12). "School choice: Where are we now?" Panel discussion at the Heritage Foundation, Washington, D.C.
- Wolf, P.J. (2000, March 2). *School choice in Washington, D.C.: An evaluation after one year. Briefing to Andrew Rotherham, Special Assistant to the President for Domestic Policy, The White House.*
- Wolf, P.J. (1996, July 5-6). *The internal and external politics of administrative reform.* Four lectures to the MPA Mid-Career Program, University of Externada, Bogota, Colombia.

REFEREE FOR:

Administration & Society
AERA Open
American Education Research Association (Division L & School Choice SIG)
American Education Research Journal
American Journal of Education
American Journal of Political Science
American Political Science Review
American Politics Research
Bloomsbury Publishing
Catholic Education
Columbia University Press
Department for International Development, Economic and Social Research Council
Economics of Education Review
Education Evaluation and Policy Analysis
Education Finance and Policy
Education Next
Educational Policy
Educational Researcher
Evaluation Review
Frontiers in Sociology
Georgetown Public Policy Review
Georgetown University Press
Governance
International Journal of Education Policy and Leadership
Journal of Education
Journal of Education Policy
Journal of Japanese & International Education
Journal of Policy Analysis and Management
Journal of Politics
Journal of Public Administration Research and Theory
Journal of School Choice
Management Science
Mathematica Policy Research
Oxford University Press

Patrick J. Wolf, Ph.D.

Palgrave Press
Pioneer Institute
Policy Studies Journal
Public Management Review
Quarterly Journal of Political Science
RAND Corporation
Remedial & Special Education
Smith-Richardson Foundation
Social Forces
Social Science Quarterly
Social Science Research
Sociological Spectrum
State Politics & Policy Quarterly
Teacher's College Press
Thomas B. Fordham Foundation
University of Kansas Press
What Works Clearinghouse of the U.S. Department of Education

COURSES TAUGHT (Graduate level unless otherwise indicated):

Education Reform for Arkansas & the World (undergraduate honors), 2025
Research Seminar in Education Policy, 2022
Program Evaluation and Research Design, 2009-2024
Seminar in School Choice, 2010, 2012, 2014, 2016, 2018, 2020, 2022, 2024
Education Accountability and Reform, 2001-02, 2004
Organizational Theory, 1999, 2001, 2003-05
Public Management, 2003, 2005
Innovation/Leadership in Public Management, 2003, 2004, 2005
Innovations in Public Management, 1998-99, 2001-03
Research Practicum and Writing Tutorial, 1998-2001, 2002-03
Financial Management in Government, 1995-99, 2002
Education Policy, 1998
Workshop in Policy Analysis, 1995-98
Bureaucracy and Politics (undergraduate), 1994-97
Workshop in Public Management, 1994-97

UNIVERSITY SERVICE (Selected List):

Director of Graduate Studies, Department of Education Reform, College of Education and Health Professions (COEHP), University of Arkansas, 2013-20, 2024-
Member, Committee of the Wise (Full Professors who advise the Dean), 2024-
Chair, Personnel Committee, Department of Education Reform, College of Education and Health Professions (COEHP), University of Arkansas, 2013-20, 2024-
Interim Head, Department of Education Reform, University of Arkansas, May-December 2021; August 2022-
Member, Search Committee for Department Head and Endowed Chair, Department of Education Reform, University of Arkansas, August 2022-
Member, Search Committee for a Departmental Research Associate, Department of Education Reform, University of Arkansas, 2021

Patrick J. Wolf, Ph.D.

Chair, Search Committee for a Departmental Chief of Staff, Department of Education Reform, University of Arkansas, 2021

Member, Council of Principal Investigators, University of Arkansas, 2019-2023

Member, Research Reproducibility and Replicability Group, University of Arkansas, 2019-21

Member, Committee on Promotion to Distinguished Professor, University of Arkansas, 2018-19 (**Acting Chair** 2019)

Member, Search Committee for an Assistant Professor of Education Policy, University of Arkansas, 2017

Member, Search Committee for an Interim Dean of COEHP, University of Arkansas, 2016

Chair, Committee on Promotion to Distinguished Professor, Department of Education Reform, College of Education and Health Professions (COEHP), University of Arkansas, 2014

Member, Committee on Compensation for Summer Dissertation Advising, College of Education and Health Professions (COEHP), University of Arkansas, 2013

Chair, Committee on Tenure and Promotion to Associate Professor, College of Education and Health Professions (COEHP), University of Arkansas, 2011 (**Member** 2010, 2012, 2014)

Chair, Committee on Promotion to Full Professor, COEHP, University of Arkansas, 2006-2007, 2010 (**Member** 2009, 2012)

Member, Committee on Administrative Reorganization, COEHP, 2009-10

Faculty Advisor, Students for Life, 2011-20

Departmental Liaison, Arkansas University Libraries, 2007-

Member, Honors Council, COEHP, University of Arkansas, 2007-2009

Member, Governance and Structure Task Force, COEHP, University of Arkansas, 2006-07

Member, Faculty Council, COEHP, University of Arkansas, 2006-07

Practicum Director -- Core faculty member in charge of supervising the nine adjunct professors who advise our master's students on their thesis work, Georgetown University Public Policy Institute (GPPI), 2002-03, 2004-06

Member, GPPI Strategic Planning Committee, 2004-05

Member, GPPI Self-Study Committee, 2003-04

Member, Committee to Plan the Seventh Public Management Research Association Conference at Georgetown University, 2002-2003

Member, Committee to Oversee the Executive MPM Program at GPPI, 2002-

Evaluator, Government Department Comprehensive Exams in American Politics, Georgetown University, 1999-

Advisor, Joint MBA/MPP Degree Program at Georgetown University, 1998-

Co-Director, Public Management and Nonprofit Studies Track at GPPI, 1998-2002, 2005-06

Member, Public Economist Search Committee, GPPI, 2001-2002

Member, Graduate Fellowships Committee, GPPI, 2002, 2004

Member, Graduate Admissions Committee, GPPI, 1999, 2001

Member, Chair in Catholic Social Thought Search Committee, Georgetown University 2001-2002

Member, Georgetown delegation to the meeting on Commitment to Justice in Jesuit Higher Education and co-author of "The Justice Mission at Georgetown University," 2000-2001

Member, Committee to Recommend Criteria for the Chair in Catholic Social Thought, Georgetown University, 1999-2000

EXHIBIT B



April 2019

SPECIAL EDUCATION

Varied State Criteria May Contribute to Differences in Percentages of Children Served

GAO Highlights

Highlights of [GAO-19-348](#), a report to congressional requesters

Why GAO Did This Study

About 13 percent of children aged 3 through 21 enrolled in public schools received special education services in school year 2015-16, and about 3 percent of children from birth through age 2 received special education services. The percentage of the population served under IDEA varies across states. For example, in fall 2016, the percentages of the population aged 6 through 21 served in individual states ranged from 6.4 percent to 15.1 percent. Concerns about the difficulties identifying and evaluating children for special education have been raised by the media, experts, and special education advocates.

GAO was asked to examine how states implement Child Find and how Education monitors it. This report examines (1) factors that may account for differences in the percentage of children receiving special education services across states, and (2) how Education and selected states monitor and support Child Find efforts.

GAO reviewed federal special education data, agency documentation, federal laws and regulations, and selected state laws; and interviewed Education officials, officials from four state agencies and 15 school districts in those states (Colorado, Iowa, Massachusetts, and New York), and representatives of organizations that advocate for families of individuals with disabilities as well as special education subject matter specialists. GAO selected the four states based on a variety of factors, including the percentage of special education students.

View [GAO-19-348](#). For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or nowickij@gao.gov.

April 2019

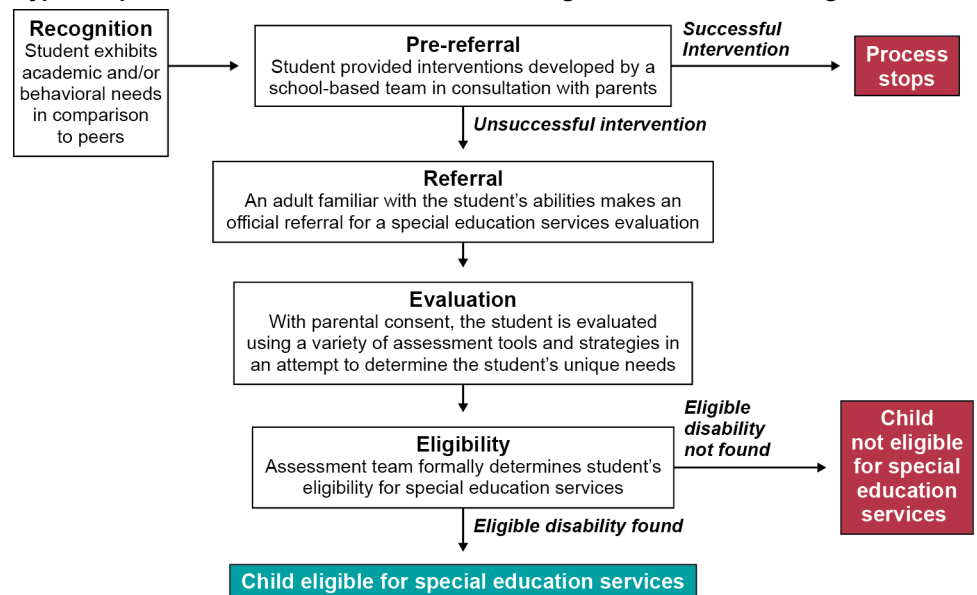
SPECIAL EDUCATION

Varied State Criteria May Contribute to Differences in Percentages of Children Served

What GAO Found

Differences in states' eligibility criteria and the difficulty of identifying and evaluating some children suspected of having disabilities may contribute to differences in the percentages of children receiving special education services across states. The Individuals with Disabilities Education Act (IDEA), the primary federal special education law, requires states to have policies and procedures in place to ensure that all children with disabilities residing in the state who need special education services are identified, located, and evaluated. These policies and procedures—known as "Child Find"—are generally implemented by local school districts (see fig.). IDEA gives states some latitude in setting eligibility criteria and defining disability categories. In addition, states may determine their own processes for identifying and evaluating children. As a result, a child eligible for services in one state might be ineligible in another. According to advocates, special education subject matter specialists, and state and local officials GAO interviewed, a number of challenges related to correctly identifying and evaluating children suspected of having a disability can affect eligibility decisions. For example, school district officials in all four states GAO visited cited challenges in properly identifying and evaluating English Learner students, as districts do not always have staff who are conversant in a child's first language and skilled in distinguishing language proficiency from disabilities.

Typical Special Education Process for School-Aged Children and Young Adults



Source: GAO analysis of information from selected state agencies and special education advocacy groups. | GAO-19-348

The Department of Education (Education) monitors and supports Child Find efforts primarily by reviewing states' annual performance data and providing professional development and technical assistance. The four states GAO visited reported monitoring and supporting school districts' efforts in a similar manner to Education's.

Contents

Letter		1
	Background	3
	Varied State Eligibility Criteria and Challenges Identifying and Evaluating Children May Help Explain Differences in Percentages Served	9
	Education and Selected States Reported Monitoring Child Find Implementation through Data Collection and Supporting It through Technical Assistance	20
Appendix I	Objectives, Scope, and Methodology	33
Appendix II	GAO Contact and Staff Acknowledgments	37
Table		
	Table 1: Key Federal and State Responsibilities under the Individuals with Disabilities Education Act (IDEA)	4
Figures		
	Figure 1: Special Education Process for State Early Intervention (IDEA Part C) Programs	6
	Figure 2: Typical Special Education Process for School-Aged Children and Young Adults (IDEA Part B)	7
	Figure 3: Percentage of the Population from Birth through Age 21 Receiving IDEA Services, by Age Group and State, Fall 2016	8

Abbreviations

CCD	Common Core of Data
Education	U.S. Department of Education
FAPE	free appropriate public education
ICE	Immigration and Customs Enforcement
IDEA	Individuals with Disabilities Education Act
IEP	individualized education program
NCES	National Center for Education Statistics
OSEP	Office of Special Education Programs
RDA	Results Driven Accountability
RTI	response to intervention
SEA	state educational agency
SLD	specific learning disability
TA&D	Technical Assistance and Dissemination
TEA	Texas Education Agency

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



April 11, 2019

The Honorable Patty Murray
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable Robert C. "Bobby" Scott
Chairman
Committee on Education and Labor
House of Representatives

Nearly 7 million children between the ages of 3 and 21 (about 13 percent of the total number of students enrolled in public schools) received special education services during school year 2015-16 under the Individuals with Disabilities Education Act (IDEA).¹ However, the percentage of the population served under IDEA varies across states. For example, in fall 2016, the percentages of the population aged 6 through 21 served in individual states ranged from 6.4 percent to 15.1 percent.

IDEA—the primary federal special education law for infants, toddlers, children, and youth with disabilities—is administered at the federal level by the U.S. Department of Education’s (Education) Office of Special Education Programs (OSEP). Under Part B of IDEA states receiving Part B funds are required to make a free appropriate public education available to all eligible children with disabilities.² To do so, IDEA requires states to have policies and procedures to ensure that all children with disabilities residing in the state are identified, located, and evaluated.³ This requirement is known as “Child Find,” and is generally implemented by local school districts.

¹ U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, *Digest of Education Statistics, 2017*, table 204.30 (July 2017).

² 20 U.S.C. § 1412(a)(1).

³ 20 U.S.C. § 1412(a)(3). The requirement includes children with disabilities who are homeless or wards of the state, and children with disabilities attending private schools, regardless of the severity of their disability. See also 20 U.S.C. § 1435(a)(5)—(a comprehensive child find system for the purposes of identifying infants and toddlers under Part C).

Concerns about the identification and evaluation of children have been raised by the media, experts, and special education advocates. For instance, a 2016 series of investigative reports by the Houston Chronicle alleged the systematic delay or denial of special education services for children with disabilities in Texas. The series alleged that, to reduce costs, the Texas Education Agency (TEA) set an 8.5 percent cap on the percent of students who could receive special education services, and intensified monitoring of school districts that exceeded that level. Education monitored TEA and found, among other things, that some school districts took steps designed to keep the percentage of children receiving special education services at or below the 8.5 percent cap.⁴ Education also found that TEA did not ensure that some school districts in the state properly performed their Child Find responsibilities. Similarly, in 2016, the Connecticut State Department of Education found that a local school district was not properly identifying children in need of special education services. In addition, special education experts and advocates have expressed concerns about both over-representation and under-representation of minorities in special education, which could indicate that these students are not appropriately being identified and evaluated for special education.⁵

You asked us to examine how states implement IDEA's Child Find requirements and how Education oversees state implementation of Child Find. This report examines (1) factors that may account for differences in the percentage of children who receive special education services across states, and (2) how Education and selected states monitor and support Child Find requirements.

To obtain information for both objectives we (1) reviewed Education's special education data for school years 2011 through 2016 (the most recent data available at the time of our review); (2) reviewed relevant Department information, such as Dear Colleague Letters (documents through which Education communicates policy information), Frequently Asked Questions, and Questions and Answers; federal laws; federal

⁴ U.S. Department of Education, Office of Special Education Programs, *DMS Letter to the Honorable Mike Morath, Commissioner, Texas Education Agency* (Jan. 11, 2018), and *DMS Texas Part B 2017 Monitoring Visit Letter, Enclosure* (Jan. 11, 2018).

⁵ In 2013, we reported on issues related to the identification of racial and ethnic overrepresentation in special education. GAO, *Individuals With Disabilities Education Act: Standards Needed to Improve Identification of Racial and Ethnic Overrepresentation in Special Education*, [GAO-13-137](#) (Washington, D.C.: Feb. 27, 2013).

regulations and policies; and selected state laws and regulations; (3) interviewed Education officials; and (4) interviewed officials from a nongeneralizable selection of four states (Colorado, Iowa, Massachusetts, and New York)⁶ from state agencies responsible for special education and from 15 school districts within those states. We selected the four states based on a variety of factors, including the differences in the percentage of special education students served. We also interviewed representatives from eight organizations that advocate for parents and families of individuals with disabilities and four special education subject matter specialists (hereinafter referred to as subject matter specialists) to discuss issues related to Child Find. We determined that the data used were sufficiently reliable for the purposes of the report. See appendix I for detailed information about our methodology.

We conducted this performance audit from August 2017 to April 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

IDEA was enacted to ensure that all children with disabilities have access to a free appropriate public education (FAPE); to protect the rights of those children and their parents; and to assist states, localities, educational service agencies, and federal agencies in educating those children.⁷ Part C of IDEA provides grants to states for Early Intervention services for infants and toddlers (birth through 2 years) with developmental delays or diagnosed conditions that have a high likelihood of developmental delay.⁸ Part B of IDEA provides grants to states to assist them in providing special education and related services to eligible

⁶ We selected states based on a variety of factors, including the percentage of special education students and geographic considerations. (For more information on our site selection methodology, see app. I.)

⁷ 20 U.S.C. § 1400(d)(1).

⁸ Under Part C of IDEA states also have the option of providing services to children at risk of developing a delay and to children between the ages of 3 and 5. 20 U.S.C. §§ 1431, 1432.

children with disabilities beginning at age 3 and possibly lasting to the student’s 22nd birthday, depending on state law or practice.⁹

Special Education
Administration and
Funding

In fiscal year 2019, the total appropriation for IDEA Parts B and C was approximately \$13.2 billion (\$12.8 billion for Part B and \$470 million for Part C). These funds are awarded through formula grants to state agencies which, in turn, provide these funds to eligible entities (school districts under Part B and early intervention service providers under Part C) to carry out applicable IDEA requirements.¹⁰ (See table 1.)

Table 1: Key Federal and State Responsibilities under the Individuals with Disabilities Education Act (IDEA)		
Agency	Monitoring	Support
U.S. Department of Education	• Monitor state implementation of IDEA • Require states to monitor implementation by school districts • Review State Performance Plans/Annual Performance Reports, information from monitoring visits, and other information, and make determinations regarding state performance using data submitted, information obtained from monitoring visits and other available information	• Advise states of available technical assistance
State Educational Agency (SEA)	• Collect data from school districts as needed to report annually to the U.S. Department of Education • Monitor implementation of Part B and make annual determinations about the performance of each school district • Ensure that school districts correct noncompliance identified by the SEA within a year	• Advise school districts of available technical assistance
Part C Lead Agency	• Monitor implementation of Part C of IDEA • Make determinations annually about the performance of each Early Intervention program • Ensure that service providers correct noncompliance identified by the Lead Agency within a year	• Provide technical assistance to agencies, institutions, organizations, and Early Intervention service providers

Source: GAO analysis of 20 U.S.C. § 1416. | GAO-19-348

⁹ 20 U.S.C. §§ 1411(a)(1), 1412(a)(1), 1419. Part B grants include the Grants to States program, for children ages 3 through 21, and the Preschool Grants program, for children ages 3 through 5. For the remainder of this report we are using the phrase “special education services” to refer to special education and related services.

¹⁰ IDEA requires Education to award Part B funds to state educational agencies; IDEA does not specify which state agency (the “lead agency”) must implement Part C. Lead agencies in states vary, and states assign Part C to state health departments, education departments, or other departments, including combined health and human services departments.

Part C (Early Intervention for Infants and Toddlers, Birth to 2 Years)

Each state has a designated lead agency—called a Part C Lead Agency—that is responsible for administering, supervising, and monitoring Part C.¹¹ Part C requires each state to have a continuous process of public awareness activities and evaluations designed to identify and refer as early as possible all young children with disabilities and their families who are in need of Early Intervention services. By law, public awareness efforts should include disseminating information to parents and those likely to make referrals, especially hospitals and physicians.¹² States have disseminated this information in different ways, including through television ads, pamphlets, and posters describing Part C and how parents can obtain services for their child.

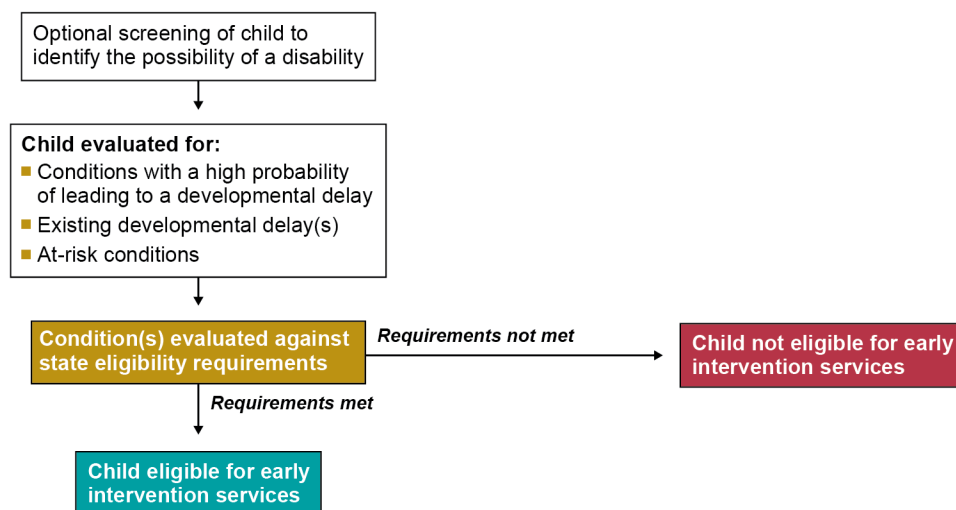
Under Part C of IDEA, states must also provide services to any child under 3 years of age who is developmentally delayed. These delays must be measured by appropriate diagnostic instruments and procedures in one or more areas of cognitive development, physical development, communication development, social or emotional development, and adaptive development, or the child must have a diagnosed physical or mental condition that has a high probability of resulting in developmental delay.¹³ Once a child who is suspected of having a disability is referred, states must evaluate the child in accordance with applicable IDEA requirements. Figure 1 illustrates the typical process in Early Intervention programs.

¹¹ 20 U.S.C. § 1435(a)(10).

¹² 20 U.S.C. § 1435(a)(6). Under IDEA, primary referral sources include (1) hospitals, including prenatal and postnatal care facilities; (2) physicians; (3) parents, including parents of infants and toddlers; (4) child care programs and early learning programs; (5) local education agencies and schools; (6) public health facilities; (7) other public health or social service agencies; (8) other clinics and health care providers; (9) public agencies and staff in the child welfare system, including child protective service and foster care; (10) homeless family shelters; and (11) domestic violence shelters and agencies. 34 C.F.R. § 303.303(c).

¹³ 20 U.S.C. § 1432(5)(A).

Figure 1: Special Education Process for State Early Intervention (IDEA Part C) Programs



Source: GAO analysis of Department of Education reports and guidance on the Individuals with Disabilities Education Act. | GAO-19-348

Infants and toddlers who are still receiving services by about age 2 and a half are evaluated again to determine if they are eligible for services under Part B.

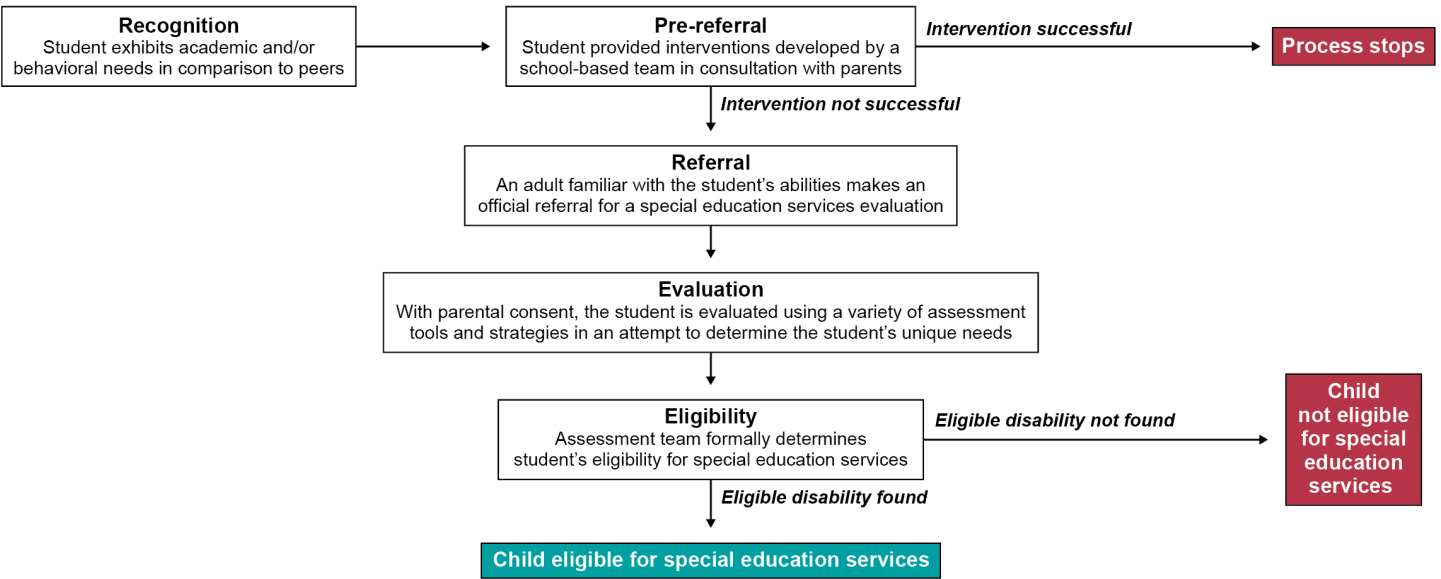
Part B (Special Education Services for Children and Youth ages 3 through 21)

Under Part B, states and school districts must make FAPE available to all eligible children with disabilities in mandatory age ranges. FAPE includes special education (specially designed instruction) and related services (support services)—such as speech therapy, psychological services, and physical therapy—tailored to their needs based on an individualized education program (IEP).¹⁴ Figure 2 illustrates the typical process for identifying students for special education under Part B. Figure 3 shows the percentage of children served under IDEA by age and state as of fall 2016. Nationally, for each age group, the percentage of children receiving

¹⁴ An IEP is a written statement developed by a team of school officials, parents, the student if appropriate, and at the discretion of the parent or school, other individuals who have knowledge or special expertise regarding the student. The IEP includes, among other information, a statement of the child's present levels of academic achievement and functional performance, annual goals, and a statement of the special education and related services and supplementary aid and services needed to attain those goals. 20 U.S.C. § 1414(d).

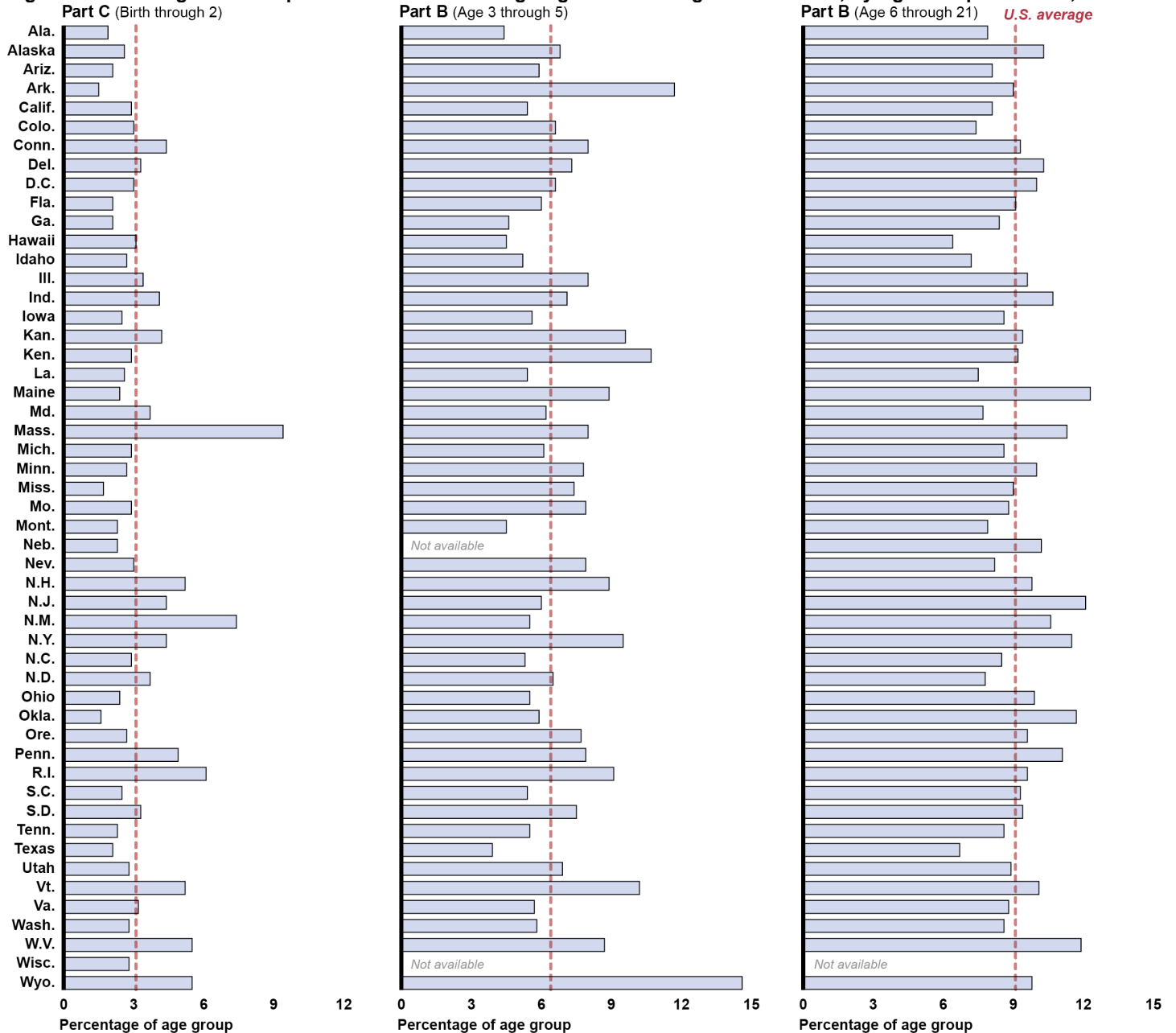
special education services remained relatively stable from 2012 through 2016, changing by less than 1 percentage point.

Figure 2: Typical Special Education Process for School-Aged Children and Young Adults (IDEA Part B)



Source: GAO analysis of information from selected state agencies and special education advocacy groups. | GAO-19-348

Figure 3: Percentage of the Population from Birth through Age 21 Receiving IDEA Services, by Age Group and State, Fall 2016



Source: GAO analysis of U.S. Department of Education report to Congress. | GAO-19-348

Note: Data for the percentage of the population ages 3 through 5 served under IDEA, Part B in 2016 in Nebraska or Wisconsin were not available. Data for the percentage of the population ages 6 through 21 served under IDEA, Part B in Wisconsin in 2016 were not available.

Varied State Eligibility Criteria and Challenges Identifying and Evaluating Children May Help Explain Differences in Percentages Served

Eligibility Criteria and Identification Processes Vary Across States

IDEA requires states to have policies and procedures to ensure that school districts identify, locate, and evaluate all children suspected of having a disability who need special education and related services, regardless of the severity of their disability, but also gives states some latitude in establishing eligibility criteria and defining disability categories. In addition, states have some flexibility to determine their own processes for identifying and evaluating children, provided the state's procedures are consistent with IDEA requirements. As a result, a child eligible for IDEA services in one state might be ineligible in another.

Early Intervention (IDEA Part C)

- **Eligibility criteria.** IDEA allows states some flexibility to establish their own definitions of developmental delay (when a child does not reach developmental milestones for certain skills, such as motor or language skills, at the expected times), including the level or severity of the delay.¹⁵ For example, in Maryland, a child must have at least a 25 percent delay in one or more developmental areas to be eligible for Early Intervention services, while in Arizona, a child must demonstrate a 50 percent delay in one or more developmental areas to be eligible.

¹⁵ Part C of IDEA requires states to have a "rigorous definition of developmental delay" in their statewide system to provide Early Intervention services. 20 U.S.C. § 1435(a)(1). Under 20 U.S.C. § 1432(5)(A), an infant or toddler with a disability is defined as an individual under 3 years of age who needs Early Intervention services because the individual is experiencing developmental delays, as measured in at least one of the following areas: cognitive development, physical development, communication development, social or emotional development, and adaptive development, or has a diagnosed physical or mental condition that has a high probability of resulting in developmental delay.

In Massachusetts, Part C lead agency officials we interviewed said that the state had, as IDEA allows, tightened eligibility criteria in 2009 to reduce the number of children eligible for Early Intervention services by narrowing the definition of developmental delay. Officials said that there were no current plans to change the eligibility criteria, but that they would consider tightening eligibility criteria again if the number of eligible children outpaces state fiscal resources for these services.

Part C of IDEA also allows but does not require states to provide Part C services to at-risk infants and toddlers.¹⁶ States that choose to provide services to at-risk children may use IDEA risk factors to determine eligibility, such as low birth weight or history of abuse and neglect, or they may develop their own list of risk factors. For example, Massachusetts developed its own at-risk criterion for eligibility, which requires the presence of four or more defined child and family factors, including biological, medical, and trauma-related factors. As of 2018, seven states or territories were serving at-risk infants and toddlers, according to an Education official.

- **Early Intervention process.** The processes states use to deliver Part C Early Intervention programs can vary in a number of ways. First, the types of agencies designated as the Part C Lead Agency vary from state to state; these lead agencies are responsible for administering and monitoring Early Intervention programs in their states. For example, Iowa's State Educational Agency (SEA) administers both its Parts C and B programs; Massachusetts and New York administer their Parts C and B programs through separate agencies; and, Colorado shares these responsibilities between two agencies. Second, the extent to which lead agencies directly provide Early Intervention programs, including locating and evaluating children, or do so through contractors varies.¹⁷ For example, both Colorado and Iowa administer their Early Intervention programs directly, while Massachusetts and New York contract with private entities to do so. In Massachusetts, early childhood officials said that they contract with 31 different vendors that operate 60 Early Intervention programs throughout the state. In addition to providing Early Intervention

¹⁶ 20 U.S.C. § 1432(5)(B). At-risk infant or toddler means an individual less than 3 years of age who would be at risk of experiencing a substantial developmental delay if Early Intervention services were not provided. 20 U.S.C. § 1432(1).

¹⁷ According to the Early Childhood Technical Assistance Center, as of 2016, lead agencies were state Departments of Health, Human Services, Education, and others. (<http://ectacenter.org/partc/ptclead.asp>).

services, these programs are responsible for locating and evaluating children, according to the early intervention officials. Those officials also said that each of these individual programs have unique relationships with referral sources, which can affect the likelihood that the sources will make referrals to a given program. Regardless of the type of entity responsible for Early Intervention programs, having strong relationships with referral sources is important, according to early childhood officials in all four of the states we visited.¹⁸ Otherwise, according to these officials, some children who are likely to be eligible for Early Intervention services may not be identified or evaluated for needed services.

In Colorado, where Early Intervention responsibilities are shared between the Part C lead agency and the SEA, state officials said that this arrangement can make it difficult to ensure a seamless process and can cause delays between evaluation and services. They said that this can result in incorrect identification or services because they do not have control over the evaluations—responsibility for evaluations is assigned to the Part B agency. Part C officials also said this can cause confusion for families as they are moved between agencies.¹⁹ Relatedly, some infants and toddlers may not be identified for Early Intervention services because of the challenges of sharing data between state agencies when more than one agency is responsible for providing special education to children. In three of the four selected states we visited, responsibility for special education services for children was shared by more than one agency and officials in all three states told us that difficulties in sharing Early Intervention program data could hamper efforts to identify potentially eligible children for special education services. Officials in one of the states said that sharing data could allow them to identify children being provided school-aged special education services that had not received Early Intervention services. The officials said that if commonalities were found among these children, it could help them find similar children and ensure they receive Early Intervention services in the future.

¹⁸ Primary referral sources include hospitals, physicians, parents, child care programs and early learning programs, local education agencies and schools, public health facilities, public health agencies or social service agencies, clinics and health care providers, public agencies and staff in the child welfare system, homeless family shelters and domestic violence shelters and agencies. 34 C.F.R. § 303.303(c).

¹⁹ Officials said that the state was looking into changing the law so that a single agency would be responsible for all early intervention evaluation responsibilities.

School-Age (IDEA Part B)

- **Eligibility criteria.** In practice, IDEA Part B’s disability definitions provide minimum standards that all states must meet. According to Education officials, IDEA allows states the flexibility to adopt more expansive definitions of disabilities than those provided in the IDEA statute and regulation, provided that the state definition would not exclude children who would be covered by the IDEA definition.²⁰ For example, in New York an intellectual disability is defined as “significantly subaverage general intellectual functioning ... that adversely affects a student’s educational performance,”²¹ while in Massachusetts an intellectual impairment is defined as occurring when “the permanent capacity for performing cognitive tasks, functions, or problem solving is significantly limited or impaired and is exhibited by...a slower rate of learning [among other things].”²² Also, states must establish their own eligibility criteria for determining the presence of a Specific Learning Disability (SLD)—a broad category of disorders related to understanding and using language.²³ IDEA also requires that states allow the use of research-based procedures in establishing the presence of an SLD, but does not define the specific procedures to be used.
- **Identification process.** IDEA requires all states to have Child Find policies and procedures in place, and requires a practical method for

²⁰ Education officials said that this flexibility derives from the general policy that IDEA allows states the flexibility to adopt policies that are more protective of children with disabilities.

²¹ N.Y. Comp. Codes R. & Regs. tit. 8, § 200.1(zz)(7).

²² 603 Mass. Code Regs. § 28.02. GAO did not examine all state laws and regulations that provide definitions for various disabilities. Whether any given state’s definition of a specific disability complies with the requirements of IDEA or with Education’s regulations is beyond the scope of this review. The examples used herein are for illustrative purposes.

²³ Under 34 C.F.R. § 300.8(c)(10), a specific learning disability includes conditions such as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia. The disability is a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, that may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or to do mathematical calculations. Under 34 C.F.R. § 300.307, a state must adopt, consistent with 34 C.F.R. § 300.309, criteria for determining whether a child has a specific learning disability as defined in 34 C.F.R. § 300.8(c)(10). Criteria adopted by the state: (1) must not require the use of a severe discrepancy between intellectual ability and achievement for determining whether a child has an SLD; (2) must permit the use of a process based on the child’s response to scientific, research-based intervention; and (3) may permit the use of other alternative research-based procedure for determining whether a child has an SLD.

determining which children with disabilities are currently receiving needed special education and related services, but does not specify the exact method to be used.²⁴ In all four of the states we visited, school district officials we interviewed said that the schools in their respective districts were using the same type of approach as part of the Child Find identification process, but that some school districts were in different stages of implementation or that the approach was being used differently by schools within the same districts. Officials in one school district in New York said that, as part of their approach, there was a concerted effort to use student data to make decisions about intervention levels and special education evaluation decisions, while a school district official in Massachusetts said that the district had placed a greater emphasis on improving classroom instruction as a means to reduce the need for special education services rather than on intervention systems used for identifying and making decisions about potentially eligible children. Officials of school districts in two of the states we visited told us that they are in the midst of revising their identification processes to increase accuracy and consistency across the schools in their districts. Officials in one of those districts said that differences in the processes schools used resulted in variations in how the special education identification process worked in each of the schools.

State and Local Officials Said Challenges Identifying and Evaluating Children Who May Be Eligible for Special Education Services May Lead to Differences in Who Is Served

Appropriately identifying and evaluating children who may be eligible for special education services can be difficult, according to advocates, subject matter specialists, and state and local officials we interviewed. Representatives of two national special education advocacy organizations and special education subject matter specialists agreed that it may be difficult to identify disabilities and that differences in school district or in school special education processes can add to this challenge.

Challenges to Early Childhood Identification and Evaluation (IDEA Part C)

Early Intervention services are intended to enhance the development of infants and toddlers with disabilities, minimize developmental delay, and reduce the need for special education later in life. However, officials we interviewed at state agencies in the four states we visited—Massachusetts, Colorado, New York, and Iowa—said that because of challenges in identifying and evaluating children, some infants and

²⁴ 20 U.S.C. § 1435(a)(5).

toddlers who are eligible and would benefit from Early Intervention services do not receive them. These challenges include navigating referral processes, obtaining parental consent, and dealing with staffing limitations.

Referrals

State early childhood officials and subject matter specialists we interviewed said it can be difficult to secure a parental or physician referral,²⁵ which can cause delays in evaluating children and may lead to some infants and toddlers not being provided Early Intervention services. In all four states we visited, officials noted that some parents or physicians did not make referrals because they did not understand the referral process. State officials in Iowa expressed concern that some doctors may take a “wait-and-see” approach instead of referring an infant or toddler for evaluation when indications first arise. Early childhood officials in Colorado as well as Early Intervention subject matter specialists we spoke to said that physicians may also choose not to refer patients because they (1) cannot guarantee families that their children will ultimately receive services, (2) find the referral process difficult, or (3) receive little feedback about whether their referrals ultimately lead to children getting Early Intervention services.

Parental consent

Before an infant or toddler can be evaluated for Early Intervention services, the parent(s) must give consent.²⁶ In Massachusetts and Colorado, state early childhood officials said that parents sometimes do not provide consent for an evaluation, which can delay or even prevent the delivery of needed services. Officials from these states cited various reasons parents might withhold consent, such as opting to wait and see if the child’s problems are resolved over time. State early childhood officials in Massachusetts also said that parents will sometimes refuse to provide consent for evaluation due to a lack of awareness of Early Intervention services or the Early Intervention process. To better address this, officials said that they are working collaboratively with state early education and care providers to inform parents about these issues. Massachusetts officials stated that parents may mistrust government agencies or

²⁵ A referral is a request that a child be evaluated to determine the presence of a disability for special education eligibility.

²⁶ 34 C.F.R. § 303.420(a).

Challenges to Preschool-Age, School-Age, and Young Adult Identification and Evaluation (IDEA Part B)

associate Early Intervention services or providers with child protective services agencies and mistakenly think they are being investigated.²⁷

Staffing limitations

Insufficient personnel with the right qualifications to conduct evaluations is another reason infants and toddlers may not be consistently identified and evaluated, particularly in certain types of locations. Officials from lead agencies in Massachusetts, Colorado, New York, and regional education officials in Iowa,²⁸ noted that it was difficult to find enough Early Intervention personnel with appropriate expertise in low population density areas which can complicate the process of identifying and evaluating children. Officials in Massachusetts noted challenges hiring staff that reflect the communities they serve and in hiring for specific disciplines, such as occupational and physical therapists. In addition, officials in New York said that they sometimes face staffing difficulties when children are located in areas with high crime rates.

State and local officials as well as special education advocacy organizations said identifying and evaluating students for Part B special education services can be complicated by many factors, which may result in some students inappropriately being determined eligible or ineligible for services. These factors include confusion over IDEA requirements, challenges implementing Response to Intervention (RTI), a child's lack of English proficiency, the difficulty of detecting certain types of disabilities, or the Part C to Part B transition.

Confusion about IDEA requirements

School district officials in Massachusetts said that confusion about IDEA requirements is common. For example, a school district official from that state told us that general education staff do not always understand when special education services are appropriate, versus when other options

²⁷ Child protective services units within state and local child welfare agencies, supported in part by the U.S. Department of Health and Human Services, can be responsible for receiving reports of abuse and neglect; conducting investigations to determine the validity of the reports; and providing services that enhance child safety and prevent further abuse and neglect to families and children. Child protective services may remove children from dangerous abusive environments and place them in protective custody.

²⁸ In one state, an Area Education Agency (AEA) is a regional education service agency created by State Code to provide special education services to public school districts and accredited nonpublic schools within the AEA's geographic boundaries.

may meet students' needs, such as Response to Intervention (RTI) or other supports.²⁹ (See sidebar for more information about RTI.) Officials in another school district in the same state said there was confusion over and little consistency in the eligibility decisions made for special education and other supports. Additionally, officials in that district said that the expertise level among the decision makers varies and can affect eligibility decisions.

Response to Intervention

For those students who may need additional academic and behavioral supports to succeed in a general education environment, schools may choose to implement a multi-tiered system of supports, such as Response to Intervention (RTI). Regulations implementing the 2004 amendments to the IDEA include a provision mandating that states allow, as part of their criteria for determining whether a child has a Specific Learning Disability (SLD), the use of a process based on the child's response to scientific, research-based intervention. See 34 C.F.R. § 300.307(a)(2).

RTI is a school-wide approach that attempts to address the needs of all students, including struggling learners and students with disabilities, and integrates assessments and interventions to maximize student achievement. Key characteristics of RTI are: (1) students receive high-quality research-based instruction in the general education setting; (2) schools continually monitor and document student performance; (3) schools screen all students for academic and behavioral problems; and (4) schools provide multiple levels (tiers) of instruction that are progressively more intense, based on the student's response to instruction. Children who do not respond to interventions are to be referred for evaluation to determine eligibility for special education and related services.

Source: U.S. Department of Education Guidance and National Center on Response to Intervention. | GAO-19-348

RTI implementation challenges

School district officials in all of the states we visited and representatives from various advocacy organizations said that there were challenges related to implementing RTI. Representatives from advocacy organizations in all four states we visited cited concerns with school RTI practices that may delay student evaluations or contribute to incorrect eligibility determinations. Advocates in Massachusetts told us that some school districts are more likely than others to put students suspected of a disability through the RTI process for extended periods of time before evaluating them. Further, advocates said using RTI to delay or deny evaluations occurs more frequently at the elementary level and for students with specific types of disabilities, such as mental health and social or emotional disabilities.

School district officials in all of the states we visited, and in multiple districts in all four states, acknowledged that the quality of RTI implementation varies within their districts. For example, district officials in New York noted that some of their schools were much better at gathering detailed student data for use in evaluation than other schools. RTI subject matter specialists we spoke to cited various issues with RTI that could affect how students are identified and evaluated for special education services, such as instructional quality, general confusion around RTI

²⁹ Although regulations implementing the 2004 amendments to the IDEA specifically address using RTI for determining if a child has a Specific Learning Disability, later guidance issued by Education in 2011 states that information obtained through RTI strategies may also be used as a component of evaluations for children suspected of having other disabilities, if appropriate. Education issued this guidance in part due to reports that some school districts were using RTI to delay or deny evaluations for children suspected of having a disability. The guidance states that the use of RTI strategies cannot be used to delay or deny the provision of a full and individual evaluation and that states and districts have an obligation to ensure that an evaluation is not delayed or denied because of implementation of RTI. U.S. Department of Education, *A Response to Intervention Process Cannot be Used to Delay-Deny an Evaluation for Eligibility under the Individuals with Disabilities Education Act* (January 2011).

implementation, the type of disability a student has, the quality and quantity of data gathered on students, and the amount of support provided for the process.

In all of the states we visited, school district officials cited efforts to address issues with RTI practices. For example, school district officials in all four states noted that training related to RTI was being provided to their schools. In Massachusetts, New York, and Iowa, school district officials cited recent initiatives specifically aimed at strengthening and implementing the RTI process in schools, such as by integrating social-emotional and behavioral components in RTI and better using student-level data to improve eligibility determinations. In one district, officials specifically noted that efforts to improve their schools' RTI processes and core curriculum had reduced the number of special education students in their district.

English Learners

According to Education's 2016-17 school year data, 73 percent of public school districts in the nation had English Learner students; nationwide, English Learner students comprise about 10 percent of public school students, an increase of almost 3 percent since 2010. School district officials we interviewed in all four states we visited described inherent challenges in properly identifying and evaluating English Learner students for special education disabilities. In Massachusetts and New York, school district officials we interviewed explained that they do not always have staff with the necessary expertise to perform evaluations in a child's first language, which makes it more difficult to determine if a child's learning difficulties are caused by a disability or by language proficiency issues. State education officials in New York told us that they are concerned about identification issues related to English Learner students, noting that over 200 languages are spoken by their students and about 12 percent of their students with disabilities were also English Learners in 2017-18.³⁰ In the same state, officials in one school district said that over 100 different languages are spoken by their students and that it was a challenge to properly identify and evaluate them.

³⁰ According to this state educational agency, in March 2017, the top 20 non-English languages spoken in the state were: Arabic, Bengali, Burmese, Chinese, French, Fulani, Haitian Creole, Japanese, Karen, Khmer, Nepali, Portuguese, Punjabi, Russian, Somali, Spanish, Urdu, Uzbek, Vietnamese, and Wolof.

Representatives of special education advocacy organizations in two states we visited—Massachusetts and New York—made similar observations, noting that English Learner students were at risk of being both over identified and under identified.³¹ For example, advocates we interviewed in Massachusetts said that under identification can occur when school districts do not communicate with parents in their home language and, as a result, the parents do not understand how to engage with the special education process. Advocates in both states told us that over and under identification may also occur if the lack of language proficiency is mistaken for a disability or if a disability is mistaken for language learning issues.

Education and the Department of Justice have issued guidance to assist schools in meeting their obligations under federal law to ensure that English Learner students who may be eligible for services under IDEA are located, identified, and evaluated for special education services in a timely manner. This guidance instructs schools to consider the English language proficiency of the students appropriately so that they are not identified as students with disabilities because of their limited English language proficiency.³²

Disability types

Local officials we interviewed in four states said that some disabilities, such as those related to mental health or behavioral disorders, can be difficult to identify and may go undiagnosed. These officials noted that behavioral disabilities can be particularly difficult to correctly identify because they sometimes affect academic performance or behavior in more subtle ways.

Some school district officials said they may not have the right tools or staff to identify these students. For example, officials in one school district in Colorado stated that a commonly used disability identification process

³¹ Protection and advocacy systems are disability rights agencies designated by the governor of each state or territory to provide legal representation and other advocacy services on behalf of qualifying individuals. Protection and advocacy systems were first established in 1975 under the Developmentally Disabled Assistance and Bill of Rights Act.

³² U.S. Department of Education and U.S. Department of Justice, *Dear Colleague Letter on the English Language Learner Students and Limited English Proficient Parents* (January 2015). The Office for Civil Rights at the Department of Education and the Civil Rights Division at the Department of Justice share authority for enforcing civil rights laws in the education context.

on its own was not effective for students with mental health and behavioral disabilities. School district officials we spoke to in Massachusetts and Iowa noted that they often struggle to employ staff with the appropriate expertise to address mental health or behavioral issues and that there are fewer resources for schools to use in these areas.

