



April 2, 2021

Meredith Bachman
Evaluation Division, NCEERA, REL
Institute of Education Sciences
550 12th Street, SW
Room 4102
Washington, DC 20004

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Evaluating the DC Opportunity Scholarship Program After the 2017 Reauthorization; Docket ID ED-2021-SCC-0173

Dear Ms. Bachman:

On behalf of the more than 3 million members of the National Education Association (NEA), I am submitting the following response to the U.S. Department of Education's (ED) comment request on the evaluation of the DC Opportunity Scholarship Program (OSP). **The NEA believes that the scope of the evaluation is too broad, should not include observation of classes, and should be limited in scope to see if previous results hold.**

The Institute of Education Sciences (IES) has requested clearance to collect data required to complete the congressionally mandated evaluation of the OSP. The OSP is the only federally appropriated school voucher program in the country, and it allows students from the District of Columbia to receive a voucher to attend private school. Although this is a congressionally mandated evaluation, we believe this is not an appropriate use of taxpayer dollars. The OSP has been evaluated seven times since 2007, and the results have never been promising.

The most recent evaluation indicated there were no statistically significant impacts on academic achievement for OSP participants.¹ Specifically, the 2017 evaluation found that OSP participants in elementary school performed worse in math and reading, compared to their peers who attended District of Columbia public schools. Furthermore, a key aspect of the evaluation is gaining an understanding of parental involvement, as it has been linked to better academic achievement and fewer behavioral problems for students. Based on the results of the 2017 evaluation, there was no impact or improvement on parental involvement for OSP participants.² Additionally, this evaluation identified waste in program resources: "about 20 percent of students stop using scholarships after one year of participation." In most cases, a program that has repeatedly shown negative effects and is as costly as the OSP would be ended.

¹ See IES Evaluations of the DC Opportunity Scholarship Program from [2007](#), [2008](#), [2009](#), [2010](#), [2017](#), [2018](#), and [2019](#).

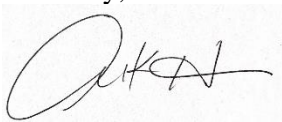
² See [IES Evaluation of the DC Opportunity Scholarship Program: Impacts After One Year](#) and [Summary of the 2017 evaluation from the National Coalition for Public Education](#)

Despite the repeated negative findings, the evaluation request has been written in a manner that seeks to identify positive results where previous evaluations have already repeatedly shown there are none. Under the previous administration, ED had shown interest in the creation of voucher programs to make education a profit-making enterprise. Attempting to steer education in this direction harms our nation's students—particularly, students of color and students from under-resourced communities. For example, the request affirmed: “Collecting information about the OSP is critical given ED’s interest in private school choice as a way to improve students’ educational outcomes and Congress’s focus on the program.” However, the current administration has formally expressed that it does not believe in the privatization of our education system, and it does not believe that creating two unequal systems will help achieve racial and social justice in education.

Voucher programs further the racial and social divide for students and school communities across the country; in fact, they cause segregation and promote racism in our education system. The federal government first created vouchers following the Supreme Court’s ruling in *Brown v. Board of Education*, which banned school segregation. School districts were then able to use vouchers to incentivize white students to attend private schools, limiting admission based on race. As a result, the public schools that served those white students closed, and schools that served predominantly students of color—particularly, Black students—remained chronically underfunded. Unlike public schools, private schools can limit their admission based on race, gender, sexual orientation, ability, and several other factors. A 2017 investigation found that 20 percent of private schools that accepted vouchers from the OSP did not serve students with learning disabilities, and an even greater percentage of private schools did not serve students with physical disabilities or students who were English learners.³ **The NEA urges the federal government to stand against these discriminatory practices and ensure that schools, particularly ones that receive federal resources, serve all students.**

The NEA respectfully submits the above comments for consideration and urges the U.S. Department of Education to limit data collection to replicate the previous evaluation in an effort to determine if the previous findings hold. Additional data collection efforts to seek validity for this program should not be authorized; as previously noted, this program has been evaluated seven times in the last 14 years. Please do not hesitate to contact me or Michael Scott at MichaelScott@nea.org should you have any questions.

Sincerely,



Alexis K. Holmes
Policy Manager, Education Policy and Practice

³ See McLaren, M. and Brown, E. (2017, July 15). [“Trump wants to spend millions more on school vouchers. But what’s happen to the millions already spent?”](#) *Washington Post*.