Part C to Part B transition

Another area of confusion may arise when children transition from Part C services to Part B services, at about age 3. School district officials in the four states we visited said that they identify a significant number of their districts' school-aged special education students through referrals from the state's Early Intervention programs during the transition process.³³ State education officials in Massachusetts indicated that the majority of children referred from the early childhood programs for Part B services are not found eligible for school-aged services, which may indicate a lack of a common understanding of the Part B eligibility criteria as the early childhood programs are required to refer the children they think could be eligible for those services.

³³ Under Part C of IDEA states must provide in their application for funds a description of the policies and procedures they will use to ensure a smooth transition for infants and toddlers receiving Part C services to other appropriate services, including Part B services. 20 U.S.C. § 1437(a)(9); 34 C.F.R. § 303.209(a).

Education and Selected States Reported Monitoring Child Find Implementation through Data Collection and Supporting It through Technical Assistance

Education Reported Monitoring State Implementation through Data Reporting and Supporting States with Technical Assistance and Information



Source: GAO. | GAO-19-348

Education's Monitoring of State Implementation of Child Find

Education's monitoring of state efforts to implement Child Find requirements is part of a broad framework—known as Results Driven Accountability (RDA)—the department uses to monitor certain aspects of IDEA implementation. Education's monitoring activities specific to Child Find are based on data and information that states submit annually, as

required by IDEA and as part of the RDA process.³⁴ Because IDEA gives states some discretion in how to meet Child Find requirements, according to Education officials, it focuses on ensuring states have policies, procedures, and systems in place for monitoring local school districts' special education programs, including their Child Find activities.

To monitor state Child Find activities, Education relies, in part, on four indicators specific to the Child Find requirements and requires states to report data on them annually in the State Performance Plan/Annual Performance Report. Three of the indicators pertain to Part C Early Intervention programs and one pertains to Part B.

- Two Part C Child Find indicators compare the numbers of children served to two data points—the national Part C average (as a percentage) as well as the percentage Education would expect a state to serve based on the state's population. Education requires states to report these Part C data for two subsets of children—birth to 1 year and birth through 3 years.³⁵ Education has encouraged states whose Part C enrollment is significantly lower than the national average or below expected levels based on the state's population, to examine compliance with related Part C requirements.³⁶ The third Part C Child Find indicator measures state compliance with the 45-day timeline. For this indicator states must report on the number and percentage of children referred to Part C whose evaluations, assessments, and initial individualized family service plan meetings were held within 45 days of referral.
- The Part B indicator measures the percent of children who were evaluated within 60 days of receiving parental consent for initial

³⁴ According to Education, RDA represents a shift from its prior emphasis on compliance to a broader focus on improved results for students with disabilities, while at the same time continuing to assist states in meeting IDEA requirements. Among other things, RDA requires each state to develop a State Systemic Improvement Plan (SSIP) as part of ongoing annual reporting. In developing SSIPs, Education expects states to use data to identify gaps in student performance, analyze state systems, and implement targeted, evidence-based reforms to address any gaps.

³⁵ According to the most recent data available, in 2016, the percentage of children from birth to 1 year receiving Early Intervention services nationally was 1.24 percent and the percentage of children from birth to 3 years receiving Early Intervention services nationally was 3.12 percent.

³⁶ See, for example, U.S. Department of Education, *Policy Letter: California Department of Developmental Services Part C Coordinator Rick Ingraham* (July 12, 2004).

evaluation.³⁷ This indicator is a compliance indicator for which states must establish a target of 100 percent.

According to Education officials, the department developed these Parts C and B indicators in response to requirements in the 2004 IDEA reauthorization, which directed the Secretary of Education to monitor the states, and require each state to monitor local educational agencies located in the state or as applicable, the early intervention providers located in the state, using quantifiable indicators in specific priority areas (including Child Find), and using such qualitative indicators as are needed to adequately measure performance in those areas.³⁸ In developing the indicators, Education officials told us that the department sought to strike a balance between the statutory requirement that they be quantifiable and the inherent challenges in knowing how many children should be identified, evaluated, and found eligible—at the state level or in individual school districts. Education officials said that states and school districts are in a much better position to estimate how many children who have disabilities and who could potentially be found eligible for special education and related services because of their disability. Education officials told us they consulted internal stakeholders, states, school districts, and other special education experts to develop possible quantifiable measures given the inherent challenges in doing so.

In addition to the Child Find indicator data submitted annually, under Part B, states provide other information related to Child Find as part of their annual data reporting to Education and the public. These data include the number and percentage of children with disabilities by race, ethnicity, English Learners, gender, and disability category that

- receive a free appropriate public education;
- participate in general education;

³⁷ Education's IDEA Part B regulations require that a child suspected of having a disability be evaluated within 60 days of receipt of parental consent for the initial evaluation or within the state-established timeframe. 34 C.F.R. § 300.301(c)(2018).

³⁸ Specifically, the 2004 IDEA amendments required the Secretary of Education to establish quantifiable indicators to measure both state and school district performance in three priority areas: (1) provision of a free appropriate public education in the least restrictive environment; (2) state exercise of general supervisory authority, including Child Find, effective monitoring, the use of resolution sessions, mediation, voluntary binding arbitration, and a system of transition services; and (3) disproportionate representation of racial and ethnic groups in special education and related services, to the extent the representation is the result of inappropriate identification. 20 U.S.C. § 1416(a)(3).

- are placed in separate classes, schools, or residential facilities;
- receive Early Intervention services; and
- are between birth to 2 years who are no longer receiving Early Intervention services.³⁹

States are also required to report the number and percentage of infants and toddlers, by race and ethnicity, who are at risk of having substantial developmental delays and who are receiving Early Intervention services.⁴⁰

Additionally, Education may receive information about states' Child Find activities in states' annual reports as part of the description of IDEA oversight policies and procedures; in explanations of any actions taken in response to Education's finding of noncompliance with Child Find indicators in prior years; or in the comprehensive multi-year improvement plan Education requires as part of its RDA framework.

Education Supports States in Implementing Child Find Requirements

Education supports states' implementation of Child Find in a variety of ways, including a network of technical assistance centers, written guidance, and direct assistance from Education staff.



Source: GAO. | GAO-19-348

Technical Assistance

The Technical Assistance and Dissemination (TA&D) program is the primary way Education provides educators, administrators, service providers, and parents with information regarding IDEA.⁴¹ This program assists state and local administrators on a range of topics including clarifying Child Find obligations, professional development for staff and administrators on various aspects of Child Find, and federal accountability requirements. Technical assistance offerings include training on data collection and Early Intervention issues for various audiences such as teachers, administrators, and special education service providers. Officials in each of the states we visited said they had used Education's technical assistance. In addition to the TA&D program, Education has

³⁹ 20 U.S.C. § 1418(a)(1).

⁴⁰ 20 U.S.C. § 1418(a)(2).

⁴¹ The TA&D network includes technical assistance centers to provide assistance to help increase states' capacity to assist school districts and schools in meeting achievement goals for special education students as well as implementing other IDEA requirements.

established six centers that specifically support states in the annual data collection process.⁴²

Written guidance

Education provides written guidance to states through documents such as Dear Colleague Letters, Frequently Asked Questions, and Questions and Answers. These documents clarify provisions of Child Find and other IDEA requirements as well as respond to common inquiries from school administrators or the public. The written guidance may also address information gathered during oversight activities and changes in federal law or regulation.

Topics Education has addressed in written guidance on Child Find include school districts' uses of RTI and requirements for subgroups of children who may be difficult to find. For example, Education issued a memorandum in 2016 reminding states and districts that (1) RTI processes cannot be used to delay or deny a timely evaluation of a child suspected of having a disability and (2) implementation or completion of RTI is not required prior to evaluating a student for special education services.⁴³ Officials in Colorado said they found this guidance helpful and issued guidance to their school districts based on Education's memorandum.⁴⁴ Additionally, in 2007 and 2008 Education addressed issues regarding Child Find requirements for certain groups of children, such as those who are homeless or those who are residing in Immigration and Customs Enforcement (ICE) residential facilities.⁴⁵ Homeless

⁴² The State Data Collection program technical assistance centers are the Center for IDEA Early Childhood Data Systems (DaSY), the IDEA Data Center (IDC), the Center for the Integration of IDEA Data (CIID), the Center for IDEA Fiscal Reporting (CIFR), the National Center for Educational Outcomes (NCEO), and the EDFacts Technical Support Services II contract.

⁴³ U.S. Department of Education, Office of Special Education and Rehabilitative Services, *A Response to Intervention Process Cannot be Used to Delay-Deny an Evaluation for Preschool Special Education Services under the Individuals with Disabilities Education Act*, OSEP 16-07 (Apr. 29, 2016).

⁴⁴ Colorado Department of Education, *Colorado Context and Reminders Regarding OSEP Memorandum on Delays and Denials of Evaluations for Preschool Special Education under IDEA* (Sept. 15, 2016).

⁴⁵ Specifically, in 2007 and 2008 the Office of Special Education Programs issued two policy letters to the General Counsel of the Texas Education Agency. These letters address children who are housed at a U.S. Immigration and Customs Enforcement Residential Facility and explained that absent any other provision of applicable law states have no Child Find obligations under IDEA related to children residing in ICE residential

children, for example, are inherently difficult to identify and evaluate for special education services because they and their families are highly mobile. Education's guidance reminded states and school districts that their Child Find obligations include these hard to find subgroups and directed states to coordinate with emergency shelters and homeless advocacy programs, among others, to help find children suspected of having a disability.⁴⁶

Direct assistance

Education's website notes that each state is assigned a customer service representative, a Part B contact, a Part C contact, and a team leader.⁴⁷ Education officials we spoke to told us that staff hold monthly check-in meetings with state officials to provide information and discuss issues of concern. They also said that issues needing clarification sometimes arise during these check-in meetings. For example, they said that in a meeting with state directors they identified a lack of clarity around some English Learner issues. As a result, Education developed guidance to explain Child Find obligations regarding English Learner students as well as other obligations under IDEA. Education also has a customer service unit available to assist states with questions about IDEA, special education, and related services.

State officials in all four states we visited told us they had good relationships with Education IDEA monitoring staff and rely on them to learn about available technical assistance and other resources. Officials we interviewed in one state said their Education contacts were instrumental in helping them improve their programs.

facilities, although Education stated that an ICE facility and the state or local school district could enter into a voluntary agreement to provide Child Find or other educational services. U.S. Department of Education, Office of Special Education and Rehabilitative Services, *Letter to David Anderson, General Counsel, Texas Education Agency* (Dec. 21, 2007); U.S. Department of Education, Office of Special Education and Rehabilitative Services, *Letter to David Anderson, General Counsel, Texas Education Agency*, (Apr. 22, 2008). Education officials told us that if these children are released from ICE facilities into the care of a sponsor to await their immigration hearings, they do have a right under federal law to enroll in public elementary and secondary schools and to receive educational services, including special education services, if found eligible.

⁴⁶ U.S. Department of Education, Office of Special Education and Rehabilitative Services, *Questions and Answers on Special Education and Homelessness*, (February 2008).

⁴⁷ See <https://www2.ed.gov/policy/speced/guid/idea/monitor/state-contact-list.html>, accessed on Feb. 27, 2019.

Selected States Reported Monitoring Local Implementation through Audits and Data Reporting and Support Local Districts with Technical Assistance and Professional Development

Data Collection and Regularly Timed Audits

States must monitor their local school districts' implementation of IDEA requirements. As part of the State Performance Plan/Annual Performance Report, each state must establish measurable and rigorous targets for the indicators, including Child Find, and must analyze the performance of each local school district in the state in implementing the requirements of Part B or as applicable, each Early Intervention provider located in the state in implementing the requirements of Part C.⁴⁸ Data analysis and regular audits are the primary means states use to monitor local school districts, according to officials we interviewed in each of the four states we visited.



Source: GAO. | GAO-19-348

The Part C lead agencies in the four states we visited reported monitoring local implementation of Early Intervention programs through indicator data or on-site visits. In their State Performance Plan/Annual Performance Reports for federal fiscal year 2016,⁴⁹ the states we visited reported various monitoring activities. For example:

- Colorado gathers data from an online system to monitor local programs and analyze performance. In addition to desk audits of local service providers, Colorado's lead agency does on-site monitoring, selecting local agencies for monitoring visits based on its annual priority areas, or focusing on a cross-section of programs based on size, region, and program structure. Colorado's annual priority areas have included topics such as increasing public awareness regarding

⁴⁸ 20 U.S.C. §§ 1412(a)(11), and 1416(a); 34 C.F.R. §§ 300.149 and 300.600 (Part B); 20 U.S.C. §§ 1435(a)(10), 1416(a), and 1442; 34 C.F.R. § 303.120 (Part C).

⁴⁹ Education used each state's federal fiscal year 2016 State Performance Plan/Annual Performance Reports as part of the basis for making its 2018 determinations about each state's implementation of the requirements of Part C and Part B of IDEA.

Early Intervention services by providing developmental information to parents of newborns in the hospital and ensuring that the transdisciplinary team members who are responsible for evaluating infants and toddlers are effectively communicating.⁵⁰

- Massachusetts' local Early Intervention programs complete and submit to the state lead agency annual reports and self-assessments based on federal indicators. Additionally, the Part C lead agency conducts on-site monitoring of selected sites on a cyclical basis, and focused monitoring to examine specific aspects of local Early Intervention programs.⁵¹
- New York conducts comprehensive on-site monitoring of municipalities that administer local Early Intervention programs and approved providers who perform Early Intervention services including reviewing written policies and procedures regarding Early Intervention processes as well as examining a sample of client records at each service location.⁵²
- Iowa monitors all regional grantees on an annual basis. The process includes review of parent surveys and review of family outcome data, among other things. When performance or compliance issues are identified, the lead agency conducts desk audits and data verification checks.⁵³



Monitoring

Although Part B monitoring activities in the four selected states are similar, they reflect the structure, policies and procedures of individual states. For example, Iowa officials said they monitor both Area Education Agencies and local school districts through desk audits and site visits.⁵⁴ Officials told us that the SEA has developed (1) a process to evaluate the performance of the regional agencies regarding the provision of special

Source: GAO. | GAO-19-348

⁵⁰ Colorado Department of Human Services, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed August 30, 2018, <https://osep.grads360.org>.

⁵¹ Massachusetts Department of Public Health, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁵² New York State Early Intervention Program, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

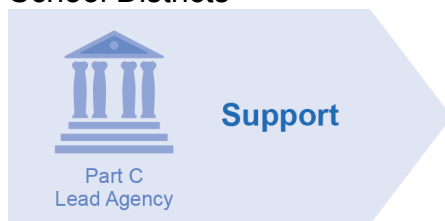
⁵³ Iowa Department of Education, *Introduction: to the State Performance Plan (SPP)/Annual Performance Report (APR)*, accessed January 28, 2019, <https://osep.grads360.org>.

⁵⁴ Area education agencies (AEA) are political subdivisions of the state organized pursuant to state law. An area education agency, depending on context, may be a local educational agency, an educational service agency, or both simultaneously.

education services and their oversight responsibilities for the local school districts, and (2) a separate process that examines the performance of school districts with regard to IDEA implementation. The State Performance Plan/Annual Performance Reports for federal fiscal year 2016 for the remaining three states we visited note the following monitoring activities:

- Colorado collects data and reviews the results of school district self-audits from each of its districts.⁵⁵
- Massachusetts reported reviewing indicator data and instituting a new monitoring process called Tiered Focus Monitoring. In the first year of the monitoring cycle, all local school districts are to conduct self-assessments on specific criteria related to the special education identification processes and other topics. The self-assessments inform the SEA's on-site monitoring in the second year. In the third year, school districts are to continue internal monitoring; and in the fourth year, they complete a self-assessment regarding special education and legal requirements.⁵⁶
- New York reported reviewing data and using school district self-assessments, desk audits, and on-site monitoring. According to the annual report the selection of sites for on-site monitoring depends on a variety of information, including performance on indicator targets.⁵⁷

Professional Development and Technical Assistance for Local School Districts



Source: GAO. | GAO-19-348

IDEA requires states and lead agencies to provide professional development and technical assistance to local school districts.

Professional development

The State Performance Plan/Annual Performance Reports for federal fiscal year 2016 for each of the four states we visited described professional development activities provided on topics related to Part C Early Intervention and Part B programs.

⁵⁵ Colorado Department of Education, *Part B FFY 2016 State Performance Plan/Annual Performance Report*, accessed August 30, 2018, <https://osep.grads360.org>.

⁵⁶ Massachusetts Department of Elementary and Secondary Education, *Part B FFY 2016 State Performance Plan/ Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁵⁷ New York State Education Department, *Part B FFY 2016 State Performance Plan/ Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

For Part C, states reported that they provided the following professional development activities among others:

- Colorado provided training on data management to ensure valid and reliable data for monitoring purposes.⁵⁸
- Iowa provided service coordination training which provides knowledge and skills to understand Early Intervention eligibility, the IDEA, and Early Intervention services.⁵⁹
- Massachusetts held training sessions for Early Intervention service providers regarding Early Intervention transitions to support children who are exiting Early Intervention services or are referred for Part B services.⁶⁰ Early Intervention service providers were also able to receive training concerning functional assessments.⁶¹
- New York employed contractors to provide training on best practices for delivering Early Intervention services and training about providing those services in a child's natural environments.⁶² Additionally, they provided training to primary referral sources.⁶³



Support

State Educational
Agency

Source: GAO. | GAO-19-348

For Part B, the states reported that they provided the following professional development activities among others:

⁵⁸ Colorado Department of Human Services, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed August 30, 2018, <https://osep.grads360.org>.

⁵⁹ Iowa Department of Education, *IDEA Part C FFY 2016 State Performance Plan (SPP)/Annual Performance Report (APR) Introduction*, accessed January 28, 2019, <https://osep.grads360.org>.

⁶⁰ Massachusetts Department of Public Health, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁶¹ Functional assessments are the assessment of a young child's skills in the real life context of family culture and community rather than discrete isolated tasks irrelevant to daily life. Massachusetts Early Intervention Training Center, *Functional Assessments* (PowerPoint), 5 (2017).

⁶² New York State Early Intervention Program, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁶³ Primary referral sources include hospitals, physicians, parents, child care programs and early learning programs, LEAs and schools, public health facilities, social services agencies, clinics and health care providers, child welfare agencies, homeless family shelters, and domestic violence shelters and agencies. 34 C.F.R. § 303.302. Primary referral sources are responsible for a significant number of referrals to Early Intervention programs. "Natural environments" means settings that are natural or typical for a same-aged infant or toddler without a disability may include the home or community settings. 34 C.F.R. § 303.26.

-
- Colorado provided professional development on topics that were identified by teachers. The SEA surveys teachers, providers, and Special Education Directors annually to determine professional development topics.⁶⁴ Officials we interviewed in selected school districts told us that they had received training on Child Find obligations and classroom interventions.
 - Iowa requires each district to develop professional development plans that support the needs of district staff responsible for instruction. Districts officials said they have provided training concerning intervention strategies and Child Find responsibilities.
 - Massachusetts has provided training in social emotional learning and behavioral interventions.⁶⁵
 - New York provides ongoing statewide training regarding classroom and behavioral interventions, as well as a program for school principals regarding special education law and regulations as well as the principal's responsibilities for implementing IDEA.⁶⁶

Technical assistance

Officials we interviewed in each of the four states we visited told us that they offer a range of technical assistance, including written guidance, webinars, meetings/conferences, telephone assistance, and one-on-one training to support local school districts and schools in implementing Child Find requirements. For example, New York instituted a Blueprint for Improved Results for Students with Disabilities. This Blueprint establishes expectations to improve instruction and results for students with disabilities, which in turn informs the state's technical assistance networks.⁶⁷ In each of the four states, officials reported (1) offering targeted assistance where there were concerns related to performance or results of Part B programs and (2) examining results and compliance data to identify areas of concern and potential recipients for targeted

⁶⁴ Colorado Department of Education, *Part B FFY 2016 State Performance Plan/ Annual Performance Report*, accessed August 30, 2018, <https://osep.grads360.org>.

⁶⁵ Massachusetts Department of Elementary and Secondary Education, *Part B FFY 2016 State Performance Plan/ Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁶⁶ New York State Education Department, *Part B FFY 2016 State Performance Plan/ Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁶⁷ New York State Education Department, *Part B FFY 2016 State Performance Plan/ Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

assistance. For example, Massachusetts reported in its annual report that it had provided one-on-one technical assistance to local school districts where there were performance concerns,⁶⁸ while New York reported that its technical assistance improvement specialists review low-performing schools and help to develop tools for improvement.⁶⁹

Similarly, the Part C lead agency officials in all of the states we visited told us they provided training and technical assistance to Early Intervention programs. These states offered assistance in a variety of ways including written guidance, information provided via phone or email, and formal training sessions. Officials from Colorado and Iowa reported holding monthly technical assistance calls,⁷⁰ while officials from Massachusetts reported holding monthly webinars for local Early Intervention providers.⁷¹ In its annual report, Iowa reported providing training on using technology to provide Early Intervention services,⁷² while New York reported offering training on best practices in identifying and evaluating infants and toddlers.⁷³ Each of the four states we visited reported offering targeted assistance to schools where monitoring efforts identified concerns or compliance issues. The targeted assistance is intended to improve performance in the areas identified.

We provided a draft of this report to Education for review and comment. Education provided technical comments, which we incorporated as appropriate.

⁶⁸ Massachusetts Department of Elementary and Secondary Education, *Part B FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁶⁹ New York State Education Department, *Part B FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁷⁰ Colorado Department of Human Services, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed August 30, 2018, <https://osep.grads360.org>, and Iowa Department of Education, *IDEA Part C FFY 2016 State Performance Plan (SPP)/Annual Performance Report (APR) Introduction*, accessed January 28, 2019, <https://osep.grads360.org>.

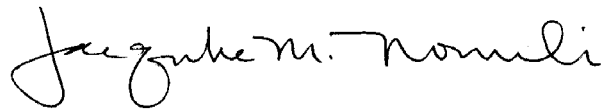
⁷¹ New York State Early Intervention Program, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

⁷² Iowa Department of Education, *IDEA Part C FFY 2016 State Performance Plan (SPP)/Annual Performance Report (APR) Introduction*, accessed January 28, 2019, <https://osep.grads360.org>.

⁷³ New York State Early Intervention Program, *Part C FFY 2016 State Performance Plan/Annual Performance Report*, accessed January 9, 2019, <https://osep.grads360.org>.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (617) 788-0580 or nowickij@gao.gov. Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

A handwritten signature in black ink, reading "Jacqueline M. Nowicki". The signature is written in a cursive, flowing style.

Jacqueline M. Nowicki, Director
Education, Workforce,
and Income Security Issues

Appendix I: Objectives, Scope, and Methodology

The objectives of this study were to examine (1) factors that may account for differences in the percentage of children receiving special education services, and (2) how the U.S. Department of Education (Education) and selected states monitor and support Child Find requirements.

To conduct this work we (1) reviewed federal special education data from school years 2011 through 2016 (the most recent available at the time of our review); (2) reviewed relevant Department information, such as Dear Colleague Letters, Frequently Asked Questions, and Questions and Answers; federal laws; regulations and policies; and selected state laws; (3) interviewed Education officials; (4) interviewed officials from state agencies responsible for administering Parts C and B of the Individuals with Disabilities Education Act (IDEA) special education programs in four states (Colorado, Iowa, Massachusetts, and New York) and fifteen school districts within those states; and (5) interviewed representatives from special education advocacy organizations that represent parents and families of individuals with disabilities and subject matter specialists to discuss issues related to Child Find. The following sections contain detailed information about the scope and methodology for this report.

Review of Federal Special Education Data

To determine the differences in the percentage of children receiving special education services across states we used Education's Annual Reports to Congress on the Implementation of the Individuals with Disabilities Education Act (IDEA) to review national and state level special education data. We used the most recent five reports, 2014 through 2018, which reported on data for school years 2012 through 2016, to review the percentages of children that were receiving special education services under IDEA Part C and Part B during school years 2012 through 2016 nationally and by state. These data, known as Section 618 data,¹ are self-reported by school districts. We focused our review primarily on data regarding the percentage of children served under IDEA Part C (ages 0-2), Part B (ages 3-5), and Part B (ages 6-21), nationally and by state during school years 2012 through 2016. We determined that the data we used from the Annual Reports to Congress on the Implementation of

¹ Section 618 data consist of (1) the number of infants and toddlers served under IDEA, Part C; the settings in which they receive program services; information on the transition at age 3 out of Part C; and dispute resolution information and (2) the number of children and students served under IDEA, Part B; the environments in which they receive education; their participation in and performance on state assessments; information on their exiting special education services; the personnel employed to provide educational services to them; disciplinary actions that affect them; and dispute resolution information.

IDEA were sufficiently reliable for the purposes of the report by reviewing technical documentation and interviewing Education officials to determine what mechanisms are in place to ensure data quality.

Review of Agency Documentation, Federal Laws, Regulations, Policies, and Selected State Laws and Regulations and Interviews of Education Officials

To obtain information on the factors that may account for variation in the percentage of children receiving special education services and to examine how Education and selected states support and monitor Child Find requirements, we reviewed Education documents, such as Dear Colleague Letters, Frequently Asked Questions, and Questions and Answers. We also reviewed Education's recent annual reports to Congress and documents containing guidance to states on required annual data submissions. Additionally, we reviewed relevant federal laws, regulations, and policies, and selected state laws and regulations.² With both Education and state agencies responsible for supporting and monitoring Child Find requirements, we interviewed officials about the agencies' responsibilities with respect to IDEA, as well as the processes the agencies put in place to monitor implementation of those requirements. We also discussed each agency's guidance and support to school districts on these issues. In addition, we collected and reviewed relevant agency procedures and guidance documents.

Site Visits and Associated Interviews with Officials at State Agencies and School Districts

To obtain information on the factors that may account for differences among selected states and school districts in the percentage of children receiving special education services and how selected states support and monitor Child Find requirements, we conducted site visits in a non-generalizable sample of four states and 15 school districts. We selected states primarily for diversity in (1) the percentage of special education students; (2) changes in the percentage of special education students over a 5-year period; (3) geography; and (4) the agency responsible for state Early Intervention programs (i.e., the state educational agency or another state agency). We used data from the National Center for Education Statistics (NCES), Common Core of Data (CCD) for the 5-year period, 2011-2015 (the most recent available data at the time of our selection) to identify the percentage of special education students in each state as well as the change in the percentage of special education

² GAO did not examine all state laws and regulations that provide definitions for various disabilities. Whether any given state's definition of a specific disability complies with the requirements of IDEA or with Education's regulations is beyond the scope of this review. The examples used herein are provided for illustrative purposes.

students in each state over the 5-year period. We determined that the data used were sufficiently reliable for the purposes of the report by reviewing technical documentation and interviewing Education officials to determine what mechanisms are in place to ensure data quality.

In each state, we interviewed officials from the state educational agency, the agency responsible for Part B special education, as well as officials from the state agency responsible for Part C special education. In addition, we also interviewed officials from special education advocacy organizations that represent parents and families of individuals with disabilities.

We selected school districts primarily for diversity of size. We used state department of education enrollment data for 2017-2018 to sort school districts based on the size of the student population. We selected three school districts in Colorado, five in Iowa, three in Massachusetts and four in New York. In each district, we interviewed district-level officials involved in special education and school Child Find processes. These officials included assistant superintendents, administrators, and directors of special education.

While not generalizable, our interviews provided illustrative examples of a range of state and district Child Find processes, and the differences and challenges states and school districts face.

Interviews with Special Education Advocates and Special Education Subject Matter Specialists

To obtain information on the factors that may account for differences among states and school districts in the percentage of children receiving special education services and processes that states and school districts may use in implementing their Child Find requirements, we interviewed representatives from eight special education advocacy organizations that represent parents and families of individuals with disabilities and four special education subject matter specialists to discuss issues related to Child Find. Some of the issues we discussed included Early Intervention eligibility, assessment processes of students including Response to Intervention, and other topics to get a better sense of Child Find processes and issues.

We conducted this performance audit from August 2017 to April 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

Jacqueline M. Nowicki, (617) 788-0580 or nowickij@gao.gov

Staff Acknowledgments

In addition to the contact named above, Bill MacBlane (Assistant Director), Mindy Bowman (Analyst-in-Charge), Aaron Karty, Deborah Signer, Phillip Steinberg, and Shelia Thorpe made key contributions to this report. Also contributing to this report were James Bennett, Deborah Bland, Shilpa Grover, Serena Lo, Art Merriam, Sheila R. McCoy, Corinna Nicolaou, James Rebbe, Brian Schwartz, Daren Sweeney, and Kathleen van Gelder.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (<https://www.gao.gov>). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to <https://www.gao.gov> and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/fraudnet/fraudnet.htm>

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

Orice Williams Brown, Managing Director, WilliamsO@gao.gov, (202) 512-4400,
U.S. Government Accountability Office, 441 G Street NW, Room 7125,
Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, spel@gao.gov, (202) 512-4707
U.S. Government Accountability Office, 441 G Street NW, Room 7814,
Washington, DC 20548



Please Print on Recycled Paper.

EXHIBIT C



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

OFFICE OF SPECIAL EDUCATION PROGRAMS

DIRECTOR

October 20, 2023

By Email

Honorable Debbie Critchfield
Superintendent of Public Instruction
Idaho Department of Education
650 West State Street
Boise, Idaho 83702

Email: dcritchfield@sde.idaho.gov

Dear Superintendent Critchfield:

The U.S. Department of Education (the Department), Office of Special Education Programs (OSEP), received an inquiry that raised concerns about the Idaho State Department of Education's (ISDE) eligibility criteria for determining whether a child is eligible to receive special education and related services under the Individuals with Disabilities Education Act (IDEA) as a child with a Specific Learning Disability (SLD). The inquiry included hyperlinks to the Idaho Special Education Manual (2018)¹ and the Idaho Specific Learning Disability Eligibility Guidance document.² OSEP has completed a preliminary review of these documents and has identified certain areas that we are requesting the State clarify in order to demonstrate its procedures are consistent with IDEA Part B.

The State's SLD Eligibility Requirements

OSEP reviewed the Idaho Special Education Manual 2018, specifically the State's definition of SLD; and the State's Eligibility Criteria for determining if a child is eligible under the IDEA which reads:³

Definition: SLD means a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, that may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or to do mathematical calculations, including conditions such as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia.

SLD does not include learning problems that are primarily the result of visual, hearing, or motor disabilities, of intellectual disability, of emotional behavioral disorder, or of environmental, cultural, or economic disadvantage.

Only a school age child may be identified as a student with an SLD. (Emphasis added).⁴

¹ Idaho Special Education Manual (2018) <https://www.sde.idaho.gov/sped/files/shared/Idaho-Special-Education-Manual-2018-Final.pdf>.

² Idaho Specific Learning Disability Eligibility Guidance <https://www.sde.idaho.gov/sped/sped-manual/files/chapters/chapter-4-evaluation-and-eligibility/SLD-Eligibility.pdf>. In OSEP's review of this document, it appears this document is intended to provide guidance on the evaluation procedures to be followed when determining whether a child is eligible to receive special education and related services as a child with an SLD. However, OSEP cannot determine specifically the usage of this guidance document.

³ Idaho Special Education Manual (2018) pp. 52-56 <https://www.sde.idaho.gov/sped/files/shared/Idaho-Special-Education-Manual-2018-Final.pdf>.

⁴ Idaho Special Education Manual (2018), p. 52. <https://www.sde.idaho.gov/sped/files/shared/Idaho-Special-Education-Manual-2018-Final.pdf>.

State Eligibility Criteria for Specific Learning Disability: In determining whether a child has an SLD, the child must meet at a minimum, the following criteria:

- a. The student does not make sufficient progress in response to effective, evidence-based instruction and intervention for the child's age or to meet state-approved grade-level standards when provided with learning experiences and instruction appropriate for the child's age or State approved grade level standards in one or more of the following areas: 1) Oral expression; 2) Listening comprehension; 3) Written expression; 4) Basic reading skills; 5) Reading comprehension; 6) Reading fluency; 7) Mathematics calculation; or 8) Mathematics problem solving.

AND

- b. The student demonstrates low achievement in the area(s) of suspected disability listed above as evidenced by a norm-referenced, standardized achievement assessment. For culturally and linguistically diverse students, the preponderance of evidence must indicate low achievement.

AND

- c. The student demonstrates a pattern of strengths and weaknesses in psychological processing skills that impact learning.

AND

- d. The student's lack of achievement is **not** primarily the result of: 1) A visual, hearing, or motor impairment; 2) Intellectual disability; 3) Emotional behavioral disorder; 4) Environmental, cultural or economic disadvantage; 5) Limited English Proficiency; 6) A lack of appropriate instruction in reading, including the essential components of reading; 7) A lack of appropriate instruction in math.

AND

- e. The disability adversely impacts the student's educational performance, and the student requires specially designed instruction.

State's "School Age" Definition

In examining the State's SLD eligibility requirements, OSEP notes that the State's eligibility criteria for a child with an SLD indicates that it is restricted to "school age" children.⁵

OSEP also reviewed Idaho Statute, Title 33, Chapter 2, Section 33-201, which reads, "The services of the public schools of this state are extended to any acceptable person of school age. "School age" is defined as including all persons resident of the state, between the ages of five (5) and twenty-one (21) years. For the purposes of this section, the age of five (5) years shall be attained when the fifth anniversary of birth occurs on or before the first day of September of the school year in which the child is to enroll in kindergarten. For a child enrolling in the first grade, the age of six (6) years must be reached on or before the first day of September of the school year in which the child is to enroll. Any child of the age of five (5) years who has completed a private or public out-of-state kindergarten for the required four hundred fifty (450) hours but has not reached the "school age" requirement in Idaho shall be allowed to enter the first grade. For resident children with disabilities who qualify for special education and related services under the federal individuals with disabilities education act (IDEA) and subsequent amendments thereto, and applicable state and federal regulations, "school age" shall begin at the

⁵ Id. at p. 52.

attainment of age three (3) and shall continue through the semester of school in which the student attains the age of twenty-one (21) years.”⁶

Applicable IDEA Part B Requirements

SLD Requirements

Under 34 C.F.R. § 300.307(a), a State must adopt criteria that are consistent with 34 C.F.R. § 300.309 and that meet the minimum requirements prescribed in 34 C.F.R. § 300.307(a)(1)-(3). The criteria adopted by the State for determining whether a child has an SLD as defined in 34 C.F.R. § 300.8(c)(10) cannot require the use of a severe discrepancy between intellectual ability and achievement.⁷ While a State cannot require the use of a severe discrepancy model, a State may prohibit or make optional, the use of a severe discrepancy model. The State’s eligibility criteria must permit the use of a process based on the child’s response to scientific, research-based intervention and may permit the use of other alternative research-based procedures for determining whether a child has an SLD, as defined in 34 C.F.R. § 300.8(c)(10). Under 34 C.F.R. § 300.307(b) a public agency must use the State’s criteria in determining whether a child has an SLD.

Under 34 C.F.R. § 300.309(a), the eligibility group described in 34 C.F.R. § 300.306 may determine that a child has an SLD, as defined in 34 C.F.R. § 300.8(c)(10), if the following criteria are met. First, the child does not achieve adequately for the child’s age or to meet State-approved grade-level standards in one or more of the following areas, when provided with learning experiences and instruction appropriate for the child’s age or State-approved grade-level standards: (i) oral expression; (ii) listening comprehension; (iii) written expression; (iv) basic reading skill; (v) reading fluency skills; (vi) reading comprehension; (vii) mathematics calculation; (viii) mathematics problem solving.⁸ Second, the child does not make sufficient progress to meet age or State-approved grade-level standards in one or more of the areas identified in 34 C.F.R. § 300.309(a)(1) when using a process based on the child’s response to scientific, research-based intervention.⁹ Third, the eligibility group determines that its findings are not primarily the result of a visual, hearing, or motor disability; an intellectual disability; emotional disturbance; cultural factors; environmental or economic disadvantage; or limited English proficiency.¹⁰

Alternatively, the eligibility group may determine that a child has an SLD if the child exhibits a pattern of strengths and weaknesses in performance, achievement, or both, relative to age, State-approved grade-level standards, or intellectual development, that is determined by the group to be relevant to the identification of an SLD, using appropriate assessments, consistent with 34 C.F.R. §§ 300.304 and 300.305 and the eligibility group determines that its findings are not primarily the result of a visual, hearing, or motor disability; an intellectual disability; emotional disturbance; cultural factors; environmental or economic disadvantage; or limited English proficiency.¹¹

Age Requirements for Eligibility as a Child with a Specific Learning Disability

Section 619 of IDEA provides for formula grants to States to assist them in providing a free appropriate public education (FAPE) in the least restrictive environment for children with disabilities, ages three through five, and

⁶ Idaho statute, Title 33, Chapter 2, Section 33-201: <https://legislature.idaho.gov/statutesrules/idstat/Title33/T33CH2/SECT33-201/>.

⁷ Moreover, the Analysis of Comments and Changes section of the IDEA Part B regulations indicates that States may prohibit the use of a discrepancy model. 71 Fed. Reg. 46646 (Aug. 14, 2006).

⁸ 34 C.F.R. § 300.309(a)(1).

⁹ 34 C.F.R. § 300.309(a)(2)(i).

¹⁰ 34 C.F.R. § 300.309(a)(3).

¹¹ 34 C.F.R. § 300.309(a)(2)(ii) and 300.309(a)(3).

at a State's discretion, to two-year-old children with disabilities who will turn three during the school year.¹² A State is eligible to receive a grant under Section 619 if it is eligible under Section 612 of IDEA to receive a grant under Part B, and makes FAPE available to all children with disabilities, aged three through five, residing in the State.¹³ The IDEA Part B regulations, when appropriate, make adaptations to the general requirements to address preschool aged children. However, neither IDEA nor its implementing regulations limit consideration of preschool aged children for eligibility using any of the disability categories defined in 34 C.F.R. § 300.8, including SLD.

Child Find Requirements

Under 34 C.F.R. § 300.111, States are required to have policies and procedures which ensure that all children, including children suspected of being a child with a disability, are identified, located, and evaluated according to the regulations and procedures of IDEA Part B.

OSEP's Analysis and Conclusion

Based on OSEP's review of the State's information described above, it is our understanding that the State requires a child to demonstrate (a) insufficient progress in response to effective, evidence-based instruction and intervention for the child's age or to meet State-approved grade-level standards when provided with learning experiences and instruction appropriate for the child's age or State approved grade level standards in one or more of the following areas listed above; and (b) low achievement in the area(s) of suspected disability listed above as evidenced by a norm-referenced, standardized achievement assessment. Further, the State requires the child to demonstrate a pattern of strengths and weaknesses in psychological processing skills that impact learning. OSEP is concerned that requiring all three conditions to be met, as described above, could be inconsistent with IDEA and impermissibly narrow IDEA's eligibility criteria for SLD found at 34 C.F.R. § 300.309.

Under 34 C.F.R. § 300.309, the group responsible for making the eligibility determination may find the child eligible as a child with an SLD if 34 C.F.R. §§ 300.309(a)(1) and 300.309(a)(2)(i); or 34 C.F.R. §§ 300.309(a)(2)(ii) and 300.309(a)(3) are met.¹⁴ Under the State's criteria for SLD, it is unclear to OSEP what evaluative data the group must obtain and review to determine whether the child demonstrates a pattern of strengths and weaknesses in psychological processing skills that impact learning. If the purpose of that requirement is to meet the condition in 34 C.F.R. § 300.309(a)(2)(ii), it would be inconsistent with IDEA's eligibility provisions to impose this additional criterion as the State's eligibility criterion would be more narrow or strict than the criterion described under 34 C.F.R. § 300.309 and would not meet the standard for criteria to determine whether a child has an SLD described in 34 C.F.R. § 300.307(a).

OSEP notes that while it may not be common for a preschool-aged child to be identified with an SLD, Part B of IDEA and its implementing regulations, including the requirements under 34 C.F.R. § 300.8(c)(10), are applicable to school-aged and preschool-aged children, including at a State's discretion two-year-old children with disabilities who will turn three during the school year.¹⁵

¹² 20 U.S.C. § 1419(a).

¹³ 34 C.F.R. § 300.804.

¹⁴ See [OSEP Letter to Prifitera](#) (March 1, 2007).

¹⁵ The Secretary provides grants under section 619 of the IDEA to assist States to provide special education and related services in accordance with Part B – (a) to children with disabilities aged three through five years; and (b) at a State's discretion, to two-year-old children with disabilities who will turn three during the school year. See 20 U.S.C. § 1419(a); 34 C.F.R. § 300.800.

Regarding the State's definition of "school age," OSEP has determined that the State's definition is inconsistent with the IDEA Part B child find provisions in 34 C.F.R. § 300.111 because the definition would only include preschool-age children that have already been identified as children with disabilities "who qualify for special education and related services". The State's definition of "school age" does not include children who are also suspected of having a disability. Children, including preschool-age children, that are not yet considered "children with disabilities who qualify for special education and related services under the federal IDEA" would be excluded from being evaluated as a child with an SLD under the current State definition.

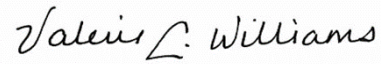
Required Next Steps

Within 90 days of the date of this letter:

1. The State must review and revise its definition of "school age" to ensure that children, including preschool-age children, who are also suspected of having a disability are included when determining whether a child has a SLD; and
2. The State must review and revise, as appropriate, its eligibility criteria for identifying a child with an SLD under the IDEA. If the State determines that its eligibility criteria are consistent with the IDEA requirements described in this letter, the State must provide an explanation to OSEP of how the criteria detailed in its Special Education Manual are implemented in a manner consistent with IDEA's procedures for identifying children with SLD. Specifically, the State must demonstrate that its criteria are consistent with 34 C.F.R. § 300.309 and do not impermissibly narrow IDEA's eligibility criteria for SLD; and
3. If the State determines that its eligibility criteria are inconsistent with the IDEA requirements described in this letter, the State must revise its policies and procedures for determining that a child is eligible to be identified as having an SLD and submit the revised policies and procedures to OSEP; and
4. If the State revises its policies and procedures for determining that a child is eligible to be identified as having an SLD, the State must provide a copy of a notification issued to all public agencies, LEAs, parent advocacy groups, the State advisory panel, and other interested parties advising them of the State's revised eligibility criteria; and
5. The State must provide a written description of how it will ensure that its revised policies and procedures are being implemented in a manner consistent with IDEA, including the provision of training, technical assistance, and monitoring of its LEAs.

We appreciate your prompt attention to this important matter. If you have questions regarding the above or would like to request technical assistance, please contact, Dwight Thomas, your State Lead at 202-245-6238 or by email at Dwight.Thomas@ed.gov.

Sincerely,

A handwritten signature in black ink that reads "Valerie C. Williams". The signature is written in a cursive style with a large, stylized "V" and "W".

Valerie C. Williams
Director
Office of Special Education Programs

cc: Chynna Hirasaki, Special Education Director, Idaho State Department of Education
Katie Flores, Idaho Special Education Advisory Panel Chair

EXHIBIT D



IDEA Series

Federal Monitoring and Enforcement of IDEA Compliance



National Council on Disability

February 7, 2018

National Council on Disability (NCD)
1331 F Street NW, Suite 850
Washington, DC 20004

(IDEA Series) Federal Monitoring and Enforcement of IDEA Compliance

National Council on Disability, February 7, 2018
Celebrating 30 years as an independent federal agency

This report is also available in alternative formats. Please visit the National Council on Disability (NCD) website (www.ncd.gov) or contact NCD to request an alternative format using the following information:

ncd@ncd.gov Email

202-272-2004 Voice

202-272-2022 Fax

The views contained in this report do not necessarily represent those of the Administration, as this and all NCD documents are not subject to the A-19 Executive Branch review process.



National Council on Disability

An independent federal agency making recommendations to the President and Congress to enhance the quality of life for all Americans with disabilities and their families.

Letter of Transmittal

February 7, 2018

President Donald J. Trump
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

On behalf of the National Council on Disability (NCD), I am pleased to submit this report titled *Federal Monitoring and Enforcement of IDEA Compliance*. This report is part of a five-report series on the Individuals with Disabilities Education Act (IDEA) that examines the history and current process of federal monitoring and enforcement of IDEA, the role of the U.S. Department of Education's Office for Civil Rights (OCR), the U.S. Department of Justice (DOJ), and IDEA's options for resolving disputes and addressing systemic violations.

As you know, the right of students with disabilities to receive a free and appropriate public education in the least restrictive environment is solidly rooted in the guarantee of equal protection under the law granted to all citizens under the Constitution. NCD has voiced concerns over federal monitoring and enforcement of IDEA in multiple reports since 1995. Some significant concerns included OCR's lack of enforcement complaint referrals to DOJ; DOJ's lack of authority to investigate and litigate IDEA cases; the Department of Education's continued funding to school systems that were noncompliant with IDEA; and a lack of funding for enforcement, complaint-handling, and technical assistance. NCD also reported that the lack of national compliance standards for IDEA hindered enforcement efforts, and recommended that the Department of Education (ED) and DOJ develop standards, improvement measures, and enforcement sanctions triggered by specific actions indicating a state's failure to ensure implementation of IDEA.

The research in this report provides up-to-date information on the issues that NCD identified in its previous IDEA reports, describes federal actions taken to address the issues and progress made, and gives recommendations for the improvement of the federal monitoring and enforcement scheme.

NCD stands ready to assist the Administration in ensuring the right to a free and appropriate public education for students with disabilities as set forth in IDEA.

Respectfully,

A handwritten signature in black ink, appearing to read "Clyde E. Terry".

Clyde E. Terry
Chairperson

(The same letter of transmittal was sent to the President Pro Tempore of the U.S. Senate and the Speaker of the U.S. House of Representatives.)

1331 F Street, NW ■ Suite 850 ■ Washington, DC 20004

202-272-2004 Voice ■ 202-272-2074 TTY ■ 202-272-2022 Fax ■ www.ncd.gov

National Council on Disability Members and Staff

Members

Clyde E. Terry, *Chairperson*
Benro T. Ogunyipe, *Vice Chairperson*
Billy W. Altom
Rabia Belt
James T. Brett
Bob Brown
Daniel M. Gade
Wendy S. Harbour
Neil Romano

Staff

Vacant, Executive Director
Joan M. Durocher, General Counsel & Director of Policy
Amy Nicholas, Attorney Advisor
Amged Soliman, Attorney Advisor
Ana Torres-Davis, Attorney Advisor
Anne Sommers, Director of Legislative Affairs & Outreach
Phoebe Ball, Legislative Affairs Specialist
Lisa Grubb, Director of Operations and Administration
Stacey S. Brown, Staff Assistant
Keith Woods, Financial Management Analyst

Acknowledgments

NCD thanks Selene Almazon, Denise Marshall, and Melina Latona of the Council of Parent Attorneys and Advocates, and Candace Cortiella of The Advocacy Institute, for the research conducted in developing this report.

Contents

Acknowledgments	5
Contents	7
Executive Summary	9
Monitoring	9
Office of Special Education Programs (OSEP) Oversight	9
Acronym Glossary	11
Introduction	13
Research Methods	13
Qualitative Analysis	14
Policy Analysis and Literature Review	14
Quantitative Data	14
Limitations	15
Chapter 1: Examining the Federal Role in Education	17
Section 504	17
The ADA	18
Chapter 2: Evolution of Monitoring and Enforcement Under IDEA	19
Chapter 3: Department of Education’s Current Process	23
OSEP Annual State Determinations 2007–2017	24
Chapter 4: State Monitoring of Local Educational Agencies (LEAs)	31
Lack of Comprehensive Information about State Monitoring Practices	32
Chapter 5: IDEA Dispute Resolution Options	35
Chapter 6: Role of the Office for Civil Rights (OCR)	39
Chapter 7: Role of the Department of Justice (DOJ)	41

Chapter 8: Perspectives of Key Stakeholders	43
Current Monitoring and Enforcement of IDEA Compliance	43
IDEA Dispute Resolution Options	44
Chapter 9: Findings and Recommendations	47
Monitoring	47
Office of Civil Rights	48
OSEP Oversight	48
IDEA	48
Recommendations	48
Endnotes	51

Executive Summary

The Individuals with Disabilities Education Act (IDEA) confers significant responsibilities for its implementation to the U.S. Department of Education (ED). Through a complex system of monitoring, ED reviews and reports on states' IDEA implementation annually. The system has undergone several changes over the years.

To better understand the current system of IDEA monitoring and enforcement, the National Council on Disability (NCD) commissioned this report. Using a mixed-methods study, key questions were used to examine the history and current process of IDEA federal monitoring and enforcement, the role of other agencies such as the Office for Civil Rights and the U.S. Department of Justice (DOJ), and IDEA's options for resolving disputes and addressing systemic violations.

In this report, NCD found the current system of monitoring and enforcement, while moving toward a more balanced approach of compliance and results, often fails to address noncompliance in a timely and effective manner, and utilize all of the options available to address issues. The following are some key findings.

Monitoring

IDEA does not impose a specific monitoring framework on states; however, the system should be accountable for enforcing IDEA requirements and for ensuring continuous improvement.

Office of Special Education Programs (OSEP) Oversight

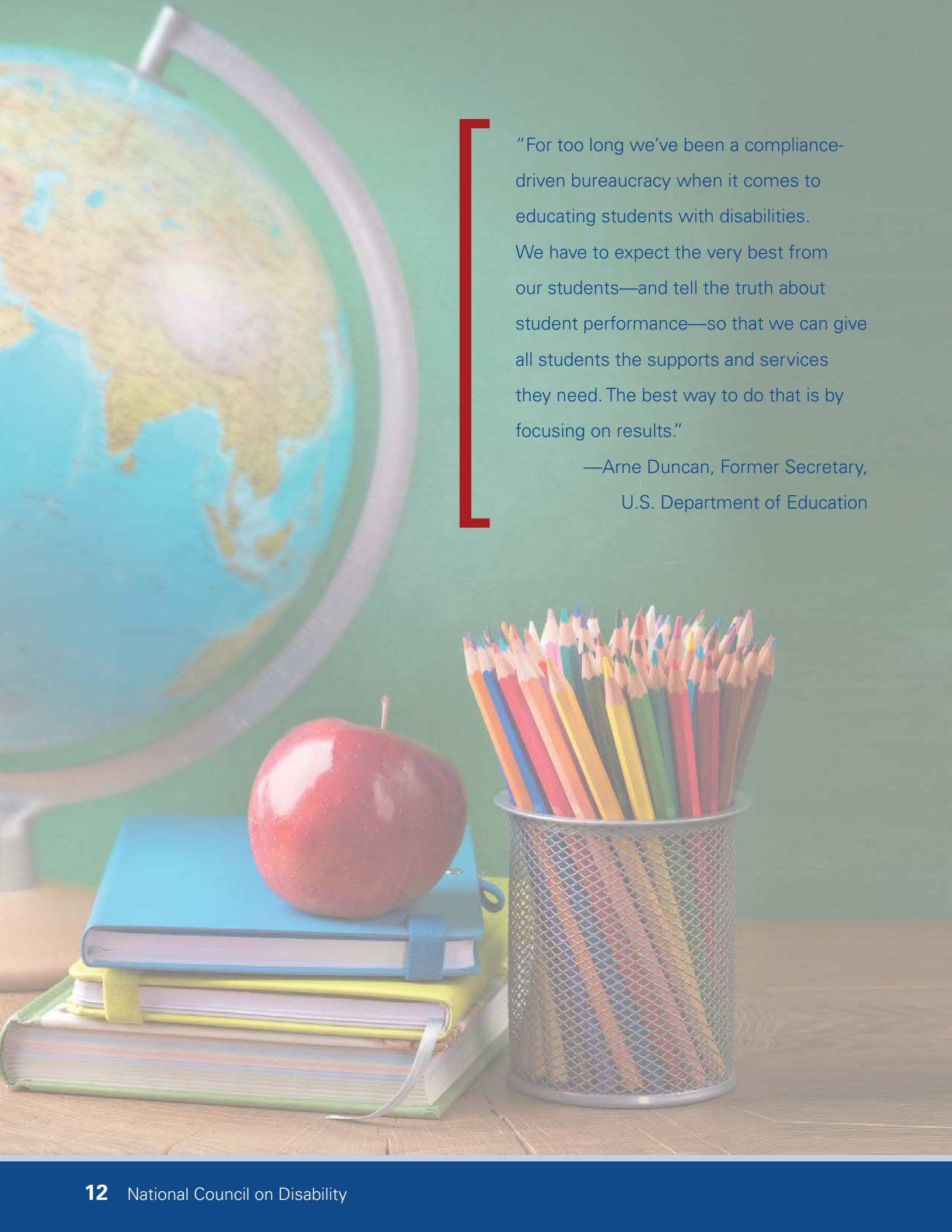
OSEP and the Office of Special Education and Rehabilitative Services (OSERS) regularly issue Dear Colleague Letters and Memorandums to address issues, including violations of IDEA that appear to be systemic.

The report makes recommendations to Congress, ED, and states. Among these recommendations are the following:

- Congress should appropriate funds for competitive grants to develop and pilot effective monitoring and enforcement activities that improve results and correct noncompliance in a timely manner.
- ED should engage in more aggressive enforcement of IDEA, and utilize its authority to withhold federal funds and make referrals to DOJ for enforcement as permitted by IDEA.
- States should fully adhere to the requirement to make public all information regarding local educational agency (LEA) monitoring and enforcement of IDEA compliance, including LEA annual performance reports (APRs), annual determinations, corrective actions ordered, and funding withheld; and develop user-friendly, easily locatable information in collaboration with parents and other stakeholders in the state.

Acronym Glossary

ADA	Americans with Disabilities Act of 1990
APR	annual performance report
CDE	California Department of Education
CIMP	Continuous Improvement Monitoring Process
CPRC	Community Parent Resource Center
CRDC	Civil Rights Data Collection
COPAA	Council of Parent Attorneys and Advocates
DCL	Dear Colleague Letter
DOJ	U.S. Department of Justice
ED	U.S. Department of Education
EL	English learner
ESE	Massachusetts Department of Elementary and Secondary Education
ESEA	Elementary and Secondary Education Act
ESSA	Every Student Succeeds Act
FAPE	free appropriate public education
GAO	Government Accountability Office
GEPA	General Education Provisions Act
GNETS	Georgia Network for Educational and Therapeutic Support
IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
LEA	local educational agency
LRE	least restrictive environment
NCD	National Council on Disability
NCSI	National Center for Systemic Improvement
OCR	Office for Civil Rights
OSEP	Office of Special Education Programs
OSERS	Office of Special Education and Rehabilitative Services
P&A	Protection and Advocacy
PTI	parent training information center
RDA	Results Driven Accountability
SEA	state educational agency
SPP	state performance plan
SSIP	state systemic improvement plan
TEA	Texas Education Authority



“For too long we’ve been a compliance-driven bureaucracy when it comes to educating students with disabilities. We have to expect the very best from our students—and tell the truth about student performance—so that we can give all students the supports and services they need. The best way to do that is by focusing on results.”

—Arne Duncan, Former Secretary,
U.S. Department of Education

Introduction

In 1995, 20 years after the passage of the Individuals with Disabilities Education Act (IDEA),¹ the National Council on Disability (NCD) released a report in which one of the key findings was “that the majority of problems which have occurred in special education have not been the result of problems with the law itself, but with its implementation.”² Yet again, in its 2000 report, *Back to School for Civil Rights*, NCD discovered that IDEA was not being implemented as intended, finding that the Federal Government was not doing enough to force states to comply with federal law on special education, and as a result, many children with disabilities were getting substandard schooling.³

This report examines the findings in previous NCD reports, the progress achieved since the last report 16 years ago, and the evolution of monitoring practices and current practices by the U.S. Department of Education (ED), and it seeks to answer the following questions:

- How does the IDEA complaint process differ in investigation and enforcement?
- Has ED developed standards, improvement measures, and enforcement sanctions triggered by specific actions indicating a state’s failure to ensure implementation of the law?

- Does ED make complaint referrals to the Department of Justice (DOJ) when lack of compliance is found?
- Does DOJ seek remedies in referred complaints?
- Does ED continue to fund school systems that are noncompliant with IDEA requirements?
- Has funding increased for IDEA enforcement, complaint handling, and technical assistance?
- Have national compliance standards for IDEA been developed by ED and DOJ?

Research Methods

To address these questions, NCD conducted a mixed-methods study gathering stakeholder perspectives, as well as policy and quantitative information. The research questions provided a basis for analysis of the history, trends, and current status of federal law—authorizing and appropriations; examination of available research and descriptive data; and consideration from the experiences of stakeholders—parents, school personnel, district and state officials or their national organizations, and ED officials.

Research Questions Addressed in Report

- How does the IDEA complaint process differ in investigation and enforcement?
- Has ED developed standards, improvement measures, and enforcement sanctions triggered by specific actions indicating a state's failure to ensure implementation of the law?
- Does ED make complaint referrals to the Department of Justice (DOJ) when lack of compliance is found?
- Does DOJ seek remedies in referred complaints?
- Does ED continue to fund school systems that are noncompliant with IDEA requirements?
- Has funding increased for IDEA enforcement, complaint handling, and technical assistance?
- Have national compliance standards for IDEA been developed by ED and DOJ?

Qualitative Analysis

To gather stakeholder perspectives, the NCD research team conducted interviews, and held four regional forums and one national forum. Specifically, NCD conducted 20 semistructured interviews with ED officials, state and local administrators, researchers, representatives from disability rights organizations, and parent organizations to determine current challenges related to the funding of IDEA.

In the second phase of research, we gathered perspectives from parents and students through four regional focus groups in California, Illinois, Texas, and Virginia. NCD recruited participants through the Council of Parent Attorneys and Advocates (COPAA)'s member network, local parent networks, and state and national partners in the forum locations. In total, 72 people participated in the regional forums. Only 30 percent of regional forum participants were COPAA members, and 70 percent were non-COPAA members. Of the 72 participants in the regional forum, 38 percent were parents or students of color.

The third phase of data collection occurred during an online forum at COPAA's national conference. In total, 58 people participated in the forum. Twenty-three percent were people of color. An additional 23 people responded through an email address.⁴

In all settings, NCD used a semistructured question protocol to gain perspectives about parent and child experiences with IDEA. Data was recorded and transcribed to identify themes among the experiences (see appendix for protocols).

Policy Analysis and Literature Review

To understand the policy context, we conducted a thorough review of current policy on the issue of IDEA federal monitoring, examining specifically any relevant statute, regulations, or guidance on the topic.

Quantitative Data

In our quantitative review, NCD gathered descriptive statistics and reviewed data from the IDEA annual reports to Congress, annual determinations of state implementation of IDEA,

state performance plans (SPPs) and annual performance reports (APRs), and other relative data, as well as other available national datasets. This quantitative review helps to provide an overarching picture of the topic nationally and enhances the individual perspectives gathered from the qualitative components.

Limitations

In this study, NCD recruited participants through COPAA's member network; local parent

networks; and state and national partners in the forum locations. Additionally, we purposefully selected interview participants based on location and position. Therefore, the qualitative data identified in the report should not be viewed as generalizable, but rather as perspectives of individuals within those positions. The qualitative data offers individual first-person perspectives to complement the quantitative aspects of this report.

Chapter 1: Examining the Federal Role in Education

Three federal laws protect students with disabilities: Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act of 1973,⁵ and the Americans with Disabilities Act of 1990 (ADA).⁶

Among these, only IDEA provides federal funds to assist states and local educational agencies with the additional costs of special education and related services. States must provide a free appropriate public education (FAPE) to all children with disabilities as a condition of receiving federal IDEA funds. Thus, IDEA is both a grants statute and a civil rights statute. IDEA includes monitoring activities and procedural safeguards as mechanisms for ensuring compliance with the statute's extensive requirements. The monitoring activities are overseen by the Office of Special Education Programs (OSEP) at the U.S. Department of Education. IDEA also requires states to provide an administrative complaint process that must be carried out by each state educational agency (SEA). IDEA is also closely interwoven with Every Student Succeeds Act (ESSA),⁷ the current version of the Elementary and Secondary Education Act (ESEA).

Section 504

Section 504 of the Rehabilitation Act of 1973, as it applies to students with disabilities, is a federal law designed to protect the rights of people with disabilities in programs and activities that receive federal financial assistance from ED. In terms of students and their education, it prohibits schools from discriminating against students with disabilities and to provide students with disabilities appropriate educational services. These services must be designed to meet the individual educational needs of students with

disabilities to the same extent that the needs of students without disabilities are met. The Office for Civil Rights

(OCR) at ED enforces Section 504, receiving and investigating complaints from parents, students, or advocates. OCR conducts agency-initiated compliance reviews and provides technical assistance to school districts, parents, and advocates. OCR provides guidance through Dear Colleague Letters (DCLs) and supplementary materials. Guidance is often issued jointly by OCR and the Civil Rights Division of DOJ or the Office of Special Education and Rehabilitative Services (OSERS).

IDEA is both a grants statute and a civil rights statute.

Disagreements between parents and school districts can be pursued through Section 504 due process hearings. OCR offers an early complaint resolution process, as well as an appeals process for complainants. OCR attempts to reach compliance through negotiation of a corrective action agreement. Resolution letters and agreements are made available to the public. If OCR is unable to achieve voluntary compliance, OCR might initiate enforcement action. OCR might (1) initiate administrative proceedings to terminate ED financial assistance to the recipient, or (2) refer the case to DOJ for judicial proceedings.⁸

The ADA

ADA Title II prohibits discrimination on the basis of disability by state and local governments regardless of whether they receive federal financial assistance.

Like Section 504, in Title II of ADA, Congress prohibited discrimination by public entities. Title II goes beyond Section 504—it applies to state and local schools regardless of whether they receive any federal funds, while Section 504 applies only to schools that receive federal funds. Because public schools receive federal funds, they are subject to the requirements of both Title II of ADA and Section 504.

[Title II of the ADA] applies to state and local schools regardless of whether they receive any federal funds, while Section 504 applies only to schools that receive federal funds.

Unlike IDEA, however, the scope of Section 504 and ADA is much broader, particularly for specific disability-related areas. In fact, ADA includes a mandate to eliminate discrimination against people with

disabilities, and it required DOJ to promulgate regulations to implement ADA to that end.⁹ Thus, while IDEA might set the “basic floor of opportunity,”¹⁰ ADA/504 might require more.

The rights of students under Title II of ADA are enforced by OCR at ED in essentially the same manner as Section 504.

Chapter 2: Evolution of Monitoring and Enforcement Under IDEA

IDEA specifies that IDEA's monitoring and enforcement responsibilities are charged to the Secretary of the U.S. Department of Education, as well as to state educational agencies (SEAs). The Secretary exercises his or her authority through ED's OSEP and OCR. States receiving IDEA federal funds must have a system of general supervision that monitors the implementation of IDEA by local educational agencies (LEAs) (i.e., school districts). IDEA does not impose a specific monitoring framework on states; however, the system should be accountable for enforcing IDEA requirements and for ensuring continuous improvement.¹¹

Monitoring initially involved an on-site visit every five to six years. Such visits included stakeholder interviews, reviews of policies and procedures, and review of student files. The state would receive a letter from OSEP summarizing the findings of the visit and direction on how the state should address any findings of noncompliance.¹²

Driven in part by the recognition that this approach to monitoring was not leading to improved performance of children with disabilities, states and OSEP began shifting to a concept called "focused monitoring" in the late 1990s.¹³ The 1997 amendments to IDEA required states to develop performance goals and indicators that would be used to judge the

states' progress in improving results for students with disabilities.¹⁴ These requirements lead to a new monitoring approach called a Continuous Improvement Monitoring Process (CIMP).¹⁵ OSEP conceptualized the CIMP model as a continuous cycle composed of the following activities:

- Self-assessment
- Validation planning
- Validation data collection
- Improvement planning
- Implementation of improvement strategies
- Verification and consequences
- Review and revision of self-assessment

OSEP used CIMP to monitor states from the 1998–1999 through 2001–2002 school years. There was no requirement, however, that states adopt this approach in monitoring LEAs. States were required to develop state improvement plans based on the findings of a self-assessment. OSEP provided technical assistance to help states implement improvement strategies, regardless of whether the states used CIMP or another approach to monitor their local programs' compliance. If a state did not make the necessary improvements, OSEP could impose enforcement actions such as special conditions

on grant awards, compliance agreement, or withholding of funds.¹⁶

OSEP modified certain aspects of CIMP in 2000, in part because of an NCD report that concluded that every state in the country was out of compliance with IDEA.¹⁷ The NCD report, *Back to School on Civil Rights*, analyzed the data contained in DOJ's state monitoring reports from 1975 to 1998, and concluded the following:

All states and the District of Columbia were found to be out of compliance with IDEA requirements to some degree. Federal efforts over several administrations to enforce IDEA in states where noncompliance persists were found to be inconsistent, often ineffective, and without any real teeth. While the statutory framework of IDEA envisioned states as the primary implementers of IDEA, the Federal Government has fallen short over five administrations in its efforts to ensure that the protections of the law for children with disabilities are enforced. This study confirmed what students with disabilities and their parents have repeatedly told NCD and that while they are enthusiastic supporters of IDEA, noncompliance with the law has persisted in some states over many years, placing enormous burdens on children and families.¹⁸

In 2002, the President's Commission on Excellence in Special Education issued an extensive report that included recommendations

regarding federal regulations and monitoring. The commission found that

[t]here is little demonstrable link between process compliance and student results and success. While process compliance two decades ago allowed the federal government to determine whether children with disabilities received any education services, then and now it does little to help parents and teachers judge whether those services lead to student success. Indeed, the complaints by NCD, witnesses and the public about the lack of historic

compliance with IDEA beg the more fundamental question of whether such procedural compliance has anything to do with actual student achievement and

their post-school success. To answer these problems, the Commission recommends that IDEA, its regulations and federal and state monitoring activities be fundamentally shifted to focus on results and accountability for scientifically based services, and their continuous improvement.¹⁹

The commission also found that it took between four and 20 months for OSEP to issue a monitoring report following the conclusion of the on-site visit, with an average of 13.6 months, and concluded that "[b]ecause of the substantial time between on-site monitoring and the release of reports, most reports are impractical and provide no assurance to Congress or families of the status of IDEA implementation."²⁰

The commission's final report made the following recommendation regarding monitoring: "The U.S. Department of Education should seek to radically change how it conducts technical assistance and monitoring activities to focus on results instead of process. The Department should monitor and provide effective technical assistance on a much smaller number of substantive measures guided by broad federal standards that focus on performance and results."²¹

Also in 2002, the U.S. Commission on Civil Rights offered its recommendations for the upcoming reauthorization of IDEA. On the subject of monitoring and enforcement, it recommended the following:

A complaint-handling process should be established at the federal level, and state complaint systems should be monitored by OSEP for efficiency and effectiveness. . . . The Federal Government must ensure that state special education programs comply with IDEA by gathering adequate data on each state's implementation and developing national compliance standards.²²

ED should exercise its authority to sanction state and local education agencies that repeatedly fail to comply with IDEA by withholding allotments until compliance is achieved. To accomplish this, ED must conduct regular and thorough reviews of how states are spending federal funds. The amount of funds withheld should be based on level of noncompliance, and sanctions should be applied equally to all states.

Compliance is best achieved through consistent federal enforcement bolstered by support activities performed by states. . . .

[S]tates should be given the same sanction authority as federal enforcement agencies to ensure that local special education programs comply with IDEA. States should scrutinize school district expenditures and allocate or withhold funds accordingly."²³

A 2004 report by the Government Accountability Office, *Special Education: Improved Timeliness and Better Use of Enforcement Actions Could Strengthen Education's Monitoring System*, echoed much of what the President's Commission found. ED was again criticized for the length of time it took to issue monitoring reports and to approve corrective action plans. The report summarized these as follows:

Education has endeavored to bring states into compliance through state corrective action plans and technical assistance, but cases of noncompliance have generally continued for years before being fully resolved. To resolve the range of deficiencies Education identified in its monitoring visits, the department required states to (1) develop corrective action plans, (2) institute remedies, and (3) demonstrate the effectiveness of the remedy within 1 year. We found that all of the 7 cases of noncompliance from 1997 to 2002 that have been fully resolved took from 2 to 6 years for closure to occur, and the remaining 23 cases—some dating back as far as 1997—have still not been completely resolved. . . . Our examination of Education documents showed that each phase of the monitoring and correction process took a considerable amount of time, including Education's issuance of its findings report and the

approval of the state correction plan. On average, Education took about a year to issue a monitoring report following its site visits, and generally 1 to 2 years passed before states' corrective action plans were approved. Infrequently, in cases of serious or longstanding noncompliance, Education has taken more severe action by using sanctions such as making grant renewals conditional on correcting noncompliance, but resolution has been slow in these cases as well. In addition, states that we examined rarely resolved noncompliance within the 1-year compliance deadline specified by Education for correction.

The report recommended the following:

To improve special education monitoring, we are recommending that Education develop additional guidance for collecting data on key outcome measures. To strengthen enforcement of IDEA, we are recommending that Education improve its response times throughout the monitoring process and that it impose realistic timeframes and firm deadlines for remedying findings of noncompliance, including making greater use of compliance agreements when appropriate.²⁴

Ultimately, the 2004 amendments to IDEA expanded requirements regarding performance goals and indicators, and included specifications for state performance plans, data collection, and reporting on targets. States had to develop an SPP that included indicators measuring compliance, as well as those measuring

performances of students with disabilities. States were required to submit an APR, which became the primary component of OSEP's state monitoring. OSEP also was required to initiate state on-site meetings over a five-year period to conduct "verifications visits." Each year, OSEP issues to every state a "determination" of its implementation of IDEA using the following categories:

- Meeting requirements and purposes of IDEA
- Needing assistance in implementing the requirements of IDEA
- Needing intervention in implementing the requirements of IDEA
- Needing substantial intervention in implementing the requirements of IDEA

Section 616 of IDEA 2004 states: "The primary focus of Federal and State monitoring activities described in paragraph (1) shall be on— (A) improving educational results and functional outcomes for all children with disabilities; and (B) ensuring that States meet the program requirements under this part with a particular emphasis on those requirements that are most closely related to improving educational results for children with disabilities."

Despite this intended focus, monitoring using the SPP/APR data and information from on-site visits remained primarily focused on compliance rather than results. In response, states focused on correction of noncompliance. Not surprisingly, state performance on compliance indicators improved significantly while student performance remained relatively unchanged.²⁵

Chapter 3: Department of Education’s Current Process

In 2012, after extensive input from stakeholders, and in an effort to improve the educational outcomes of students with disabilities, ED announced a major shift in the way OSEP would oversee the effectiveness of states’ special education programs. Until that time, OSEP’s primary focus was to determine whether states were meeting procedural requirements such as timelines for evaluations, due process hearings, and transitioning children into preschool services.

While these compliance indicators remain important to children and families, under the revised framework known as Results Driven Accountability (RDA),

OSEP now includes educational results and outcomes for students with disabilities in making each state’s annual determination under IDEA. In announcing RDA, the Secretary of Education said this:

For too long we’ve been a compliance-driven bureaucracy when it comes to educating students with disabilities. We have to expect the very best from our students—and tell the truth about student performance—so that we can give all students the supports and services they

need. The best way to do that is by focusing on results.

ED also announced that it would cease to conduct verification visits, but would continue to review states’ APRs and monitor state supervision systems.²⁶

As part of RDA, OSEP moved to “differentiated monitoring and support” for all states, but especially low-performing states.

OSEP now provides differentiated technical assistance based on annual determinations, with low-performing states receiving more intensive support.²⁷

In shifting to the RDA process for annual determinations, OSEP funded technical assistance centers to provide states help with data collection. The Center for IDEA Fiscal Reporting²⁸ and the IDEA Data Center²⁹ are two such centers. OSEP also has a system that flags state data that appears to be questionable, and verifies such data with the state.

OSEP also added a new indicator to the SPP in 2013. The new indicator required states to develop a State Systemic Improvement Plan (SSIP). An SSIP is a plan for improving results for students with disabilities. The basis for the SSIP

OSEP now includes educational results and outcomes for students with disabilities in making each state’s annual determination under IDEA.

is a detailed data and infrastructure analysis that will guide the development of strategies to increase the state’s capacity to structure and lead meaningful change in LEAs. The SSIP has been implemented in stages, beginning with the APR submitted February 1, 2015.³⁰ To assist states in the planning and implementation of the SSIP, OSEP funded a new technical assistance center known as the National Center for Systemic Improvement (NCSI). This center is charged with “helping states achieve a national vision of Results Driven Accountability for special education and early intervention programs.”³¹

OSEP began using the RDA process in making the Part B state determinations in June 2014. As the following chart indicates, the impact of the shift from a focus primarily on procedural compliance to consideration of both compliance and results made a significant difference in state ratings, with the percentage of states receiving

a “meets requirements” rating declining substantially.

OSEP Annual State Determinations 2007–2017

The following table provides information on the number of states identified in each determination

category between 2007 and 2017. Annual determinations are based on data from the prior two years. For example, the 2016 determinations were

based on data for fiscal year 2014.

It should be noted that no state has ever been designated as “needing substantial intervention,” despite the fact that the Bureau of Indian Education has received a needs intervention determination for five consecutive years and the District of Columbia has received a needs intervention determination for 10 consecutive years. In other words, there appears to be no amount of ongoing noncompliance that rises to

[T]here appears to be no amount of ongoing noncompliance that rises to the level of [“needing substantial intervention”].

Number of States by Determination Category			
Year	Meets Requirements	Needs Assistance	Needs Intervention
2007	9	41	10
2008	14	36	10
2009	30	25	5
2010	31	27	2
2011	30	26	4
2012	33	18	9
2013	40	17	3
RDA/2014	21	34	5
RDA/2015	21	36	3
RDA/2016	26	31	3
RDA/2017	25	34	1

the level of this determination. This might be, at least in part, because of the specific actions the Secretary must take in the case of a state determined to need substantial intervention (see the following description).

Both IDEA law and regulations provide explicit actions the Secretary may or shall take for each determination category, as the following describes.³²

Actions the Education Secretary May or Shall Take by Determination Category

Needs Assistance Category (for Two Consecutive Years)

The Secretary shall take one or more of the following actions:

- Advises the state of available sources of technical assistance that may help the state address the areas in which it needs assistance, which may include assistance from OSEP, other offices of ED, other federal agencies, technical assistance providers approved by the Secretary, and other federally funded nonprofit agencies, and requires the state to work with appropriate entities. Such technical assistance may include the following:
 - The provision of advice by experts to address the areas in which the state needs assistance, including explicit plans for addressing the area for concern within a specified period of time
 - Assistance in identifying and implementing professional development, instructional strategies, and methods of instruction that are based on scientifically based research
 - Designating and using distinguished superintendents, principals, special education administrators, special education teachers, and other teachers to provide advice, technical assistance, and support
 - Devising additional approaches to providing technical assistance, such as collaborating with institutions of higher education, educational service agencies, national centers of technical assistance supported under Part D of the Act, and private providers of scientifically based technical assistance
- Directs the use of state-level funds under section 611(e) of the Act on the area or areas in which the state needs assistance.
- Identifies the state as a high-risk grantee and impose special conditions on the state's grant under Part B of the Act.

(continued)

Actions the Education Secretary May or Shall Take by Determination Category, *continued*

Needs Intervention Category (for Three or More Consecutive Years)

The Secretary can take any of the actions listed under Needs Assistance.

The Secretary shall take one or more of the following actions:

- Requires the state to prepare a corrective action plan or improvement plan if the Secretary determines that the state should be able to correct the problem within one year
- Requires the state to enter into a compliance agreement under section 457 of the General Education Provisions Act, as amended, 20 U.S.C. 1221 et seq. (GEPA), if the Secretary has reason to believe that the state cannot correct the problem within one year
- For each year of the determination, withholds not less than 20 percent and not more than 50 percent of the state's funds under section 611(e) of the Act, until the Secretary determines the state has sufficiently addressed the areas in which the state needs intervention
- Seeks to recover funds under section 452 of GEPA
- Withholds, in whole or in part, any further payments to the state under Part B of the Act
- Refers the matter for appropriate enforcement action, which may include referral to the Department of Justice

Needs Substantial Intervention Category

Secretary shall take one or more of the following actions:

- Recovers funds under section 452 of GEPA
- Withholds, in whole or in part, any further payments to the state under Part B of the Act
- Refers the case to the Office of the Inspector General at the Department of Education
- Refers the matter for appropriate enforcement action, which may include referral to the Department of Justice

OSEP officials interviewed for this report³³ indicated that the issue of a possible referral to DOJ for enforcement is raised when necessary in discussion with states that are not complying fully with their IDEA obligations. However, OSEP has not made any referrals to DOJ for enforcement under IDEA.

ED has not developed general standards, improvement measures, or enforcement sanctions beyond those specified in IDEA law and federal regulations.

The SPP/APR module is publicly available online at osep.grads360.org and provides each state

with information on OSEP's response to the state's performance on indicators one through 17 of the SPP and any actions that the state is required to take. SEAs are required to make their SPP/APRs available to the public, primarily via posting online, and information regarding OSEP's response to the APR makes it possible for interested parties to utilize the information, including specific corrective action the state is to undertake.

OSEP and OSERS regularly issue DCLs and Memorandums to address issues, including violations of IDEA that appear to be systemic. For example, recent DCLs addressed the use of the terms dyslexia, dyscalculia, and dysgraphia in IDEA evaluations, eligibility determinations or Individualized Education Program (IEP) documents; the requirement that schools provide positive behavioral supports to students with disabilities who need them; and the rights of

students with disabilities to have access to the general education curriculum and standards-based IEPs to ensure educational opportunity.³⁴ While not carrying the force of law, these communications are valuable tools that can be used by parents, advocates, districts, schools, and states.³⁵ In fact, the November 2015 DCL on standards-based IEPs served as the centerpiece of a resource document for states produced by the Council of Chief State School Officers and

NCSI regarding how states can improve services to students with disabilities in the context of ESSA.³⁶

OSEP also issues policy letters that are direct responses to requests for clarification on a variety of issues raised by parents, advocates, and school personnel. Again, while they do not carry the weight of law, these letters are helpful in

providing clarification on specific circumstances that might not be directly addressed in IDEA law or federal regulations.³⁷

OSEP utilizes other types of information beyond the states'

SPP/APR to monitor states and LEAs, including receiving multiple reports regarding the same LEA and reporting by the press. One recent example of this is the actions taken by ED in 2016 with the Texas Education Authority (TEA). The *Houston Chronicle* asserted that TEA had placed a cap on the percentage of students that LEAs could identify as eligible for special education.³⁸ Based on this reporting, OSEP demanded a formal response from TEA, held a series of "listening sessions" across Texas in

OSEP has not made any referrals to DOJ for enforcement under IDEA.

ED has not developed general standards, improvement measures, or enforcement sanctions beyond those specified in IDEA law and federal regulations.

mid-December 2016, and performed monitoring visits to several Texas LEAs. While OSEP's actions in this case are admirable, it should be noted that Disability Rights Texas, the state's protection and advocacy agency, had reported the same concerns regarding the TEA policy to OSEP more than a year prior to the *Houston Chronicle* reports, and no action was taken.

Another recent OSEP action was spurred by an opinion issued in 2016 by a federal judge in Connecticut in an education funding case. In the decision, the judge suggested that children with multiple disabilities should not be given an education because no services would be "appropriate" for children with profound disabilities. OSEP issued a letter to the Connecticut State Department of Education, making it clear that all children are entitled to an education, regardless of their disability or the severity of the disability.³⁹

OSEP does not provide a formal process through which to file a complaint regarding alleged violations of IDEA. While OSEP receives phone calls and written communications of complaints, how it handles these complaints is not directed by any formal process (unlike the written state complaint process detailed in IDEA federal regulations). This lack of a formal complaint process should be further investigated.

Since at least 2002, the U.S. Commission on Civil Rights identified a lack of adequate

resources for state and federal monitoring and enforcement programs. Upcoming budget proposals should assure adequate resources to carry out rigorous monitoring and enforcement activities.⁴⁰

OSEP should continue to strengthen its partnership with the Protection and Advocacy (P&A) System to improve IDEA compliance. The P&A System comprises a nationwide network

of congressionally mandated, legally based disability rights agencies operating in every state and territory in the United States.

The P&A network has the authority to provide

legal representation and advocacy services to all people with disabilities. Despite the fact that the P&A System has no designated funding source for education-related casework, P&A advocates and attorneys work with families and schools to ensure students with disabilities receive the supports and services they are entitled to

receive. The extensive education work of the P&A networks makes them uniquely qualified to assist in monitoring and enforcement activities at both the federal and state levels.

One large state P&A network reported having 24 attorneys and advocates across the state doing special education advocacy work. The P&A networks generally seek to focus their education work on systemic issues such as restraint and seclusion, discipline, and least restrictive environment (LRE). Many use the IDEA state

Since at least 2002, the U.S. Commission on Civil Rights identified a lack of adequate resources for state and federal monitoring and enforcement programs.

The extensive education work of the P&A networks makes them uniquely qualified to assist in monitoring and enforcement activities at both the federal and state levels.

complaint process, discussed later in this report, as a means to address such systemic issues and bring about corrective action.

ED funds 104 parent information centers across the country, which includes 65 Parent Training Information Centers (PTIs), 30 Community Parent Resource Centers (CPRCs) and nine Technical Assistance Centers. Through the PTIs and CPRCs, “children with disabilities and their parents receive training and information on their rights, responsibilities, and protections under IDEA, in order to develop the skills

necessary to cooperatively and effectively participate in planning and decision making relating to early intervention, educational, and transitional services.”⁴¹ The centers also provide information to parents on alternative methods of dispute resolution, such as mediation. However, the centers rarely provide direct advocacy services to parents, and few have attorneys on staff. This is in large part due to their limited role as defined under IDEA and to inadequate funding, which has declined from \$28.9 million in 2012 to \$27.4 million in 2015 through 2017.⁴²

Chapter 4: State Monitoring of Local Educational Agencies (LEAs)

IDEA places responsibility for monitoring and enforcement of special education implementation of LEAs with SEAs. The IDEA does not establish any direct or enforcement relationship between ED, which distributes the IDEA funds to the states, and an LEA.

When states monitor LEAs' implementation of IDEA, regulations require that they focus on improving educational results and functional outcomes for all children with disabilities.

Monitoring must also ensure that public agencies meet the program requirements under IDEA, with an

emphasis on improving educational results for children with disabilities. Monitoring must also include (but is not limited to) the following:

- Making determinations annually about the performance of each LEA using the same categories used for annual state determinations
- Enforcement using appropriate mechanisms, which must include, if applicable, technical assistance; conditions on funding of an LEA; a corrective action plan or improvement plan; or withholding funds, in whole or in part, by the SEA

- Reporting to the public on the performance of each LEA on the targets in SPP/APR

States are reminded of the reporting requirement each year via letter from OSEP informing the state of its determination category. The letters state that the

[s]tate must report annually to the public, by posting on the State educational agency's

(SEA's) Web Site, the performance of each local educational agency (LEA) located in the State on the targets in the SPP/APR as soon as

practicable, but no later than 120 days after the State's submission of its FFY 2014 SPP/APR. In addition, your State must:

1. review LEA performance against targets in the State's SPP/APR;
2. determine if each LEA "meets the requirements" of Part B, or "needs assistance," "needs intervention," or "needs substantial intervention" in implementing Part B of the IDEA;
3. take appropriate enforcement action; and
4. inform each LEA of its determination.⁴³

IDEA places responsibility for monitoring and enforcement of special education implementation of LEAs with SEAs.

Despite both IDEA requirements and annual reminders, most SEAs are not providing the public with information regarding the findings of LEA monitoring, including the determination category and LEA performance on SPP indicators.⁴⁴ OSEP should monitor SEA adherence to this requirement, and take action to ensure that every state is in full compliance with their legal responsibility to report. Providing this information in a user-friendly and easy-to-locate manner would enable the public to use the information in a variety of ways, and would provide transparency about how LEAs are performing.

Lack of Comprehensive Information about State Monitoring Practices

Unfortunately, there is a general lack of comprehensive information about state monitoring practices.

The latest report, issued in 2010, examined monitoring and improvement practices between 2004–2005 and 2006–2007. Thus, there is little information on

which to base recommendations regarding how to improve states' monitoring and enforcement processes.

The 2010 study found, as had previous reports, that there was substantial variability in the nature and design of states' monitoring systems. It recommended development of a common framework across states for consistency and research purposes.⁴⁵

A 2016 study, commissioned by the Massachusetts Department of Elementary and

Secondary Education (ESE), in anticipation of changes to its monitoring process, provides an inventory of national promising practices including a survey of compliance monitoring models currently employed in several states, with the goal of identifying approaches that support improved outcomes in special education programs.⁴⁶ The study found these best practices enhance a robust monitoring system:

- **Stakeholder engagement:** A diverse group of stakeholders should have an important role in monitoring activities, working in partnership with the state to develop targets, review data of improvement activities, and make suggestions for update to the activities and targets.

- **Vision statement and policy document:** States should develop a vision statement,

establish goals, and define their approach to monitoring. This should be written and described within the context of the state's System of General Supervision, providing

as much detail as possible for LEAs and other stakeholders to understand all of the state's special education monitoring activities. The information should be publicly available.

- **Customized approach:** There are myriad ways for states to develop monitoring systems. States should develop a monitoring process that is reflective of their priorities and designed to improve student outcomes.

Despite both IDEA requirements and annual reminders, most SEAs are not providing the public with information regarding the findings of LEA monitoring . . .

In a rare legal move, in 2012 two associations of parents of children with disabilities who attend California public schools filed a federal lawsuit against the California Department of Education (CDE), alleging that the state fails to effectively monitor LEAs' compliance with IDEA. Specifically, the suit alleges these three violations:

- CDE monitors local school districts' efforts to comply with IDEA only superficially. It does not ask for meaningful data or verify the accuracy of data it receives. It analyzes data selectively and turns a blind eye to negative trends.
- CDE does not truly investigate the complaints it receives. In its investigations,

it relies on unverified reports prepared by allegedly deficient school districts.

- CDE takes no action to meaningfully enforce school districts' obligations under IDEA. It requires only that school districts adopt

policies, not implement those policies, and it is satisfied with shallow promises of future effort. It does not verify compliance, and when it does, it does so by sampling student data after advanced warning. School districts can therefore sanitize their records.⁴⁷

In 2012, two associations of parents of children with disabilities who attend California public schools filed a federal lawsuit against the California Department of Education (CDE), alleging that the state fails to effectively monitor LEAs' compliance with IDEA.

The suit is moving through the courts at the time of this report. Its outcome could have a significant impact on the monitoring system of the nation's largest SEA.

Chapter 5: IDEA Dispute Resolution Options

IDEA provides several ways in which disputes can be addressed, including the written state complaint process, mediation, and due process complaints. States are charged with the responsibility to carry out each of these options and ensure timely compliance with federal timelines.

Among these options, only the written state complaint process is available to parties other than the parent or guardian of a student receiving special education. State complaints may be filed by an organization or individual, including one from another state. It is also the only option that allows complainants to allege systemic violations against LEAs.⁴⁸ In fact, the usefulness of state complaints was noted by ED when issuing the IDEA federal regulations in 2006, stating that “[t]hrough its Part B State complaint procedures, each State has a powerful tool to address noncompliance with Part B of IDEA and its implementing regulations in a manner that both supports and protects the interests of children and their parents and facilitates ongoing compliance by the State and its public agencies with the IDEA and implementing regulations.”⁴⁹

State complaints and the investigation reports produced by SEAs can serve as critical sources of information in OSEP monitoring activities.

The manner in which SEAs handle investigations of written state complaints, including findings of fact and corrective action ordered, varies significantly across states. To help address this, OSEP has issued several policy letters and guidance in recent years regarding

issues such as burden of proof and corrective action.

State complaints and the investigation reports produced by SEAs can serve as critical sources of information

in OSEP monitoring activities. An analysis of the issues raised in state complaints and findings of noncompliance should be a standard part of monitoring activities by SEAs and OSEP. Furthermore, steps should be taken by SEAs to ensure that all state complaint investigation reports are available to the public in a timely manner.

Due process complaints continue to be the most utilized dispute resolution option for individual students and their families. However, most of the hearing requests are settled without the need for a fully adjudicated (i.e., submitted for decision) hearing. Just 2,571 of the 17,107 due process complaints filed in 2014–2015 resulted in fully adjudicated hearings, or only 3.8 hearings per

10,000 special education students in the nation. The vast majority of complaints are withdrawn, dismissed or resolved without a hearing.⁵⁰

Mediations are requested less frequently than due process hearing; however, this is the only option that shows steady increase and results in more agreements. The past several years have also seen wide adoption by states of a process known as IEP Facilitation. IEP Facilitation is an optional process, not required by IDEA, that SEAs or school districts can provide to parents and schools. A facilitated IEP meeting is the same as any other IEP meeting, except that a facilitator

joins the meeting.⁵¹ The number of states offering IEP Facilitation in 2017 was 36, up from 29 in 2015 and 9 in 2005.⁵²

Yet, according to data compiled by the federally funded Center on Dispute Resolution, IDEA written state complaints are the least utilized dispute resolution options, suggesting that this appears to be underutilized as a tool for improving the compliance and quality of special education programs. The following table shows the use of each option during school year 2014–2015 and the trend between 2006–2007 and 2014–2015.⁵³

Dispute Resolution Option	Number Reported	Number per 10,000 Special Education Students Ages 3–21	Trend 2006–2007 to 2014–2015
Written State Complaints filed	4,991	7.5	Declined 12.2%
Mediation Requests	10,260	15.3	Increased 19.5%
Due Process Complaints filed	17,107	25.5	Declined 8.3%

A 2014 Government Accountability Office (GAO) report, *Special Education: Improved Performance Measures Could Enhance Oversight of Dispute Resolution*, noted that data collected on due process hearings

does not provide clear, complete information about the duration of this process, information which is useful for ensuring effective program monitoring and targeted technical assistance. While Education tracks the number of hearing decisions made within 45 days, without

information on the amount of time added to decisions timelines by extensions, Education is limited in its ability to monitor in this area, which could negatively affect children and their families by, for example, delaying the provision of appropriate special education services.

The report recommended that OSEP revise its performance measure to collect information from states on the amount of time that extensions add to due process–hearing decisions.⁵⁴



The data and results of the state complaint process, mediations, and facilitated IEP meetings indicate that there are viable options to parents and families prior to proceeding to a due process hearing. Given the low rate of

due process hearings that are fully adjudicated, further study is needed to determine how families may be informed of alternative dispute resolution options and the state complaint process.

Chapter 6: Role of the Office for Civil Rights (OCR)

OCR has, pursuant to its authority under Section 504 of the Rehabilitation Act and ADA's Title II, issued several guidance documents relating to the rights of children with disabilities in public schools. Frequently, OCR and OSERS issue joint DCLs and policy guidance in an attempt to provide states and LEAs with guidance on systemic issues such as bullying, restraint and seclusion, and access to accelerated programs and extracurricular athletics.⁵⁵

Unlike OSEP, OCR has the resources and statutory authority to investigate complaints filed against individual LEAs. OCR has regional offices staffed with attorneys who carry out investigations of complaints and seek resolutions. OCR also initiates cases, typically called compliance reviews, to target resources on compliance problems that appear particularly acute.

OCR has seen a dramatic increase in complaints. In its latest annual report (2016), OCR documented receiving 16,720 complaints, by far the highest one-year total in OCR's history and 61 percent higher than 2015. Nearly 6,000 of the complaints filed in 2016 alleged violations of disability laws covering a broad range of issues.

Of those, over 2,000 alleged violation of a free appropriate public education. OCR resolved over 5,200 claims of disability discrimination, and entered into 587 written agreements in fiscal year 2016.⁵⁶ The dramatic increase in OCR

OCR resolved over 5,200 claims of disability discrimination, and entered into 587 written agreements in fiscal year 2016.

complaints involving children with disabilities, the majority of whom are IDEA-eligible students, might suggest that parents and other parties, such as advocates, are

turning to OCR complaints filed as violations of Section 504 rather than using the dispute resolution options under IDEA. Thus, when considering the trends in disputes, it is important to consider data on complaints filed under both IDEA and Section 504.

The ADA Amendments Act of 2008 broadened the eligibility for protections to children with disabilities under Section 504. As a result, the number of children with Section 504 plans has increased. According to data from the 2011–2012 Civil Rights Data Collection (CRDC), 738,500 students (approximately 1.5 percent of public school enrollment) are eligible under Section 504.⁵⁷ This is in addition to almost six million public school students who are eligible under IDEA. All IDEA eligible students are also protected by Section 504.

Current funding in the 2018 proposed budget remains flat funded at \$108.5 million for the Education Department's Office for Civil Rights⁵⁸— which has investigated thousands of complaints of discrimination in school districts across the country and needs to retain the ability to do so going forward. Executive Order 13777,

which mandated every federal agency review existing regulations and recommend which are “burdensome” or too expensive for school districts, states, and colleges to implement, must be carefully watched to ensure there is not a discriminatory or chilling effect on enforcement of civil rights.

Chapter 7: Role of the Department of Justice (DOJ)

The DOJ Civil Rights Division, Educational Opportunities Section, is primarily responsible for enforcing Title IV of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, national origin, sex, and religion in public schools and institutions of higher learning; the Equal Educational Opportunities Act of 1974, which, among other things, requires states and school districts to provide English learner (EL) students with appropriate services to overcome language barriers; and ADA, which prohibits disability discrimination. The Section will also enforce Section 504 of the Rehabilitation Act and IDEA upon referral from other governmental agencies. The Section may also intervene in private suits alleging violations of education-related anti-discrimination statutes.⁵⁹

Despite the fact that IDEA gives ED the authority to refer states to DOJ after several consecutive annual determinations that the state is failing to implement IDEA in compliance with IDEA law and regulations, ED has not exercised this authority since beginning the monitoring activities required by IDEA 2004.

Despite the fact that IDEA gives ED the authority to refer states to DOJ . . . , ED has not exercised this authority since beginning the monitoring activities required by IDEA 2004.

In recent years, ED and DOJ have jointly filed a number of *amicus curiae* briefs in ongoing federal litigation. These briefs are another method by which ED establishes its policies and views on issues involving individual cases that interpret the requirements of IDEA. These cases have presented issues involving evaluations, the responsibility of LEAs to provide translations for parents of children with disabilities at IEP meetings and similar meetings where the

parents do not speak and understand English well, and overrepresentation of students of color in special education. At the appellate level, briefs have addressed the interaction of IDEA and ADA's Title II

regarding a Deaf and Hard of Hearing student, access of P&A networks to student records, whether efforts to stop bullying of a child with a disability must be addressed in the child's IEP, whether a child might qualify as having a disability under more than one category, and whether a child's consistent failure to advance academically violates IDEA. ED and DOJ have also jointly filed briefs in IDEA cases decided by the Supreme Court in 2016, including a brief in *Endrew F. v. Douglas County School District* that

addressed the critical issue of whether IDEA requires a “meaningful benefit” for students with disabilities.⁶⁰ ED also sends notifications to school districts explaining the positions taken in its *amicus* briefs.

In 2016, DOJ, in consultation with ED, filed a complaint in federal court alleging that the state of Georgia had violated ADA’s Title II by unnecessarily segregating many students with behavioral disabilities in separate school buildings around the state, which was known as the Georgia

Network for Educational and Therapeutic Support (GNETS) Program.⁶¹ Placement in GNETS completely isolates these students from their peers. The DOJ investigation revealed that the separate buildings were often in poor condition, the students there did not have access to the

full curriculum other students had, and the quality of instruction often was not up to the standards of that in other schools. The state of Georgia contends that the placement practices

are lawful under IDEA.⁶²

The government alleged that the GNETS program violates the community integration mandate of ADA and the 1999 Supreme Court’s decision in *Olmstead v. L.C.*⁶³ It is the first DOJ case to challenge a state-run school system for segregating students with disabilities utilizing ADA.⁶⁴

In 2016, DOJ, in consultation with ED, filed a complaint in federal court alleging that the state of Georgia had violated ADA’s Title II by unnecessarily segregating many students with behavioral disabilities . . . It is the first DOJ case to challenge a state-run school system for segregating students with disabilities utilizing ADA.

As these examples demonstrate, there are various ways in which ED can set forth its views on issues addressing the rights of individual students under IDEA, even though its legal authority is technically limited to reviewing state implementation of IDEA.

Chapter 8: Perspectives of Key Stakeholders

Current Monitoring and Enforcement of IDEA Compliance

Across all stakeholders, there was nearly unanimous support for ED's decision to move from reviewing states' IDEA implementation using strictly procedural compliance. In their opinion, the new system has a better balance of focusing on compliance and results such as academic achievement and graduation in order to improve the quality of education for students with disabilities. Several stated that the mostly compliance-oriented review that OSEP used prior to moving to RDA seemed to accomplish very little in improving the quality of special education services.

Nearly all also agreed that while the shift to RDA appears to be a positive development, it is too early to determine whether the new approach will translate into improved services and outcomes for students with disabilities. Most individuals interviewed agreed that, as promising as RDA appears to be, it will take several years before experts in the field can decide whether progress has been made under this approach. However, no one recommended a return to past review policies.

There was a consistent view, however, that the current method of OSEP review of state data and reporting can provide only limited results. One continuing concern is that because the state data is a statistical aggregation of data provided by LEAs, this data permits OSEP to discover only broad patterns of violations. Given the large number of LEAs in most states, even systemic violations or problems within one or two LEAs are not readily apparent in state data.

[I]t may take OSEP and states a number of years to uncover and remedy problems. During that time, children will not be receiving appropriate IDEA services, and problematic practices will continue.

These issues can create two problems. First, as previously stated, problems in one or two LEAs, even of a systemic nature, may not be apparent when statewide data is aggregated. The

second is that, even if OSEP can discern a broad pattern of IDEA problems or violations, the process of correcting the underlying violation or questionable conduct can be very time-consuming. The data must demonstrate the violations, OSEP must discover them, and then OSEP must describe the issues to the state and allow time for corrective action. Consequently, it may take OSEP and states a number of years to uncover and remedy problems. During that time, children will not be receiving appropriate IDEA

services, and problematic practices will continue. Denial of FAPE, LRE, or appropriate services for a number of years can have very serious or even catastrophic consequences on an individual student's development. The OSEP review process, many felt, was unfortunately slow and cumbersome, allowing deficiencies for many students to continue for long periods of time.

Several interviewees commented that OSEP appears to no longer make on-site visits to LEAs that may be having difficulties or deficiencies in implementing IDEA. Each felt an on-site presence used to be helpful to OSEP, and indicated to state and local officials, and the public, that OSEP was actively monitoring compliance. Many said those visits should be resumed.

Several interviewees stated that the accuracy of LEA data has improved over the years. They also acknowledged that there might still be occasions when the data that an LEA provides to the state is not accurate. Unless the state discovers the problems, and most often they will not be apparent, the inaccuracies will be embedded in the state's data report that becomes its SPP/APR. To assist states with quality of data, OSEP funds two technical assistance centers, the Center for IDEA Fiscal Reporting⁶⁵ and the IDEA Data Center.⁶⁶

Nearly all the individuals interviewed had the viewpoint that OSEP's enforcement efforts have been too mild and need to be more assertive. When OSEP determines that a state's data discloses deficiencies in IDEA implementation, OSEP will point out those deficiencies but will

not impose sanctions; rather, OSEP will simply offer technical assistance to the state to help correct the problem. Some participants felt that while technical assistance is welcomed and can work, in many instances, use of more severe sanctions authorized by IDEA (e.g., withholding of federal funds, referral to DOJ for enforcement action) should be employed, or at least explored, more than they are now. The view of some was that there is insufficient follow-up by OSEP, and problems can be left unremedied.

One interviewee suggested charging ED's Inspector General with regular reviews of OSEP's monitoring and enforcement.

Several interviewees stated that most states fail to make their annual

ratings of LEAs special education implementation available to the public in a manner that is user-friendly, accessible to people with disabilities, and easy to locate. Doing so would significantly aid the public's scrutiny of LEAs and assist with any challenge to the actions of an LEA in either individual or systemic cases. As states were unwilling to make critical data and assessments about LEAs available, stakeholders unanimously asserted that OSEP should require states to make the data public.

IDEA Dispute Resolution Options

As was stated in a recent law review article, "[t]he general consensus is that [IDEA's] heavy reliance on private enforcement (such as due process) has led to underenforcement, especially for poor or otherwise marginalized groups. . . ."⁶⁷ The stakeholders interviewed for this report had

Nearly all the individuals interviewed had the viewpoint that OSEP's enforcement efforts have been too mild and need to be more assertive.

similar views. Many stated that in most instances where an individual is challenging the actions of an LEA, the burden falls entirely on the parents.⁶⁸

There were similar views about the use of resolution meetings. One interview participant said resolution meetings are seldom used in his state. Another commented that even when used, the burden still seems to be on the parent to show the school's decisions are incorrect.

Another stated that parents are often intimidated in such meetings. Nearly all agreed that, even in resolution meetings,

parents need the kind of legal or educational expertise school district personnel already have.

When a due process hearing is the next available step for parents, it is seldom used. The individuals interviewed unanimously stated

people of limited means are simply unable to use these processes to challenge a school's IEP or other aspects of IDEA. Formal due process hearings are expensive, and legal representation is essential to obtaining a successful outcome. As all those interviewed recognized, schools automatically have legal representation, but parents must afford their own. Although parents may be able to seek reimbursement for their attorney fees if they are successful, parents must bear the costs of bringing the case. In addition, the burden of proof is on the parents, making a successful challenge much more difficult. Many felt that due process hearings are also stacked against parents because the hearing officers are trained by the SEAs, and their conduct will be biased to support the LEA.

Some stated that use of IEP Facilitation is resulting in a better and less adversarial process. Several commented that the PTIs funded through IDEA provide parents the needed assistance in understanding their dispute resolution options, but that the "playing field" between many parents and school systems is simply financially uneven, with parents at a serious and often insurmountable disadvantage.

Nearly all forum participants stated that there is a pressing need for more information

and training for parents. They stated that many parents are unprepared for meetings with schools or LEA administrators, and therefore are at a severe disadvantage. Many do not understand their rights under IDEA, and they are unable to

challenge decisions that school officials make for their children.

One interviewee made the interesting observation that the legal relationships created by IDEA effectively excludes parents. OSEP's relationship in the federal review process is with state agencies, and a state agency's direct relationship in this process is with its LEAs. Parents have little formal or required input into the process by which OSEP reviews and evaluates the performance of states and LEAs.

There was also concern about the written state complaint process. There were comments that staffing at some SEAs has been cut, reducing the state's ability to take in and investigate individual complaints. This

[P]eople of limited means are simply unable to use these processes to challenge a school's IEP or other aspects of IDEA. Formal due process hearings are expensive, and legal representation is essential to obtaining a successful outcome.

reduction makes it impossible for those states to investigate many complaints within the mandatory time requirements (60 days), or to investigate them thoroughly. Complaints about individual cases or individual children were not given any sort of priority, and SEAs did not appear to pursue any complaints aggressively. Some SEAs appear to dismiss complaints without any basis or because of lack of information, without giving the

complainant an opportunity to respond. Several research participants expressed a general view that state complaint systems are not effective, even though this is the least adversarial and least expensive route to settling disputes. Forum participants expressed general feelings

[S]taffing at some SEAs has been cut, . . . mak[ing] it impossible for those states to investigate many complaints within the mandatory time requirements (60 days), or to investigate them thoroughly.

of bias, with SEAs making rulings in favor of districts. Parents who fail to follow very strict and specific complaint procedures are unlikely to have their case investigated, creating yet another disadvantage. One stakeholder noted

that SEA does not feel that it has enforcement authority over LEAs—that the state could recommend that an LEA take corrective actions as a result of a complaint investigation but could not require that

action be taken despite the clear enforcement authority of SEAs in federal regulations. It is important that IDEA provides no basis for raising these concerns beyond SEA, as the direct appeal option to OSERS was removed in IDEA regulations issued in 1997.

Chapter 9: Findings and Recommendations

This report examined findings in previous NCD reports, the progress achieved since the last report 16 years ago, the evolution of monitoring practices and current practices by ED, and makes the following findings.

Monitoring

It is disturbing that very little has actually changed since the passage of IDEA more than 40 years ago with regard to the use of monitoring as an effective tool to drive compliance with the law and systemic change that is demonstrated to have an effect on student learning and outcomes.

There is still a heavy reliance on private enforcement resulting in underenforcement by OSEP. This continues to leave an unfair and arguably inequitable burden on children and families.

IDEA does not impose a specific monitoring framework on states; however, the system should be utilized to its full capacity, and states need to be held accountable for enforcing IDEA requirements and for ensuring continuous improvement.

- Forum participants and interviewees were nearly unanimous in support of ED's move to RDA, believing the new system has a better balance of focus on compliance and results, such as academic achievement and graduation.

- Prior to the shift to the RDA model, monitoring using the SPP/APR data and information from on-site visits remained primarily focused on compliance rather than results. In response, states focused on correction of noncompliance. State performance on compliance indicators improved significantly while student performance remained relatively unchanged. The current system shows promise, but it is still too early to tell if RDA will in fact result in better outcomes.
- ED has suspended on-site visits, which stakeholders viewed as highly problematic. On-site visits are helpful to indicate to state and local officials and the public that OSEP is actively involved.
- Stakeholders view ED monitoring as "too mild and needs to be more assertive." Evidence of this includes the following:
 - No state has ever been designated as "needing substantial intervention."
 - ED does not make use of its authority to withhold federal funds when a state is noncompliant with the law. OSEP has not made any referrals to DOJ for enforcement under IDEA.

Office of Civil Rights

OCR does not have direct responsibility for monitoring of IDEA, rather it primarily enforces ADA and Section 504.

- There has been a dramatic increase in OCR complaints involving students with disabilities, the majority of whom are eligible under IDEA. The year 2016 saw the highest number of complaints ever filed ever, 61 percent higher than the number filed in 2015.
- This trend might suggest that parents and other parties, such as advocates, are turning to OCR complaints filed as violations of Section 504 rather than using the dispute resolution options under IDEA.
- Considering the trends in disputes, it is important to consider data on complaints filed under both IDEA and Section 504.

OSEP Oversight

- OSEP and OSERS regularly issue DCLs and Memorandums to address issues, including violations of IDEA, that appear to be systemic.
- OSEP also issues policy letters that are direct responses to requests for clarification on a variety of issues.
- There is no formal process through which one can file a complaint directly to OSEP regarding alleged violations of IDEA.
- The current method of OSEP review of state data and reporting can provide only

limited results because data is aggregated, showing only broad patterns of violations, and systemic violations within LEAs are not readily apparent.

- Though not currently used for such purpose, state complaints and investigation reports produced by SEAs can serve as critical sources of information in OSEP monitoring.
- Despite both IDEA requirements and annual reminders from OSEP, most SEAs are not providing the public with information about the findings of LEA monitoring.

IDEA

Several ways are provided in which disputes can be addressed through a state complaint system, through administrative hearing process, and through mediation.

- Given the low rate of due process hearings that are fully adjudicated, further study is needed to determine how families choose which dispute resolution option to utilize, and the pros/cons of each for both individual relief and systemic change.
- How parents might be better informed of alternative dispute resolution options and the state complaint process should also be fully explored.

Recommendations

The following recommendations are based upon independent reports and input from stakeholders interviewed to inform this report.

Congress should

1. Appropriate funds to establish an independent entity to assist states and the Federal Government using evidence-based practices shown to enhance robust state level monitoring and enforcement systems;
2. Expand the role of PTIs to include provision of IEP Facilitation and increase funding to provide such services to LEAs;
3. Appropriate funds for competitive grants to develop and pilot effective monitoring and enforcement activities that improve results and correct noncompliance in a timely manner;
4. Place the burden of proof in IDEA administrative hearings exclusively on LEA;
5. Ensure that IDEA requires the costs of expert witness to be assessed against LEA/SEA if the parent prevails, as other civil rights laws allow; and
6. Require SEAs to make all IDEA state complaint investigation reports available to the public, and provide for a period of reconsideration of findings.

ED should

7. Engage in more aggressive enforcement and utilize its authority to withhold federal funds and make referrals to DOJ for enforcement as permitted by IDEA;
8. Establish a formal procedure for submission of complaints to ED and OSEP;
9. Continue and accelerate efforts to improve validity and reliability of systems of data gathering and analysis;
10. Shorten the length of time between SPP/APR submission and release of determinations and other findings;
11. Provide clear instructions that enable stakeholders to locate OSEP's response to each state's SPP/APR and any actions required by the states;
12. Provide links to the information each state is required to make available in OSEP's SPP/APR online portal to improve the public's access to LEA determinations;
13. Provide comprehensive guidance to SEAs on investigating and enforcing state complaints, including corrective actions for denial of FAPE;

(continued)

ED should, *continued*

14. Analyze the issues raised, and findings of noncompliance in state complaints and investigative reports should be a standard part of monitoring activities by OSEP;
15. Pursue regulatory revision to extend the statute of limitations on filing written state complaints to two years; and
16. Increase funding of PITs in budget proposals, and expand the role of PTIs in monitoring and enforcement, including identification of systemic noncompliance.

SEAs should

17. Fully adhere to the requirement to make public all information regarding LEA monitoring and enforcement of IDEA compliance, including LEA APRs, annual determinations, corrective actions ordered, and funding withheld; and develop user-friendly, easily locatable information in collaboration with parents and other stakeholders in the state (Maryland's website for display of this information at http://mdideareport.org/special_main.aspx should be the model for such reporting);
18. Make public all state complaint investigation reports in a timely and user-friendly manner;
19. In responding to state complaints, address corrective actions for denial of FAPE, including compensatory services and monetary reimbursement consistent with CFR 300.151(b)(1), and rigorously enforce all corrective action ordered;
20. Consider state complaints with findings of noncompliance in conjunction with LEA monitoring;
21. Make information on dispute resolution options highly visible on SEA websites;
22. Expand parent training opportunities through increased support for outreach by federally funded PTIs and by requiring school systems to enhance the provision of training and educational material to parents;
23. Align all resources with SSIP-supported LEAs in improving the educational outcomes for students with disabilities;
24. Meaningfully include parents of children with disabilities, including PTI personnel, in monitoring of LEAs and in regularly reviewing data and development of SPP/APR; and
25. Ensure that SEA website content and functionality is accessible to people with disabilities.

Endnotes

- 1 Individuals with Disabilities Education Improvement Act of 2004, Pub. L. No. 108-446, 118 Stat. 2647 (December 3, 2004).
- 2 National Council on Disability, *Improving the Implementation of the Individuals with Disabilities Ed Act: Making Schools Work for All of America's Children* (Washington, DC: Author, 1995), accessed October 18, 2017, www.ncd.gov/publications/1995/09051995.
- 3 National Council on Disability, *Back to School on Civil Rights* (Washington, DC: Author, 2000), accessed October 18, 2017, <http://ncd.gov/publications/2000/Jan252000>.
- 4 There is no demographic information from the 23 email responses.
- 5 29 U.S.C. § 794.
- 6 42 U.S.C. § 12101, et seq.
- 7 Every Student Succeeds Act, Pub. L. No. 114-95, 114 Stat. 1177 (2015).
- 8 U.S. Department of Education, Office for Civil Rights, *Protecting Students with Disabilities: Frequently Asked Questions About Section 504 and the Education of Children with Disabilities*, 2015, accessed October 18, 2017, <https://www2.ed.gov/about/offices/list/ocr/504faq.html>.
- 9 42 U.S.C. § 12134.
- 10 *Board of Education of Hendrick Hudson Central School District, Westchester County v. Rowley*, 458 U.S. 176, 186 (1982).
- 11 National Center for Special Education Accountability Monitoring, *Developing and Implementing an Effective System of General Supervision: Part B*, 2007, accessed October 18, 2017, http://www.hdc.lsuhsd.edu/docs/TIERS/resources/Effective%20General%20Supervision%20Paper_Part%20B.pdf.
- 12 Center for Technical Assistance for Excellence in Special Education, *SEA Monitoring Systems: Entering the Age of Results Driven Accountability*, 2015, accessed October 18, 2017, http://www.taese.org/cms/images/_utahstate_media/documents/SEAmontsysfin2015122bj.pdf.
- 13 U.S. Department of Education, *Seventeenth Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act*, 1995, accessed October 18, 2017, <https://ed.gov/pubs/OSEP95AnlRpt/ch6b.html>.
- 14 Individuals with Disabilities Education Act Amendments of 1997, Pub. L. No. 105-17, 11 Stat. 37 (1997).
- 15 National Center for Special Education Research, *A Study of States' Monitoring and Improvement Practices Under the Individuals with Disabilities Education Act* (Rockville, MD: Westat, 2010), accessed October 18, 2017, <https://ies.ed.gov/ncser/pubs/20113001/>.
- 16 Ibid.
- 17 National Council on Disability, *supra* n. 3.
- 18 National Council on Disability, *National Disability Policy: A Progress Report—June 2001*, 2001, accessed October 18, 2017, http://www.ncd.gov/progress_reports/June2001.
- 19 President's Commission on Excellence in Special Education, *A New Era: Revitalizing Special Education for Children and Their Families*, 2002, accessed October 18, 2017, http://ectacenter.org/~pdfs/calls/2010/earlypartc/revitalizing_special_education.pdf.
- 20 Ibid.
- 21 Ibid.
- 22 U.S. Commission on Civil Rights, *U.S. Commission on Civil Rights Recommendations for the Reauthorization of the Individuals with Disabilities Education Act*, 2002, accessed October 18, 2017, <http://www.usccr.gov/pubs/idea/recs.htm>.
- 23 Ibid.

- 24 Government Accountability Office, *Special Education: Improved Timeliness and Better Use of Enforcement Actions Could Strengthen Education's Monitoring System* (Washington, DC: Author, 2004), accessed October 18, 2017, <http://www.gao.gov/assets/250/244030.html>.
- 25 Center for Technical Assistance for Excellence in Special Education, *supra* n. 12.
- 26 U.S. Department of Education, *Department Announces New Effort to Strengthen Accountability for Students with Disabilities: Moving from Compliance-Focused Approach to One Driven by Results* (Washington, DC: OSEP Press Office, 2012), accessed October 18, 2017, <http://www2.ed.gov/about/offices/list/osers/osep/rda/rdaarchvie.html>.
- 27 U.S. Department of Education, Office of Special Education and Rehabilitative Services, *Results Driven Accountability*, 2016, accessed October 18, 2017, <https://ed.gov/about/offices/list/osers/osep/rda/index.html>.
- 28 Center for IDEA Fiscal Reporting (CIFR), accessed October 18, 2017, <https://cifr.wested.org/>.
- 29 IDEA Data Center, accessed October 18, 2017, <https://ideadata.org/>.
- 30 U.S. Department of Education, Office of Special Education and Rehabilitative Services, *Part B State Performance Plan (Part B – SPP) and the Part B Annual Performance Report (Part B – APR)*, 2015, accessed October 18, 2017, <https://www2.ed.gov/policy/speced/guid/idea/bapr/2015/2015baprmemo122314.pdf>.
- 31 WestEd, *National Center for Systemic Improvement*, accessed October 18, 2017, <https://www.wested.org/project/national-center-for-systemic-improvement/>.
- 32 34 C.F.R. § 300.604.
- 33 Interview with representatives of the Office of Special Education Programs, U.S. Department of Education, October 28, 2016.
- 34 U.S. Department of Education, *OSEP Policy Letters (Including OSEP Memos, Dear Colleague Letters, and FAQs)*, accessed October 18, 2017, <https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/index.html>.
- 35 Some courts have considered the DCL guidance as important guidance for courts. See *T.K. v. New York City Dep't of Educ.* (2d Cir. 2016), accessed November 22, 2017, <http://www.jdsupra.com/legalnews/second-circuit-holds-district-denied-88311/>. See also 20 U.S.C. § 1406.
- 36 Council of Chief State School Officers and the National Center for Systemic Improvement, *ESSA: Key Provisions and Implications for Students with Disabilities*, 2016, accessed October 18, 2017, http://www.ccsso.org/Documents/2016/ESSA/ESSA_Key_Provisions_Implications_for_SWD.pdf.
- 37 U.S. Department of Education, *supra* n. 34.
- 38 Brian M. Rosenthal, "Denied," *Houston Chronicle* (2016), accessed October 18, 2017, <http://www.houstonchronicle.com/denied/>.
- 39 Kathleen Megan, "Education Official: State Could Violate Federal Law under Judge's School Reform Ruling," *Hartford Courant* (December 15, 2016), accessed October 18, 2017, <http://www.courant.com/education/hc-federal-concern-ccjef-1216-20161215-story.html>.
- 40 U.S. Commission on Civil Rights, *U.S. Commission on Civil Rights Recommendations for the Reauthorization of the Individuals with Disabilities Education Act*, 2002, accessed October 18, 2017, <http://www.usccr.gov/pubs/idea/recs.htm>.
- 41 U.S. Department of Education, Special Education, *Fiscal Year 2017 Budget Request*, accessed October 18, 2017, <http://www2.ed.gov/about/overview/budget/budget17/justifications/h-special.pdf>.
- 42 *Ibid.*
- 43 U.S. Department of Education, *2016 Determination Letters on State Implementation of IDEA*, 2016, accessed October 18, 2017, <https://www2.ed.gov/fund/data/report/idea/ideafactsheet-determinations-2016.pdf>.
- 44 One state, Maryland, provides all of the required information in a user-friendly format that is accessible to people with disabilities (accessed October 18, 2017, http://mdideareport.org/special_main.aspx), which should serve as an exemplar to other SEAs.
- 45 National Center for Special Education Research, *supra* n. 15.
- 46 Public Consulting Group, *Coordinated Program Review, Summary Report*, 2016, accessed October 18, 2017, <http://www.doe.mass.edu/pqa/news/2016-1215CPRSummaryReport.docx>.

- 47 *Morgan Hill Concerned Parents Association v. California Department of Education*, accessed October 18, 2017, <https://dockets.justia.com/docket/california/caedce/2:2011cv03471/233488> and <https://docs.justia.com/cases/federal/district-courts/california/caedce/2:2011cv03471/233488/333> for update where the judge issued an order on 9/18/17 granting discovery.
- 48 U.S. Department of Education, Office of Special Education and Rehabilitative Services, *Dispute Resolution Procedures under Part B of the Individuals with Disabilities Education Act (Part B)*, 2013, accessed October 18, 2017, <https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/acccombinedosersdisputeresolutionqafinalmemo-7-23-13.pdf>.
- 49 71 Fed. Reg. 46601 (August 14, 2006).
- 50 Center for Appropriate Dispute Resolution in Special Education, *Trends in Dispute Resolution under the Individuals with Disabilities Education Act (IDEA)*, 2016, accessed October 18, 2017, <http://www.cadreworks.org/sites/default/files/resources/TrendsinDisputeResolutionundertheIDEOCT16.pdf>.
- 51 Center for Appropriate Dispute Resolution in Special Education, *Individualized Education Program (IEP) Facilitation: A Guide for Parents of Children & Youth (Ages 3–21)*, 2014, accessed October 18, 2017, http://www.cadreworks.org/sites/default/files/IEP_Facilitation_ParentGuide_11.3.14.pdf.
- 52 Center for Appropriate Dispute Resolution in Special Education, *supra* n. 50.
- 53 Center for Appropriate Dispute Resolution in Special Education, *IDEA Dispute Resolution Data Summary for U.S. and Outlying Areas 2004–05 to 2014–15*, 2016, accessed October 18, 2017, <http://www.cadreworks.org/sites/default/files/2014-15%20DR%20Data%20Summary%20U.S.%20%26%20Outlying%20Areas.pdf>.
- 54 Government Accountability Office, *Special Education: Improved Performance Measures Could Enhance Oversight of Dispute Resolution*, 2014, accessed October 18, 2017, <http://www.gao.gov/products/GAO-14-390>.
- 55 U.S. Department of Education, Office for Civil Rights Policy Guidance, *Policy Guidance*, 2017, accessed October 18, 2017, <https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/index.html>.
- 56 U.S. Department of Education, Office for Civil Rights, *Securing Equal Educational Opportunity: Report to the President and Secretary of Education under Section 203(b)(1) of the Department of Education Organization Act, FY 2016* (Washington, DC: U.S. Department of Education, 2016), accessed October 18, 2017, <https://www2.ed.gov/about/reports/annual/ocr/report-to-president-and-secretary-of-education-2016.pdf>.
- 57 The Advocacy Institute, *Analysis of Students Served Solely under Section 504 School Year 2011–12*, 2015, accessed October 18, 2017, <http://www.advocacyinstitute.org/resources/Overall.504StudentsCRDC2012.pdf>.
- 58 Appropriations Bill, 2018. Committee on Appropriations. Departments of Labor, Health and Human Services, and Education, and Related Agencies. H. Rep 115 - ____ at 221. July 12, 2017, accessed October 18, 2017, <https://appropriations.house.gov/uploadedfiles/23920.pdf>.
- 59 U.S. Dept. of Justice, Civil Rights Division, *Educational Opportunities Section Overview*, 2017, accessed October 18, 2017, <https://www.justice.gov/crt/educational-opportunities-section-overview>.
- 60 *Endrew F. v. Douglas County School District RE-1* (S. Ct.) – Amicus, accessed October 18, 2017, <https://www.justice.gov/crt/appellate-briefs-and-opinions-8>. **Question Presented:** What is the level of educational benefit that school districts must confer on children with disabilities to provide them with the free appropriate public education guaranteed by the Individuals with Disabilities Education Act, 20 U.S.C. § 1400 et seq.? **Holding:** To meet its substantive obligation under the Individuals with Disabilities Education Act, a school must offer an “individualized education program” reasonably calculated to enable a child to make progress appropriate in light of the child’s circumstances.
- 61 *U.S. v. State of Georgia* (Georgia Network for Educational and Therapeutic Support Program), accessed October 18, 2017, <https://www.justice.gov/crt/case-document/us-v-georgia-georgia-network-educational-and-therapeutic-support-program-complaint>. On October 11, 2017, Georgia Advocacy Office and the Arc filed a class action lawsuit alleging discrimination in placement of students with disabilities in the GNETS program, see <http://www.bazelon.org/wp-content/uploads/2017/10/GNETS-Complaint-FINAL-10.10.17.pdf>.
- 62 See also Alan Judd, “Georgia ‘psychoeducational’ students segregated by disability, race,” *The Atlanta Journal-Constitution*, 2016, accessed October 18, 2017, <http://specials.myajc.com/psychoeducation/>.

- 63 527 U.S. 581 (1999).
- 64 Department of Justice, Office of Public Affairs, *Justice Department Sues Georgia for Unnecessarily Segregating Students with Disabilities*, 2016, accessed October 18, 2017, <https://www.justice.gov/opa/pr/justice-department-sues-georgia-unnecessarily-segregating-students-disabilities>.
- 65 Center for IDEA Fiscal Reporting (CIFR), accessed October 18, 2017, <https://cifr.wested.org/>.
- 66 IDEA Data Center, accessed October 18, 2017, <https://ideadata.org/>.
- 67 Eloise Pasachoff, *Advocates, Federal Agencies, and the Education of Children with Disabilities* (Georgetown Law Faculty Publications and Other Works, 2014), 1390, accessed October 18, 2017, <http://scholarship.law.georgetown.edu/facpub/1390>.
- 68 Council of Parent Attorneys and Advocates, *Make Burden of Proof Fair and Equitable*, 2016, accessed October 18, 2017, <http://www.copaa.org/?page=BOP>.



National Council on Disability
1331 F Street, NW, Suite 850
Washington, DC 20004

EXHIBIT E

Special Education and the Milwaukee Parental Choice Program

Patrick J. Wolf
University of Arkansas

John F. Witte
University of Wisconsin

David J. Fleming
Furman University

SCDP Milwaukee Evaluation
Report #35
February 2012





The University of Arkansas

was founded in 1871 as the flagship institution of higher education for the state of Arkansas. Established as a

land grant university, its mandate was threefold: to teach students, conduct research, and perform service and outreach.

The College of Education and Health Professions established the Department of Education Reform in 2005. The department's mission is to advance education and economic development by focusing on the improvement of academic achievement in elementary and secondary schools. It conducts research and demonstration projects in five primary areas of reform: teacher quality, leadership, policy, accountability, and school choice.

The School Choice Demonstration Project (SCDP), based within the Department of Education Reform, is an education research center devoted to the non-partisan study of the effects of school choice policy and is staffed by leading school choice researchers and scholars. Led by Dr. Patrick J. Wolf, Professor of Education Reform and Endowed 21st Century Chair in School Choice, SCDP's national team of researchers, institutional research partners and staff are devoted to the rigorous evaluation of school choice programs and other school improvement efforts across the country. The SCDP is committed to raising and advancing the public's understanding of the strengths and limitations of school choice policies and programs by conducting comprehensive research on what happens to students, families, schools and communities when more parents are allowed to choose their child's school.

Special Education and the Milwaukee Parental Choice Program

Patrick J. Wolf
University of Arkansas

John F. Witte
University of Wisconsin

David J. Fleming
Furman University

SCDP Milwaukee Evaluation Report #35
February 2012



**SCHOOL CHOICE
DEMONSTRATION PROJECT**

School Choice Demonstration Project
Department of Education Reform
University of Arkansas
201 Graduate Education Building
Fayetteville, AR 72701

479-575-6345

<http://www.uark.edu/ua/der/SCDP/Research.html>

Executive Summary

Special education and parental school choice are two of the most controversial issues in K-12 education in the United States. Those policies converge on an important question in an evaluation of the Milwaukee Parental Choice Program, what proportion of students have education-related disabilities? This debate, in Wisconsin, has provoked a lawsuit against the state's Department of Public Instruction (DPI), which implements the Milwaukee Parental Choice Program (MPCP). MPCP is the oldest and largest urban private school voucher program in the United States.

We might expect MPCP to serve fewer students with disabilities than Milwaukee Public Schools (MPS), since most federal disability laws do not apply to private schools and the MPCP schools do not receive any extra government funds to serve students with disabilities. Still, if only a small portion of all MPCP students have disabilities, that finding would raise questions regarding the extent to which the program is fulfilling its original mission to serve disadvantaged students in Milwaukee. What proportion of students served by MPCP has disabilities? As policy researchers interested in both school choice and special education, we think this question merits a careful examination.

Based on evidence we have collected over five years of studying the MPCP program, we are able to estimate that between 7.5 and 14.6 percent of Choice students have disabilities that likely would qualify them for special education services in MPS. We have access to three different sources of statistical evidence regarding the percentage of MPCP students who have disabilities. We find that:

- 14.6 percent of the MPCP students we observed in both the private and public school sectors from 2006 through 2010 were classified as participating in special education while in MPS;
- 7.5 percent of all MPCP students were classified as having disabilities when we used MPS administrator designations for students who spent any time in MPS and MPCP administrator designations for students who always remained in MPCP;
- 11.4 percent of MPCP students were described by their parents as having disabilities, based on responses to our parent surveys administered from 2007 through 2009.

Although each of these data sources has limitations that we discuss below, collectively they establish a range of 7.5 to 14.6 percent within which we think the actual percentage of MPCP students with disabilities likely falls. Our estimated rate of student disability in the MPCP is between 23 and 61 percent lower than the rate of student disability of 19 percent reported for MPS. Our estimates, however, are more than four times higher than the disability rate of 1.6 percent for the MPCP announced by DPI based merely upon the percentage of MPCP students who were given accommodations during the most recent round of accountability testing.

Additionally, we conducted site visits of 13 MPCP schools in part to learn about how they serve students with disabilities. What we observed during those visits confirmed claims in the research and policy literature that most private schools lack the incentives, personnel, protocols, and organizational culture that lead public school systems to label students with disabilities as requiring special education services. In many cases, private school personnel hesitate to count a student as having a disability, even if public school personnel would recognize the

student as such. However, that does not mean that private schools do not enroll students who would be formally designated as students with special needs if they were in the public schools.

In sum, our five years of research on the MPCP suggests that students with disabilities are classified and served differently in the private and public education sectors in Milwaukee, and that the MPCP serves students with disabilities at about two-fifths to three-quarters the rate of MPS.

This project has been funded by a diverse set of philanthropies including the Annie E. Casey, Joyce, Kern Family, Lynde and Harry Bradley, Robertson, and Walton Family foundations. We thank them for their generous support and acknowledge that the actual content of this report is solely the responsibility of the authors and does not necessarily reflect any official positions of the various funding organizations or the universities that employ us. We also express our gratitude to officials at MPS and the Wisconsin Department of Public Instruction for their willing cooperation, advice, and assistance throughout this project. A preliminary draft of this report was greatly improved based on comments from the School Choice Demonstration Project Research Advisory Board, especially Paul Peterson and Andy Rotherham. All remaining errors are the responsibility of the authors alone.

Special Education and the Milwaukee Parental Choice Program

Special education and parental school choice are two of the most controversial issues in K-12 education in the United States. In certain places, especially Milwaukee, Wisconsin, those two sensitive education concerns intersect in ways that prompt regular interest on the part of policy makers, advocates, the media, and the public at large. In this report we examine evidence regarding the extent to which the Milwaukee Parental Choice Program (MPCP) serves students with special physical or educational needs. At issue is the difference between students being formally (and legally) identified as “in special education” and students who likely would be so identified if they were in public rather than private schools.

The extent to which school choice initiatives such as public charter schools and private voucher or scholarship programs are accessible to students with disabilities is a major policy concern. For example, a public charter school in Washington, DC, is being investigated due to the complete absence of any special education students within its walls (Turque 2012). In Milwaukee, the public charter schools that are independent of Milwaukee Public Schools (MPS) have a total special education enrollment of 8.4 percent, less than half the 19 percent rate for MPS (Witte *et al.* 2010a, p. 12).

Our specific concern here is with the participation rates of students with disabilities in Milwaukee’s means-tested school voucher program. Voucher programs permit parents to enroll their child in a participating private school, of their choosing, with the support of government funds that often are accepted as the full cost of educating the child. Tax-credit scholarship programs are similar to voucher programs except that they are funded indirectly by providing individuals and corporations with a dollar-for-dollar reduction in their tax liability in exchange for charitable contributions to nonprofit organizations that issue voucher-type scholarships.

Fifteen voucher and 11 tax-credit scholarship programs currently operate in the U.S. (Exhibit 1). We have organized them into two types. Traditional voucher or tax-credit scholarship programs usually are limited to families below a certain income level or students attending public schools deemed in need of improvement. Seventeen such programs exist in the U.S., including in Milwaukee and Racine, Wisconsin. Type A private school choice programs collectively enroll 181,224 students, with the majority of them in the large statewide tax-credit scholarship programs in Pennsylvania and Florida or the established urban voucher programs in Milwaukee and Cleveland. Type A programs account for 86 percent of all private school choice students in the U.S.

Type B programs provide vouchers or tax-credit scholarships to students with disabilities, regardless of their family income or the performance of their neighborhood public school. Nine such programs operate in the U.S., enrolling 30,158 students who comprise 14 percent of all private school choice enrollments. Most of the students using special needs vouchers are in Florida, as the McKay Scholarship for Students with Disabilities Program enrolls 22,861 students, making it approximately the same size as the MPCP.

Our research here most clearly applies to Type A private school choice programs. After all, the percentage of students with disabilities in the 9 special needs programs is obvious: it is 100 percent. Thus, although we think that some of the issues that we discuss in this report, such as the different ways that students with disabilities are labeled and served in the public and private sectors, apply to all private school choice programs, we acknowledge

that the empirical results of our study apply most clearly to the 17 voucher or tax-credit programs that primarily serve students who are low-income or leaving low-performing public schools (or both).

We draw upon three sources of statistical data for our analysis of special education in MPCP. First, we draw on administrative data associated with students in our longitudinal study who attended both MPCP and MPS schools during our five-year research project to inform a statistical estimation of the extent to which the same student's probability of being classified as having a disability changes when that student moves between the MPCP and the MPS sectors. Second, we compile five years worth of information on the disability status of all the MPCP students in our study, drawn from MPCP school personnel. Our third source of information is the results of a survey we administered to the parents of a representative sample of students in the Choice program and the parents of similar MPS students over a three-year period. In addition to these quantitative measures of student disability in MPCP and MPS, we also draw from interviews of teachers and administrators at private schools participating in the MPCP regarding their organizational norms and practices in relation to such students.

Although each of these data sources has limitations that we discuss below, collectively they establish a range of 7.5 to 14.6 percent within which we think the actual percentage of MPCP students with education-related disabilities likely falls. Our estimated rate of student disability

Exhibit 1: Types of Private School Choice Programs in the U.S., 2011-12



TAX CREDIT PROGRAMS



VOUCHER PROGRAMS

Type A. Traditional Voucher or Tax-Credit Scholarship Programs (17)

Arizona Individual School Tuition Organization Tax Credit	
Arizona Corporate School Tuition Organization Tax Credit	
Cleveland Scholarship and Tutoring Program	
District of Columbia Opportunity Scholarship Program	
Douglas County, Colorado, Choice Scholarship Program	
Florida Tax Credit Scholarship	
Georgia Scholarship Tax Credit Program	
Indiana Corporate and Individual Scholarship Tax Credit Program	
Indiana Choice Scholarship Program	
Iowa Individual and Corporate School Tuition Organization Tax Credit	
Milwaukee Parental Choice Program	
New Orleans Student Scholarships for Educational Excellence Program	
Ohio Educational Choice Scholarship Program	
Oklahoma Equal Opportunity Education Scholarships (has a provision for special needs students)	
Pennsylvania Educational Improvement Tax Credit	
Racine Parental Choice Program	
Rhode Island Corporate Scholarship Tax Credit	
Total Enrollments:	181,224
Percent of All Voucher/Tax-Credit Enrollments:	86%

Type B. Special Needs Voucher/Tax-Credit Programs (9)

Arizona Empowerment Scholarship Accounts Program	
Arizona Lexie's Law	
Florida McKay Scholarship Program	
Georgia Special Needs Scholarship Program	
Louisiana School Choice Pilot Program for Certain Students with Exceptionalities	
Ohio Autism Scholarship Program	
Ohio Jon Peterson Special Needs Scholarship Program	
Oklahoma Lindsey Nicole Henry Scholarship for Students with Disabilities	
Utah Carson Smith Special Needs Scholarship	
Total Enrollments:	30,158
Percent of All Voucher/Tax-Credit Enrollments:	14%

Source: Compiled from Glenn and Gininger 2012, pp. 12-13.

in the MPCP is between 23 and 61 percent lower than the rate of student disability of 19 percent reported for MPS in 2011. Our estimates, however, are more than four times higher than the disability rate of 1.6 percent for the MPCP announced by the Wisconsin Department of Public Instruction (DPI) based merely upon the percentage of MPCP students who were given accommodations during the most recent round of accountability testing (Wisconsin DPI 2011a).

This report is structured as follows. Next we discuss the legal and procedural structure of special education in the public and private educational sectors. After that we paint a picture of the operational reality of special education in MPCP through material from school visits. We then present our three statistical estimates of the disability rate in MPCP. Finally, we discuss why our statistical estimates differ both from DPI's announced disability rate for the MPCP and the official rate of disability reported in MPS.

Structure of Special Education

Special education refers to educational supports and programs targeted to school-age children with exceptional education needs due to physical, cognitive, or behavioral disabilities. Receiving a special education designation brings with it certain legal rights for special services or accommodations in the public educational sphere. Such rights originated with the federal Rehabilitation Act of 1973 and were further codified and extended through the All Handicapped Children Act of 1975, which has since been renamed the Individuals with Disabilities Education Act or IDEA (Palmaffy 2001).

Students with qualified official diagnoses of a disability that affects their learning, and most disabilities do, are covered by special education laws and programs in Wisconsin and throughout the country. The most commonly recognized qualified diagnoses include autism, visual impairment, speech or hearing impairment, mobility impairment, other health impairment, mental retardation, emotional disturbance, and specific learning disability (Horn and Tynan 2001, p. 29).

Public school students who are diagnosed with a qualifying condition are entitled by federal law to receive a Free and Appropriate Public Education (FAPE) to include special education services in the least restrictive environment possible and according to an Individualized Education Program (IEP) (Wolf and Hassel 2001). A student's IEP is drawn up by a committee of interested parties including the student's parents or guardians, local public school officials, and relevant medical or psychological diagnosticians and care providers. The extra services provided to students in special education are funded through a combination of federal, state, and local monies based on formulas established in law. In Wisconsin, the federal government pays about 11 percent of the extra cost of educating each student in special education, with the state paying 26 percent of those costs and the local public school district covering the remaining 63 percent. In some cases districts across the country contract with private schools to enroll and educate students with disabilities who they cannot accommodate within their own schools (McGroarty 2001).

The legal and funding structure surrounding special education in the private school sector differs greatly from the situation in the public school sector. Except for the case of public school contracts with private schools, the IEP and additional funding associated with a student with a disability in the public sector does not transfer with

the student if the child enrolls in a private school. The point is made clearly in a recent memo on the subject from the Wisconsin DPI (2011b, p. 6):

...[S]tudents with disabilities attending voucher schools as part of the MPCP are considered parentally placed private school students and as such, DPI treats them in the same fashion as students attending private non-voucher schools. Under 34 CFR § 300.137 parentally placed private school students are eligible to participate in equitable services and are not entitled to a Free and Appropriate Public Education (FAPE). How, where, and by whom equitable services will be provided for parentally placed private school students is determined through a consultative process between representatives of MPS and representatives of private school officials and representatives of parentally placed private school students.

If a parent, as opposed to local school officials, enrolls a student with special needs in a private school, that student must surrender his or her legal rights to the special educational services and funding included in her IEP. Private schools are not required by federal law to enroll students with disabilities (Wisconsin DPI 2011b, p. 3).

Private schools are not entitled to any additional resources from the state if they do enroll a student with special needs. They can either accommodate the student themselves, using whatever resources they have, or seek to engage in a negotiation with public school officials regarding the provision of special services to the student by the public school system with additional public funds. The latter option, called “equitable services”, does not appear to be popular with private school officials and parents. One MPCP principal we interviewed stated that private school parents “know that an extended process to qualify for a [equitable] services plan usually results in their child being assigned a waiting list for services and often will not receive any services.” Public school officials, quite understandably, are most interested in serving their own special needs students first.

This does not mean that private schools do not enroll or serve students with special needs. Many of them do so. In fact, some private schools, in Wisconsin and throughout the nation, exclusively serve students with severe disabilities that cannot be adequately accommodated elsewhere (McCroarty 2001; Wolf and Hassel 2001, pp. 60–62). Wisconsin state law prohibits private schools participating in MPCP from discriminating against student applicants based on disability. The Wisconsin DPI (2011b, p. 6) states:

A private school may not discriminate against a child with special educational needs in the admission process for the MPCP. However, as a private school, a MPCP school is required to offer only those services to assist students with special needs that it can provide with minor adjustments.

In reality most private schools, including many of the schools in MPCP, are only equipped to serve students with mild-to-moderate special needs. As Superintendent of Public Instruction Tony Evers stated in a memo on the MPCP to the Wisconsin Joint Committee on Finance (Wisconsin DPI 2011c, p. 6), “as a practical matter, public schools offer a greater range of services and better economies of scale [than private schools] when providing special education services.”

What is important here is not the fine legal distinctions between the rights of students and the responsibilities of schools and school districts in the public and private sectors so much as the more general distinction in form and style regarding how students with disabilities are identified and served in the two sectors. In the public sector, special education is largely driven by legal rights and formal procedures (Wolf and Hassel 2001). Official diagnoses must be made and, once made, an elaborate multi-step process must be followed that results in some change in how or where a student is educated that is expected to serve the child's special needs. Students are officially designated as "special education" on forms and in school records to ensure that they receive the extra services to which they are entitled by law. Once a student receives a special education designation, that label tends to stick until the child drops out of school or graduates (Finn, Rotherham and Hokanson 2001, p. 338). The procedures and services that result are supported by additional federal, state, and local funds.

In the private sector, in contrast, special education tends to be handled much less formally. Most elements of the IDEA law do not apply to private schools, so such schools are not required to follow formal procedures in diagnosing or serving students with special educational needs. Student IEPs have no legal force in the private sector and bring no additional public funds to the private school. The formal structure of special education, including explicitly labeled students, exists primarily and almost exclusively in the public sector. When and if parents choose to enroll their student with special needs in a private school, for example through participating in a Type A voucher program such as the MPCP, they leave all of that formal policy structure -- including the child's IEP, special education label, special supports, and extra funding -- behind.

Given the reality that special education is implemented with great formality in the public sector and great informality in the private sector, we might expect the same student with special educational needs to be less likely to be diagnosed and labeled as "special education" if that child is enrolled in the private school sector, through the MPCP, as opposed to the public sector. There are at least three reasons to expect an under-designation of special education students in the private school sector:

1. Private schools are far less likely to employ school psychologists and counselors than are public schools, meaning a given student with special education needs is less likely to be diagnosed as such if in a private school;
2. Many private schools resist conferring formal labels on their students, so even if a private school realizes that a student has a disability it is unlikely to formally designate him or her as a special education student;
3. Private schools need to educate a given special needs student, to the best of their ability and for the same amount of resources, regardless of whether they go through the time and trouble to formally designate him or her as a special education student, so, not surprisingly, most private schools do not bother to do so (Peterson and Llaudet 2006, p. 14).

Under such circumstances, we expect two empirical realities to hold. First, the percentage of MPCP students who actually have disabilities that presumably would qualify them for special education will be smaller than the percentage of MPS special education students. This is because the public sector receives more resources and can provide more special services to special education students, naturally attracting such students to their school system and away from the private sector. Second, the percentage of MPCP students classified as having

a disability will be substantially lower than the percentage of MPCP students who actually have the sorts of special educational needs that would qualify them as special education students were they to be educated in MPS. Before we test these expectations empirically we provide additional information about how students with disabilities are treated in MPCP schools.

Special Education in the MPCP: The Reality on the Ground

In the final year of our longitudinal evaluation of the MPCP we examined with our own eyes how education was delivered to students in Milwaukee schools (Stewart, Jacob, and Jensen 2012). We requested permission from a broad assortment of MPCP and MPS schools to conduct site visits and interview school personnel. We received permission to conduct the site visits from most of the MPCP schools we approached, and several MPS principals invited us to visit their schools, but we were denied access to any MPS schools by the central administration.

One goal of our 2011 site visits was to learn more about the number of students with disabilities who attend MPCP schools and how those special needs students are served. We visited six high schools and seven elementary/middle schools that participate in MPCP. Our research protocols require that we keep the names of the schools and school personnel confidential. The schools were selected to represent the diversity of MPCP regarding school-level performance and other distinctive characteristics of schools. We interviewed teachers, administrators, board members, and parents. When interviewing principals and school counselors, we asked them how they serve students with disabilities. In general we learned that:

- These schools enroll students with special needs, even some with severe disabilities. We observed children with Down's Syndrome, autism, and emotional disturbance. One MPCP elementary school we visited only serves students with disabilities.
- Few schools in the MPCP formally classify any of their students as in special education. Several principals stated that parents of students with disabilities switch their children to the private school from MPS specifically to escape the special education label.
- Most of the schools in the MPCP that we visited said that they serve students with disabilities in the same way they serve all their economically and educationally disadvantaged students -- by providing a challenging educational program but also extra time and individualized attention from teachers and Title I tutors to learn the material.
- Most of the MPCP school personnel we interviewed said that their school lacks the resources and programs to serve the needs of students with severe physical, emotional, or learning disabilities. Almost all of their enrollees who would be classified as special education if in MPS have disabilities within the range of mild-to-moderate in severity, with the exceptions noted above. The fact that the voucher amount of \$6,442 per student must cover all of the costs of educating each MPCP student was cited by principals as the main reason why students with severe disabilities do not seek enrollment in their schools and could not be served effectively if they did so.

While these were our general findings regarding how MPCP schools deal with the issue of special education, some specific quotes from our interviews help to make the approach more concrete. A high school principal (High School Site 6) who estimated that 8-9 percent of the school's MPCP students would qualify as special education students said:

Initially we tried mainstreaming them but it did not work and we started our modified tracking system. We call it College Readiness Continuum and any student who is 1-2 years behind in math or reading we try to catch them up. Right now it is only a 1-hour-a-day program. The goal of the program is to have them prepared for college.

One of the MPCP elementary schools we visited had a student population that was 18-20 percent students with special needs, according to the principal (Elementary Site 7). As she characterized it, "We have the range of abilities a school can have, from gifted and talented to a Down's Syndrome child and everything in between." The school has a full-time staff person to help struggling students, called a Learning Support Specialist. The Learning Support Specialist described why she enjoys her work:

...Because of the incredible freedom that I have to meet the needs of the children as I see best, in collaboration with the teachers and the parents. I can really build a program to meet the needs. And my program changes every year. ... And that is magnificent... I don't have external parameters dictating what I have to do.

One would rarely find such flexibility in a special education program in the public sector given the "external parameters" that govern special education in public schools (Wolf and Hassel 2001). It is not surprising that some parents would choose the more flexible private-sector environment for the education of their special needs child.

The MPCP schools we visited regularly emphasized that they resist labeling students with special needs. As one teacher put it, "There's not a test and there's not a form" (Elementary Site 7). She proceeded to describe in detail how students with cognitive challenges in her class are fully integrated into the educational experience and also receive special assistance, with the example of a field trip:

The students with strong cognitive abilities remember a lot of details and communicate that in their essays.... They are participating in the assignment and they are doing the utmost that they can do that matches their ability. [Children with cognitive impairments] will have trouble even remembering...it was just a vague memory. Then the children, as a social exercise -- this is a reading and science assignment but it is also a social assignment -- are asked to help the other students with gentleness [and partner up with the struggling students to remind them of what happened] and then they can start to write.... Maybe their spelling is very intuitive and phonetic but that's where they are. If they are matching letters to sounds that make sense then they are making progress.... Then we can talk about the spelling rules and they can correct or a peer can help them to correct and then they have a reason to take pride in their work and

they work real hard and they don't get an F or a D. Then there is the artistic part. If a student doesn't do so well on the cognitive side they can excel on the artistic side.

Finally, the MPCP school we visited that exclusively serves students with disabilities (Elementary Site 5) merits some consideration. It is one of two such schools we know of in the MPCP. It has 9 full-time employees and currently enrolls 55 students in grades 1-8, all suffering from emotional disturbance. Most of the students enrolled in the school participate in the MPCP. The annual cost per pupil at the school is about \$12,000. Since the MPCP voucher provides a maximum of \$6,442/year per student, even if they have a disability, the school has to rely on charitable donations to fill the gap.

The primary educational strategy of the school is to “accept kids where they are”. School personnel, including a full-time social worker, try to place the focus on what students can do, rather than what they struggle at doing. The school has a program in which students meet with a full-time art therapist for about an hour per week and engage in unstructured “art therapy”. The activity is used as an opportunity for informal counseling, as the art therapist said that students often reveal important information in the one-on-one setting. The teachers use this information to understand what troubles the students may be having at home that might be affecting their academics.

The school leadership defines student success as growth in the academic, emotional, and spiritual realms. The school has a sectarian religious affiliation and many of its students are referred there from other similarly affiliated religious schools in the area. School personnel say that they de-emphasize traditional measures of student success such as test scores. Their theory of action is that if they address the emotional and behavioral problems of the students first, academic progress will then follow. They also try various ways to get parents involved, such as traditional parent-teacher conferences and home meetings.

Our qualitative research on the MPCP provides additional insight into special education in the nation's oldest and largest urban school voucher program. The Choice schools we visited all served students with disabilities, most commonly those in the mild-to-moderate range of severity. The principals repeatedly said that it is difficult for them to specify how many special education students they have in their schools because they resist labeling the children.

Quantitative Estimates of the Student Disability rate in the MPCP

If we wanted to compare the percentage of MPCP students in special education with the percentage of MPS students in special education, ideally we would insist that the private schools in the Choice program classify and handle students with disabilities in exactly the same way that public schools do. If that were the case, we would be confident that student disabilities are being recognized and measured similarly in the two sectors and therefore direct cross-sector comparisons of disability rates would be valid. It is neither possible nor arguably desirable to require that private schools measure and manage special education in the same way that public schools do. Private schools participating in voucher programs are subject to different laws and follow different norms and practices than public schools. Special education is “special” in the private sector, and we have been advised that some parents specifically choose to place their special needs child in a private school for that very reason.

Under these circumstances, how are we to know or at least estimate what proportion of students in the MPCP have special educational needs? First of all, there is little sense in using the term “special education” for such a comparison, because the phrase has very different meanings in the public and private school sectors. What we can do is ask school administrators and parents whether a child has a disability, particularly one that affects their learning, since the term “disability” and the phrase “disability that affects learning” have a more consistent meaning across school sectors than does the phrase “special education”. That is what we did in surveys of private school administrators and MPCP and MPS parents. Three different ways to analyze the data lead us to estimate that the proportion of MPCP students with disabilities that likely would qualify them for special education services if they were in MPS is between 7.5 and 14.6 percent.

Exceptional Education Rates in the MPCP According to a Rigorous Statistical Analysis

First, we consider what the administrative data regarding the disability classifications of students in our study say about whether a child’s school sector affects the likelihood that he or she will be formally classified as a special education student. To do so we apply a statistical methodology called individual level fixed-effects analysis to the students in our five-year longitudinal study.

The 2005 Wisconsin Act 125 directed our research organization to conduct a longitudinal evaluation of the MPCP starting in 2006 and report our results annually. We selected a random sample of all MPCP students in grades 3–8, plus the entire population of MPCP 9th graders, and carefully matched them to MPS students in the same grades and neighborhoods, with similar test scores and other important characteristics (Witte *et al.* 2008). In 2007 and 2008, we added additional MPCP and MPS third grade students to the sample using the same matching strategy. In total, our samples have 3,669 students in MPCP and the same number in MPS. This approach provided us with two panels of students, one representative of all students attending the MPCP (at least in the specified grades) and a very similar group attending MPS. We then tracked these two panels of students over five years, from 2006–07 through 2010–11, to produce reports about the test score achievement and educational attainment of the Choice students compared to their public school peers (Witte *et al.* 2009; 2010b; 2011; 2012; Cowen *et al.* 2011; 2012).

To help track the students in our study panels, every year from 2006 through 2010 we sent an enrollment verification form to each MPCP school. The form listed the students in our study who we confirmed were attending that specific private school in the previous year and asked the school staff to indicate if the student still was enrolled and, if not, where they were (if known). The form also asked the school staff to: “Indicate whether each student has a physical or learning disability” (Appendix A). Thus we have administrative data from the private schools in the MPCP regarding the disability status of the 3,669 students in our MPCP panel. Annually we also received the accountability testing file from MPS which included information on the special education status of the 3,669 students in our MPS panel as well as any of our MPCP panelists who had subsequently switched to MPS.

We readily acknowledge that our measures of student disability are not identical across the private and public sectors. Our private school measure is whether or not the student has a disability, in the opinion of private school administrators. Our public school measure is the official MPS indicator for whether or not a child

is in special education. In the public sector, having a disability is likely closely aligned with being in special education. The diagnosis of a disability results in the special education classification. That is how the public sector is required and expected to accommodate students with disabilities. Having a disability is likely poorly aligned with any formal classification of special education in the private sector because many private schools do not make special education classifications and do not have formal special education programs. The statistical comparisons we make below are of private school classifications of student disability compared with public school classifications of special education status.¹ When we say “disability classification” we mean administrator opinion in the case of MPCP and formal special education designation in the case of MPS. The fact that they are likely two different things is, in a sense, the whole point of this exercise.

Through the course of our five-year study, 1,475 of the 7,338 students in our MPCP and MPS study panels (20.1%) switched school sectors, in some cases multiple times. A total of 1,045 students originally in our MPCP panel subsequently switched to MPS and remained there. An additional 104 students originally in our MPS panel switched to MPCP and stayed there. Ninety-six students in our MPCP panel switched to MPS and back again, while 57 students in our MPS panel switched to MPCP and then returned to MPS.²

The students in our longitudinal study who switched sectors provide us with a unique opportunity to determine the extent to which private schools in the Choice program recognize student disabilities at different rates than MPS. This is informative because these sector-switchers had the opportunity to be classified as having a disability in the public sector, the private sector, both, or neither. In research parlance, the students are observed in both the private school and public school conditions, and we know from administrative records if their disability status changed or stayed the same when their school sector changed.

Individual level fixed-effects analysis is the ideal methodology for analyzing these data. The fixed effects in the statistical regression model control for the unique characteristics of each student while determining whether general factors, such as the student’s school sector, influences student disability classifications over time. The method systematically compares the disability classifications of students in MPCP to the disability classifications of themselves when they are observed in MPS, and vice-versa. Each student is his or her own control group.

Before we get to the statistical regression results, we can get a hint of what the data will tell us by simply examining a cross-tabulation of the disability classification rates for the sector-switchers in our study. Table 1 provides us with initial evidence that Milwaukee students have a greater likelihood of being classified as having a disability in MPS compared to MPCP. If disability classification practices were identical across the two sectors, all of the student observations would appear in the upper left quadrant of the results table (YES/YES)

1 Because we seek to determine the rate at which students are affirmatively classified as having a disability, we treat missing data for any student in any year as equivalent to a 0 for the variable “classified as having a disability.” Although imputing zeroes for missing data is inappropriate when determining such things as student proficiency rates and test scores (Jacob and Wolf 2012), it makes sense in this case because we are interested in differences in disability classification practices and rates across the school sectors. Not answering the disability question, as administrators did during nearly 16 percent of the student-years in our analysis, is literally not classifying the student as having a disability.

2 The remaining 173 sector switchers had more complicated switching patterns and/or incomplete data.

or the lower right quadrant (NO/NO). In other words, every student classified as having a disability in one sector would be similarly classified in the other sector and every student classified as not having a disability in one sector would be similarly classified in the other sector.

Table 1: Disability Status for Sector Switchers Observed in Each Sector, 2006-2010

		Disability in MPS?		Total
		YES	No	
Disability in MPCP?	YES	33 (2.2)	35 (2.4)	68 (4.6)
	NO	161 (10.9)	1,246 (84.5)	1,407 (95.4)
Total		194 (13.2)	1,281 (86.9)	1,475 (100.0)

Note: Numbers in parentheses are cell percentages based on the total sample of 1,475. Student counted as “yes” if classified as having a disability in any year in that sector.

Sources: MPCP enrollment verification lists 2006-2010; DPI MPCP accountability testing database 2010; MPS accountability testing files 2006-2010.

Although most observations do fall along what researchers call the “primary diagonal” from upper left to lower right, enough observations deviate from that pattern to indicate that disability classifications are not consistent across sectors. A total of 2.4 percent of the sector-switchers in our study were assigned a disability classification when in MPCP but not while in MPS. This small proportion is dwarfed by the 10.9 percent of our sector-switchers who were not given a disability classification when in MPCP but were so classified when in MPS. Overall, of the sector switchers in our study, 4.6 percent of them were ever classified in MPCP as having a disability while 13.2 percent of them received such a classification when in MPS. These descriptive statistics suggest that the same students are almost three times more likely to be classified as having a disability when in MPS than when in MPCP.

Are these differential rates of disability classification solely a function of unclassified special needs students “washing out” of MPCP and reverting to MPS? By examining the differential rates of disability classification among different groups of sector-switchers we see that is not the case (Table 2). The overwhelming majority of sector-switchers (80%) went from MPCP to MPS. That group was classified with disabilities at a rate of 4.4 percent when in MPCP but 12.7 percent when in MPS. Students in our study who switched from MPS to MPCP, on the other hand, were classified with disabilities at a rate of 10.6 percent in MPS but at a rate of 0.0 percent in MPCP. In other words, students who started in MPS and then entered the MPCP shed their official disability label if they had one, and 10.6 percent of them did. Students who started in MPCP, switched to MPS, then switched back to MPCP were classified with disabilities at approximately similar rates of 9.4 percent when they were in MPCP and 8.3 percent when they were in MPS. Note that this group of students was welcomed back into MPCP, after leaving it, even though nearly 10 percent of the students had disabilities. Finally, students who started in MPS, switched to MPCP, and then returned to MPS were classified with disabilities at

a rate of 15.8 percent while in MPS but at a rate of 0.0 percent while in MPCP. Remember, these are the same students observed in both sectors.

Table 2: Disability Status for Sector Switchers By Switching Pattern

Item	MPCP to MPS	MPS to MPCP	MPCP to MPS to MPCP	MPS to MPCP to MPS
Disability in MPCP	4.4%	0.0%	9.4%	0.0%
Disability in MPS	12.7%	10.6%	8.3%	15.8%
Total Number of Switchers (N)	1,045	104	96	57

Sources: MPCP enrollment verification lists 2006-2010; DPI MPCP accountability testing database 2010; MPS accountability testing files 2006-2010

Finally, to further test the extent to which a student's disability designation is influenced by the sector in which they are enrolled we estimate a statistical model with individual level fixed-effects that estimates each student's likelihood of being given a disability classification across the five years in which they appear in our data. The variable of interest in the model is an indicator for whether or not the student was in MPS during a particular year. By using individual students as their own comparison group, this analytic method tells us if disability classification rates vary systematically depending upon school sector, and by how much, controlling for everything that is unique about each student. Our simplest model only includes the indicator variable for school sector while a second model simultaneously controls for other general characteristics of the data that can affect classifications such as year and student grade level.³

The results of the fixed-effects analysis are presented in Table 3. In our simplest model the effect of a given student being in MPS is to increase their likelihood of being classified with a disability by 12.4 percentage points, from 4.1 percent if in MPCP to 16.5 percent if in MPS. Our second model controls for certain general trends in the data. The disability classifications of the students tend to increase in frequency across the years of our study. However, controlling for that trend, designations tend to decrease somewhat once the student is in high school.

Because our Model 2 controls for variables that never take the value 0, such as year and grade, the interpretation of the regression coefficients is not as straightforward as for Model 1. Once the effects of year and grade are controlled for, and the proper calculations are made using the "predict" command in STATA, the effect of being in MPS on the likelihood of a student being classified with a disability is an increase of 5.5 percentage points, from 9.1 percent to 14.6 percent, a difference that is both large and statistically significant beyond the 99 percent confidence level. If we suspect that the MPS classification rate is correct and the MPCP rate is biased

³ We estimate these models as linear probability models to facilitate ease of interpretation, though the results are similar if the models are run as logit or probit estimations. Disability designation is the dependent indicator variable (1=YES; 0=NO). We estimate the model over the five years of our study for each student in our sample.

Table 3: Predicting Disability Designations in Milwaukee

VARIABLES	Model 1 Beta Coefficient	Model 2 Beta Coefficient
In MPS	0.124*** (0.006)	0.061*** (0.008)
2007		0.018*** (0.006)
2008		0.026** (0.012)
2009		0.047*** (0.017)
2010		0.066*** (0.023)
Grade 4		0.008 (0.007)
Grade 5		-0.000 (0.013)
Grade 6		-0.013 (0.019)
Grade 7		-0.023 (0.024)
Grade 8		-0.033 (0.030)
Grade 9		-0.054 (0.036)
Grade 10		-0.061 (0.042)
Grade 11		-0.084* (0.047)
Grade 12		-0.096* (0.525)
Constant	0.041*** (0.002)	0.086*** (0.015)
N	7,338	7,332
F-Stat	398.99***	10.77***

Notes: *** p < .01, ** p < .05, * p < .10. Beta coefficients are linear probability estimates of being classified as having a disability or being in special education. Student fixed-effects included. Standard errors clustered by student are in parentheses.

Sources: MPCP enrollment verification lists 2006-2010; DPI MPCP accountability testing database 2010; MPS accountability testing files 2006-2010.

to the low side, which we do, then students in the MPCP who ever were educated in MPS have special educational needs due to disabilities at the rate of 14.6 percent.

Disability Rate in MPCP for All Students Using Best Classification Available

The 14.6 percent disability rate among MPCP students generated by our statistical analysis only applies to the students in our study who switched sectors. Although sector-switchers comprised 20 percent of our total sample of MPCP and MPS students, they represented 35 percent of the students who started off in our MPCP panel, since MPCP students switch sectors at a higher rate than MPS students (Cowen *et al.* 2010). MPCP sector-switchers probably have a higher rate of disability than MPCP non-sector-switchers. Therefore, readers must understand that the 14.6 percent disability rate is only definitely valid for the subgroup of Choice students who switch between the private and public sectors. For an estimate of the student disability classification rate across the entire MPCP, including students who never attend a public school, we need to look elsewhere.

Our administrative data on MPCP student disability classifications is helpful here. Although the evidence above indicates that MPCP administrators under-classify students with disabilities compared to their MPS counterparts, the enrollment verification form information from MPCP schools is the best administrative data we have on the disability status of the 65 percent of MPCP students in our study who never attended MPS. If we average the MPCP disability classification rate of 3.75 percent for MPCP non-switchers with the MPS disability classification rate of 14.6 percent for MPCP switchers, we get an estimate of the overall disability rate in MPCP of 7.5 percent.

We think that this 7.5 percent rate for the MPCP might under-estimate the actual disability rate across MPCP, because MPCP school personnel appear to under-classify students with disabilities. Therefore, we think the best estimate of the student disability rate in MPCP lays in the range between the lower bound of 7.5 percent established from our administrative data and the upper bound of 14.6 percent established by our statistical analysis.

Disability Rates in the MPCP According to Our SCDP Parent Survey

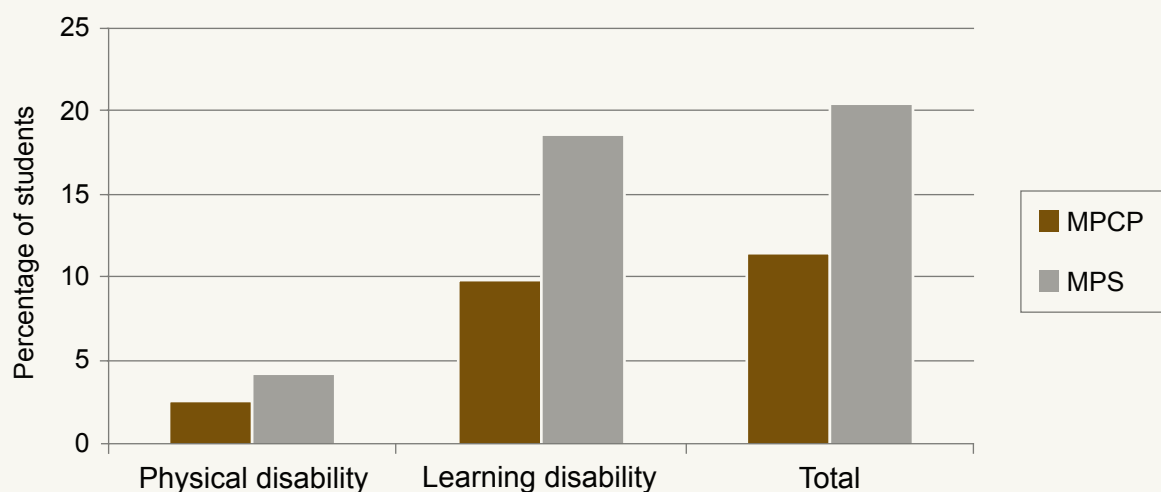
Fortunately we have additional data that we can use to estimate the disability rate in MPCP. This third source of information on student disabilities comes from parent surveys implemented as part of our longitudinal study.

In the springs of 2007, 2008, and 2009 we surveyed parents in both our MPCP and MPS matched panels by telephone. In that survey, we asked parents three questions about their child's special educational needs:

- “Does [the child] have any physical disabilities?” (yes/no)
- “Does [the child] have any learning disabilities?” (yes/no)
- If a parent answered yes to the learning disabilities question, we further asked: “How well do the facilities at [the child's] school attend to his/her particular needs?” (very well, adequately, poorly, other/refused/don't know)

Based on parent responses, 2.5 percent of students in the MPCP have a physical disability and 9.8 percent have a learning disability. A total of 4.1 percent of the parents of MPS students in our matched panel similarly responded that their child has a physical disability and 18.5 percent acknowledged a learning disability. When we combine the two categories and account for students with both types of disabilities, we arrive at a student disability rate in the MPCP of 11.4 percent and in our MPS-matched sample of 20.4 percent (Figure 1). The MPS rate from our survey is similar to the official disability rates reported for all MPS students over the past four years of 18-19 percent (Wisconsin DPI 2011c, Table 1), giving us great confidence in the reliability of the MPCP disability rate from our parent surveys.

Figure 1 - Percentage of Students Whose Parents Said They Have a Disability

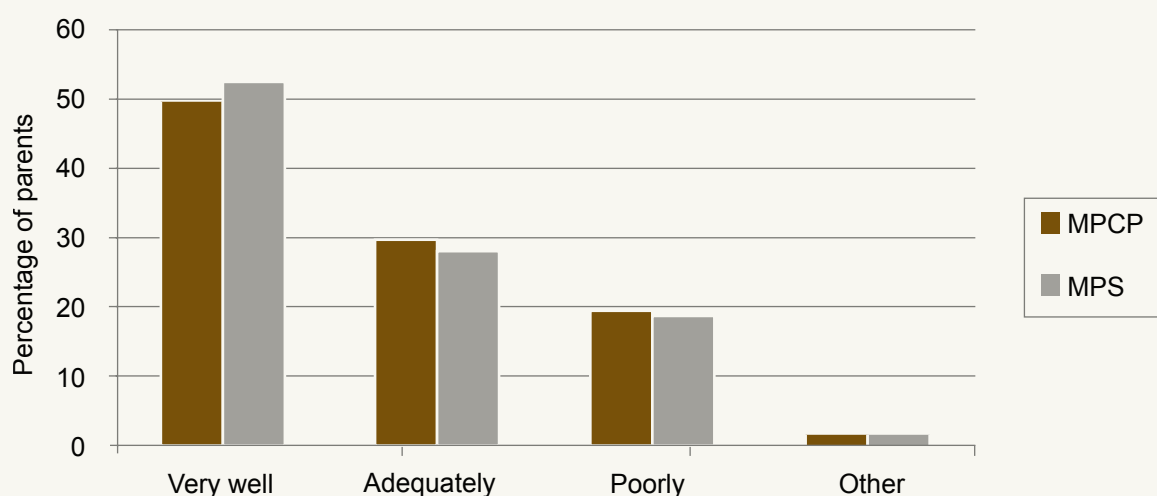


Note: Responses based on the first time a parent answered the question, usually in 2007. Follow-up surveys were used exclusively to fill-in missing data from 2007 non-respondents. The percentage of students with learning or physical disabilities does not add to the total because some students have both.

Source: Milwaukee Longitudinal School Choice Evaluation Parent Surveys in 2007, 2008, and 2009.

We think this comparison of the student disability rates in MPCP and MPS is reliable because parental standards regarding whether or not a child has a disability are likely similar regardless of whether the child is in private or public schools. Our survey evidence indicates that the MPCP student disability rate is more than half of the MPS rate, and is almost exactly in the middle of the range of 7.5 to 14.6 percent established by our analysis of administrative data.

Figure 2 - Parental Responses Regarding How Well the School Addresses the Child's Learning Disability



Note: Responses based on the first time a parent answered the question, usually in 2007. Follow-up surveys were used exclusively to fill-in missing data from 2007 non-respondents.

Source: Milwaukee Longitudinal School Choice Evaluation Parent Surveys in 2007, 2008, and 2009.

Parents of students with learning disabilities further report similar levels of satisfaction with the educational services provided to their child whether the student was in MPCP or MPS (Figure 2). For both groups, approximately half the parents said the school did “very well” at serving their child’s special needs, about 30 percent of parents in both groups said the school served their child “adequately” and about 19 percent said “poorly.” These survey findings might seem surprising, since few students in MPCP schools receive extra government funding for services when they have a disability. Still, according to the parents in our survey, nearly 10 percent of the students in the MPCP have a learning disability and parents tend to be as satisfied with the educational services that those students are receiving in the private sector as are parents of students with learning disabilities in the public sector. Moreover, a legal memo pertaining to the civil rights case (Wisconsin DPI 2011b, p. 4) states:

...DPI is required to accept due process complaints and state complaints related to the equitable services provisions of IDEA. DPI has not received any due process or state complaints related to the participation of children with disabilities in the MPCP.

In the 21 years that the Wisconsin Department of Public Instruction has administered the Milwaukee Parental Choice Program, it has not received a single formal complaint regarding the Choice program's treatment of students with disabilities.

The Disability Rate in MPCP According to DPI

The 2010-11 school year was the first one for which private schools in MPCP were required to test all of their voucher students in grades 3-8 and 10 using the state government test, the Wisconsin Knowledge and Concepts Exam (WKCE). In a press release (DPI 2011a, p. 2) the Wisconsin DPI stated that "the private schools reported about 1.6 percent of choice students have a disability". The press release then contrasted that figure with the MPS special education rate of 19 percent.

This DPI claim that 1.6 percent (or "less than 2 percent") of MPCP test-takers had disabilities was presented in several news reports as evidence that the MPCP serves very few students with disabilities (e.g., Richards 2011; Hetzner and Richards 2011; Miner 2011). The release of the figure also led disability rights groups to file a lawsuit against the MPCP and DPI, claiming that the MPCP program and schools discriminate against students with disabilities.

How did DPI arrive at their 1.6 percent disability rate in MPCP? They did not ask MPCP administrators to indicate which students have disabilities, as we were able to do, because they lack legal authority to do so. DPI provided the following response to a question from the petitioners in the civil rights lawsuit (Wisconsin DPI 2011b, p. 4):

9. Please describe whether and how DPI tracks data regarding application, enrollment, retention, outreach, disenrollment, transfer, and suspension or expulsion, of children with disabilities in MPCP schools.

[DPI response:] Private schools are only required to provide to the department the information set forth on the MPCP Student Application. Wisconsin Stat. § 119.23, the statute governing the MPCP, neither authorizes DPI to request nor requires schools participating in the MPCP to provide the other data to which question 9 refers. Therefore it is not collected.

The MPCP Student Application does not include a question regarding student disability, since it is illegal for MPCP schools to discriminate against students in admission based on disability. DPI had neither the authority nor the means to collect such data from MPCP administrators.

If DPI's disability rate is not based on classifications by MPCP administrators, on what is it based? Beginning in the fall of 2010, DPI did have legal authority to receive copies of the state test that the MPCP schools administered to their voucher students in certain grades. It is only from those test forms that DPI received any information about MPCP students with disabilities. The only disability measure on the test forms was an indicator of whether or not a student was provided a test accommodation due to a disability, not whether or not the student had a disability (Appendix B; Wolf 2012).

Students with disabilities are not automatically provided testing accommodations, especially in the private sector, which is not bound by most federal disability laws. In fact, the training instructions for administering the WKCE state clearly that students only should be provided with testing accommodations if specified in their Individualized Education Program (IEP). Since few private schools develop or maintain IEPs for their students with disabilities, few MPCP students with disabilities could be provided with testing accommodations. This is a clear example of how the coding and classification system regarding students with disabilities and the WKCE was aligned to the procedures and practices of the public school system and in direct opposition to the procedures and practices common to the private schools participating in the MPCP.

Our MPCP administrative data from the past five years indicates that MPCP officials flagged 5.6 percent of 2010 WKCE test-takers as having a disability but only 1.6 percent of test-takers (less than a third) were actually given any testing accommodations. Since most MPCP students with disabilities were not provided with testing accommodations, the testing accommodation question that DPI used to measure the disability rate in MPCP clearly is negatively biased, by a lot.

The error in reporting a flawed measure of disability in the MPCP was magnified by the fact that DPI then compared that rate to the special education rate in MPS and characterized the comparison as “apples-to-apples” (Wisconsin DPI, 2011c, p.1). Since the MPS data with which the MPCP rate was compared were collected using very different procedures, sources, and standards than DPI used to arrive at the MPCP rate, we strongly advise readers to instead focus upon our more reliable estimates of the disability rate in MPCP which are much more comparable to the official special education rate reported for MPS.

Discussion

The wealth of quantitative and qualitative evidence from our state-mandated longitudinal study indicates that the student disability rate in the MPCP likely is between 7.5 and 14.6 percent, with perhaps our best estimate based on parent responses that 11.4 percent of MPCP students have disabilities. The MPCP appears to attract and enroll fewer students with special educational needs than does MPS, where the official student special education rate is 19 percent and around 20 percent of the parents of students in our matched MPS sample say their child has a disability. Still, the difference in disability enrollment rates across the two sectors appears to be dramatically smaller than previously supposed.

Eleven percent is significantly lower than 20 percent. If 11 percent is a reliable estimate of the percentage of students in MPCP with disabilities, why is it 9 percentage points lower than the rate in MPS which is also based on parent reports? The MPCP is likely to be less appealing of an option than the public school system for many parents of students with disabilities. As discussed throughout this report, the MPCP voucher is limited to \$6,442/year, less than half the per-pupil expenditure in MPS, regardless of whether or not a student has a disability. Prior to the fall of 2011, MPCP could not require any participating families to supplement the voucher amount. Thus, MPCP schools have little choice but to deliver a highly efficient educational program.

As we discussed in the section regarding our school visits, every MPCP school we visited said that they provide special support for struggling students, but most of them lack the full complement of educational programs that students with disabilities are entitled to if they receive their education in the public sector. Eleven percent of

MPCP parents acknowledge that their child has a disability and have chosen to have the student's educational needs addressed in a private school, through participation in the MPCP. Twenty percent of MPS parents in our comparison sample similarly acknowledge that their child has a disability and have decided to use the very different public school system of special education supports to serve the student's needs. Given the greater resources and legal entitlements available to students with disabilities in the public sector compared to the private sector, we would have been shocked if our data had suggested that the disability rates in the two sectors are similar. They are not, in all likelihood simply due to the different educational choices that parents have made and the different incentives that surround those choices.

If policy makers remain concerned that only 7.5-14.6 percent of the students in the MPCP have disabilities, one option for increasing that percentage would be to add a "special needs" voucher program to the school choices available to parents. Over 30,000 students bearing special educational needs participate in one of the nine school voucher or tax-credit scholarship programs in the U.S. limited exclusively to students with disabilities. Special needs voucher programs bring with them two advantages over the MPCP for parents of students with disabilities. First, the maximum value of the voucher is on a sliding scale based on the severity of the student's disability, so high-needs students can bring more resources to the private schools to address those needs. Second, special needs vouchers reduce some of the monetary disincentive that private schools face to avoid classifying students as having a disability. We take no position on the desirability of special-needs vouchers here except to point out that they are an option for increasing access to private schools for students with disabilities.

Our findings have implications for how we think about, talk about, and analyze student disabilities and special education in the context of a school choice program like the MPCP. The MPCP does enroll a lower percentage of students with special educational needs than does the MPS. The MPCP does, however, enroll a much higher percentage of special education students than is commonly reported -- 7.5-14.6 percent instead of less than 2 percent. Comparisons between the rates of officially diagnosed special education students in the MPCP and MPS are not really reliable simply because student disability is perceived, measured, and handled differently in the two education sectors.

Importantly, because student disability is measured very differently in MPCP compared to MPS, comparisons between the performance of MPCP and MPS students should never separate out or "control for" special education status in modeling achievement gains or comparing achievement levels. Any attempt to control for special education in comparing student performance in MPCP to that in MPS is likely to generate a severe bias against the MPCP schools because it only controls for the underperformance of students formally designated as special education students. Most if not all of the students with special educational needs in MPS have that formal designation, so their educational struggles are thereby removed from the equation. But most MPCP students with special educational needs are not formally designated as special education or even of having a disability, so their educational struggles remain in the equation and pull down the average overall performance level of students in the MPCP.

The only perfect way to correct that bias would be to force the private schools in the MPCP to classify special needs students in exactly the same way as MPS, something that neither the schools nor the parents they serve would likely support. The next best approach is to control for student baseline test-scores in any MPCP-MPS

comparisons of student performance, as we do in our longitudinal evaluation (Witte *et al.* 2012), with the expectation that much of the disadvantage that a special education student faces in learning is already reflected in their prior test scores, an expectation that has been confirmed by research (National Research Council, 1997). A final alternative is to compare student performance between the MPCP and MPS straight up, as we do in our Annual School Testing Summary Report (Jacob and Wolf 2012), discarding the illusion that we can effectively know and control for exactly which students are and are not special education students in the two sectors, because we know that we cannot. Although our two studies of comparative MPCP achievement growth and achievement levels have limitations that we openly acknowledge in the reports, they do not suffer from the severe bias that comes from comparisons “controlling for” special education because they do not employ a control variable that is measured dramatically differently in the two sectors.

Just like the children with special needs (either classified or not) served by schools in Milwaukee, special needs classifications need to be handled with care. Through our longitudinal study we can estimate reliably that at least 7.5 percent and perhaps as many as 14.6 percent of the students in the Milwaukee Parental Choice Program have the kinds of exceptional educational needs that would qualify them for the special education label and legal entitlements if they were in Milwaukee Public Schools. We have also learned that many private schools handle students with disabilities very differently from public schools, generally by fully including challenged students in the regular educational program of the school with modest personal or programmatic supports. When parents and school officials think that such an approach is not effectively serving the needs of the child, then the student might transfer to MPS where there is a much greater likelihood that he or she will be officially labeled as a special education student.

Many people are making choices in the educational environment of Milwaukee. For some parents and educators, those choices involve eschewing the formal special education label for students with disabilities. The sooner everyone accepts this important reality the sooner we can focus more effectively on unbiased evaluations and reasoned discussions of educational interventions such as parental school choice.

References

- Cowen, Joshua M., David J. Fleming, John F. Witte, and Patrick J. Wolf. 2010. *School and Sector Switching in Milwaukee*, Milwaukee Evaluation Report #16, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uark.edu/ua/der/SCDP/Milwaukee_Eval/Report_16.pdf
- Cowen, Joshua M., David J. Fleming, John F. Witte, and Patrick J. Wolf. 2011. *School Vouchers and Student Attainment: Initial Results from an Evaluation of the Milwaukee Parental Choice Program*, Milwaukee Evaluation Report #24, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uark.edu/ua/der/SCDP/Milwaukee_Eval/Report_24.pdf
- Cowen, Joshua M., David J. Fleming, John F. Witte, Patrick J. Wolf, and Brian Kisida. 2012. *Student Attainment and the Milwaukee Parental Choice Program: Final Follow-up Analysis*, Milwaukee Evaluation Report #30, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uaedreform.org/SCDP/Milwaukee_Eval/Report_30.pdf
- Finn, Chester E. Jr., Andrew J. Rotherham, and Charles R. Hokanson. 2001. "Conclusions and Principles for Reform," in Chester E. Finn, Jr., Andrew J. Rotherham, and Charles R. Hokanson (eds.), *Rethinking Special Education for a New Century* (Washington, DC: Progressive Policy Institute & Thomas B. Fordham Foundation).
- Glenn, Malcom, and Michelle Gininger. 2012. *School Choice Now: The Year of School Choice*, School Choice Yearbook 2011-12, Washington, DC: Alliance for School Choice, <http://www.allianceforschoolchoice.org/yearbook>
- Hetzner, Amy, and Erin Richards. 2011. "Test Results Spark Debate Over Best Way to Measure Achievement," *Milwaukee Journal-Sentinel*, April 7.
- Horn, Wade F., and Douglas Tynan. 2001. "Time to Make Special Education 'Special' Again," in Chester E. Finn, Jr., Andrew J. Rotherham, and Charles R. Hokanson (eds.), *Rethinking Special Education for a New Century* (Washington, DC: Progressive Policy Institute & Thomas B. Fordham Foundation).
- McCroarty, Daniel. 2001. "The Little-Known Case of America's Largest School Choice Program," in Chester E. Finn, Jr., Andrew J. Rotherham, and Charles R. Hokanson (eds.), *Rethinking Special Education for a New Century* (Washington, DC: Progressive Policy Institute & Thomas B. Fordham Foundation).
- Miner, Barbara. 2011. "Take a Stand Against School Vouchers," *Milwaukee Journal-Sentinel*, November 19.
- National Research Council. 1997. *Educating One and All: Students with Disabilities and Standards-Based Reform* (Washington, D.C.).
- Palmaffy, Tyce. 2001. "The Evolution of the Federal Role," in Chester E. Finn, Jr., Andrew J. Rotherham, and Charles R. Hokanson (eds.), *Rethinking Special Education for a New Century* (Washington, DC: Progressive Policy Institute & Thomas B. Fordham Foundation).
- Peterson, Paul E., and Elena Llaudet. 2006. "On the Public-Private School Achievement Debate," Paper prepared for the annual meetings of the American Political Science Association, Philadelphia, PA, August.
- Richards, Erin. 2011. "Voucher Testing Data Takes a New Twist," *Milwaukee Journal-Sentinel*, March 30.
- Stewart, Thomas, Anna M. Jacob and Laura I. Jensen. 2012. *School Site Visits: What Can We Learn From Choice Schools in Milwaukee?* Milwaukee Evaluation Report #34, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uaedreform.org/SCDP/Milwaukee_Eval/Report_34.pdf

- Turque, Bill. 2012. "D.C. Charter School Under Scrutiny for Lack of Special-Ed Students," *Washington Post*, February 2.
- Wisconsin Department of Public Instruction, 2011a. "Overall MPS Results Higher Than Choice Schools on Statewide Exams," News Release DPI-NR 2011-30 B, March 29.
- Wisconsin Department of Public Instruction. 2011b. "Responses of State Superintendent Tony Evers and the Wisconsin Department of Public Instruction to U.S. DOJ Civil Rights Division Letter of August 17, 2011."
- Wisconsin Department of Public Instruction. 2011c. "Analysis of MPCP Data and Implications for Program Expansion," memo submitted by State Superintendent Tony Evers to the Joint Committee on Finance, May 23.
- Witte, John F., Patrick J. Wolf, Joshua M. Cowen, David J. Fleming, and Juanita Lucas-McLean. 2008. *MPCP Longitudinal Educational Growth Study Baseline Report*, Milwaukee Evaluation Report #5, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uaedreform.org/SCDP/Milwaukee_Eval/Report_5.pdf
- Witte, John F., Patrick J. Wolf, Joshua M. Cowen, David J. Fleming, and Juanita Lucas-McLean. 2009. *MPCP Longitudinal Educational Growth Study Second Year Report*, Milwaukee Evaluation Report #10, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uark.edu/ua/der/SCDP/Milwaukee_Eval/Report_10.pdf
- Witte, John F., Joshua M. Cowen, David J. Fleming, Patrick J. Wolf, Meghan R. Condon, and Juanita Lucas-McLean. 2010b. *The MPCP Longitudinal Educational Growth Study Third Year Report*, Milwaukee Evaluation Report #15, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uark.edu/ua/der/SCDP/Milwaukee_Eval/Report_15.pdf
- Witte, John F., Deven Carlson, Joshua M. Cowen, David J. Fleming, and Patrick J. Wolf. 2011. *The MPCP Longitudinal Educational Growth Study Fourth Year Report*, Milwaukee Evaluation Report #23, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uark.edu/ua/der/SCDP/Milwaukee_Eval/Report_23.pdf
- Witte, John F., Deven Carlson, Joshua M. Cowen, David J. Fleming, and Patrick J. Wolf. 2012. *The MPCP Longitudinal Educational Growth Study Final Year Report*, Milwaukee Evaluation Report #29, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uark.edu/ua/der/SCDP/Milwaukee_Eval/Report_29.pdf
- Witte, John F., Patrick J. Wolf, Alicia Dean, and Deven Carlson. 2010a. *Milwaukee Independent Charter Schools Study: Report on One Year of Student Growth*, Milwaukee Evaluation Report #21, School Choice Demonstration Project, University of Arkansas, Fayetteville, AR, http://www.uark.edu/ua/der/SCDP/Milwaukee_Eval/Report_21.pdf
- Wolf, Patrick J. 2012. E-mail correspondence with Duane Dorn, Office of Educational Accountability, Wisconsin Department of Public Instruction, January 19 (available by request).
- Wolf, Patrick J., and Bryan C. Hassel. 2001. "Effectiveness and Accountability (Part 1): The Compliance Model," in Chester E. Finn, Jr., Andrew J. Rotherham, and Charles R. Hokanson (eds.), *Rethinking Special Education for a New Century* (Washington, DC: Progressive Policy Institute & Thomas B. Fordham Foundation).

Appendix A:

Directions for Completing the Student Enrollment Verification Form

Evaluation of the Milwaukee Parental Choice Program

Before completing the Student Enrollment Verification Form, please review these instructions and column explanations. If you have any questions email us.

RETURN THIS COMPLETED FORM IN THE
ENCLOSED PRE-PAID ENVELOPE –OR– BY FAX
BY OCTOBER 14, 2010.

For each MPCP panel student:

1. Confirm if he/she is **CURRENTLY ENROLLED** at your school for the 2010-11 school year.
2. Update any information that has changed.
3. Fill in any missing information.

Column Explanations:

- **Enrollment** – if a student is no longer enrolled at your school, please indicate why in the “Reason Left School” column. If the reason is not specified on the form or if you do not know why a student left the school, check the “Other” box and write in the actual reason or “DK” (I don’t know) on the blank line. If you know the new school name, write it in the “New School Name” column. If you do not know the name of the new school, write “DK.”
- **Race** – check all that apply
- **ELL (English Language Learners)** – All ELL students are required to test. However, students who have been in the U.S. for less than 12 months are only required to take the math portion.
- **Disabilities** – Indicate whether each student has a physical or learning disability. If he/she has a disability that makes it impossible for him/her to take the test, mark “no” in the “Able to Test” column. If a student does not have a disability or has a disability that does not hinder him/her from testing, indicate “yes” in the “Able to Test” column. For students with disabilities who are able to test, list any accommodations that must be met during testing. Check all that apply. If you do not see the proper accommodation, check the “Other box” and write it in on the blank line.

Appendix B -- WKCE Test Forms Pertaining to Student Disability

Below are the only portions of the WKCE student test score reports that pertain to special educational needs. Although the second form contains a “Student Performance Level Survey,” that section is limited only to students judged by IEP teams (which most private schools lack) to require the alternative test to the WKCE. The first form simply describes any testing accommodations provided to a student with a disability. Nowhere in the WKCE student report are school officials asked if a student has a disability or participates in special education.

Wisconsin Student Assessment System (WSAS)							
Student Assessment Report							
Write student's name in this box.	All students must take either the complete WKCE or the complete WAA-SwD—not parts of both. The WKCE is for students whose instruction is based on the Wisconsin Model Academic Standards. The WAA-SwD is for students whose instruction is based on the Extended Grade Band Standards.						
WKCE Assessment Accommodations							
Directions: Complete this section for students who participated in the WKCE with one or more accommodations. Fill in all that apply. The following accommodations are NOT intended for use with all students. Please refer to the Assessment Accommodations Matrix in the WSAS <i>Guide for District Assessment Coordinators and School Assessment Coordinators</i> to see if an accommodation is allowed for a given student based on ELL and/or disability status.							
Type of Accommodation	Reading	Math					
Used a scribe	☐	☐					
Provided extra time	☐	☐					
Read test questions and content to student		☐					
Used DPI-provided test translation		☐					
Used locally provided test translation		☐					
Used DPI-provided glossary of terms		☐					
Used “text-talker”		☐					
Signed test questions and content to student		☐					
Used another DPI-approved accommodation	☐	☐					
Used DPI-provided Braille test ☐							

Student Assessment Report

Write student's name in this box.

All students must take either the complete WKCE or the complete WAA-SwD—not parts of both. The WKCE is for students whose instruction is based on the Wisconsin Model Academic Standards. The WAA-SwD is for students whose instruction is based on the Extended Grade Band Standards.

Student Performance Level Survey

Note: Read the Performance Level Descriptors located in the Extended Grade Band Standards before completing this section. This survey is used for research purposes only and will not influence the score of the student for whom you are administering the assessment. The results of this survey are completely confidential and only summary-level data will be reviewed.
Directions: Based on the Performance Level Descriptors and the test administrator's judgment, this student's performance rating is estimated to be (please mark one rating for each content area tested on the WAA-SwD):

	Reading	Mathematics	Science
WAA-SwD Minimal Performance	☐	☐	☐
WAA-SwD Basic	☐	☐	☐
WAA-SwD Proficient	☐	☐	☐
WAA-SwD Advanced	☐	☐	☐

WAA-SwD Assessment Accommodations

Directions: Complete this section for students who participated in the WAA-SwD with one or more of the following accommodations. Mark all that apply.

Type of Accommodation	Reading	Mathematics	Science
Used translation	☐	☐	☐
Signed test questions and content to student	☐	☐	☐
Used Braille	☐	☐	☐
Used assistive device (e.g., text-talker, adaptive keyboard, picture symbols)	☐	☐	☐
Used objects or manipulatives	☐	☐	☐
Used another DPI-approved accommodation	☐	☐	☐

Alternate Assessment Results for Social Studies, Language Arts, and Writing

Directions: Complete this section for all students with disabilities who participated in the alternate assessment for Social Studies, Language Arts, and Writing. Results must be based upon DPI Administration Guide and Rating Scales.

	Social Studies	Language Arts	Writing
WAA-SwD Minimal Performance	☐	☐	☐
WAA-SwD Basic	☐	☐	☐
WAA-SwD Proficient	☐	☐	☐
WAA-SwD Advanced	☐	☐	☐

Special Education and the Milwaukee Parental Choice Program

About the Authors



Patrick J. Wolf is Professor of Education Reform and 21st Century Endowed Chair in School Choice at the University of Arkansas in Fayetteville. He also is principal investigator of the School Choice Demonstration Project. Wolf has authored, co-authored, or co-edited three books and more than 30 articles and book chapters on school choice, special education, and public management. A 1987 *summa cum laude* graduate of the University of St. Thomas (St. Paul, MN), he received his Ph.D. in Political Science from Harvard University in 1995.



John F. Witte is a Professor in the Department of Political Science and the Robert M. La Follette School of Public Affairs at the University of Wisconsin - Madison. He received his Ph.D. in political science from Yale University. He has been a fellow at the Russell Sage Foundation and at the Center for Advanced Study in the Behavioral Sciences. His latest book from Princeton University Press is *The Market Approach to Education: An Analysis of America's First Voucher Program*.



David J. Fleming is an Assistant Professor of Political Science at Furman University. He received his B.A. from the University of Notre Dame in 2003 and his Ph.D. from the University of Wisconsin-Madison in 2009. He was a fellow in the interdisciplinary training program in education sciences at the University of Wisconsin. His current research project examines how education policies affect parents' political and social engagement. He teaches classes in American politics, research methods, and public policy.



**SCHOOL CHOICE
DEMONSTRATION PROJECT**

School Choice Demonstration Project
Department of Education Reform
University of Arkansas
201 Graduate Education Building
Fayetteville, AR 72701
479-575-6345
<http://www.uark.edu/ua/der/SCDP/Research.html>

EXHIBIT F



UNIVERSITY OF
ARKANSAS

College of Education & Health Professions
Education Reform

2024-25 Arkansas Education Freedom Accounts Program Annual Report

Daion L. Daniels

Alison Heape Johnson

Joshua B. McGee

Patrick J. Wolf

October 2025

University of Arkansas

Department of Education Reform

School Choice Demonstration Project

In collaboration with the Arkansas Department of Education



Contents

Executive Summary	3
Introduction	5
Student Participation	7
School Participation	12
School Retention Rates	17
Qualifying Expenses	22
Participating Providers	24
Fiscal Impact	25
Assessment Results	28
2025-26 EFA Program Summary Highlights	33
Office of School Choice and Parental Empowerment	34
University of Arkansas Department of Education Reform	35
Appendix A - Expenditure Categories	37
Appendix B - EFA Expenditures by Private School/Provider	39
Appendix C – Assessment Percentiles	88
Appendix D – ATLAS Performance Levels	92

Executive Summary

Overview

The 2024–25 school year marked a strong second year for Arkansas’s Education Freedom Accounts (EFA) program, with substantial growth in participation, expanded eligible uses (including homeschool supports), and encouraging indicators on family satisfaction, retention, and student performance. The program remained fiscally modest relative to the state’s K–12 budget while continuing to build operational capacity and provider choice statewide.

Participation and Access

Participation more than doubled to 14,256 active students (up from 5,548). Of these, 10,834 (76%) attended participating private schools and 3,422 (24%) used EFAs to support homeschooling—the first year homeschool became an eligible pathway. Each EFA provided \$6,856 (or \$7,617 for former Succeed Scholarship students), disbursed quarterly via secure payments to approved schools and providers. Private-school access expanded to 126 participating schools, alongside a growing homeschool ecosystem supported by approved curricula, tutoring, and enrichment providers.

Retention and Family Experience

Retention from 2024–25 to 2025–26 was strong, with 91% of EFA students continuing in the program. Participating private schools also retained, on average, 84% of their EFA students. Families reported positive experiences as platform reliability, guidance, and communications improved over the year.

Use of Funds and Marketplace

Spending aligned with the program’s primary purpose—tuition and core educational services—while supporting targeted homeschool needs. The marketplace continued to diversify, with more than 1,800 service providers available in 2024–25 and over 2,100 approved at the beginning of the 2025–26 school year, providing families with expanded access to instructional materials, therapies, enrichment, and tutoring that is consistent with program rules.

Executive Summary

Student Achievement

Participating schools administered nationally norm-referenced assessments (e.g., NWEA MAP, ITBS, Stanford 10), producing valid percentile ranks for submitted tests. On average, EFA students scored at the 57th percentile in math and 59th percentile in ELA, above the national median.

Outlook

Entering 2025–26, the program demonstrates a durable scale, with 46,578 approved applicants, 166 approved private schools, 2,132 providers, and an updated EFA amount of \$6,994. Priorities include expanding direct-pay capacity, improving status visibility and communications, strengthening assessment data quality (including ATLAS reporting), and continuing support for instructional, tutoring, therapy, and enrichment uses aligned to success-ready outcomes.

2024-25 Education Freedom Account Program at a Glance

14,256 Active Students	\$6,856 EFA Account Value	126 Participating Private Schools	4.0 Parent Satisfaction with ClassWallet (On a Scale of 1-5)
\$93.8M Total EFA Spending	4/4 Quarterly Payments Disbursed	1,800+ Participating Service Providers	4.3 Parent Satisfaction with the Administration of the EFA Program by ADE (On a Scale of 1-5)

Introduction

Report Overview

The Arkansas Department of Education (ADE) is required, by Arkansas Code § 6-18-2510, to provide an annual report on the Education Freedom Accounts (EFA) program to the Arkansas Legislative Council and the House and Senate Education Committees. To fulfill this requirement, the University of Arkansas Department of Education Reform, in collaboration with the Arkansas Department of Education, prepared this report. The report covers the period from July 1, 2024, through June 30, 2025, representing the second year of program implementation. As stipulated in Arkansas Code § 6-18-2510, this report includes the following:

1. The total number of students currently participating in the program
2. A list of all participating schools and participating service providers
3. The total student enrollment of each participating school and the percentage of the total enrollment of each school represented by participating students
4. The percentage of funds used for each type of qualifying expense
5. A preliminary analysis of the program's fiscal impact
6. Aggregated test result data for participating students for the 2024-25 academic year
7. The retention rates for participating students enrolled in participating schools
8. The results of a parent satisfaction survey administered by the Department

Education Freedom Accounts Overview

The EFA program empowers families to make the best educational choices for their children by providing financial resources for eligible students to attend an approved private school or homeschool. For the 2024–25 school year, each EFA provided most families with \$6,856 per student. Students with disabilities who received a Succeed Scholarship in 2022–23 were eligible for a higher allocation of \$7,618.

Funds were disbursed quarterly to support families' chosen educational options. Parents of eligible students could apply their EFA funds toward enrollment in a private school or, for the first time in 2024–25, toward homeschooling expenses.

Introduction

All payments were processed through either Students First Technologies or ClassWallet, two secure digital accounts payable platforms, ensuring that funds were delivered directly to participating schools and service providers for educational services and qualifying expenses.

To qualify for the 2024–25 academic year, a student must have been eligible to enroll in an Arkansas public elementary or secondary school, have a parent who is a current resident of the state, and meet at least one of the following additional criteria:

1. First-time kindergartener
2. Student who attended a D- or F-rated public school in the previous year
3. Student who participated in the Succeed Scholarship Program for the 2022-23 school year^{1,2}
4. Student with a disability identified under the Individuals with Disabilities Education Act
5. Student experiencing homelessness
6. Current or former foster-care child
7. Child of a veteran or military personnel (active-duty or reserve)
8. Child of a first responder or law enforcement officer

¹ Pursuant to Arkansas Code § 6-41-901, to qualify for the Succeed Scholarship Program, a student must have been enrolled in a public school district for at least the full school year immediately prior (or have a superintendent waiver) and (1) have a disability (as defined in the Individuals with Disabilities Education Act) or (2) have been a current or former foster care students or (3) have participated in the Succeed Scholarship Program during the prior year and not turned twenty-one years of age or (4) Have been the child of a uniformed service member (if funds remain after all other eligible students received funding).

² Former Succeed Scholarship students continue to receive the full foundation funding amount, which they received as participants in the Succeed Scholarship Program.

Student Participation

Overview

The second year of the EFA program demonstrates the strong and growing interest in school choice among Arkansas families, as thousands took advantage of the opportunity to customize their children's education. Eligibility expanded to include students who attended D-rated public schools in the 2023–24 school year and students whose parents or guardians are first responders, law enforcement officers, veterans, or military personnel (active-duty or reserve). In addition, authorized uses of EFA funds expanded beyond private school tuition and fees to include homeschooling expenses.

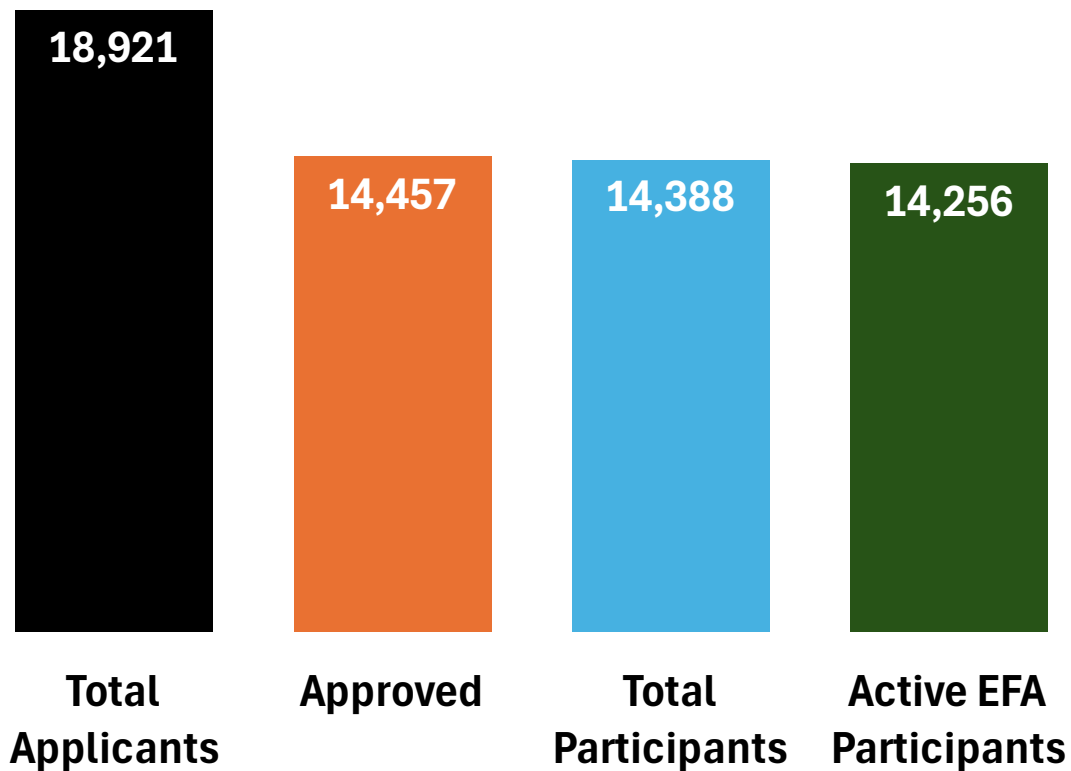
Participation increased substantially, with the number of active EFA accounts rising from 5,548 in the first year to 14,256 in the second year—an increase of 8,708 students, or 157% growth. Of these, 3,422 accounts (24%) were used to support homeschooling.

From Applicant to Active EFA Participant

Most completed EFA applications were approved, nearly all approved applicants participated, and nearly all participants were active throughout the school year (see Figure 1).

Student Participation

Figure 1: 2024–25 EFA Student Participation



Applied (18,921)

- All completed and submitted EFA applications

Approved (14,457)

- Applications approved by the Department and that received at least one quarterly payment
- Reasons for non-approval, applicant
 - did not submit the required documentation
 - confirmed that they no longer intended to participate in the EFA program that year
 - did not meet the eligibility criteria

Student Participation

Total Participants (14,388)

- Families who made at least one transaction using EFA funds

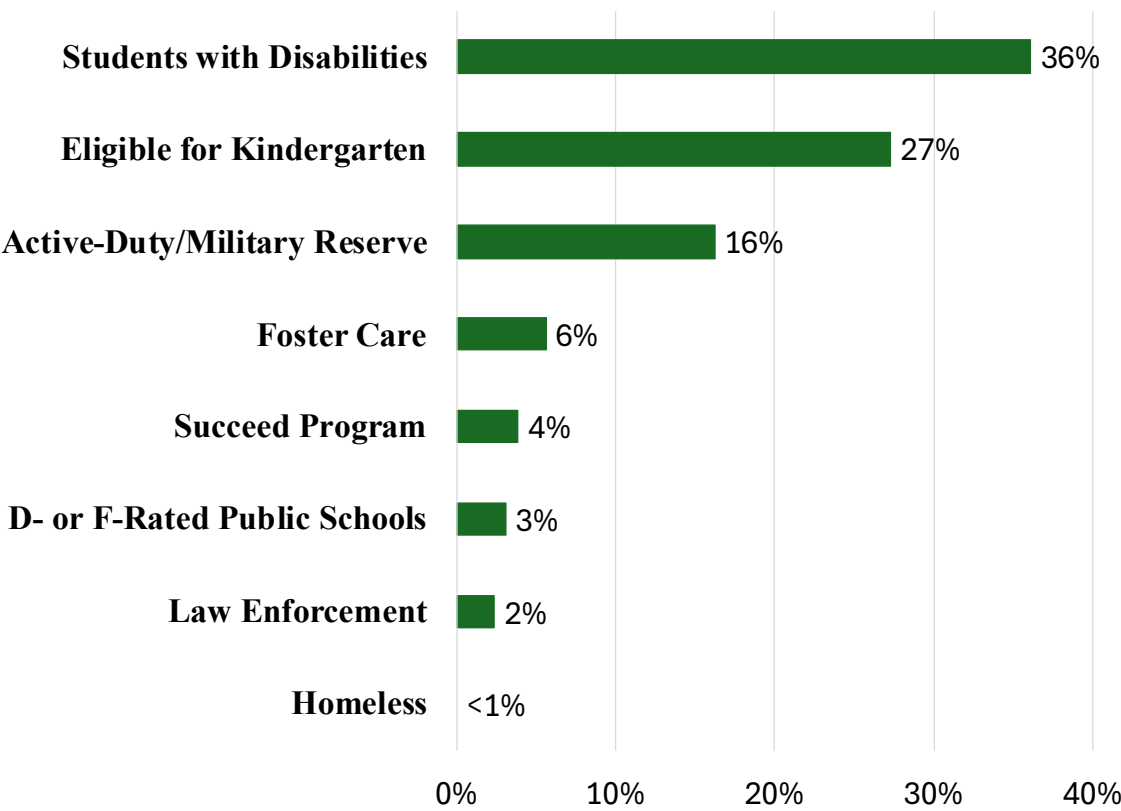
Active Participants (14,256)

- Students participating in the program at the end of the 2024–25 school year

Eligibility Subgroups

Students with disabilities, as identified under the Individuals with Disabilities Act (IDEA), were the largest subgroup represented among students who used an EFA, accounting for 36% of total participants. First-time kindergarteners also made up a significant portion of the participants (27%). Students of active duty or military reserve parents represented 16% of the participants.

Figure 2: 2024–25 Participation by Education Freedom Account Eligibility Criteria

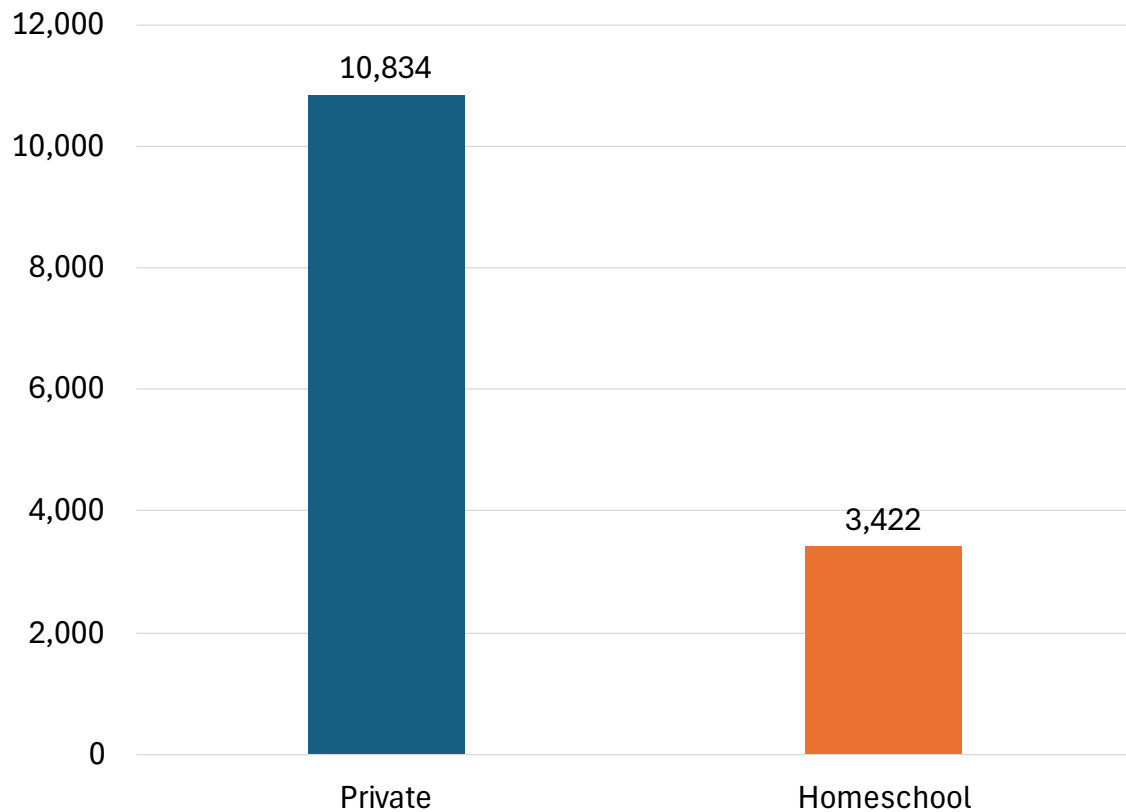


Student Participation

Participation by Schooling Sector

Of active EFA participants, 76% (10,834) attended private schools and 24% (3,422) were homeschooled.

Figure 3: 2024–25 Participation in the Education Freedom Account by Schooling Sector

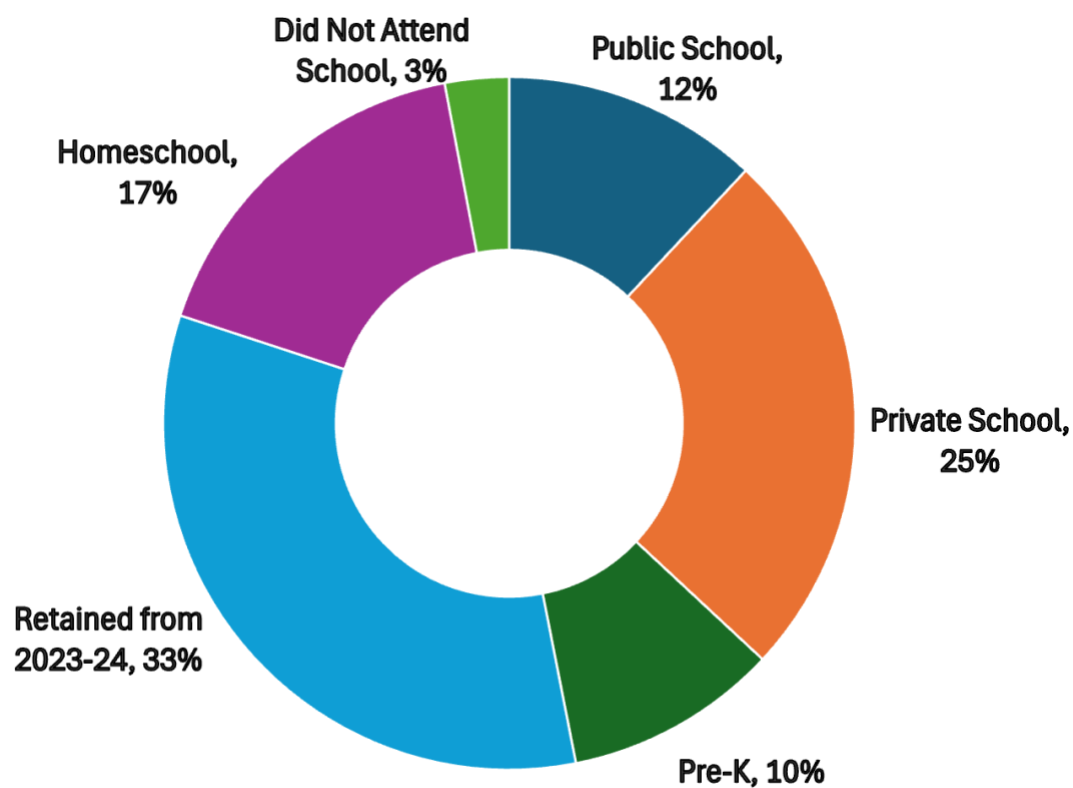


Student Participation

Previous School

One third of participating students were retained in the EFA program from 2023-24.³ Ten percent were first-time kindergarteners who attended preschool previously, while three percent were not in school before joining the EFA program. One quarter of students attended a private school, 17% were homeschooled, and 12% attended a public school previously.

Figure 4: 2024-25 Student Participation by Previous School Status During the 2023-24 School Year



³ This sentence and Figure 4 have been updated for clarity. An earlier version of this report correctly stated that prior school type was not listed on the application for one third of students. The reason prior school type was not listed in their application materials is that these students participated in the EFA program in 2023-24 and were retained in 2024-25.

School Participation

In the 2024–25 school year, 126 private schools participated in the EFA program. On average, 48% of enrolled students at participating schools received EFA funds.

Table 1 (1/5): Participating Private Schools

School Name	EFA Enrollment	Total Enrollment	EFA % of Total Enrollment
Abundant Life Christian Academy	236	375	63%
Academy of Excellence	26	40	65%
ACCESS Schools	115	378	30%
Agape Academy	19	36	53%
Ambassador Baptist Academy	13	35	37%
ANH Montessori School	19	46	41%
Anthem Classical Academy	69	111	62%
Apostolic Christian Academy (Magnolia)	2	11	18%
Arkansas Christian Academy	165	365	45%
Arrows Academy	18	26	69%
Baptist Prep	312	700	45%
Baseline Bilingual Elementary School	8	25	32%
Batesville Montessori School	5	10	50%
Bentonville Christian Academy	65	119	55%
Blessed Sacrament Catholic School	52	137	38%
Cabot Christian School	14	20	70%
Calvary Academy	181	429	42%
Calvary Christian Academy (Berryville)	21	50	42%
Calvary Christian Academy (Hot Springs)	11	41	27%
Calvary Christian School	52	65	80%
Catholic High School	227	714	32%
Central Arkansas Christian (CAC)	427	850	50%
Central Arkansas Montessori (North Little Rock)	70	70	100%
Central Christian Academy	4	75	5%
Chenal Valley Montessori School	3	15	20%
Christ Lutheran (Little Rock)	82	125	66%
Christ the King Catholic School (Ft. Smith)	115	205	56%
Christ the King School (Little Rock)	275	546	50%
Clear Spring School	17	65	26%
Clover Community School	15	18	83%

School Participation

Table 1 (2/5): Participating Private Schools

School Name	EFA Enrollment	Total Enrollment	EFA % of Total Enrollment
Columbia Christian School	152	275	55%
Community Christian School	19	28	68%
Compass Academy	105	140	75%
Conway Christian School	290	580	50%
Cornerstone Christian Academy - Tillar	109	175	62%
Cornerstone Montessori Christian Academy	12	32	38%
Crestline Academy	6	30	20%
CrossPointe Preparatory	57	130	44%
Easterseals Academy	77	78	99%
Eighty-Twenty Learning for ASD, LLC	23	25	92%
Episcopal Collegiate School	311	770	40%
Fayetteville Christian School	70	150	47%
Fayetteville Nature School	21	32	66%
Fe Viva Christian School	10	38	26%
First Academy	100	150	67%
First Lutheran School (Benton)	19	20	95%
First Lutheran School (Fort Smith)	43	75	57%
Fort Smith Montessori School	33	35	94%
Friendship Lab School for Dyslexia	23	89	26%
FUTURES High School	1	100	1%
Garrett Memorial Christian School	61	185	33%
Gospel Light Christian School	45	125	36%
Grace Christian School	15	45	33%
Harding Academy	257	676	38%
Harvest Time Academy	82	100	82%
Heber Christian School	19	30	63%
Holy Rosary Catholic School	23	75	31%
Homeschool	3,422	N/A	N/A
Immaculate Conception Catholic School	224	336	67%
Immaculate Conception School (Fort Smith)	121	230	53%

School Participation

Table 1 (3/5): Participating Private Schools

School Name	EFA Enrollment	Total Enrollment	EFA % of Total Enrollment
Immaculate Heart of Mary School	52	110	47%
Jacksonville Christian Academy	89	142	63%
Joshua Academy	95	115	83%
Leapfrog Montessori Forest School	31	40	78%
Legacy Academy	35	150	23%
Legacy Christian Academy (Mabelvale)	16	32	50%
Life Way Christian School	227	525	43%
Little Rock Christian Academy	637	1,572	41%
Madonna Learning Center	1	45	2%
Maranatha Baptist Christian School	14	50	28%
Mount St. Mary Academy	169	495	34%
Mountain Home Christian Academy	70	200	35%
New Life Christian Academy	123	220	56%
North Little Rock Catholic Academy	81	150	54%
North River Christian Academy	60	100	60%
Oaks Christian Academy	42	52	81%
Our Lady of Fatima School	32	90	36%
Our Lady of the Holy Souls	250	470	53%
Ozark Catholic Academy	26	112	23%
Pinnacle Classical Academy	44	75	59%
PLUM St. Howard's Academy	4	30	13%
Prism North America	21	50	42%
Providence Classical Christian Academy	224	600	37%
Pulaski Academy	383	1,370	28%
Ridgefield Christian School (Jonesboro)	73	175	42%
Room to Bloom	3	12	25%
Russellville Baptist Academy	46	50	92%
Sacred Heart School	123	237	52%
Saline County Christian School	10	32	31%
Searcy Christian Academy	38	60	63%

School Participation

Table 1 (4/5): Participating Private Schools

School Name	EFA Enrollment	Total Enrollment	EFA % of Total Enrollment
Sherwood Christian Academy	16	45	36%
Shiloh Christian School	488	1,520	32%
Shiloh Excel Christian School	7	13	54%
South Arkansas Christian School	21	50	42%
Southwest Christian Academy	113	200	57%
St. John Catholic School (Russellville)	38	70	54%
St. John's Catholic School (Hot Springs)	38	140	27%
St. Joseph Catholic School (Conway)	234	445	53%
St. Joseph Catholic School (Fayetteville)	168	415	40%
St. Joseph School (Paris)	24	48	50%
St. Mary School	16	30	53%
St. Michael's Catholic School	19	25	76%
St. Paul Catholic School	57	107	53%
St. Theresa Catholic School	102	220	46%
St. Vincent de Paul Catholic School	162	350	46%
Subiaco Academy	32	148	22%
Thaden School	72	359	20%
The Academy of TLC	31	35	89%
The Anthony School	153	341	45%
The Decker School	39	74	53%
The Delta Institute for the Developing Brain	43	100	43%
The Divine Learning Academy	18	20	90%
The Grace School	15	23	65%
The Hill School	31	75	41%
The Huda Academy	39	250	16%
The New School	96	460	21%
Trinity Catholic School	71	240	30%
Trinity Christian School (Bradford)	6	20	30%
Trinity Christian School (Texarkana)	71	200	36%
Union Christian Academy	212	375	57%

School Participation

Table 1 (5/5): Participating Private Schools

School Name	EFA Enrollment	Total Enrollment	EFA % of Total Enrollment
Valley Christian School	73	135	54%
Victory Christian School (Camden)	28	100	28%
Walnut Farm Montessori School	13	51	25%
West Memphis Christian School	176	375	47%
West Side Christian School	121	210	58%
Wisdom and Truth Classical Academy	4	12	33%
World Harvest Baptist Academy (Russellville)	2	12	17%

School Retention Rates

Overview

Entering its third year (i.e., 2025–26), the EFA program retained 91% of participating students from the previous year (i.e., 2024–25), while participating private schools retained, on average, 84% of their EFA students. These retention rates include students who were in the highest grade served by their school last year, who may have left the program due to graduation.

Table 2 (1/5): Retention Rates for Participating Private Schools

2024-25 School Name	Percent Continuing in the EFA Program	Percent Continuing at the Same School
Abundant Life Christian Academy	89%	88%
Academy of Excellence	92%	92%
ACCESS Schools	92%	90%
Agape Academy	79%	58%
Ambassador Baptist Academy	85%	85%
ANH Montessori School	95%	79%
Anthem Classical Academy	100%	94%
Apostolic Christian Academy (Magnolia)	100%	100%
Arkansas Christian Academy	93%	92%
Arrows Academy	100%	94%
Baptist Prep	93%	90%
Baseline Bilingual Elementary School	50%	50%
Batesville Montessori School	80%	40%
Bentonville Christian Academy	92%	86%
Blessed Sacrament Catholic School	90%	88%
Cabot Christian School	93%	86%
Calvary Academy	97%	96%
Calvary Christian Academy (Berryville)	100%	81%
Calvary Christian Academy (Hot Springs)	100%	100%
Calvary Christian School	96%	90%
Catholic High School	77%	76%
Central Arkansas Christian (CAC)	91%	90%
Central Arkansas Montessori (North Little Rock)	84%	76%
Central Christian Academy	75%	75%
Chenal Valley Montessori School	100%	67%
Christ Lutheran (Little Rock)	99%	87%
Christ the King Catholic School (Ft. Smith)	97%	88%

School Retention Rates

Table 2 (2/5): Retention Rates for Participating Private Schools

2024-25 School Name	Percent Continuing in the EFA Program	Percent Continuing at the Same School
Christ the King School (Little Rock)	100%	88%
Clear Spring School	82%	82%
Clover Community School	93%	87%
Columbia Christian School	96%	95%
Community Christian School	95%	84%
Compass Academy	87%	80%
Conway Christian School	94%	90%
Cornerstone Christian Academy – Tillar	91%	80%
Cornerstone Montessori Christian Academy	92%	92%
Crestline Academy	100%	83%
CrossPointe Preparatory	88%	74%
Easterseals Academy	91%	88%
Eighty-Twenty Learning for ASD, LLC	96%	96%
Episcopal Collegiate School	92%	90%
Fayetteville Christian School	93%	91%
Fayetteville Nature School	71%	48%
Fe Viva Christian School	90%	90%
First Academy	95%	85%
First Lutheran School (Benton)	79%	74%
First Lutheran School (Fort Smith)	84%	79%
Fort Smith Montessori School	91%	79%
Friendship Lab School for Dyslexia	57%	48%
FUTURES High School	0%	0%
Garrett Memorial Christian School	90%	85%
Gospel Light Christian School	93%	93%
Grace Christian School	100%	100%
Harding Academy	96%	95%
Harvest Time Academy	90%	79%
Heber Christian School	89%	89%
Holy Rosary Catholic School	96%	96%

School Retention Rates

Table 2 (3/5): Retention Rates for Participating Private Schools

2024-25 School Name	Percent Continuing in the EFA Program	Percent Continuing at the Same School
Homeschool	88%	76%
Immaculate Conception Catholic School	99%	87%
Immaculate Conception School (Fort Smith)	96%	86%
Immaculate Heart of Mary School	98%	92%
Jacksonville Christian Academy	83%	80%
Joshua Academy	96%	92%
Leapfrog Montessori Forest School	100%	84%
Legacy Academy	94%	89%
Legacy Christian Academy (Mabelvale)	100%	94%
Life Way Christian School	93%	92%
Little Rock Christian Academy	94%	94%
Madonna Learning Center	100%	100%
Maranatha Baptist Christian School	86%	86%
Mount St. Mary Academy	78%	77%
Mountain Home Christian Academy	91%	91%
New Life Christian Academy	93%	93%
North Little Rock Catholic Academy	93%	81%
North River Christian Academy	83%	82%
Oaks Christian Academy	86%	83%
Our Lady of Fatima School	100%	94%
Our Lady of the Holy Souls	98%	90%
Ozark Catholic Academy	85%	85%
Pinnacle Classical Academy	98%	95%
PLUM St. Howard's Academy	75%	75%
Prism North America	90%	86%
Providence Classical Christian Academy	96%	91%
Pulaski Academy	91%	90%
Ridgefield Christian School (Jonesboro)	90%	89%
Room to Bloom	67%	67%
Russellville Baptist Academy	100%	98%

School Retention Rates

Table 2 (4/5): Retention Rates for Participating Private Schools

2024-25 School Name	Percent Continuing in the EFA Program	Percent Continuing at the Same School
Sacred Heart School	96%	96%
Saline County Christian School	100%	70%
Searcy Christian Academy	97%	87%
Sherwood Christian Academy	94%	81%
Shiloh Christian School	95%	94%
Shiloh Excel Christian School	71%	71%
South Arkansas Christian School	90%	90%
Southwest Christian Academy	84%	81%
St. John Catholic School (Russellville)	95%	87%
St. John's Catholic School (Hot Springs)	87%	82%
St. Joseph Catholic School (Conway)	95%	93%
St. Joseph Catholic School (Fayetteville)	96%	92%
St. Joseph School (Paris)	83%	71%
St. Mary School	44%	44%
St. Michael's Catholic School	100%	100%
St. Paul Catholic School	93%	93%
St. Theresa Catholic School	99%	95%
St. Vincent de Paul Catholic School	96%	93%
Subiaco Academy	75%	75%
Thaden School	85%	82%
The Academy of TLC	87%	87%
The Anthony School	93%	82%
The Decker School	100%	82%
The Delta Institute for the Developing Brain	91%	84%
The Divine Learning Academy	100%	94%
The Grace School	93%	87%
The Hill School	81%	74%
The Huda Academy	97%	97%
The New School	90%	85%
Trinity Catholic School	76%	75%

School Retention Rates

Table 2 (5/5): Retention Rates for Participating Private Schools

2024-25 School Name	Percent Continuing in the EFA Program	Percent Continuing at the Same School
Trinity Christian School (Bradford)	83%	83%
Trinity Christian School (Texarkana)	92%	65%
Union Christian Academy	98%	96%
Valley Christian School	96%	96%
Victory Christian School (Camden)	93%	89%
Walnut Farm Montessori School	69%	69%
West Memphis Christian School	96%	89%
West Side Christian School	92%	89%
Wisdom and Truth Classical Academy	75%	75%
World Harvest Baptist Academy (Russellville)	100%	100%

Qualifying Expenses

Overview

In the second year of the EFA program, eligible expenses included tuition/fees, uniforms, assessment, instructional materials, tutoring services, curricula, supplemental supplies, specific technology devices, transportation costs, and tuition/fees for college courses. See Appendix A for a detailed description of each expense category and the categorization methodology.

Table 3: 2024–25 Summary of EFA Expenditures by Category for All Students

Category	Expenditures	Number of Transactions	Average Cost/Transaction	Percent of Total
Private School Tuition & Fees	\$68,348,251	82,764	\$826	81%
Supplies	\$7,100,421	39,761	\$179	8%
Curriculum	\$3,185,511	18,829	\$169	4%
Homeschool Tuition & Fees	\$3,151,409	4,589	\$687	4%
Enrichment ⁴	\$1,269,768	6,847	\$185	2%
Tutoring	\$904,650	2,592	\$349	1%
Therapy	\$344,276	1,173	\$294	<1%
Uniforms	\$263,958	1,946	\$136	<1%
Assessment	\$152,027	2,411	\$63	<1%
College Tuition/ Fees/Supplies	\$68,745	176	\$391	<1%
Account Management	\$55,057	14,909	\$4	<1%
Disability Evaluation/Assessment	\$45,725	\$99	\$462	<1%
Transportation	\$32,916	181	\$182	<1%
Refunds/Cancellations	(\$416,488)	4,325	(\$96)	<1%
Total	\$84,506,226⁵	180,602	\$468	

⁴ Enrichment spending was relatively low in the fall semester but increased in the spring as additional providers were approved, especially among homeschool students. During the 2025 legislative session, the Arkansas General Assembly enacted Senate Bill 625 (SB625), which limits the use of Education Freedom Account (EFA) funds for extracurricular activities, physical education, and transportation.

⁵ This total includes \$18,643 (29 transactions) that are refunds from students who withdrew from the EFA program during the year and were not listed as private or homeschooled students at the end of the year. Those transactions are excluded from Tables 4 and 5 because they cannot be classified as private or homeschool.

Qualifying Expenses

Table 4: 2024–25 Summary of EFA Expenditures by Category for Private School Students

Category	Expenditures	Number of Transactions	Average Cost/Transaction	Percent of Total
Private School Tuition & Fees	\$67,903,068	81,941	\$829	97%
Supplies	\$1,426,419	6,123	\$233	2%
Uniforms	\$241,634	1,735	\$139	<1%
Tutoring	\$175,473	551	\$318	<1%
Curriculum	\$152,707	815	\$187	<1%
Enrichment	\$106,487	506	\$210	<1%
Therapy	\$80,372	280	\$287	<1%
Homeschool Tuition & Fees	\$22,287	38	\$586	<1%
Disability Evaluation/Assessment	\$15,578	33	\$472	<1%
Assessment	\$5,391	53	\$102	<1%
College Tuition/Fees/Supplies	\$4,974	15	\$332	<1%
Account Management	\$4,139	1,776	\$2	<1%
Transportation	\$1,187	6	\$198	<1%
Refunds/Cancellations	(\$176,366)	1,513	(\$117)	<1%
Total	\$69,963,350	95,385	\$733	

Table 5: 2024–25 Summary of EFA Expenditures by Category for Homeschool Students

Category	Expenditures	Number of Transactions	Average Cost/Transaction	Percent of Total
Supplies	\$5,674,003	33,638	\$169	39%
Curriculum	\$3,032,804	18,014	\$168	21%
Homeschool Tuition & Fees	\$3,129,122	4,551	\$688	21%
Enrichment	\$1,163,281	6,341	\$183	8%
Tutoring	\$729,177	2,041	\$357	5%
Private School Tuition & Fees	\$445,183	823	\$541	3%
Therapy	\$263,904	893	\$296	2%
Assessment	\$146,636	2,358	\$62	1%
College Tuition/Fees/Supplies	\$63,771	161	\$396	<1%
Account Management	\$50,918	13,133	\$4	<1%
Transportation	\$31,729	175	\$181	<1%
Disability Evaluation/Assessment	\$30,147	66	\$457	<1%
Uniforms	\$22,324	211	\$106	<1%
Refunds/Cancellations	(\$221,480)	2,783	(\$80)	(2%)
Total	\$14,561,519	85,188	\$171	

Participating Providers

Overview

In the second year of the EFA program, students purchased educational products and services from nearly 2,000 providers, with most of the funds spent on private schools. For a total list of providers, see Appendix B.

Table 6: Top 10 Private Schools by EFA Expenditures⁶

School Name	Expenditures
1. Little Rock Christian Academy	\$2,137,156
2. Shiloh Christian School	\$1,591,412
3. Central Arkansas Christian Schools, Inc.	\$1,451,527
4. Pulaski Academy	\$1,284,962
5. Episcopal Collegiate School	\$1,043,393
6. Baptist Prep	\$1,018,384
7. Conway Christian School	\$947,001
8. Christ the King Catholic School - Little Rock	\$904,875
9. Abundant Life Christian Academy	\$777,817
10. Catholic High School	\$767,814

Table 7: Top 10 Educational Product and Service Providers by EFA Expenditures

Educational Product and Service Providers	Expenditures
1. Best Buy	\$1,385,177
2. Amazon	\$738,213
3. Lakeshore	\$283,409
4. Office Depot	\$237,537
5. Staples	\$218,627
6. Abeka	\$138,931
7. McGregors Teacher Supplies	\$103,281
8. Home Science Tools	\$100,107
9. Leaf'd Box	\$97,738
10. The Good and the Beautiful	\$95,241

⁶ Tables 5 and 6 reflect providers by expenditures from spring transactions only. Due to limitations in the fall payment processing platform, provider identities could not be reliably determined for that period.

Fiscal Impact

Overview

Understanding the fiscal impact of the Education Freedom Account (EFA) program is important because policymakers, educators, and the public need to know how the program fits within the state budget and how it changes state education investment. To answer these questions, we look at the EFA program's costs during the 2023–24 and 2024–25 school years. Specifically, we consider how much the program costs the State of Arkansas in total, what its net cost is after accounting for potential savings, and how those costs compare to the state's overall K-12 education budget.

Fiscal Impact Analysis

In its first year, 2023–24, the state spent \$37.3 million on the EFA program. That figure rose to \$93.8 million in 2024–25.⁷ These numbers represent the state's total expenditures for the program each year, without adjusting for the potential savings that occur when students use an EFA instead of attending a public school.

To understand the program's budgetary impact, it is necessary to account for what we call “switchers”—students who enrolled with an EFA but who otherwise would have attended a public school. Switchers matter because the per-student cost of an EFA is lower than the state funding that would have been directed to a public school for the same student. As a result, switchers generate potential savings for the state and reduce the program's net cost.

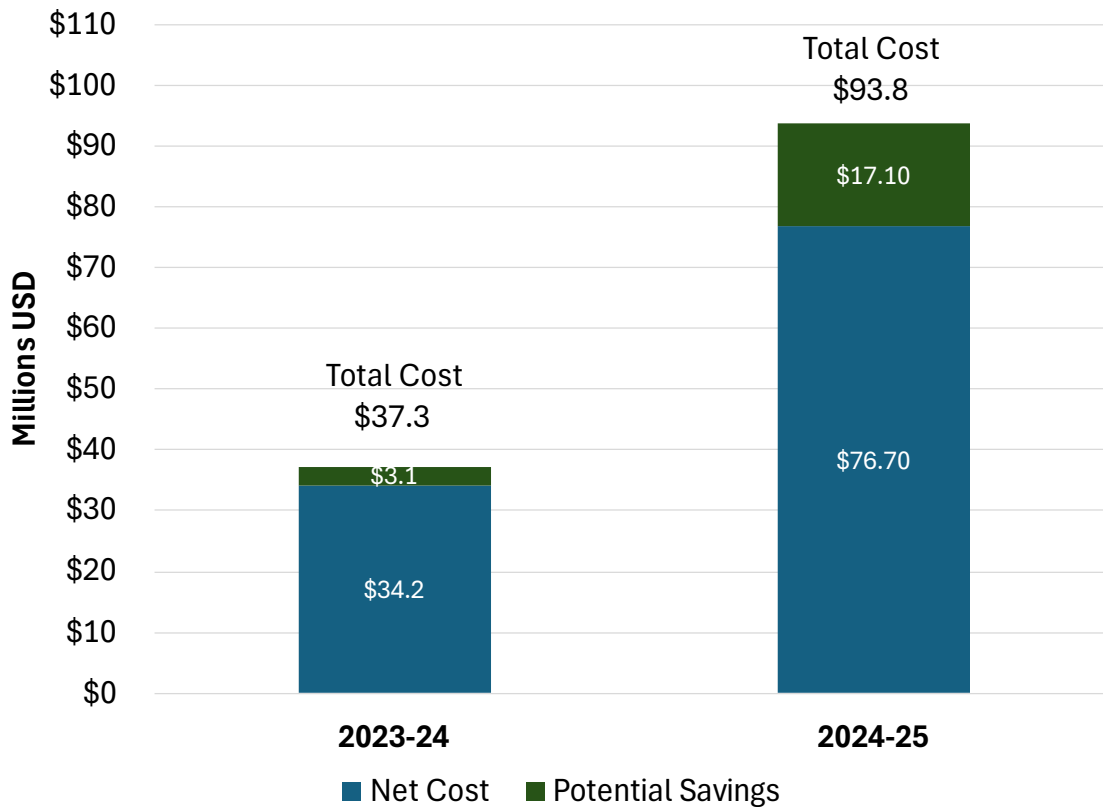
In 2023–24, these switchers generated an estimated \$2.0–\$4.2 million in potential savings, which lowered the program's net cost to between \$33.1 and \$35.3 million. In 2024–25, the potential savings were larger—between \$12.2 and \$22.0 million—reducing the net cost to between \$71.8 and \$81.6 million. The potential savings were larger in the program's second year because more students who would have otherwise attended a public school were eligible and participated in the EFA program. Figure 5 illustrates the relationship between the total program cost, the potential savings from switchers, and the resulting net cost to the state.

⁷ This figure is higher than is reflected in the total in Table 3 because it captures program costs that were not part of the transactions data.

Fiscal Impact

It is important to note that these savings are not immediate. Arkansas bases public school funding on the previous year's average daily membership (ADM) and districts receive declining-enrollment funding for up to two years, so the budgetary impact of switchers is delayed.

Figure 5: 2023–24 and 2024–25 EFA Program Total Cost, Estimated Potential Savings, and Net Cost



Note. Potential savings are the midpoint of the estimated range.

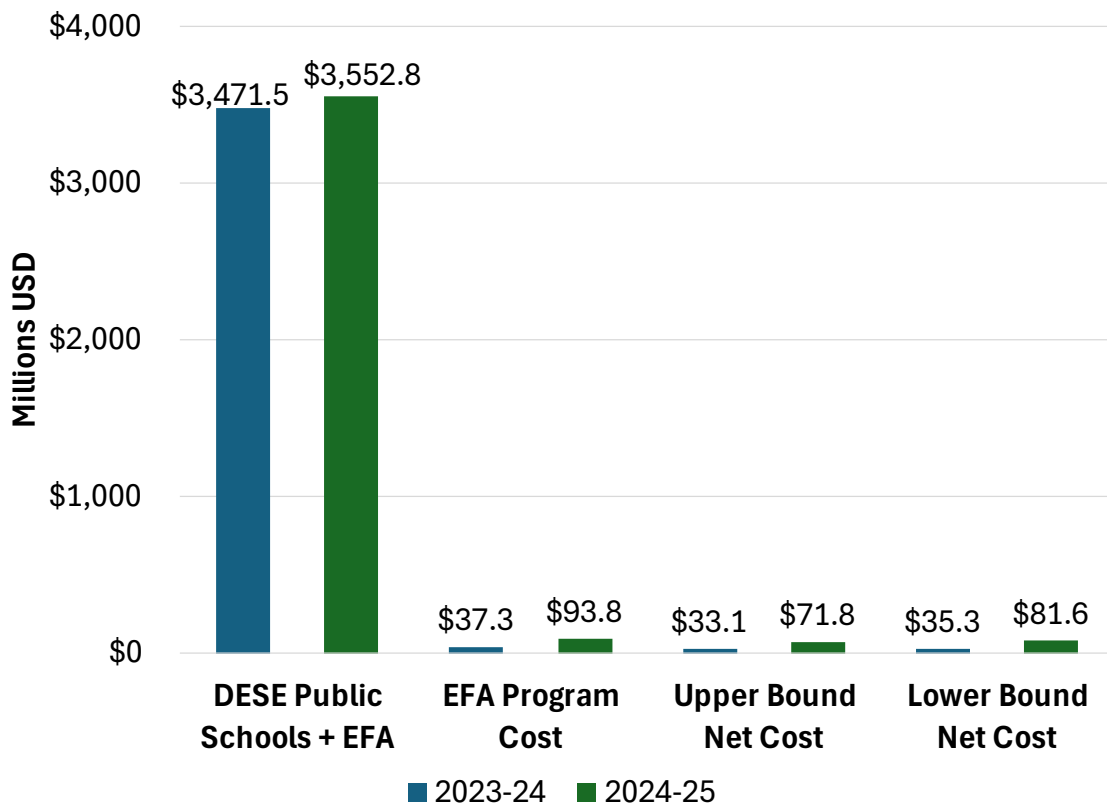
Looking at the program in the context of the full state K-12 education budget helps put its scale in perspective. Figure 6 shows total and net EFA costs alongside the DESE appropriation for school districts and special programs.⁸ Even without counting potential savings, the EFA program has represented only a small share of education spending—just 1.1% of DESE's ~\$3.5 billion allocation for total education funding in 2023-24 and 2.6% in 2024–25.

⁸ See appropriation bills for [2023-24](#), [2024-25](#), and [2025-26](#).

Fiscal Impact

In 2024–25, Arkansas provided funding for 488,593 students in total—474,337 in public schools and 14,256 through EFAs. That means the state devoted only 2.6% of its K-12 education budget to serve 3% of the state’s students through the EFA program. Looking ahead to 2025–26, the first year of universal eligibility, EFA program costs are projected to reach about \$277 million. Even at that level, the program would account for only 7.4% of the roughly \$3.7 billion allocated to fund the state’s students, while serving just under 10% of Arkansas students based on currently approved applications.

Figure 6: 2023–24 and 2024–25 EFA Program Cost Compared to Arkansas K-12 Budget



Assessment Results

Overview

In the second year of the EFA program, participating private schools were required to report assessment results for participating students in mathematics and English Language Arts (ELA) as both raw scores and national percentile ranks when available.

The most common assessments administered were the NWEA Measure of Academic Progress (MAP), the Iowa Tests of Basic Skills (ITBS), and the Stanford Achievement Test (Stanford 10). Approximately 3% of students were exempt from assessment due to disabilities and instead submitted educational progress documentation.

Among submitted assessments, 87% included valid national percentile ranks, allowing for accurate aggregation and averaging across EFA participants.⁹ On average, EFA students scored at the 57th percentile in math and the 59th percentile in ELA, meaning they outperformed 57% of students nationwide in math and 59% in ELA on nationally norm-referenced assessments.¹⁰

When disaggregated:

- Private school EFA students scored at the 55th percentile in math and the 57th percentile in ELA.
- Home school EFA students scored at the 63rd percentile in math and the 68th percentile in ELA.

See Appendix C for a summary of average math and ELA percentiles for each participating private school.

⁹ The 13% of students who did not report valid national percentile ranks includes some data entry errors, reporting of grade-level equivalents or other non-percentile measure, a small number of 11th–12th grade students who were not required to test, and students who left or planned to leave the program and likely did not provide valid results.

¹⁰ In future years, University of Arkansas Researchers will collaborate with ADE to directly equate ATLAS assessment results and the other nationally normed assessments taken by EFA students.

Assessment Results

Table 8: 2024–25 EFA Student Assessment Performance for All Students

Assessment Name	Average Math Percentile	Average Reading Percentile	Total Test Completions
NWEA Measure of Academic Progress (MAP)	58%	60%	5,317
Iowa Tests of Basic Skills (ITBS)	62%	64%	2,380
Stanford Achievement Test (Stanford 10)	45%	49%	1,107
Renaissance Star Assessments	62%	64%	638
Comprehensive Testing Program (CTP)	59%	61%	494
ACT	59%	64%	455
Thrive Academics Performance Series	69%	68%	453
PSAT	47%	56%	404
PreACT	48%	55%	292
Kaufman Test of Educational Achievement (KTEA-III)	32%	25%	252
Classic Learning Test	49%	52%	181
TerraNova	63%	55%	105
i-Ready Assessments	64%	60%	57
Wide Range Achievement Test (WRAT4)	44%	55%	35
Educational Development Series (EDSERIES)	41%	55%	27
SAT	58%	69%	11
Edmentum Exact Path	62%	75%	10
Total	57%	59%	12,218

Assessment Results

Table 9: 2024–25 EFA Student Assessment Performance for Private School Students

Assessment Name	Average Math Percentile	Average Reading Percentile	Total Test Completions
NWEA Measure of Academic Progress (MAP)	57%	57%	3,959
Iowa Tests of Basic Skills (ITBS)	60%	62%	1,813
Stanford Achievement Test (Stanford 10)	42%	45%	852
Renaissance Star Assessments	63%	64%	609
Comprehensive Testing Program (CTP)	59%	62%	490
PSAT	47%	56%	401
ACT	60%	65%	378
PreACT	48%	55%	283
Kaufman Test of Educational Achievement (KTEA-III)	32%	24%	228
Classic Learning Test	45%	49%	132
TerraNova	63%	56%	104
i-Ready Assessments	71%	64%	34
Thrive Academics Performance Series	57%	38%	30
Wide Range Achievement Test (WRAT4)	19%	54%	5
Edmentum Exact Path	83%	95%	5
SAT	41%	40%	2
Total	55%	57%	9,325

Assessment Results

Table 10: 2024–25 EFA Student Assessment Performance for Homeschool Students

Assessment Name	Average Math Percentile	Average Reading Percentile	Total Test Completions
NWEA Measure of Academic Progress (MAP)	64%	69%	1,358
Iowa Tests of Basic Skills (ITBS)	67%	71%	567
Thrive Academics Performance Series	70%	70%	423
Stanford Achievement Test (Stanford 10)	54%	59%	255
ACT	53%	61%	77
Classic Learning Test	59%	62%	49
Wide Range Achievement Test (WRAT4)	48%	55%	30
Renaissance Star Assessments	56%	60%	29
Educational Development Series (EDSERIES)	41%	55%	27
Kaufman Test of Educational Achievement (KTEA-III)	40%	35%	24
i-Ready Assessments	55%	55%	23
SAT	62%	75%	9
PreACT	60%	67%	9
Edmentum Exact Path	41%	56%	5
Comprehensive Testing Program (CTP)	18%	53%	4
PSAT	12%	60%	3
TerraNova	47%	34%	1
Total	63%	68%	2,893

Assessment Results

ATLAS Assessment

The Arkansas Teaching and Learning Assessment System (ATLAS) is the state’s new statewide assessment. Approximately 300 EFA participants from four private schools reported ATLAS scores in math, English Language Arts, and Science. Performance on the assessment is reported in four levels based on established cut scores:

- Level 4 – Advanced: Students demonstrate an advanced understanding.
- Level 3 – Proficient: Students demonstrate a proficient understanding.
- Level 2 – Basic: Students demonstrate a basic understanding.
- Level 1 – Limited: Students demonstrate a limited understanding.

Overall, 48% of students achieved performance Level 3 (Proficient) or higher on the ATLAS assessment.¹¹

When disaggregated by subject:

- 49% of students achieved Level 3 (Proficient) or above in English Language Arts (ELA).
- 52% of students achieved Level 3 (Proficient) or above in math.
- 41% of students achieved Level 3 (Proficient) or above in science.

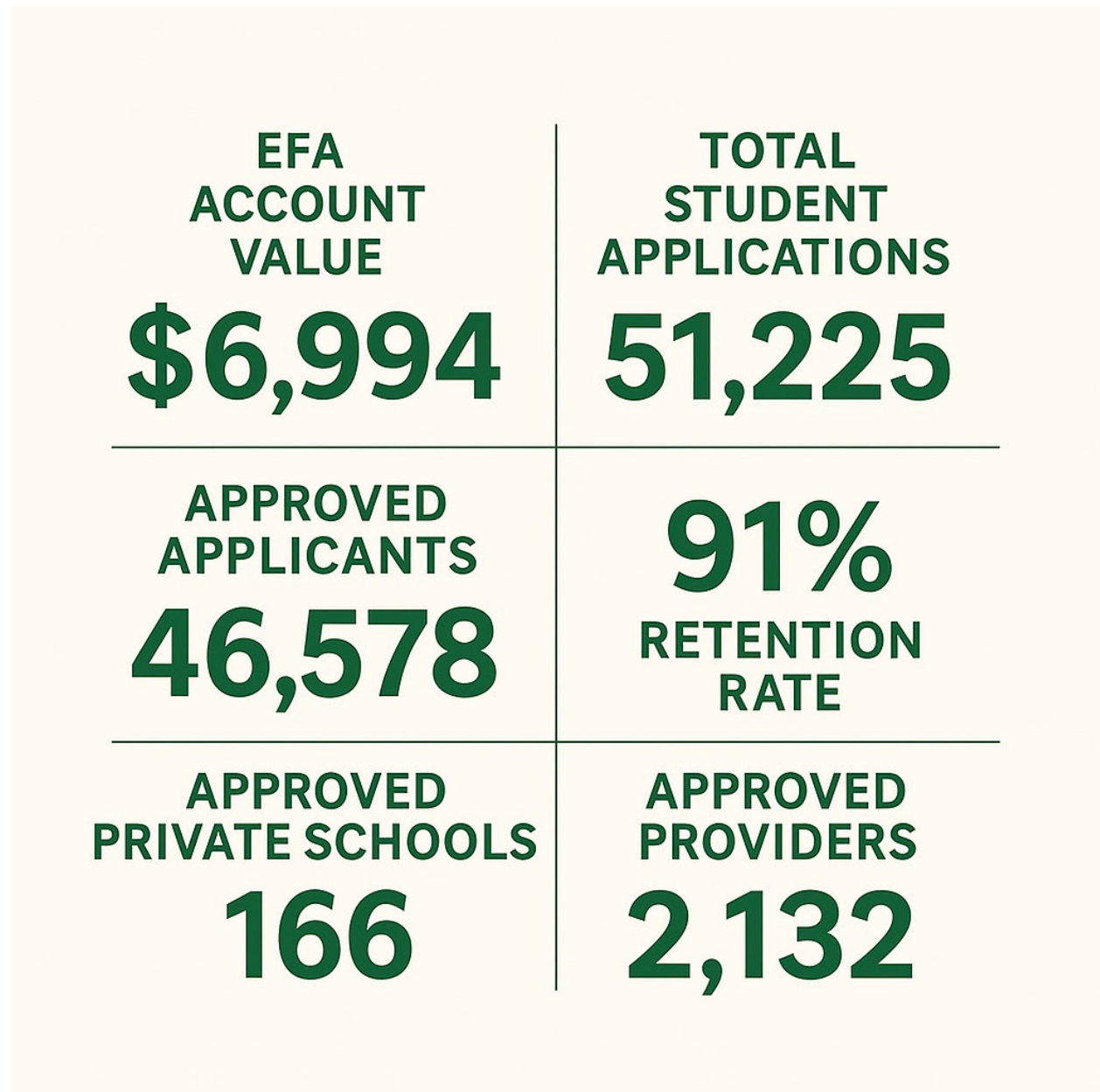
Table 11: 2024–25 ATLAS Performance Levels

Performance Level	ELA	Math	Science	Average
1	7%	13%	17%	12%
2	44%	35%	41%	40%
3	33%	36%	29%	33%
4	16%	16%	12%	15%
Total				100%

For a breakdown of Atlas performance levels for the four private schools, see Appendix D.

¹¹ In future years, University of Arkansas researchers will collaborate with ADE to directly equate ATLAS assessment results and the other nationally normed assessments taken by EFA students.

2025–2026 EFA Program Summary Highlights



Office of School Choice and Parent Empowerment

The Arkansas Department of Education's (ADE) Office of School Choice and Parent Empowerment (OSCPE) is responsible for planning, implementing, and monitoring the Education Freedom Accounts (EFA) program, as well as overseeing ADE's broader school choice initiatives. The following principles guide the Office of School Choice and Parent Empowerment's work:

- Empower parents to make the best school choice for their child
- Expand educational opportunities and access for Arkansas' families
- Support high-quality school options
- Balance accountability with flexibility
- Ensure strong fiscal stewardship of public funds
- Use data to inform rulemaking

OSCPE is pleased to partner with the University of Arkansas Department of Education Reform to report on the successful second year of the EFA program, which expanded significantly in both participation and reach. Building on that momentum, the Office of School Choice & Parent Empowerment (OSCPE) has led the program's policy, operations, and family support, standing up a statewide marketplace of schools and providers, onboarding and monitoring participants, safeguarding funds, and publishing clear guidance and data so families can make informed choices. Arkansas is one of five states with universal program eligibility that empowers families to choose the educational path that best fits their children's needs, providing EFAs for private and home education. This report reflects OSCPE's core work: expanding high-quality options, ensuring program integrity, and making school choice more accessible and transparent for Arkansas families.

University of Arkansas Department of Education Reform

As Arkansas' flagship institution, the U of A provides an internationally competitive education in more than 200 academic programs. Founded in 1871, the U of A contributes more than [\\$3 billion to Arkansas' economy](#) through the teaching of new knowledge and skills, entrepreneurship and job development, discovery through research and creative activity while also providing training for professional disciplines. The Carnegie Foundation classifies the U of A among the few U.S. colleges and universities with the highest level of research activity. U.S. News & World Report ranks the U of A among the top public universities in the nation. See how the U of A works to build a better world at [Arkansas Research and Economic Development News](#).

The **College of Education and Health Professions** established the **Department of Education Reform** in 2005. The department's mission is to advance education and economic development by focusing on the improvement of academic achievement in elementary and secondary schools. It conducts research and demonstration projects in five primary areas: teacher quality, leadership, policy, accountability and transparency, and school choice.

The **School Choice Demonstration Project (SCDP)**, based within the Department of Education Reform, is an education research initiative devoted to the non-partisan study of the effects of school choice policy and is staffed by leading school choice researchers and scholars. Led by Dr. Patrick J. Wolf, Distinguished Professor of Education Reform and Endowed 21st Century Chair in School Choice, SCDP's national team of researchers, institutional research partners, and staff are devoted to the rigorous evaluation of school choice programs and other school improvement efforts across the country. The SCDP is committed to raising and advancing the public's understanding of the strengths and limitations of school choice policies and programs by conducting comprehensive research on what happens to students, families, schools, and communities when more parents are allowed to choose their child's school.

2024-2025
Education Freedom Account
Appendix

Appendix A – Expenditure Categories

Expenditure Category Definitions

1. **Account Management** – Percentage fee charged to students for purchases in the closed marketplace
2. **Assessment** – Standardized assessment cost
3. **College Tuition/Fees/Supplies** – Payments for college tuition, dual credit courses, fees, and books
4. **Curriculum** – Printed or online curriculum in core subjects (math, English Language Arts, science, history)
5. **Disability Evaluation/Assessment** – Assessments for disabilities (e.g., dyslexia)
6. **Enrichment** – Extracurricular activities outside core subjects (e.g., art, physical education, music, elective courses)
7. **Homeschool Tuition & Fees** – Tuition and fees for academies, micro-schools, co-ops, and learning centers
8. **Private School Tuition & Fees** – Tuition and fee payments to private schools
9. **Refunds/Cancellations** – Purchases canceled or refunded to the EFA account or the state
10. **Supplies** – Technology, school supplies, non-curriculum specified books/materials, desks/chairs, application subscriptions (e.g., Microsoft Office and Adobe)
11. **Therapy** – Approved therapy services (e.g., speech and brain)
12. **Transportation** – Mileage/fuel reimbursement
13. **Tutoring** – Tutoring services in core subjects
14. **Uniforms** – School uniforms

Appendix A – Expenditure Categories

Expenditure Categorization Methodology

Due to the mid-year change in the EFA platform provider, there are two distinct datasets of EFA transactions. The fall 2024 dataset includes about 33,000 reimbursement transactions in which families listed the items they purchased. These transactions were coded based on the first eligible item the family listed. For example, if a parent lists that they purchased a computer, math notebook, and pencils, that purchase was classified as a “supplies.” The remaining non-reimbursement fall transactions were coded according to the direct account established with the private school or educational/product providers and the EFA account.

The spring transactions were coded using two factors: the provider and the category the family listed for the EFA transaction. In some cases, transactions were recategorized from the category selected by the family to better match the use. For example, if a family listed that their EFA transaction to a local art studio for art lessons is “tuition and fees,” or “curriculum,” the transaction was instead reclassified as “enrichment” because art lessons are not listed as core subject but is an eligible purchase.

Appendix B – EFA Expenditures by Private School/Provider

Appendix B: EFA Expenditures for Each Private School and Educational Product and Service Provider ¹²

School or Provider	Expenditures
100FTHOSE BOOKSTORE	\$13
180 RANCH	\$400
1ST DAY SCHOOL SUPPLIES	\$10,973
1ST LUTHERAN SCHOOL	\$434
36 UNIVERSITY	\$385
37 NORTH	\$3,085
3DOODLER	\$79
4H SEEK	\$5,131
5 BELOW	\$70
7 SISTERS HOMESCHOOL	\$367
72 WEST	\$75
A B C KID	\$959
A BEES CLOSET	\$86
A BRIGHTER CHILD	\$44
A CURIOSITY BOX	\$20,863
A CURRICULUM COMPANY: ARGOPREP	\$13,781
A DELECTABLE EDUCATION	\$20
A GENTLE FEAST	\$323
A HUMBLE PLACE	\$63
A NATURAL STATE OF SPEECH	\$1,481
A NERDY COMPANY, VARSITY TUTORS	\$6,620
A PLUS TEACHING SUPPLIES	\$541
A TO Z FOR MOMS LIKE ME	\$3,756
A TO Z LEARNING ACADEMY	\$2,856
A YEAR OF LEARNING	\$53
A.C.E SCHOOL OF TOMORROW	\$1,018
Ã¡HABLAMOS! FUN & FUNCTIONAL SPANISH IMMERSION EXPERIENCE	\$300
A+ MATH SOLUTIONS	\$850
A+ TUTORING	\$300
A1 THOMPSON DRIVING	\$16,670
AARDVARKS HORTICULTURE	\$24,002
ABC MOUSE	\$1,139
ABCYA	\$45
ABE BOOKS	\$2,191
ABEDVENTURES	\$154
ABEKA	\$138,931

¹² All Appendix B tables reflect providers by expenditures from spring transactions only. Due to limitations in the fall payment processing platform, providers' identities could not be reliably determined for that period.

Appendix B – EFA Expenditures by Private School/Provider

ABERCROMBIE	\$859
ABIDING WORSHIP	\$1,850
ABILITIES INC.	\$1,886
ABLENET	\$330
ABSOLUTE READING AND DYSLEXIA TUTORING	\$3,055
ABUNDANT LIFE CHRISTIAN ACADEMY	\$777,817
ACADEMIC ADVANTAGE	\$6,920
ACADEMIC EXCELLENCE	\$100
ACADEMIC THERAPY FOR EXCEPTIONAL LEARNERS, LLC	\$978
ACADEMY OF CHAOS AND WONDER	\$750
ACADEMY OF EXCELLENCE	\$77,230
ACADEMY SPORTS	\$849
ACCELERATED CHRISTIAN EDUCATION	\$212
ACCELLUS	\$15,718
ACCESS EVALUATION AND RESOURCE CENTER	\$1,600
ACCESS GROUP	\$295
ACCESS SCHOOLS	\$394,292
ACE - ALTERNATE COMMUNITY EDUCATION	\$11,300
ACE SCHOOL OF TOMORROW	\$1,310
ACHE HEALTH AND WELLNESS	\$40
ACORN & TWIGS	\$182
ACRES ACADEMY, LLC	\$53,787
ACT	\$11,137
ACTIVITIES FOR LEARNING	\$34
ADAMS THERAPY	\$564
ADAPTED MIND	\$419
ADAPTIVE TEAM THERAPY	\$1,375
ADOBE, INC	\$1,268
ADVENTUM	\$135
ADVENTURE ACADEMY	\$215
ADVENTURE ART	\$43
ADVENTURES IN ODYSSEY	\$118
AEROPOSTALE	\$159
AGAPE ACADEMY	\$60,201
AGE OF LEARNING	\$470
AGENA ASTRO	\$1,124
AIM ACADEMY ONLINE	\$76
AIVITUVIN	\$608
AKANSAS REGIONAL THERAPY SERVICES	\$200
ALCA CONCURRENT SPRING 2025	\$90
ALDI	\$94

Appendix B – EFA Expenditures by Private School/Provider

ALEKS	\$100
ALFRED	\$25
ALFRED MUSIC	\$17
ALI EXPRESS	\$163
ALIBRIS	\$69
ALISA COFFEY	\$2,580
ALISON'S MONTESSORI	\$68
ALL ABOUT LEARNING PRESS	\$20,888
ALL ABOUT READING	\$2,984
ALL CHILDREN'S ACADEMY	\$108,553
ALL CHILDREN'S THERAPY	\$9,805
ALL STAR SPORTING GOODS	\$55
ALLEACE LOOPER	\$22,411
ALLIANCE JIU JITSU OF NWA	\$6,240
ALLIED TECHNOLOGY	\$571
ALMA JOY MCCANN	\$1,120
ALOHA MICRO ACADEMY	\$1,150
ALPHA OMEGA PRODUCTIONS	\$51,966
ALPHAGRAPHICS	\$52
AMANDA BO	\$21
AMAZON	\$738,213
AMBASSADOR BAPTIST ACADEMY	\$27,025
AMBASSADOR BAPTIST CHURCH	\$200
AMBER WILLIAMS	\$285
AMERICAN CIVICS WITH MICHAEL FARRIS	\$299
AMERICAN EAGLE	\$802
AMERICAN OPINION FOUNDATION INC.	\$2,025
AMERICAN PRINTING HOUSE FOR THE BLIND	\$38
AMERICAN RED CROSS TRAINING SERVICES - KATRINA BRYANT	\$70
AMERICA'S NATIONAL PARK STORE	\$33
AMY BOUNDS	\$4,000
AMY IMME LITERACY LADDER	\$770
ANA KOCH	\$26,400
ANCIENT LANGUAGE INSTITUTE	\$40
AND ON	\$6
ANDREA'S SCHOOL OF DANCE, BRYANT	\$2,540
ANGEL STUDIOS	\$55
ANGIE TENNANT	\$2,460
ANH MONTESSORI SCHOOL, LLC	\$63,921
ANIMAL CARDS AND TALES	\$55
ANN MARIE PRATHER, PHD	\$1,586

Appendix B – EFA Expenditures by Private School/Provider

ANNIES	\$483
ANSWERS IN GENESIS	\$1,654
ANTHEM CLASSICAL ACADEMY	\$241,538
ANTHONY SCHOOL	\$650
AOP CHRISTIAN HOMESCHOOL	\$396
APO UNITED ACADEMY	\$6,950
APOLOGETICS PRESS	\$24
APOLOGIA	\$8,097
APOSTOLIC CHRISTIAN ACADEMY	\$6,728
APOSTOLIC LIGHTHOUSE	\$5,500
APPLE	\$34,268
AQUAHAWGS	\$2,626
AR NICA	\$1,340
ARIZONA STATE UNIVERSITY	\$100
ARKANSAS CATHOLIC HOMESCHOOLERS	\$2,015
ARKANSAS CENTER FOR EXTREME SPORTS	\$3,362
ARKANSAS CHILDREN’S HOSPITAL GIFT SHOP	\$19
ARKANSAS CHRISTIAN ACADEMY	\$543,607
ARKANSAS GOLD GYMNASTICS	\$998
ARKANSAS KNIFE SHOP	\$54
ARKANSAS MUSEUM OF FINE ARTS	\$516
ARKANSAS MUSIC CONSERVATORY	\$13,758
ARKANSAS NEUROPSYCHOLOGY AND BEHAVIORAL HEALTH	\$1,640
ARKANSAS NICA	\$1,005
ARKANSAS NORTHEAST COLLEGE	\$512
ARKANSAS OUTDOOR SCHOOL 4H	\$280
ARKANSAS REGIONAL THERAPY SERVICES	\$7,026
ARKANSAS SCHOOL FOR MATHEMATICS, SCIENCES, AND THE ARTS	\$95
ARKANSAS STATE CAPITOL GIFT SHOP	\$53
ARKANSAS STATE PARKS (BULL SHOALS-WHITE RIVER STATE PARK)	\$34
ARKANSAS STATE UNIVERSITY	\$390
ARKANSAS SWIM ACADEMY	\$9,288
ARKANSAS VISION DEVELOPMENT CENTER	\$27
ARMA POWER PC	\$13,357
ARMY AND AIR FORCE EXCHANGE	\$114
ARROWS ACADEMY	\$60,556
ART MAKES ME SMART	\$50
ART OF PROBLEM SOLVING	\$4,598
ART SUPPLIES	\$23
ART WITH LAUREN	\$68
ARTISTIC PURSUITS	\$191

Appendix B – EFA Expenditures by Private School/Provider

ARTS LIVE THEATRE	\$126
ARTS THERAPY	\$25
ARVIDA BOOK COMPANY	\$30
ASCENSION	\$129
ASD READING	\$320
ASHLEY COLLINS, BSE, AT	\$1,120
ASHLEY FENDLEY	\$1,700
ASHLEY MCCORD	\$180
ASHLEY MCCORD LEAP OF FAITH LEARNING	\$450
ASHLEY WHITE	\$125
ASPIRE GYMNASTICS ACADAMY	\$90
ASU BEEBE	\$752
ASU PREP GLOBAL ACADEMY	\$1,350
AT&T	\$1,539
AT. VINCENT	\$275
ATELIER SCHOOL OF ART	\$440
ATELIER SEWING STUDIO	\$750
ATTACK SHARK	\$29
ATWOODS	\$306
AUDIBLE.COM	\$4,197
AUDIOBOOKS.COM	\$9
AUSTIN AQUARIUM	\$66
AUTIO	\$36
AUTISM COMMUNITY STORE	\$36
AUTISM OASIS	\$299
AVA GRACE HORTON	\$200
B & H	\$2,443
BABBEL.COM	\$495
BACH TO THE FUTURE PIANO STUDIO	\$1,500
BACK MARKET	\$97
BACK PORCH MUSIC STUDIO	\$1,446
BACKBEAT MUSIC	\$75
BAKER CREEK	\$375
BAKERS GAS	\$215
BAKETIVITY	\$71,531
BAKIT BOX	\$8,370
BAKKEN	\$132
BALLET ARKANSAS	\$535
BAM	\$33
BAMBOO LAB	\$10,362
BANANA REPUBLIC OUTLET	\$26

Appendix B – EFA Expenditures by Private School/Provider

BAPTIST BOOK STORE	\$286
BAPTIST PREP	\$1,018,384
BAPTIST PREP ACADEMY	\$1,201
BARBARA NELSON	\$2,206
BAREFOOT BOOKS	\$120
BARGAIN BROTHERS	\$22
BARNES & NOBLE	\$12,885
BARTON READING AND SPELLING	\$3,224
BASLINE BILINGUAL SCHOOL	\$6,728
BASS PRO SHOP	\$117
BATESVILLE HOMESCHOOL CO-OP	\$1,920
BATESVILLE MONTESSORI SCHOOL	\$16,821
BAYARD	\$59
BAYLOR UNIVERSITY	\$2,250
BCN APPARELL	\$64
BE EDUCATION	\$50
BEAKERZ SCIENCE	\$7,319
BEAN'S BOOKS	\$30
BEARAPY ORGANIZATION	\$71,300
BEAST ACADEMY	\$11,227
BEAUTIFUL FEET BOOKS	\$4,990
BEAUTY AND BLAKE	\$85
BEAUTY AND TRUTH MATH	\$19
BEDISO INC	\$169
BEE WISE TUTORING	\$624
BEHAVIORAL HEALTH SERVICES, SUSAN BRYANT, PHD	\$517
BELK	\$547
BELLA GRACE DESIGNS	\$250
BELLA LUNA TOYS	\$670
BELLE AME CENTER FOR ARTFUL LIVING	\$19
BELLEVUE TUTORIAL	\$1,350
BENTON HOMESCHOOL CO-OP	\$119
BENTONVILLE CHRISTIAN ACADEMY	\$212,330
BEREAL BUILDERS	\$1,573
BERKELEY FARM	\$950
BEST BUY	\$1,385,177
BESTOWING THE BRUSH	\$247
BETHANY SIRLES	\$5,760
BETTER READING TUTORING	\$3,300
BETTER WORLD BOOKS	\$175
BETTY LUKENS	\$206

Appendix B – EFA Expenditures by Private School/Provider

BEYOND SPEECH LLC	\$3,462
BEYOND THE PAGE	\$1,202
BIBLE STEPS FOR KIDS	\$19
BIBLICAL LANGUAGE CENTER	\$125
BIBLINGO	\$396
BIDFTA	\$70
BIG FROG	\$219
BIG LOTS	\$33
BIOBOX LABS	\$2,869
BIRD BUDDY	\$298
BJ'S WHOLESALE	\$289
BJU PRESS HOMESCHOOL	\$59,095
BLACK RIVER TECHNICAL COLLEGE	\$100
BLACKBAUD TUITION MANAGEMENT	\$250
BLACKMAGIC	\$295
BLACKWELLS	\$28
BLESSED ACADEMY	\$17,457
BLESSED SACRAMENT CATHOLIC SCHOOL	\$166,161
BLESSINGS USED BOOKS	\$636
BLICK ART MATERIALS	\$566
BLOSSOM AND ROOT	\$70
BLUE PARK THERAPY	\$735
BNC SERVICES	\$85
BNC VIRTUAL ISMART BOOKSTORE	\$380
BOB BOOKS PUBLICATIONS LLC	\$270
BOB JONES PRESS	\$269
BOB JONES UNIVERSITY	\$45
BODY TALK BASICS LLC	\$147
BOMGAARS	\$105
BOOK NOOK	\$223
BOOK OUTLET	\$238
BOOK SHARK	\$1,158
BOOKISH	\$133
BOOKS	\$70
BOOKS A MILLION	\$2,401
BOOKS BY THE POUND	\$109
BOOKS4SCHOOL	\$32,817
BOOKSHARK	\$11,541
BOOKTACO.COM	\$70
BORDERLESS HORSEMANSHIP	\$3,890
BOSSREADERS	\$2,536

Appendix B – EFA Expenditures by Private School/Provider

BRAIN POP	\$204
BRANCHES	\$150
BRANDON ADAMS	\$300
BRANDON BUCHWALTER	\$310
BRAVE BOOKS	\$2,183
BRAVE WRITER	\$1,656
BREAKING THE BARRIER	\$2,025
BREANNA BULLINGTON	\$645
BREWER TESTING SERVICES	\$589
BRIAN DAVIS	\$28
BRICK EXPLORERS	\$1,923
BRIDGE TO HOPE ACADEMIC THERAPY AND CONSULTING SERVICES, LLC	\$4,425
BRIGHAM YOUNG UNIVERSITY IDAHO	\$504
BRIGHT & QUIRKY	\$335
BRIGHT EDUCATION	\$45
BRIGHT LEARNERS ACADEMY	\$50
BRIGHT PATH EDUCATION	\$1,750
BRIGHTER DAY PRESS	\$450
BRIGHTEST OWL LLC	\$2,760
BRIGHTWIRE DYSLEXIA CENTER	\$15,640
BRIGITTE DUNN	\$210
BRITTANY BARFIELD	\$265
BRITT'S VIBRANT VISIONS	\$1,260
BROOKLYN DAVIS MUSIC STUDIO	\$700
BROTHER-USA	\$924
BRYAN AND BECCA, LLC	\$2,622
BRYAN DAVID - BOOKS	\$31
BRYAN DAVIS	\$16
BRYANT PSYCHOLOGY AND BEHAVIORAL HEALTH	\$1,793
BSN TEAM SPORTS	\$826
BUC-EES	\$21
BUCHHEITS	\$168
BUDDYBOOKS	\$7,562
BUILD YOUR LIBRARY	\$91
BULK APOTHECARY	\$98
BURLINGTON COAT FACTORY	\$8
BUSHEL & PECK BOOKS	\$259
BUTTERFLY YOUR WORLD	\$74
BUY A BLAZER	\$94
BX EXCHANGE	\$34
C R FAULKNER INC	\$2,159

Appendix B – EFA Expenditures by Private School/Provider

CABOT APOSTOLIC LEARNING CENTER	\$33,800
CABOT CHRISTIAN SCHOOL	\$46,461
CABOT GYMNASTICS ACADEMY, INC	\$2,020
CABOT JUI JITSU ACADEMY	\$110
CABOT PUBLIC SCHOOL	\$47
CAKLE	\$185
CAILIN WILLIAMS TUTORING	\$2,010
CALVARY ACADEMY NLR	\$155,798
CALVARY CHRISTIAN ACADEMY 1ST FREEWILL BAPTIST CHURCH	\$34,820
CALVARY CHRISTIAN ACADEMY HOT SPRINGS	\$29,812
CALVARY CHRISTIAN SCHOOL	\$156,600
CALVARY OZARK	\$5,605
CALVERT HOMESCHOOL	\$892
CAMP INVENTION	\$250
CAMP TRINITY	\$200
CAMPFIRE CURRICULUM	\$806
CAMPUS INC	\$1,379
CANNON PRESS	\$1,166
CANOPY	\$120
CANVA	\$855
CAREER FITTERS	\$20
CARLA YOUNG	\$7,700
CARLIAS TUTORING	\$630
CARLSBAD CAVERNS NATIONAL PARK	\$62
CARLSON GRACIE VILONIA	\$4,172
CARLY TUTORING	\$1,610
CAROLINA BIOLOGICAL	\$32,453
CARRIE VICK	\$501
CARSON DELLOSA EDUCATION	\$31
CAST 'N CREW- THEATER CLASS	\$150
CATHERINE CHERRY	\$5,300
CATHOLIC FAMILY CRATE	\$50
CATHOLIC HERITAGE CURRICULA	\$4,276
CATHOLIC HIGH SCHOOL	\$767,814
CATHOLIC KIDS CLUB MAGAZINE	\$65
CATHOLIC SCHOOLHOUSE	\$1,040
CATHOLIC SPROUTS	\$486
CATHOLIC TEXTBOOK PROJECT	\$291
CAVE OF THE WINDS	\$41
CAYLA THOMAS	\$1,300
CC BOOKSTORE	\$1,438

Appendix B – EFA Expenditures by Private School/Provider

CCU, ABE, AND PEARSON	\$452
CEDAR FORT PUBLISHING	\$129
CENTER FOR LIT	\$149
CENTER FOR PSYCHOLOGY & COUNSELING	\$635
CENTERTON EYE CARE	\$147
CENTRAL ARKANSAS CHRISTIAN SCHOOLS, INC.	\$1,451,527
CENTRAL ARKANSAS HOMESCHOOL ACADEMY	\$58,365
CENTRAL ARKANSAS LIBRARY SYSTEM	\$123
CENTRAL ARKANSAS MONTESSORI	\$236,930
CENTRAL BAPTIST COLLEGE	\$900
CENTRAL CHRISTIAN ACADEMY	\$16,821
CHAMPIONSHIP MMA, LLC	\$4,470
CHANCE 2 DANCE LLC	\$6,256
CHANNIE'S	\$25,078
CHAPTERS ON MAIN	\$114
CHARGE MOMMY BOOKS	\$143
CHARLOTTE BUTCHER PIANO STUDIO	\$4,834
CHARLOTTE MASON BEEHIVE	\$153
CHARLOTTE MASON EDUCATION CENTER	\$300
CHARLOTTE MASON INSTITUTE	\$718
CHARLOTTE PIANO STUDIO	\$420
CHASE MUSIC STUDIO	\$6,075
CHAT GPT	\$40
CHATTERING CHERRY	\$40
CHE	\$25
CHEGG	\$28
CHENAL VALLEY MONTESSORI SCHOOL	\$10,093
CHESS.COM	\$120
CHESSUP	\$289
CHICAGO BOOKS	\$34
CHILD1ST PUBLICATIONS	\$295
CHILDREN PLACE	\$263
CHILDRENS HOUSE MONTESSORI SCHOOL	\$11,414
CHILDRENS PLACE	\$1,776
CHILDRENS THERAPY SERVICES INC	\$1,243
CHILDREN'S THERAPY TEAM	\$816
CHOICE EDUCATION NETWORK	\$7,930
CHOMPSHOP	\$626
CHRIST LUTHERAN CHURCH AND SCHOOL	\$281,624
CHRIST THE KING CATHOLIC SCHOOL - LITTLE ROCK	\$904,875
CHRIST THE KING CATHOLIC SCHOOL (FORT SMITH)	\$390,805

Appendix B – EFA Expenditures by Private School/Provider

CHRISTIAN BOOK	\$43,146
CHRISTIAN LIBERTY PRESS	\$38
CHRISTIAN LIGHT	\$4,514
CHRISTIAN SEX EDUCATOR	\$63
CHRISTINA NEWTON	\$3,220
CHURCH SOURCE	\$85
CIE	\$360
CIRCE INSTITUTE	\$129
CIRCUITMESS	\$246
CITY OF BENTONVILLE	\$315
CITY OF MOUNTAIN HOME ARKANSAS PARKS & RECREATION	\$28
CJS SALES & SERVICES	\$56
CLAIBORNE STUDIO	\$735
CLARKS TUTORING	\$850
CLASSFUL	\$19
CLASSIC ACADEMIC PRESS	\$60
CLASSIC LEARNING TEST (CLT)	\$998
CLASSICAL ACADEMIC PRESS	\$70
CLASSICAL AMB LLC.	\$706
CLASSICAL CONNECTIONS OF NORTHWEST ARKANSAS	\$316
CLASSICAL CONVERSATION	\$34,014
CLASSROOM COMPLETE PRESS	\$3,994
CLEAR SPRING SCHOOL INC	\$59,488
CLEVERBRIDGE	\$14
CLOVER COMMUNITY SCHOOL	\$52,322
CLRC ONLINE	\$1,008
CLUBHOUSE KID & CRAFT	\$54
CMEC	\$300
COACH BRANDON KIKER	\$137
CODE MONKEY	\$240
CODE NINJA	\$1,296
CODE REV KIDS	\$289
CODEWIZARDSHQ	\$1,782
COLLEGE BOARD	\$1,066
COLLEGE PREP GENIUS	\$732
COLORADO CHRISTIAN UNIVERSITY	\$952
COLUMBIA CHRISTIAN SCHOOL	\$359,314
COMM CENTRAL ACADEMY	\$57,746
COMMON SENSE PRESS	\$182
COMMUNITY CHRISTIAN SCHOOL SILOAM SPRINGS	\$55,256
COMMUNITY SCHOOL OF THE ARTS	\$195

Appendix B – EFA Expenditures by Private School/Provider

COMPASS ACADEMY	\$368,008
COMPASS CLASSROOM	\$5,007
COMPUSCHOLAR	\$90
COMPUTER	\$1,000
COMPUTERS FOR THE BLIND	\$350
CONCORDIA PUBLISHING HOUSE	\$85
CONFESSIONS OF A HOMESCHOOLER	\$60
CONNECT EDUCATION COOPERATIVE	\$100
CONNECTIONS TRAINING	\$10,650
CONNIE STOREY	\$12,250
CONNIE WATERS	\$2,160
CONWAY CHRISTIAN SCHOOL	\$947,001
CONWAY PUBLIC SCHOOLS	\$69
CONWAY TOE2TOE	\$3,402
COOPER & KID, LLC	\$2,834
COR JESU PRESS	\$65
CORE KNOWLEDGE	\$85
CORNER POST	\$31
CORNERSTONE CHRISTIAN ACADEMY - KENSETT	\$28,999
CORNERSTONE CHRISTIAN ACADEMY - TILLAR	\$264,352
CORNERSTONE EDUCATIONAL SUPPLY	\$245
CORNERSTONE MONTESSORI CHRISTIAN ACADEMY	\$40,371
CORSAIR	\$100
COSMIC KIDS YOGA	\$59
COSSATOT COMMUNITY COLLEGE	\$257
COSTCO	\$12,763
COTTON COMPANY	\$99
COUNTRY SONG TEACHER SHOP	\$70
COURSERA	\$32
COUSIN'S OFFICE FURNITURE INC.	\$204
COVENANT ACADEMY CHRISTIAN HOMESCHOOL COOPERATIVE	\$2,074
COZY CRAFTERS	\$20
COZYLA	\$450
CRACKER BARREL	\$25
CRAFTSMAN CRATE	\$257
CRAYOLA	\$22
CREALITY	\$2,243
CREATING A MASTERPIECE	\$219
CREATIVE MINDS	\$650
CREATIVITY LAB OF JONESBORO	\$1,523
CRESTLINE ACADEMY	\$17,846

Appendix B – EFA Expenditures by Private School/Provider

CRESTVIEW PSYCHOLOGICAL TESTING & COUNSELING CENTER	\$650
CRICUT	\$522
CRISTIAN BOOK	\$141
CRITICAL THINKING COMPANY	\$324
CROSSMAN PRINTING	\$139
CROSSPOINTE PREPARATORY	\$134,137
CROSSWAY	\$213
CROWDER COLLEGE	\$372
CROWN ONLINE	\$25
CRUNCH LABS	\$21,829
CRYSTAL BRIDGES	\$1,410
CTC MATH	\$1,745
CULTIVATE WHAT MATTERS	\$49
CURIOSITY CENTER	\$32
CURIOSITY CHRONICLES	\$766
CURIOSITY STREAM	\$40
CURIOSITY UNTAMED	\$210
CURIOUS PARADOX	\$650
CURRICULUM	\$1,183
D1 TRAINING	\$29,865
DAD SUGGEST	\$21
DAILY SKILL BUILDING	\$80
DALLAS HOLOCAUST AND HUMAN RIGHTS MUSEUM	\$19
DANA BRADLEY MINISTRIES INC	\$10,170
DANCE BRANSON SCHOOL OF THE ARTS	\$2,773
DANCE BY ELIESE LLC	\$2,840
DANCE EST JOIE	\$1,645
DASH INTO LEARNING	\$493
DAVIS TRANSPORATION	\$458
D-BAT	\$12,651
DEBORAH POIROT DYSLEXIA SERVICES	\$3,465
DEBRA DAUGHERTY	\$1,100
DECIPHERING DYSLEXIA	\$6,360
DELL	\$9,846
DEMME LEARNING	\$31,062
DEMPSEY BREWER TESTING SERVICES	\$90
DENISON ALGEBRA	\$3,685
DENNIS UNIFORM	\$27
DESIGN CROWD	\$15
DEVILS TOWER NATIONAL PARK	\$10
DEVINE GRACE	\$120

Appendix B – EFA Expenditures by Private School/Provider

DIANNE CRAFT	\$429
DICKS SPORTING GOODS	\$39
DICKSON STREET BOOK STORE	\$367
DIDION ATHLETICS	\$5,926
DILLARDS	\$4,326
DINOLINGO	\$153
DISCOUNT SCHOOL SUPPLY	\$354
DISCOVER	\$2,799
DISCOVER WILD LEARNING	\$75
DISCOVERY MUSEUM	\$10
DISCOVERY TOYS	\$179
DISNEY	\$20
DISSOLVE	\$500
DISSOLVE AI	\$77
DIVE DIGITAL INTERACTIVE VIDEO EDUCATION	\$506
DIVE INTO MATH & SCIENCE	\$213
DIY FAMILY VIDEO	\$46
DOG EAR BOOKS	\$15
DOLLAR GENERAL	\$469
DOLLAR STORE	\$16
DOLLAR TREE	\$351
DOODLE NOGGIN	\$10
DOUG BRADBERRY	\$247
DOWNTOWN DANCE	\$180
DOXA ARTS ACADEMY	\$32,737
DR. AMY THOMPSON, CALT, C-SLDS	\$500
DR. CHRIS EMERT	\$1,280
DR. KLEIN PSYCHOLOGIST	\$355
DR.LANDRY HOMESCHOOL SCIENCE	\$440
DRAW NEAR DESIGN	\$65
DREAMBOX MATH	\$246
DREWS ART BOX	\$27,438
DRIVEN BY GRACE	\$1,275
DRIVING ACADEMY OF NORTHWEST ARKANSAS, LLC	\$13,877
DUCK DUCK GOOSE	\$32
DUOLINGO	\$2,440
DUTCH ACRES FARM INC	\$231
DWIGHT DAUGHERTY	\$1,400
DYERMARK	\$104
DYSLEXIA SUCCESS ACADEMY	\$2,500
DYSLEXIA THERAPY	\$2,200

Appendix B – EFA Expenditures by Private School/Provider

DYSLEXIA TUTORING	\$300
EASTERSEALS ACADEMY	\$275,231
EASY GRAMMAR SYSTEMS	\$612
EASY PEASY OUTLET	\$1,300
EASY PEASY SCIENCE	\$6,233
EAT2EXPLORE	\$2,799
EBAY	\$11,814
EBONY DELEON	\$41
ECCLESIA PREP CO-OP	\$620
ECHO VALLEY ARABIANS	\$2,660
ECLECTIC TEACHING CONSORTIUM	\$105,621
EDGEWOOD STUDIO VISUAL ARTS	\$400
EDIBLE KNOWLEDGE	\$344
EDOVATE LEARNING CORP.	\$819
EDUCATE FOR LIFE	\$619
EDUCATION	\$574
EDUCATION MEGA STORE	\$17,377
EDUCATIONAL EDGE	\$1,745
EDUCATIONAL INTERVENTION SERVICES	\$6,370
EDUCATIONAL PRODUCTS INC.	\$72
EDUCATORS	\$45
EDZOOCAATION	\$683
EIGHTY-TWENTY LEARNING FOR ASD, LLC	\$77,558
ELEGOO	\$860
ELEMENTAL SCIENCE	\$466
ELEPHANT LEARNING	\$8,794
ELEVATE GYMNASTICS	\$225
ELITE DANCE STUDIOS	\$1,111
ELKINS TEST PREP	\$290
ELLEN CRAIN	\$80
EMANUALSON STUDIO	\$15,010
EMILY POWELL	\$6,230
EMILYS PLACE, INC	\$81,854
EMOTIONAL ABC'S	\$16
EMPIRE KIDS	\$2,539
ENGLISH LANGUAGE THROUGH LITERATURE	\$22
ENLIGHTIUM ACADEMY	\$2,910
ENRICHMENT CENTER	\$400
ENSIGN PEAK ACADEMY	\$1,794
EPIC	\$252
EPIC GARDENING	\$600

Appendix B – EFA Expenditures by Private School/Provider

EPISCOPAL COLLEGIATE SCHOOL	\$1,043,393
EPSON	\$592
EREFLECT	\$201
ERICA KEEN	\$1,430
ERIN CONDREN	\$255
ESPECIALLY FOR YOU DESIGN	\$25,661
ESSENTIALS IN WRITING	\$3,862
ETSY	\$1,115
EVAN MOORE	\$826
EVERGREEN ACADEMY	\$57
EVERYDAY SPEECH	\$620
EVERYMAN	\$72
EVOLVE PERSONAL FITNESS COACHING LLC	\$2,340
EXACT EDITIONS	\$70
EXACTMATS	\$94
EXCEL HIGH SCHOOL	\$1,980
EXCELSIOR	\$60
EXCHANGE	\$28
EXODUS BOOKS	\$256
EXPECTING ADVENTURES, LLC	\$9,064
EXPLORATION EDUCATION	\$83
EXTRAORDINARY MISSIOK	\$88
FACEBOOK MARKETPLACE	\$2,206
FACTS	\$2,388
FAITH APOSTOLIC CHRISTIAN ACADEMY	\$2,671
FAMILIFY	\$65
FAMILY DOLLAR	\$151
FAMILY FARM CHRISTIAN DAY CAMP	\$155
FAMILY LEARNING ORGANIZATION	\$180
FAMILY LITERACY CENTER	\$1,205
FANCY SCHMANCY FLEA MARKET	\$200
FARMER'S ASSOCIATION	\$132
FASTSPRING	\$22
FAT BRAIN TOYS	\$161
FAT QUARTER SHOP	\$167
FAYETTEVILLE ACTON ACADEMY, LLC	\$18,067
FAYETTEVILLE CHRISTIAN SCHOOL	\$91,759
FAYETTEVILLE CREATIVE SCHOOLS, INC.	\$35,525
FAYETTEVILLE MARTIAL ARTS	\$744
FAYETTEVILLE NATURE SCHOOL	\$71,204
FE VIVA CHRISTIAN SCHOOL	\$37,568

Appendix B – EFA Expenditures by Private School/Provider

FEDEX	\$26
FEPPY	\$2,538
FERNCLIFF	\$8,333
FIDGET GAME	\$20,854
FIG TREE BOOKS AND MORE	\$75
FILM SCHOOL 4 TEENS	\$17,306
FIRST ACADEMY	\$308,181
FIRST BAPTIST CHURCH-TEXARKANA-SCHOOL OF WORSHIP ARTS	\$855
FIRST HOMESCHOOL	\$1,218
FIRST LUTHERAN SCHOOL (BENTON)	\$55,721
FIRST LUTHERAN SCHOOL (FORT SMITH)	\$142,937
FIRST SCHOOL	\$17,829
FIVE BELOW	\$168
FIVE IN A ROW	\$59
FIVE OAKS	\$107
FIVE STAR	\$40
FLASHFORGE	\$802
FLIP FLOP SPANISH	\$157
FLIP SIDE NINJA PARK	\$12,795
FLITE TEST	\$268
FLYING PIG TOYS	\$81
FLYNNO'HARA	\$593
FOCUS ON THE FAMILY	\$296
FOIHLETPATH	\$36
FORCA MARTIAL ARTS AND FITNESS	\$1,603
FORENSIC SCIENCE SCHOOL	\$850
FORESTRY SUPPLIERS, INC.	\$223
FOREVER 21	\$22
FORT SMITH MONTESSORI SCHOOL, INC.	\$99,547
FORTRESS CHRISTIAN	\$125
FORTY FORTY	\$213
FOUNDATION OF ARTS JONESBORO	\$300
FOUNDATION WORLDVIEW	\$465
FRAN VAUGHT ART	\$800
FRANCES VAUGHT	\$400
FRANCESCAS	\$136
FRANKLIN UNIVERSITY	\$67
FRECKLED HEN	\$133
FREEDOM EDUCATION SERVICES, INC.	\$1,436
FREEDOM PROJECT ACADEMY	\$1,450
FRENCH TOAST	\$759

Appendix B – EFA Expenditures by Private School/Provider

FRIENDS OF THE BENTONVILLE LIBRARY	\$23
FRIENDSHIP LAB SCHOOLS FOR DYSLEXIA	\$73,268
FUEL REIMBURSEMENT	\$18,068
FUNNIX	\$175
FUNPHIX	\$1,966
FURNITURE ROW	\$380
FUSION THERAPY CENTER	\$6,346
FUTURES HIGH SCHOOL	\$3,297
FUZZY YELLOW TENNIS BALLS	\$47
G3 MINISTIES	\$300
GAP	\$734
GAP RELIEF	\$4,378
GARDEN TOWER PROJECT	\$2,097
GARDENARY	\$174
GARDYN	\$1,313
GARRETT MEMORIAL CHISTIAN SCHOOL	\$110,180
GATHER MAKE ART	\$49
GATHER ROUND	\$6,154
GENERATION GENIUS	\$2,567
GENEROUS FAMILY	\$11,745
GENEROUS STUDENTS	\$130
GENESIS GYMNASICS ACADEMY	\$7,414
GENNI SUTANTO	\$1,100
GENTLE FEAST	\$58
GENUINE INK	\$192
GEOKIDZ	\$6,011
GEORGE GUITARS	\$10,825
GIGS MUSIC STUDIO	\$760
GILMER'S LEARNING SOLUTIONS, LLC	\$22,875
GIMKIT	\$60
GLENDIA BRYAN TUTORING	\$2,160
GLITTERBOMBERS	\$56
GLOBAL EXPLORERS	\$75
GLOBAL GOOSE LANGUAGES	\$609
GLOBAL SCHOOLWEAR	\$58
GLOSSA HOUSE	\$121
GLOSSICKA	\$25
GO MARKIT	\$32
GOALLY	\$11,970
GOLDFISH SWIM SCHOOL	\$15,715
GOODKIND	\$25

Appendix B – EFA Expenditures by Private School/Provider

GOODNOTES 6	\$36
GOODWILL	\$391
GOOGLE PLAY VIDEO	\$14
GOSPEL LIGHT CHRISTIAN SCHOOL	\$125,008
GOYERINK, LLC	\$650
GRACE & TRUTH BOOKS	\$61,613
GRACE ACADEMY ARKANSAS	\$59,717
GRACE CHRISTIAN SCHOOL	\$46,659
GRACE CURRICULUM	\$84
GRACE WAY ACADEMY	\$2,450
GRACEFUL BY DESIGN	\$121
GRACIE JIU JITSU	\$13,176
GRADE POTENTIAL TUTORING	\$444
GRAMMAR FLIP	\$40
GRAMMARLY	\$932
GRAND MASTER HAN'S TAEKWONDO	\$4,551
GREAT BATTLES FOR BOYS	\$454
GREAT MINDS	\$260
GREENWAYS ACADEMY	\$2,647
GREETINGS ISLAND	\$27
GREG LANDRY HOMESCHOOLSCIENCE	\$880
GROOVED LEARNING	\$445
GROWTH WISE TUTORING	\$1,192
GUEST HOLLOW	\$248
GUIDE ALONG	\$93
GUIDE DOTS	\$13,833
GUMROAD	\$6
GYM STARS DIAMONDS	\$8,440
GYMNASTICS UNLIMITED	\$557
H&M	\$147
HABBI HABIB	\$595
HAEFNER SWIMMING	\$1,980
HALF A HUNDRED ACRE WOOD	\$40
HALF PRICE BOOKS	\$495
HALFTONE STUDIO	\$289
HALLOW	\$154
HAMILTON HOUSE HOMESCHOOL CO-OP, L.L.C.	\$14,600
HAND2MIND	\$24,973
HANDS 4 BUILDING	\$18,896
HANDWRITING WITHOUT TEARS	\$74
HANNAH EDUCATIONS RESOURCES AND EVALUATIONS	\$16,675

Appendix B – EFA Expenditures by Private School/Provider

HANNAH HANNAN	\$700
HANNAH JARCHOW	\$2,825
HANNAH PIGMAN	\$17,834
HAPPY CHEETAH READING	\$175
HAPPY NUMBERS	\$99
HAPPY PLANNER	\$50
HAPPY TEACHERS	\$42
HARBOR & SPROUT	\$2,106
HARBOR FREIGHT	\$571
HARDING ACADEMY	\$645,550
HARDING UNIVERSITY	\$297
HARKLA	\$63
HARLEN BELL	\$2,300
HARLEYS POTTERY PAINTING STUDIO	\$413
HARPPA	\$116
HARP'S	\$6
HARRISON KRAV MAGA	\$3,421
HARRISON PARKS AND RECREATION	\$100
HARRISVILLE DESIGNS	\$131
HARVEST TIME ACADEMY	\$272,562
HATCHING EGGS	\$25
HAVOC	\$1,600
HAWAII PACIFIC PARKS ASSOCIATION	\$76
HAWKES LEARNING	\$116
HEALING HOOVES	\$1,000
HEART OF DAKOTA	\$1,639
HEARTH AND STORY	\$100
HEARTWOOD HOUSE	\$1,850
HEATHER RODGERS PIANO STUDIO	\$450
HEBER CHRISTIAN SCHOOL	\$64,406
HEGGERTY	\$678
HELLOSIMPLY	\$120
HELPING HANDS	\$8
HENZIE'S ART STUDIO	\$391
HERE	\$2,493
HERITAGE THERAPY	\$719
HEWITT LEARNING	\$170
HEWLETT PACKARD	\$8
HEWO STORE	\$130
HIGGINBOTHAM THERAPY PROVIDERS	\$1,505
HIGH-IMPACT EDUCATION, LLC DBA 36 UNIVERSITY	\$120

Appendix B – EFA Expenditures by Private School/Provider

HIGHLIGHTS MAGAZINE	\$221
HILLSDALE COLLEGE	\$60
HILLTOP ACADEMY	\$3,315
HIPPOS & FISH SPECIALIZED PEDIATRIC THERAPY SERVICES	\$640
HISTORICAL CONQUEST	\$84
HISTORY PLUS ONLINE	\$15
HISTORY UNBOXED	\$23,983
HOBBY LOBBY	\$6,266
HOFFMAN ACADEMY	\$667
HOKA ELEMENTARY	\$351
HOKE'S BOOKSTORE	\$66
HOLA AMIGO	\$3,194
HOLLAND BULB FARMS	\$96
HOLLY HACKS MATH	\$11,145
HOLLYHOCK MONTESSORI	\$9,972
HOLY FAMILY PRESS	\$38
HOLY HEROES	\$144
HOLY ROSARY CATHOLIC SCHOOL	\$37,600
HOME DEPOT	\$3,560
HOME SCHOOL BETTER TOGETHER	\$19
HOME SCIENCE TOOLS	\$100,107
HOME WORKS FOR BOOKS	\$11,071
HOMEGOODS	\$39
HOMEGROWN EDUCATION	\$101
HOMESCHOOL ADVENTURE	\$15
HOMESCHOOL ARTBOX	\$7,873
HOMESCHOOL BOSS	\$66,973
HOMESCHOOL BUYERS CLUB	\$531
HOMESCHOOL CONNECTIONS	\$615
HOMESCHOOL CO-OP	\$6,158
HOMESCHOOL DIPLOMA	\$45
HOMESCHOOL IN THE WOODS PUBLISHING	\$139
HOMESCHOOL JOURNEY	\$61
HOMESCHOOL LANGUAGES	\$443
HOMESCHOOL PLANET	\$277
HOMESCHOOL SALE	\$40
HOMESCHOOLING TORAH	\$47
HOMESTEAD ACADEMY LLC	\$65,656
HOMESTEAD EDUCATION	\$688
HOMEWORKS BY PRECEPT	\$976
HONEST HISTORY	\$9,245

Appendix B – EFA Expenditures by Private School/Provider

HONEY FLOW	\$528
HOOKED ON PHONICS	\$1,064
HOPE CO-OP	\$4,075
HOPE THERAPY	\$2,055
HOPS PRESS, LLC	\$34
HORIZONTAL HIVE	\$465
HORSE ILLUSTRATED	\$58
HOT SPRINGS CHILDREN'S DANCE THEATER	\$725
HOT SPRINGS GYMNASTICS	\$17,838
HOT SPRINGS NINJA	\$90
HOW WEE LEARN	\$83
HP	\$6,271
HUMBLE HEART PRESS	\$177
HUNTINGTON LEARNING CENTER	\$4,591
I CREATE ART	\$13,898
I55 BOOK FAIR	\$416
IBRICK	\$1,653
ICODE LITTLE ROCK	\$6,729
IDA PEARSON	\$900
IGNATIUS PRESS	\$89
IGNITE LEARNING ACADEMY	\$13,236
IGNITIA VIRTUAL ACADEMY	\$535
IKEA	\$11,492
IKOREE	\$76
IMMACULATE CONCEPTION CATHOLIC SCHOOL	\$730,928
IMMACULATE CONCEPTION SCHOOL (FORT SMITH)	\$362,667
IMMACULATE HEART OF MARY SCHOOL	\$151,548
IMPACT CIRCLE INC	\$380
IMPERIAL ACADEMY	\$528
INFERNO MARTIAL ARTS	\$1,571
INFINITI ATHLETICS	\$3,935
INKTECHNOLOGIES	\$210
INNOVATION STATIONS	\$17,100
INSECT LORE	\$493
INSIDE OUT STUDIO	\$13,167
INSPIRE STEAM ACADEMY	\$24,554
INSPIRE TO CREATE	\$257
INSTITUTE FOR EXCELLENCE IN WRITING	\$8,242
IN-SYNC PEDIATRIC THERAPY CENTER	\$450
INTEGRATE BRAIN HEALTH	\$1,096
INTO THE DEEP	\$123

Appendix B – EFA Expenditures by Private School/Provider

INTOXICATED LIFE	\$279
INVENTR.IO	\$46
IOWA TESTS OF BASIC SKILLS (ITBS)	\$1,010
IRIS READING	\$399
ISINGAPORE MATH	\$162
ISTREAM	\$2,225
ITUNES	\$23
IVY KIDS	\$12,781
IXL	\$7,293
J. CREW FACTORY	\$151
J.M. STEVENS FORGE	\$219
J2 ATHLETICS	\$4,100
JACK & LINK	\$643
JACKRIS PUBLISHING	\$104
JACKSONVILLE CHRISTIAN ACADEMY	\$292
JACKSONVILLE CHRISTIAN ACADEMY	\$155,725
JACKSONVILLE FLEA MARKET	\$626
JAM WITH LATIN	\$418
JAMES MOORE MATH TUTORING	\$2,025
JAX GYM	\$11,215
JCPENNEY	\$2,756
JEANNE HARRISON	\$360
JEANNIE FULBRIGHT PRESS	\$172
JEANNIE MILLER	\$880
JEFFREY RUDD	\$30
JENNIFER PATTERSON	\$375
JEREMIAH CULLUM	\$240
JEREMY BIAR	\$20
JERI VAN PATTEN'S MUSIC STUDIO	\$750
JETPENS	\$105
JETTAWAY PERFORMANCE	\$5,694
JGA	\$164
JIU-JITSU JONESBORO	\$71
JOANN FABRICS	\$1,077
JO-ELLE ADAIR PIANO STUDIO	\$240
JOETTE'S LEARNING CENTER	\$136
JOHN BARBAROTTO	\$853
JONES CENTER	\$226
JONESBORO GYMNASTICS ACADEMY	\$1,530
JOSHUA ACADEMY	\$290,341
JOURNEY HOMESCHOOL ACADEMY	\$1,153

Appendix B – EFA Expenditures by Private School/Provider

JOY CENTER OF LEARNING	\$176
JOYCE DAVIS	\$75
JOYCES PIANO STUDIO	\$1,855
JST ROCKIN B RANCH, LLC	\$5,880
JUDITH BROWN	\$660
JUI-JITSU	\$90
JULI SALLINGS SPANISH	\$680
JULIA RINE	\$12,540
JUMPSPORT	\$274
JUNIOR BIBLE QUIZ	\$43
JUSCOLE FARMS	\$2,385
JUSTIN LESSEL	\$1,100
K12INC	\$3,252
K5	\$24
KAILEY BUCK LLC	\$1,450
KALEIDOSCOPE	\$725
KALEIDOSCOPE KIDS BIBLE REIMAGINED	\$197
KAPLAN	\$288
KAREN MINNIE	\$3,960
KATE DUTTON TUTORING	\$300
KATHERINE LASTOWIECKA	\$4,000
KATHLEEN WALLACE	\$2,442
KATHLEEN WALLACE	\$540
KATIE STEHLE	\$2,722
KC TUTORING	\$19,295
KELLI BEARD	\$46,200
KELLY JO FOLEY	\$1,200
KELLY MAHLER CURRICULUM	\$216
KELLY VANDOREN	\$608
KELSEY FORD	\$311
KER LANN	\$672
KERI CLAIBORNE	\$600
KEVINLOVEGREEN	\$73
KHAN ACADEMY	\$88
KHOLS	\$18
KICKS N FLIPS TUMBLE & CHEER INC	\$2,632
KID SOURCE	\$60
KIDS BEING KIDS THERAPY LLC	\$2,040
KIDS CLUB SPANISH SCHOOL, LLC	\$180
KIDS CORNER	\$10,254
KIDS N GOLF	\$175

Appendix B – EFA Expenditures by Private School/Provider

KIDS SPOT PEDIATRIC THERAPY	\$700
KIDSGARDENING	\$49
KIDSOURCE THERAPY	\$1,216
KIM DODGE	\$5,760
KIM LARSON	\$1,140
KIMBERLY LEDEE	\$1,800
KINDLE	\$51
KINDNESS AND JOY TOYS	\$85
KINDRED MERCANTILE	\$119
KINDRED PEDIATRIC THERAPY	\$905
KING ELITE CHEER INC.	\$2,864
KING OF S.T.E.M. LEARNING	\$1,260
KING'S GYMNASTICS	\$7,735
KITCHEN STEWARDSHIP LLC	\$294
KIWICO	\$11,226
KLETT WORLD LANGUAGES	\$65
KNETBOOKS	\$77
KNOWLEDGE CRATES	\$38,017
KNOWLEDGE IN MOTION	\$3,513
KNOWLEDGE TREE	\$422
KODABLE	\$200
KOHL'S	\$1,474
KOLBE ACADEMY	\$2,603
KRISTA BARKER	\$7,099
KRISTEN CICHOSKI MUSIC STUDIO	\$50
KRISTIE DELGADO	\$76
KRISTINA CARPENTER	\$28
KROGER	\$77
KRYSTAL CLEAR TUTORING SERVICES	\$780
K-STIX LLC	\$3,424
KUK SOOL OF THE RIVER VALLEY	\$1,627
KUMON	\$15,093
LAKESHORE	\$283,409
LAMPLIGHTER BOOKS	\$1,331
LAND GUARD	\$440
LANDS' END	\$10,670
LAURA GODFREY	\$225
LAURA INGALLS WILDER HISTORIC HOME AND MUSEUM BOOKSTORE	\$206
LAURA'S PIANO LESSONS	\$2,375
LAUREL DENISE	\$136
LAUREL SPRINGS SCHOOL	\$7,860

Appendix B – EFA Expenditures by Private School/Provider

LAYERS OF LEARNING	\$45
LDS PAINT BY NUMBER	\$26
LEAF'D BOX	\$97,738
LEAPFROG	\$70
LEAPFROG MONTESSORI FOREST SCHOOL	\$108,466
LEARN HOW TO SIGN	\$299
LEARN MATH FAST	\$375
LEARN PLAY GROW CHILDRENS THERAPY SERVICES	\$1,827
LEARN READING	\$110
LEARN TO READ	\$110
LEARN WELL	\$818
LEARNING ALLY	\$585
LEARNING BY FAITH	\$150
LEARNING IN FAITH	\$13,263
LEARNING OASIS	\$47
LEARNING PRESS	\$515
LEARNING WITH FRIENDS	\$267
LEARNING WITHOUT TEARS	\$309
LEARNINGRX BRAIN TRAINING	\$13,547
LEGACY ACADEMY	\$115,623
LEGACY CHRISTIAN ACADEMY (MABELVALE)	\$49,949
LEGACY CO-OP	\$5,615
LEGO	\$2,397
LENOVO	\$6,283
LESLEY PAIGE ESTES, INC	\$1,250
LESSONFACE	\$3,712
LETOURNEAU UNIVERSITY	\$1,060
LETS PLAY MUSIC	\$2,960
LETTERS FROM AFAR	\$74
LETTUCE GROW	\$3,055
LEVEL UP LEARNING, LLC	\$1,080
LEVENO	\$1,000
LEVI ALLEN	\$50
LEXERCISE	\$840
LEXIA	\$285
LEXIA CORE5	\$175
LEXICON SPEECH, LANGUAGE & READING	\$52,211
LIAHONA PREPARATORY	\$1,413
LIBERTAS INSTITUTE	\$730
LIBERTY UNIVERSITY ONLINE ACADEMY	\$35,815
LIBRARIES OF HOPE	\$55

Appendix B – EFA Expenditures by Private School/Provider

LIBRO AUDIOBOOKS	\$128
LIBRO FM	\$372
LIFE SCIENCE	\$32
LIFE STUDIES	\$9
LIFE WAY CHRISTIAN SCHOOL	\$743,477
LIFEGIVINGPAGES	\$11
LIFEWAY	\$79
LIFEWITHIN COUSELING AND TESTING	\$120
LIGHT OF FAITH RESOURCES	\$84
LIGHTHOUSE ACADEMY	\$1,250
LIGHTHOUSE HOMESCHOOL COOPERATIVE	\$182,384
LIGHTHOUSE OF MERCY CHRISTIAN SCHOOL	\$14,600
LIGRO LEARNING	\$111
LILY AND THISTLE	\$532
LINDSAY BURNETT STUDIOS	\$560
LINDSAY LARSEN	\$99
LINGOKIDS	\$150
LIOVENT	\$128
LISA JONES	\$60
LISA KAY BELL	\$1,200
LISA LUNDEEN	\$6,580
LITERACY LIVE	\$272
LITERARY ADVENTURES FOR KIDS	\$81
LITERATI	\$63
LITFAD	\$1,270
LITHOS KIDS	\$213
LITTLE BIBLE STORIES	\$144
LITTLE BLUE SCHOOLHOUSE	\$80
LITTLE DISCIPLES	\$30
LITTLE HOUSE LEARNING CO	\$34
LITTLE LATIN READERS	\$465
LITTLE LEARNERS TUTORING	\$400
LITTLE LIONS LEARN, LLC	\$1,511
LITTLE PASSPORTS	\$217
LITTLE ROCK ATHLETIC CLUB	\$1,664
LITTLE ROCK CHRISTIAN ACADEMY	\$2,137,156
LITTLE ROCK CLIMBING CENTER	\$2,302
LIVING BOOK PRESS	\$343
LIVING HISTORY	\$180
LIVING WATER ELEMENTARY	\$34,927
LIVING WELL PROFESSIONAL COUNSELING	\$225

Appendix B – EFA Expenditures by Private School/Provider

LIW HOME AND MUSEUM	\$110
LLAMITAS SPANISH	\$760
LOCAL SPARK	\$66
LOCKER ROOM INC	\$373
LOGIC OF ENGLISH	\$6,290
LOGOS	\$618
LOGOS PRESS	\$1,543
LOOP EARPLUG	\$57
LORD OF MAPS	\$81
LORI CANTABERY	\$3,703
LOST10TRIBES	\$231
LOUANNE WILLIAMSON	\$500
LOVETOLEARN	\$10
LOVEVERY	\$168
LOWER HOMESCHOOL	\$25
LOWE'S	\$1,998
LUCY	\$80
LULU-MATH MAMMOTH	\$89
LUMINOUS MINDS	\$850
LYDIA PARIS	\$2,900
M & M FARM AND LUMBER	\$72
MAC OF ALL TRADES	\$402
MADONNA LEARNING CENTER, INC.	\$3,738
MAGICORE	\$1,800
MAKE THE GRADE, LLC	\$444
MAKEDO	\$114
MAKER'S CHOICE POTTERY	\$92
MANGO LANGUAGES	\$200
MARANATHA BAPTIST CHRISTIAN SCHOOL	\$46,972
MARCIA OLIVER	\$40
MARDEL	\$16,665
MARIA GONZALEZ	\$350
MARLA BARINA	\$350
MARLTON BOOKS/ AMAZON	\$15
MARSHALLS	\$155
MARY MIRANDA MUSIC ACADEMY	\$300
MARY SALDIVAR	\$1,400
MASTER BOOKS	\$17,624
MASTER BOOKS ACADEMY	\$1,503
MASTER CLASS	\$99
MASTERPIECE SOCIETY STUDIO	\$469

Appendix B – EFA Expenditures by Private School/Provider

MATH ACADEMY	\$1,341
MATH AND MORE W/KRISTY	\$1,188
MATH MAMMOTH	\$91
MATHNASIUM	\$24,441
MATH-U-SEE	\$1,236
MATRIX RACQUET CLUB LLC	\$1,500
MATTHEW MARK FOUNDATION	\$48
MAX MILAM LIBRARY	\$54
MAXIMUM WEATHER INSTRUMENTS	\$300
MAXWOOD FURNITURE	\$239
MCCAFFERTY IRISH FEIS FOUNDATION	\$1,100
MCGRAW HILL	\$465
MCGREGORS TEACHER SUPPLIES	\$103,281
MCLENNAN COMMUNITY COLLEGE	\$1,426
MEDICALESHP	\$605
MEET YOUR MINI MAKER	\$32
MEGAPIXELS LLC	\$350
MEL SCIENCE	\$31,700
MELISSA PLAFCAN	\$695
MELODY BUTLER	\$5,220
MEMORIA ACADEMY	\$10,569
MEMORIA PRESS	\$17,731
MENARDS	\$270
MERCARI	\$1,848
MERCER PUBLISHING	\$45
MIA ACADEMY	\$30,886
MICHAEL LEE TREAT	\$2,460
MICHAELS	\$3,109
MICRO CENTER	\$1,896
MICROSOFT	\$2,080
MIGHTIER	\$219
MILESTONE BOOKS	\$1,265
MILLER PAD & PAPER, LLC	\$57
MINDPLAY	\$336
MINNESOTA STATE WIDE TESTING	\$2,600
MINT AND BLOOM	\$10
MIRUS TOYS	\$16,752
MISS CARLY TUTORING	\$1,138
MISSION IMPERATIVE	\$174
MISSOURI UNIVERSITY OF SCIENCE AND TECHNOLOGY	\$750
MOJO LEARNING	\$2,319

Appendix B – EFA Expenditures by Private School/Provider

MONTESSORI CHRISTIAN ACADEMY	\$600
MONTESSORI SERVICES	\$249
MORTON TUTORING	\$600
MOTHER OF DIVINE GRACE	\$3,770
MOUNT ST MARY ACADEMY CORPORATION	\$547,300
MOUNTAIN HOME CHRISTIAN ACADEMY	\$168,129
MOVING BEYOND THE PAGE	\$1,848
MR. D MATH	\$681
MRS. WORDSMITH	\$556
MSTP	\$96
MT RUSHMORE GIFT SHOP	\$190
MT. HAVEN MICROSCHOOL	\$1,600
MULDROW ACTIVITY CENTER	\$570
MULTISENSORY READING CENTER	\$4,785
MUSEUM OF DISCOVER	\$186
MUSEUM STORE	\$30
MUSIC DUO ACADEMY	\$158
MUSIC THERAPY OF NORTHWEST ARKANSAS	\$405
MUSICNOTES	\$5
MY FATHER'S WORLD	\$7,717
MY MATH ASSISTANT	\$260
MY NERDY TEACHER	\$22
MY PAYMENTS PLUS	\$191
MY TOPO	\$37
MYSTERY SCIENCE	\$109
N SPEECH THERAPY	\$3,550
NASCO EDUCATION	\$521
NAT THEO	\$10
NATALIE LIVELY	\$1,550
NATIONAL AUTISM RESOURCES	\$6,065
NATIONAL BIBLE BEE	\$445
NATIONAL GEOGRAPHIC	\$69
NATIONAL INVENTORS HALL OF FAME	\$275
NATIONAL PARK COMMUNITY COLLEGE	\$115
NATIONAL PARK MYSTERY SERIES	\$65
NATURAL STATE PERFORMING ARTS	\$1,280
NATURALREADER	\$110
NATURE GIFT STORE	\$146
NATURE'S WORKSHOP PLUS	\$469
NAVY EXCHANGE	\$240
NEBRASKA FURNITURE MART	\$25

Appendix B – EFA Expenditures by Private School/Provider

NECTAR GROUP	\$400
NELLIE BEES	\$94
NELMS DYSLEXIA CENTER	\$26,589
NESSY READING AND SPELLING	\$205
NETA FIT	\$400
NEURALIGN USA	\$3,000
NEURODIVERSE NETWORK LLC	\$4,079
NEUROTONE	\$14
NEW GROWTH PRESS, LLC	\$53
NEW HOPE THERAPY	\$11,178
NEW LEAF PUBLISHING GROUP LLC	\$3,813
NEW LIFE CHRISTIAN ACADEMY	\$338,497
NEW WEST PRESS	\$469
NEW YORK TIMES	\$50
NEWEGG	\$6,499
NEWSWEEK	\$98
NEXT STEP DANCE STUDIO	\$730
NICA PIT ZONE	\$335
NICOLE THE MATH LADY	\$250
NIGHT ZOO KEEPER	\$785
NIGRI JEWISH ONLINE SCHOOL	\$13,417
NINTENDO	\$30
NO LIMITS PEDIATRIC THERAPIES	\$360
NO LIMITS THERAPY	\$70
NOBLE KNIGHT	\$118
NOEO SCIENCE	\$1,276
NOMADIC COURSES LLC	\$1,000
NORTH ARKANSAS COLLEGE	\$718
NORTH LITTLE ROCK CATHOLIC ACADEMY	\$183,903
NORTH LITTLE ROCK STRINGS	\$1,103
NORTH RIVER CHRISTIAN ACADEMY	\$184,275
NORTHWEST ARKANSAS COMMUNITY COLLEGE	\$9,706
NORTHWEST BIBLE BOOKSTORE	\$41
NORTHWESTERN UNIVERSITY	\$600
NOT CONSUMED	\$4,611
NOTGRASS HISTORY	\$4,187
NOW! PROGRAMS	\$8,597
NWA BOOK SALE	\$45
NWA DRIVING ACADEMY	\$720
NWA HOMESCHOOL BOOKS	\$223
NWA LEARNING ADVENTURES LLC	\$1,581

Appendix B – EFA Expenditures by Private School/Provider

NWA PREMIER THERAPY	\$508
NWEA	\$1,615
OAK MEADOW	\$18,798
OAKS CHRISTIAN ACADEMY	\$111,788
OAQ VR EXPLORATIONS	\$12,252
ODYSSEY OF THE MIND	\$290
OFFICE DEPOT	\$237,537
OK CORRAL WESTERN STORE	\$92
OKLAHOMA CHRISTIAN UNIVERSITY	\$463
OLD INDEPENDENT REGIONAL MUSEUM	\$30
OLD NAVY	\$6,778
OLLIE'S	\$188
ONCE UPON A TIME BOOKS	\$874
ONE THIRD STORIES	\$3,832
ONFIRE LEARNING	\$3,961
ONLINE CURRICULUM	\$360
ONLINE SCIBBLERS	\$297
OOLY	\$218
OPENAUDIBLE	\$22
OPENLIGHT MEDIA	\$169
ORAL ROBERTS UNIVERSITY	\$1,255
ORIENTAL TRADING	\$518
ORIGINS CURRICULUM	\$340
OUI SI	\$60
OUR LADY OF FATIMA SCHOOL	\$71,231
OUR LADY OF THE HOLY SOULS	\$767,232
OUR LADY OF VICTORY	\$2,169
OUTLAW LEATHER	\$364
OUTSCHOOL	\$91,487
OUTSIDE THE BOX CREATION	\$11,866
OVERSTOCK	\$1,237
OVERTIME ATHLETICS TRAINING FACILITY	\$1,270
OYLA MAGAZINE	\$150
OZ ACTON ACADEMY	\$10,335
OZARK BOULDERING GYM	\$477
OZARK CATHOLIC ACADEMY	\$91,719
OZARK CLIMBING GYM	\$120
OZARK TENNIS ACADEMY	\$4,327
PADDLE	\$49
PAIDEA CLASSICS	\$101
PAIGE MILLS	\$925

Appendix B – EFA Expenditures by Private School/Provider

PAINTED DOOR	\$91
PAINTED TREE MARKETPLACE	\$43
PALMER MUSIC COMPANY	\$34,398
PALMER STRING STUDIO	\$1,390
PALMER VIOLIN SHOP	\$6,796
PAM BARNHILL	\$22
PANAMERICANA	\$234
PANDIA PRESS	\$1,432
PANGOBOOKS	\$278
PAOLA BROWN	\$198
PAPER	\$38
PAPERPIE LEARNING	\$20,773
PAPIER	\$44
PARCHMENT	\$63
PARELLI	\$130
PARKERMAN STABLES	\$3,630
PARTS & MORE INC.	\$562
PASSIONATE PENNY PINCHER	\$100
PATHWAYS TO READING	\$174
PATRICK SMART	\$680
PATTY DAILY	\$1,065
PAUL BACIO	\$25
PAULINE BOOKS AND MEDIA	\$355
PAYPAL	\$239
PCC	\$252
PCCA	\$263
PEACEFUL PRESS	\$9
PEARSON	\$1,649
PEDIATRIC PLAYHOUSE	\$90
PEGGY YODER	\$1,615
PELLETS	\$12
PEM LIFE	\$99
PENN FOSTER	\$2,043
PENNY'S FROM HEAVEN	\$139
PETSMART	\$445
PHILADELPHIA VISITOR CENTER	\$36
PHOENIX RISING MARTIAL ARTS	\$1,651
PHOTOMATH	\$10
PHYSICAL THERAPY INSTITUTE	\$835
PIANO MARVEL LLC	\$448
PIANO SAFARI	\$67

Appendix B – EFA Expenditures by Private School/Provider

PIANO TRAX	\$6
PIANO WITH SANDRA LLC	\$720
PICTURE BOOK	\$14
PINE HILL RANCH	\$913
PINES AND OAK	\$90
PINK MONTESSORI	\$442
PINNACLE CLASSICAL ACADEMY	\$145,332
PINNACLE GYMNASTICS	\$730
PIRATE SHIP	\$7
PLAN,PREP AND PRAY	\$57
PLANET GREEN RECYCLE	\$37
PLANK+BEAM	\$164
PLAY PIPER	\$8,238
PLAY ROBOTICS	\$208
PLAYFUL PATH COUNCELING LLC	\$75
PLAYSCRIPTS, INC.	\$227
PLAYSTRONG THERAPY	\$360
PLUM PAPER	\$87
PLUM'S ST. HOWARD'S ACADEMY	\$13,457
POSITIVE ACTION FOR CHRIST	\$61
POST PEDIATRIC THERAPIES	\$2,269
POTTERS HOUSE THRIFT	\$17
POTTERY BARN	\$465
POTTSVILLE ASSEMBLY OF GOD CHRISTIAN ACADEMY	\$1,433
POWER HOMESCHOOL	\$12,462
POWERHOUSE TRAINING COMPLEX	\$9,043
PRAISE AND HARMONY TV	\$275
PRATHER PSYCHOLOGICAL SERVICES	\$2,100
PRESWICK HOUSE	\$786
PRIDE READING PROGRAM	\$9,437
PRIMARY	\$152
PRINCETON REVIEW	\$299
PRISM NORTH AMERICA	\$75,026
PRODIGIES MUSIC	\$19,172
PRODIGY	\$1,115
PROVIDENCE CLASSICAL CHRISTIAN ACADEMY	\$713,598
PRUITT	\$164
PRUSA3D	\$332
PULASKI ACADEMY	\$1,284,962
PULASKI TECHNICAL COLLEGE	\$767
PURPLE HEART PRESS	\$55

Appendix B – EFA Expenditures by Private School/Provider

PURPLE HOUSE PRESS	\$1,106
QC TRAINING LLC	\$2,980
QIDI	\$468
QUINN MORISETTE LLC	\$97
QUIZLET	\$72
QUSTODIO	\$205
RABBIT TRAILS HOMESCHOOL	\$237
RACHEL MOONEYS PIANO STUDIO	\$420
RADDISH KIDS	\$341
RADIANCE BALLET	\$705
RAINBOW RESOUCRE CENTER	\$72,431
RAISING REAL MEN	\$300
RALPH LAUREN	\$940
RAMSEY SOLUTIONS	\$736
RANGERS ACADEMY	\$313
RAY-BAN	\$327
RAYBURN SPORTS	\$125
RAYCON	\$92
RC HISTORY	\$96
RCOM INCUBATORS USA	\$410
READ ALOUD REVIVAL	\$637
READ TO SUCCEED TUTORING SERVICES	\$5,650
READ WITH ELLO	\$352
READABILITY	\$300
READING	\$662
READING EGGS	\$2,053
READING HORIZONS	\$481
READING READY TUTORING SERVICES	\$1,820
READING SERVICES OF ARKANSAS	\$4,550
READING THERAPY	\$1,698
REAPER FITNESS	\$4,000
REBECCA KELLY	\$1,350
REBECCA WILLIAMS	\$5,400
REBEKAH RUSSELL SELAH STUDIOS	\$540
RED CURTAIN THEATER	\$295
REFORMATION HERITAGE BOOKS	\$15
REGISTERBLAST	\$74
REIMER LIFESKILLS	\$2,400
REJOICE BALLET ACADEMY	\$14,265
RENOWN MUSIC	\$8,536
RESPARKED	\$83

Appendix B – EFA Expenditures by Private School/Provider

RESTORATION COUNSELING	\$1,328
REVOLUTION COMBAT & FITNESS	\$40
REVOLUTION MMA	\$699
REWILD THE CHILD	\$7,455
RHAE LANA'S	\$200
RICHARD HANSON, PHD	\$29,864
RIDGEFIELD CHRISTIAN SCHOOL (JONESBORO)	\$230,460
RIGHTSTARTMATH	\$1,342
RISE	\$1,000
RIVER CITY GYMNASTICS	\$4,113
RIVERBEND PRESS	\$146
ROBBIE ROWTON	\$3,425
ROBINSON CURRICULUM	\$36
ROCK ISLAND BOOKS	\$55
ROCKET MATH	\$27
ROKLAND	\$78
RON PAUL CURRICULUM	\$425
ROOM TO BLOOM	\$9,825
ROOTS ACADEMY LLC	\$22,390
ROSETTA STONE	\$2,201
ROSIMOSI	\$40
ROSS DRESS FOR LESS	\$80
ROYAL FIREWORK PRESS	\$1,226
RUSSELLVILLE BAPTIST ACADEMY	\$123,270
RUSSELLVILLE REACH	\$60
RYAN LAWRENCE	\$100
SABREEN TIERI	\$35
SACRED HEART CATHOLIC SCHOOL	\$388,600
SAGER CLASSICAL ACADEMY	\$10,645
SALINE COUNTY CHRISTIAN SCHOOL	\$14,784
SALINE OPEN HOMESCHOOL ASSOCIATION	\$5
SALVATION ARMY	\$4
SAMARITAN SHOP	\$25
SAMMIE STEPHENSON	\$570
SAM'S CLUB	\$26,069
SAMSUNG	\$285
SANDRA GIROUARD	\$1,547
SARA ERWIN	\$5,603
SARAH RACHEL	\$1,159
SARALYN WORKMAN	\$1,430
SARA'S	\$2,158

Appendix B – EFA Expenditures by Private School/Provider

SAVERS	\$77
SAVVY LEARNING	\$912
SAXON	\$206
SCA	\$128
SCANMARKER	\$14,159
SCHOLAR WITHIN	\$3,215
SCHOLASTIC	\$70,975
SCHOOL OF GRACE	\$62,135
SCHOOL OF ROCK	\$2,631
SCHOOLHOUSE DISCOVERIES	\$1,657
SCHOOLHOUSE TEACHERS	\$90
SCHOOLIO	\$120
SCIENCE MOM	\$1,012
SCIENCE MUSEUM	\$62
SCIENCE SHEPHERD	\$633
SCOTT BUSS	\$1,320
SCOTT FAMILY AMAZEUM	\$31,903
SCRIB	\$56
SEA HOMESCHOOLERS	\$86
SEAN ELKIN	\$290
SEARCY CHRISTIAN ACADEMY	\$103,379
SEARCY COMMUNITY SCHOOL OF MUSIC	\$13,456
SEARCY FARMERS ASSOCIATION	\$104
SEARCY SCHOOL OF DANCE	\$383
SEARCY SCHOOL OF MUSIC	\$140
SECOND CHANCES CHILDREN'S CONSIGNMENT SHOP	\$75
SECOND STORY WINDOW	\$96
SECONDHAND	\$45
SEL POWER PACK	\$40
SELF	\$398
SENSORY PHONICS	\$25
SERVSAFE	\$179
SETON BOOKS	\$721
SETON HOME STUDY SCHOOL	\$1,288
SETON TESTING SERVICES	\$16,494
SETSON	\$64
SEVIER TUTORING	\$650
SHADOW VALLEY	\$550
SHAHEEN'S DEPARTMENT STORE	\$41
SHANNON JACKSON	\$2,100
SHARK WAVE AQUATIC TEAM	\$1,177

Appendix B – EFA Expenditures by Private School/Provider

SHARUMS	\$62
SHEELS	\$13
SHEET MUSIC DIRECT	\$99
SHEET MUSIC PLUS	\$7
SHEILA GONSER	\$10
SHEIN	\$223
SHELBY KIRKLEY	\$100
SHELLY JAMES	\$625
SHEPHERD KIDS CO	\$95
SHERWOOD CHRISTIAN ACADEMY	\$46,640
SHERWOOD CROSSFIT	\$2,835
SHILOH CHRISTIAN SCHOOL	\$1,591,412
SHILOH EXCEL CHRISTIAN SCHOOL	\$13,824
SHINING LIGHT DOLLS	\$130
SHIRLEY ENGLISH	\$33
SHOPIFY	\$54
SHUFFLES & BALLET II	\$3,565
SHURLEY INSTRUCTIONAL MATERIALS	\$349
SIDEWALK THERAPY GROUP, LLC	\$5,026
SILOAM CHRISTIAN SCHOOL	\$59,791
SILOAM SPRINGS PARKS AND REC	\$32
SILVER LINING THERAPY SERVICES	\$17,975
SILVERMOON CHILDREN'S THEATRE	\$475
SIMPLY CHARLOTTE MASON	\$2,120
SIMPLY HOMESCHOOL	\$39
SIMPLY LTD	\$150
SIMPLY NOVEL	\$13
SIMPLY ON PURPOSE PRINT SHOP	\$97
SIMPLY PIANO	\$510
SIMPLY SOUTHERN	\$37
SIMULATION CURRICULUM	\$50
SINGAPORE MATH	\$11,152
SKETCHBOX	\$428
SKOOVE	\$150
SKYLIGHT	\$349
SKYLIGHT FRAME	\$691
SKYWARD DYSLEXIA THERAPY	\$12,570
SMARTER BY 1 DEGREE, LLC	\$356
SMITHSONIAN INSTITUTION	\$58
SMOKEY EMERSEN	\$690
SNAKE RIVER STRINGS	\$2,239

Appendix B – EFA Expenditures by Private School/Provider

SNOGA	\$135
SO TYPICAL ME	\$49
SOAR THERAPY	\$510
SOLID ROCK ACADEMIC CENTER	\$14,000
SONLIGHT CURRICULUM	\$27,884
SONSHINE ACADEMY	\$34,370
SORA ONLINE SCHOOL	\$3,576
SOUL SPARKLETTES ART	\$196
SOUND FOUNDATIONS	\$51
SOUNDED EDUCATIONAL THERAPY	\$1,110
SOUTH ARKANSAS ART CENTER	\$850
SOUTH ARKNASAS CHRISTIAN SCHOOL	\$56,373
SOUTHERN ARKANSAS UNIVERSITY	\$425
SOUTHERN MERCANTILE	\$4
SOUTHERN ROOTS NATURE ACADEMY LLC	\$1,320
SOUTHWEST CHRISTIAN ACADEMY	\$384,671
SOUTHWESTERN ADVANTAGE	\$1,128
SOVOL	\$49
SPANISH BITES	\$245
SPANISH EDUCATION SOLUTIONS	\$217
SPANISH FOR KIDS	\$405
SPANISH HOMESCHOOL ACADEMY	\$19
SPANISH WITH SAMANTHA	\$4,777
SPARKJUMP	\$43
SPARROW PLANNER	\$43
SPEECH SOLUTIONS	\$375
SPEECHIFY	\$595
SPELLING SAFARI	\$98
SPELLING SUCCESS	\$210
SPIRALBIBLE	\$106
SPIRRIZZI PRESS	\$72
SPLASH LEARNING	\$70
SPORTSSTOP	\$152
SPOTIFY	\$26
SPRAY ACADEMY	\$280
SPRINGDALE YOUTH WRESTLING	\$595
ST CLARE HEIRLOOM SEEDS	\$48
ST MICHAEL'S CATHOLIC SCHOOL	\$63,200
ST. JOHN CATHOLIC SCHOOL	\$117,748
ST. JOHN'S CATHOLIC SCHOOL (HOT SPRINGS)	\$131,334
ST. JOSEPH CATHOLIC SCHOOL (CONWAY)	\$675,620

Appendix B – EFA Expenditures by Private School/Provider

ST. JOSEPH CATHOLIC SCHOOL (FAYETTEVILLE)	\$526,037
ST. JOSEPH SCHOOL (PARIS)	\$69,850
ST. MARY SCHOOL	\$36,750
ST. NICHOLAS BOOKSTORE	\$41
ST. PAUL CATHOLIC SCHOOL	\$123,569
ST. PAUL CENTER	\$66
ST. THERESA CATHOLIC SCHOOL	\$313,640
ST. THOMAS AQUINAS ACADEMY	\$735
ST. VINCENT DE PAUL CATHOLIC SCHOOL	\$457,966
STACIA EMORY	\$90
STAGES LEARNING MATERIALS	\$3,481
STANDARDS IN PUZZLES	\$3,695
STANFORD PRE-COLLEGIATE UNIVERSITY LEVEL ONLINE	\$500
STANTON TEST	\$45
STAPLES	\$218,627
STARLING MUSIC STUDIO	\$27,692
STARLINK	\$2,816
STARS AND STRIPES GYMNASTICS	\$900
STATE BAGS	\$28
STEAM	\$125
STEAM CO-OP	\$450
STEAM FOR THE NEXT GENERATION	\$7,575
STEVE LEAKE	\$775
STONE SOUP PRESS	\$49
STONE TABLET PRESS	\$124
STORIES OF BIBLE	\$153
STORIES OF COLOR	\$35
STORMS IN THE SKYY GROUP BUY INS	\$88
STORY WARREN STORE	\$249
STRING CONNECTIONS	\$1,620
STRIVE ACADEMICS	\$25
STROUGH'S SOLUTIONS LLC	\$5,707
STUDIES WEEKLY	\$80
STUDIO 7	\$600
STUDIO 8	\$450
STUDY	\$198
SUBIACO ACADEMY	\$108,448
SUBSCRIPTION BOX KIDS	\$427
SUGARLAND NATIONAL PARK	\$47
SUMMER SCHOOL	\$200
SUMMER SKILLS	\$55

Appendix B – EFA Expenditures by Private School/Provider

SUMMIT MINISTRIES	\$157
SUNDOG BOOKS	\$78
SUNSHINE ACADEMY	\$441
SUPER TEACHER WORKSHEETS	\$76
SUPERCHARGED SCIENCE	\$1,939
SUPPLIES OUTLET	\$300
SUPPLY	\$848
SUSIE HOBBS	\$1,756
SUTHERLANDS	\$289
SUZANNE L FULLERTON	\$1,875
SV TENNIS	\$332
SVCC	\$95
SWIM STATION LLC	\$1,950
SWIM WITH KARMA	\$20,720
SWIMMING	\$600
SWORD OF THE LORD PUBLICATIONS	\$120
SYCAMORE CHRISTIAN HOME SCHOOL CENTER	\$1,017
SYLLABIRD	\$89
SYLVAN LEARNING CENTER	\$2,609
SYNTHESIS TUTOR	\$2,199
TABITHA WILDHIRT	\$5,742
TABLE GROUP	\$25
TAC	\$400
TAKE TIME FOR ART	\$61
TALK BOX MOM	\$793
TALK TOOLS	\$268
TAMMY MURRY	\$2,000
TAMMY WIXSON	\$3,000
TAN BOOKS	\$550
TAPPITY	\$1,648
TARGET	\$23,668
TARK'S STORIED BREW	\$54
TEACH TCI	\$321
TEACH YOUR MONSTER	\$15
TEACHABLE	\$324
TEACHER CHRISTY ENTERPRISES	\$3,000
TEACHER CREATED RESOURCES	\$23
TEACHERS PAY TEACHERS	\$4,191
TEACHING TEXTBOOKS	\$2,610
TECHNOBOTICS	\$823
TED DEKKER	\$471

Appendix B – EFA Expenditures by Private School/Provider

TEENPACT	\$610
TEMU	\$744
TERRA STUDIOS	\$40
TESTING	\$341
TESTING MOM	\$405
TESTPREP ONLINE	\$208
TEXARKANA COLLEGE	\$160
TEXARKANA REGIONAL ARTS	\$206
TEXAS A&M AGRILIFE	\$507
TEXAS SCOTTISH RITE	\$52
THADEN SCHOOL	\$200,362
THE 101 SERIES	\$120
THE 1988 BOOKSTORE	\$1,116
THE ACADEMIC SUCCESS CENTER	\$850
THE ACADEMY OF CHAOS	\$1,800
THE ACADEMY OF TLC	\$100,180
THE ACADEMY WAY SCHOOL	\$100
THE ANIMATION COURSE, LLC	\$800
THE ANTHONY SCHOOL	\$517,752
THE APPLE GROUP	\$868
THE ART OF AARON BLAISE, LLC.	\$499
THE ATELIER SCHOOL OF ART	\$6,475
THE AUTHENTIC YOU LLC	\$1,490
THE AUTISM HELPER	\$1,098
THE AVENUE BOOKSTORE	\$341
THE BEGINNERS GARDEN BY JOURNEY WITH JILL	\$192
THE BOOK STORE	\$77
THE BOOK WAREHOUSE	\$42
THE BOOK WORM	\$205
THE BOUTIQUE	\$45
THE BUTTERFLY PALACE	\$86
THE CHILDRENS PLACE	\$3,013
THE CHILDREN'S TRADITION	\$475
THE COMMUNICATION DEPOT	\$132
THE COMPASS STORE	\$25
THE CONTAINER STORE	\$75
THE CORE GROUP	\$274
THE COTTON COMPANY	\$89
THE CREATIVITY LAB	\$175
THE CRITICAL THINKING CO	\$662
THE CULTURED KID	\$597

Appendix B – EFA Expenditures by Private School/Provider

THE CURIOUS BEAR TOY AND BOOK SHOP	\$212
THE DAILY GRACE CO.	\$1,294
THE DECKER SCHOOL	\$131,808
THE DELTA INSTITUTE FOR THE DEVELOPING BRAIN	\$147,653
THE DIVINE LEARNING ACADEMY	\$55,510
THE EAGLE FOUNDATION	\$3,300
THE FIDGET GAME	\$285
THE FORGING PLACE	\$325
THE FOUNDATION OF ARTS FOR NE ARKANSAS	\$115
THE FRONT PORCH	\$16
THE GOOD AND THE BEAUTIFUL	\$95,241
THE GOOD BOOK	\$165
THE GOOD KIND	\$69
THE GRACE SCHOOL	\$54,577
THE GRIFFIN PROMISE AUTISM CLINIC	\$3,570
THE HANGOUT FITNESS & SPORTS LLC	\$2,325
THE HERITAGE SCHOOLHOUSE	\$180
THE HILL SCHOOL	\$102,609
THE HOME OF TIMES TALES	\$451
THE HOMESCHOOL PRINTING COMPANY	\$394
THE HOMESTEAD EDUCATION	\$338
THE HORSE PARK AT WALNUT CREEK	\$1,020
THE HUDA ACADEMY	\$130,692
THE KJV STORE	\$639
THE LANDMARK KIDS	\$17,065
THE LEARNING HUB	\$22,425
THE LITERACY BRIDGE NWA	\$660
THE LITTLE LATIN SCHOOL	\$286
THE LITTLE SCHOOL OF SMITHS	\$24
THE LOCAL SPARK ART STUDIO	\$7,522
THE MUSICIAN ASPIRANT	\$30
THE MYSTERY OF HISTORY	\$1,527
THE NEW SCHOOL	\$318,762
THE NOMADIC PROFESSOR	\$249
THE OGBURN SCHOOL, INC	\$2,411
THE OLD SCHOOLHOUSE	\$30
THE PEACEFUL PRESS	\$12
THE PEDIATRIC PLAYHOUSE	\$214
THE PINE HILL RANCH	\$3,853
THE PLANT OUTLET	\$151
THE ROYAL CONSERVATORY	\$80

Appendix B – EFA Expenditures by Private School/Provider

THE SEWING SPOT	\$1,245
THE SYMBOLIC WORLD STORE	\$88
THE TUTTLE TWINS	\$8,804
THE UNDERWOOD BRANCH HOMESCHOOL COOPERATIVE	\$98,665
THE UPS STORE	\$102
THE WALDOCK WAY	\$38
THE WEEK JUNIOR	\$159
THE WELL ORDERED HOMESCHOOL	\$68
THE WELL PLANNED GAL	\$91
THE WELL-TRAINED MIND	\$20
THE WOOBLES	\$908
THE WOODEN WAGON	\$359
THE WOODSMAN COMPANY	\$60
THE WORKBENCH COLLECTIVE	\$20,775
THE WORLD OF BOOKS	\$33
THE YELLOW LAMB	\$3,440
THEOLOGY OF THE BODY EVANGELIZATION TEAM	\$445
THERAKIDS LLC	\$4,394
THERAPY	\$765
THERAPY 4 KIDS	\$1,380
THERAPY AND ASSESSMENT CENTER	\$400
THERAPY PROVIDERS, P. A.	\$300
THINKING TREE	\$70
THINKOUTSIDE	\$550
THINKWELL	\$3,735
THINKWELL HOMESCHOOL	\$271
THINKWELL HYBRID SCHOOL OF DISCOVERY	\$61,290
THREE STRIDES OUT	\$975
THRIFTBOOKS	\$15,314
THRIVE ACADEMICS	\$7,185
THRIVE ACADEMIES, INC.	\$25
THRIVE ACADEMY	\$50
THRIVE ACADEMY	\$25
TIKTOK	\$83
TIMBERDOODLE	\$26,271
TIME4LEARNING	\$26,153
TIMOTHY E TRAWICK	\$1,297
TIMOTHY SHOEMAKER	\$11
TINA CONSTANTIN	\$280
TINY SHINY SCHOOLHOUSE	\$36
TINY THINKERS	\$39

Appendix B – EFA Expenditures by Private School/Provider

TJ MAXX	\$596
TODDLERS CAN READ	\$83
TOGGERY UNIFORMS	\$78,749
TOMMY HILFIGER	\$534
TONIES	\$8,463
TORCHLIGHT CURRICULUM	\$42
TOUCH MATH	\$41
TOUCH TYPE READ AND SPELL	\$1,242
TOYBOX	\$993
TRACTOR SUPPLY	\$1,398
TRACY ZURBORG	\$1,680
TRAIN UP A CHILD PUBLISHING	\$29
TRANSCRIPT MAKER	\$59
TRANSCRIPT SERVICES	\$45
TRAVEL ART	\$193
TRAVEL POWERHOUSE SPORTS COMPLEX APPROVED PROVIDER	\$97
TREASURE BY THE BOX	\$9,696
TREAT YO SHELF BOOKS	\$392
TREEHOUSE SCHOOLHOUSE	\$1,465
TREERING	\$53
TRIANGLE EDUCATION ASSESSMENTS	\$264
TRIBESIGNS	\$250
TRICIA GOYER	\$1,425
TRICIA GOYER - TUTOR - ESSAY WRITING - HOPE CO-OP	\$550
TRIKE THEATRE	\$360
TRILINGO KIDS LLC	\$97
TRINITY CATHOLIC SCHOOL	\$193,658
TRINITY CHRISTIAN SCHOOL (BRADFORD)	\$7,800
TRINITY CHRISTIAN SCHOOL (TEXARKANA)	\$243,932
TRINITY MUSIC LESSONS	\$2,620
TRUE NORTH HOMESCHOOL ACADEMY	\$659
TRUSTED BY TEACHERS	\$24
TUITION	\$7,472
TURBOSCRIBE	\$60
TUTOR	\$6,085
TUTUS AND TAP SHOES	\$785
TWIN LAKES COMMUNITY	\$650
TWINKL USA	\$225
TYNKER	\$432
TYPING INSTRUCTOR	\$74
TYPING SOFTWARE	\$25

Appendix B – EFA Expenditures by Private School/Provider

TYPINGCLUB	\$35
U OF M-E	\$68
UC SCOUT ONLINE	\$399
UDEMY	\$97
ULINE	\$300
ULTIMATE 3D PRINTING STORE	\$379
ULTIMATE GLOBES	\$144
ULTIMATE GLOBES	\$73
ULTIMATE GUITAR	\$20
UNDER ARMOUR	\$2,133
UNION CHRISTIAN ACADEMY	\$692,127
UNIVERISTY OF CENTRAL ARKANSAS	\$148
UNIVERISTY OF MINNESOTA	\$121
UNIVERSAL YUMS	\$479
UNIVERSITY OF ARKANSAS	\$4,771
UNIVERSITY OF ARKANSAS AT LITTLE ROCK	\$2,132
UNIVERSITY OF ARKANSAS COMMUNITY COLLEGE AT BATESVILLE	\$1,512
UNIVERSITY OF ARKANSAS COMMUNITY COLLEGE AT MORRILTON	\$2,911
UNIVERSITY OF ARKANSAS COMMUNITY COLLEGE MORRILTON	\$1,110
UNIVERSITY OF ARKANSAS PULASKI TECHNICAL COLLEGE	\$3,288
UNIVERSITY OF CENTRAL ARKANSAS	\$6,545
UNIVERSITY OF FLORIDA	\$90
UNIVERSITY OF MINNESOTA	\$950
UNLOCKING POTENTIAL EDUCATIONAL SERVICES, LLC	\$670
UPPER STORY	\$1,238
UPWARD NINJA & BOULDERING	\$5,334
UPWARD NINJA AND BOULDERING	\$200
USPS	\$395
VALERIE'S TUTORING	\$480
VALLEY CHRISTIAN SCHOOL	\$219,312
VALORE	\$14
VANWINKLE SPORTS	\$18
VAVA	\$248
VENMO	\$195
VENTRIS LEARNING	\$90
VERITAS PRESS	\$10,906
VERIZON	\$850
VETERAN'S THRIFT TOWN	\$3
VEVOR	\$198
VICTORY CHRISTIAN SCHOOL (CAMDEN)	\$89,701
VICTORY CLASSICAL SCHOOL	\$7,850

Appendix B – EFA Expenditures by Private School/Provider

VILONIA YOUTH FOOTBALL	\$53
VIMEO	\$218
VIRGINA RITTER	\$7
VIRTUAL ACADEMY	\$182
VIRTUAL ARKANSAS	\$330
VITAL FUNCTION THERAPIES LLC	\$2,320
VIVACE MUSIC STUDIOS LLC	\$841
VOETBERG MUSIC ACADEMY	\$37
W.W NORTON DIGITAL PRODUCT	\$43
WALDORF	\$500
WALDORF ESSENTIALS	\$595
WALDORF UNIVERISTY	\$500
WALGREENS	\$94
WALLETWIN	\$307
WALMART	\$85,246
WALNUT FARM MONTESSORI SCHOOL	\$43,735
WASP PUBLICATIONS	\$84
WATERS EDGE COUNSELING	\$1,146
WATERSTONE	\$960
WATERSTONE COUNSELING CENTER	\$360
WATSON COMMUNITY SCHOOL	\$2,000
WAVE RURAL CONNECT	\$223
WAYFAIR	\$4,027
WEBSTAURANTSTORE	\$113
WEEK JUNIOR	\$60
WELL PLANNED GAL	\$32
WELL TRAINED MIND	\$1,604
WELLSPRING FOREST SCHOOL	\$200
WEST MEMPHIS CHRISTIAN SCHOOL	\$586,502
WEST SIDE CHRISTIAN SCHOOL	\$410,980
WESTMINISTER BOOKSTORE	\$200
WESTSIDE MMA	\$1,170
WESTWOOD GARDENS	\$332
WHAT'S FOR DINNER?	\$22
WHERE'D YOU LEARN THAT? HOMESCHOOL	\$6
WHISTLEFRITZ	\$217
WHITE RIVER BAPTIST ACADEMY	\$22,352
WHITMORE SCHOOL	\$1,709
WILD + FREE	\$190
WILD AND UNSTRUCTURED LEARNING	\$1,698
WILD BOOKS	\$148

Appendix B – EFA Expenditures by Private School/Provider

WILD BROTHERS PRODUCTIONS	\$43
WILD LEARNING	\$1,824
WILLIAM BAKER	\$500
WILLIAM LITCHFORD	\$5,200
WILLIAMS BAPTIST UNIVERSITY	\$2,001
WILLOW ROOTS - LEARNING CENTER	\$2,750
WILSON HILL ACADEMY	\$8,048
WINTER PROMISE PUBLISHING	\$543
WISDOM & TRUTH CLASSICAL ACADEMY	\$7,360
WOFFORD RANCH	\$20,810
WOMEN OF PRAYER UNITED	\$45
WONDER CRATE	\$6,078
WONDER HOUSE CREATIVE	\$25
WONDERBLY BOOKS	\$73
WONKY STAR LTD	\$199
WOOLBUDDY	\$64
WOR	\$4
WORD OF OUTREACH CHRISTIAN ACADEMY	\$24,723
WORLD HARVEST BAPTIST ACADEMY (RUSSELLVILLE)	\$6,728
WORLD NEWS GROUP	\$116
WORLD OF BOOKS	\$14
WORLD WATCH NEWS	\$215
WORLDVIEWSOFTWARE	\$30
WORSHIP ARTS ACADEMY AT FIRST BAPTIST LAVACA	\$2,500
WRIGHT EDUCATION CONSULTANTS, INC.	\$16,224
WRITEATHOME	\$2,932
WRITING TALES	\$65
WRITING WONDERS	\$720
WRITINGS FROM THE WILD	\$129
WYSOCKI PSYCHOLOGICAL SERVICE	\$136
XGIMI	\$493
YEAGER'S HARDWARE	\$16
YELLOW LAMB	\$1,013
YESTERDAYS CLASSICS	\$161
YOTO	\$47,080
YOUNG + WILD & FRIEDMAN	\$1,555
YOUNG CHEFS ACADEMY	\$8,509
YOUNG WRITERS WORKSHOP	\$574
YOUR STORY HOUR	\$48
YOUR WILD BOOKS	\$197
YOUSCIENCE	\$49

Appendix B – EFA Expenditures by Private School/Provider

YOUSICIAN	\$30
YOUTH INSTITUTE ACADEMY	\$10,037
YOUTH WITH A MISSION	\$802
YOYO GAMES	\$100
ZANE ISAACS CHAMPIONSHIP MMA	\$3,178
ZEEZOK PUBLISHING	\$219
ZOE PRESS	\$31
ZUCA	\$250
Total	\$43,185,234

Appendix C – Average Assessment Percentiles

Appendix C: 2024–25 Average Assessment Percentiles for Participating Private Schools¹³

School Name	Average Math Percentile	Average ELA Percentile
Abundant Life Christian Academy	41%	53%
Academy of Excellence	39%	49%
ACCESS Schools	18%	25%
Agape Academy	48%	45%
Ambassador Baptist Academy	44%	50%
ANH Montessori School	46%	45%
Anthem Classical Academy	76%	79%
Apostolic Christian Academy (Magnolia)	N/A	N/A
Arkansas Christian Academy	59%	60%
Arrows Academy	19%	54%
Baptist Prep	60%	61%
Baseline Bilingual Elementary School	83%	95%
Batesville Montessori School	30%	28%
Bentonville Christian Academy	43%	51%
Blessed Sacrament Catholic School	69%	72%
Cabot Christian School	60%	43%
Calvary Academy	34%	41%
Calvary Christian Academy (Berryville)	46%	58%
Calvary Christian Academy (Hot Springs)	45%	54%
Calvary Christian School	37%	56%
Catholic High School	N/A	N/A
Central Arkansas Christian (CAC)	64%	66%
Central Arkansas Montessori (North Little Rock)	42%	41%
Central Christian Academy	73%	58%
Chenal Valley Montessori School	40%	51%
Christ Lutheran (Little Rock)	61%	65%
Christ the King Catholic School (Ft. Smith)	52%	50%
Christ the King School (Little Rock)	63%	60%
Clear Spring School	45%	19%
Clover Community School	14%	30%
Columbia Christian School	52%	56%
Community Christian School	37%	43%
Compass Academy	24%	11%
Conway Christian School	60%	62%
Cornerstone Christian Academy - Tillar	66%	62%

¹³ Schools marked “N/A” include those where student test scores were illegible, reported only as grade-level equivalents, exempt, or came from tests that do not provide percentile rankings.

Appendix C – Average Assessment Percentiles

Cornerstone Montessori Christian Academy	78%	81%
Crestline Academy	39%	59%
CrossPointe Preparatory	56%	59%
Easterseals Academy	N/A	N/A
Eighty-Twenty Learning for ASD, LLC	26%	25%
Episcopal Collegiate School	64%	68%
Fayetteville Christian School	58%	58%
Fayetteville Nature School	54%	64%
Fe Viva Christian School	21%	13%
First Academy	75%	86%
First Lutheran School (Benton)	52%	45%
First Lutheran School (Fort Smith)	66%	67%
Fort Smith Montessori School	48%	57%
Friendship Lab School for Dyslexia	22%	10%
FUTURES High School	N/A	N/A
Garrett Memorial Christian School	47%	50%
Gospel Light Christian School	58%	52%
Grace Christian School	54%	33%
Harding Academy	60%	57%
Harvest Time Academy	67%	65%
Heber Christian School	60%	60%
Holy Rosary Catholic School	53%	55%
Homeschool	63%	68%
Immaculate Conception Catholic School	61%	62%
Immaculate Conception School (Fort Smith)	51%	54%
Immaculate Heart of Mary School	47%	46%
Jacksonville Christian Academy	57%	61%
Joshua Academy	44%	40%
Leapfrog Montessori Forest School	57%	38%
Legacy Academy	41%	39%
Legacy Christian Academy (Mabelvale)	38%	40%
Life Way Christian School	63%	65%
Little Rock Christian Academy	64%	61%
Madonna Learning Center	N/A	N/A
Maranatha Baptist Christian School	32%	33%
Mount St. Mary Academy	51%	61%
Mountain Home Christian Academy	N/A	N/A
New Life Christian Academy	N/A	N/A
North Little Rock Catholic Academy	49%	43%
North River Christian Academy	51%	49%
Oaks Christian Academy	71%	71%

Appendix C – Average Assessment Percentiles

Our Lady of Fatima School	39%	48%
Our Lady of the Holy Souls	56%	57%
Ozark Catholic Academy	50%	51%
Pinnacle Classical Academy	85%	75%
PLUM St. Howard's Academy	N/A	N/A
Prism North America	48%	55%
Providence Classical Christian Academy	58%	54%
Pulaski Academy	60%	60%
Ridgefield Christian School (Jonesboro)	44%	55%
Room to Bloom	91%	88%
Russellville Baptist Academy	68%	69%
Sacred Heart School	49%	57%
Saline County Christian School	42%	64%
Searcy Christian Academy	64%	71%
Sherwood Christian Academy	56%	46%
Shiloh Christian School	59%	61%
Shiloh Excel Christian School	38%	27%
South Arkansas Christian School	49%	54%
Southwest Christian Academy	59%	56%
St. John Catholic School (Russellville)	61%	59%
St. John's Catholic School (Hot Springs)	59%	68%
St. Joseph Catholic School (Conway)	52%	53%
St. Joseph Catholic School (Fayetteville)	63%	59%
St. Joseph School (Paris)	62%	62%
St. Mary School	38%	45%
St. Michael's Catholic School	58%	59%
St. Paul Catholic School	51%	53%
St. Theresa Catholic School	28%	29%
St. Vincent de Paul Catholic School	70%	69%
Subiaco Academy	47%	53%
Thaden School	78%	82%
The Academy of TLC	2%	6%
The Anthony School	64%	65%
The Decker School	51%	57%
The Delta Institute for the Developing Brain	N/A	N/A
The Divine Learning Academy	55%	59%
The Grace School	9%	8%
The Hill School	50%	47%
The Huda Academy	52%	51%
The New School	67%	68%
Trinity Catholic School	39%	43%

Appendix C – Average Assessment Percentiles

Trinity Christian School (Bradford)	25%	39%
Trinity Christian School (Texarkana)	57%	66%
Union Christian Academy	56%	57%
Valley Christian School	61%	61%
Victory Christian School (Camden)	69%	59%
Walnut Farm Montessori School	57%	66%
West Memphis Christian School	33%	41%
West Side Christian School	43%	46%
Wisdom and Truth Classical Academy	96%	97%
World Harvest Baptist Academy (Russellville)	87%	44%
Total	57%	59%

Appendix D – ATLAS Performance Levels

Appendix D: 2024–25 ATLAS Performance Levels by School¹⁴

	ELA				Math				Science			
School Name	1	2	3	4	1	2	3	4	1	2	3	4
CLEAR SPRING SCHOOL	0%	43%	57%	0%	43%	57%	0%	0%	N/A	N/A	N/A	N/A
FAYETTEVILLE CHRISTIAN SCHOOL	11%	43%	37%	9%	15%	39%	40%	7%	13%	35%	35%	16%
HARDING ACADEMY	6%	43%	30%	20%	9%	34%	37%	20%	19%	42%	27%	12%
SOUTH ARKANSAS CHRISTIAN SCHOOL	7%	54%	29%	11%	26%	30%	26%	17%	15%	46%	31%	8%
Total	7%	44%	33%	16%	13%	35%	36%	16%	17%	41%	29%	12%

¹⁴ Clear Spring School did not administer the ATLAS science assessment to any EFA students.