



January 22, 2013

Director of the Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW
LBJ Room 2E117
Washington, DC 20202-4537
Docket ID number ED-2012-ICCD-0055
Submitted electronically via www.regulations.gov

Re: AAUW comments on the District of Columbia Opportunity Scholarship Program

Dear Sir/Madam:

On behalf of the 150,000 members and supporters of the American Association of University Women (AAUW), I am pleased to share AAUW's comments on the District of Columbia's Opportunity Scholarship Program, which grants students federally funded vouchers to attend private schools. The Department of Education is seeking public comments on the voucher program and what data should be collected.¹

AAUW believes a strong, free public education system is the foundation of a democratic society, and has long opposed all forms of publicly funded school voucher programs, including the DC school voucher program.² However, now that the DC voucher program has been extended by Congress, it is critical that it be administered properly. A key aspect of this is rigorous data collection that will hold schools accountable and protect students' rights to a high-quality and equitable education.

There are three aspects of the DC voucher program and proposed data collection that concern AAUW: 1) Private voucher school programs have not been shown to improve education outcomes; 2) the DC voucher program has an established history of insufficient accountability; and 3) the current data collection system is either not capturing or not releasing all the information needed to hold schools accountable and ensure that all students receive a high-quality and equitable education.

Vouchers Have Not Been Shown to Improve Education Outcomes

There has been no compelling evidence that private school vouchers raise student achievement. A study conducted by the National Center for Education Statistics of the U.S. Department of Education compared the effectiveness of public schools to that of private institutions. After controlling for critical demographic factors (parents' income, education level, number of books in household), NCES found that public schools perform as well as, and even better in a few instances, than private schools.³ A 2001 Government Accountability Office study confirmed that the official evaluations of Cleveland's and Milwaukee's voucher programs found no differences in the achievement of voucher students compared to public school students, despite built-in applicant advantages for private schools.⁴

Additionally, private and religious school voucher programs weaken the public school system by diverting already scarce funds that could otherwise be used for needed teacher training, smaller class sizes, expanded support services, and improved facilities. Our country's public schools already face teacher shortages, overcrowded classrooms, and increased accountability without adequate funding. Diverting critical resources from the school systems that educate 90 percent of America's students is not a fiscally sound investment.⁵

DC School Voucher Program has Insufficient Accountability

AAUW continues to be concerned that the DC voucher program has not overcome its troubled history. Congress's 2011 reauthorization⁶ gave new life to a program with a history of problems, and AAUW is concerned those problems have not been fully addressed. According to *The Washington Post* on November 17, 2012:

At a time when public schools face increasing demands for accountability and transparency, the 52 D.C. private schools that receive millions of federal voucher dollars are subject to few quality controls and offer widely disparate experiences, the *Post* found.

Some of these schools are heavily dependent on tax dollars, with more than 90 percent of their students paying with federal vouchers. Yet the government has no say over curriculum, quality or management. And parents trying to select a school have little independent information, relying mostly on marketing from the schools.

(...) While public schools must report test scores and take action when they don't meet goals, private schools participating in the D.C. voucher program are insulated from such interference.

The schools must administer a single standardized test, but can choose the type. Those scores are not made public, and schools can stay in the voucher program no matter how their students fare.⁷

Needless to say, AAUW finds this lack of transparency and accountability problematic. Not only does the voucher system remove funding from public schools (approximately \$20 million per year),⁸ it sends students to private schools without any guarantee of educational quality. This is extremely disturbing and disappointing.

Not Enough Data Collected or Released

When the DC voucher program was reauthorized in 2011, AAUW urged the Department of Education to collect comprehensive data on participating schools and students. AAUW believes that having the most detailed information possible will provide the best picture of these students' opportunities, challenges, and choices, and whether schools treat all students equally. School districts, educators, and policy-makers cannot create the right solutions if they do not have all the possible data.

In our June 28, 2011 comments,⁹ AAUW urged the Department to collect the following information:

1. *Cross-tabulated and disaggregated data*
2. *How many students are applying to, and enrolled in, the DC private school voucher program?*
3. *What schools do enrolled students attend?*
4. *What percentage of students are at or below the federal poverty line?*
5. *What is the yearly retention rate?*
6. *What is the graduation rate?*
7. *What percentage of students come from schools in need of improvement?*
8. *What percentage of students attend religious schools?*
9. *What percentage of enrolled students have been diagnosed with a disability and disability eligibility category under IDEA?*

A review of the materials¹⁰ released by the program indicates that while some of this data has been released, much of it has not been made public.

1. *Cross-tabulated and disaggregated data*
AAUW recommended that all data collected be cross-tabulated and disaggregated by all possible categories, including gender, race, ethnicity, socioeconomic status, English proficiency, mobility, disability, and other population characteristics wherever possible. Although the program has released the racial breakdown of students, there is no information available about their gender, ethnicity, English proficiency, mobility, disability, or other characteristics. AAUW recommends that this data be collected and released as soon as possible.
2. *How many students are applying to, and enrolled in, the DC private school voucher program?*
AAUW is pleased that this information is publicly available on the voucher program's website.
3. *What schools do enrolled students attend?*
This information is not available in an accessible manner. Participants are presented with an Internet application that allows them to type in a school name or address, but there is no comprehensive list of participating schools or how many students attend each school. AAUW recommends that the full list of schools be made easily accessible.
4. *What percentage of students are at or below the federal poverty line?*
AAUW is pleased that the Program Fact Sheet Summary lists the percentage of students receiving SNAP and/or TANF benefits.

5. *What is the yearly retention rate?*
AAUW is pleased that this information is publicly available. As with other data collection, AAUW recommends this information be cross-tabulated and disaggregated by all possible categories.
6. *What is the graduation rate?*
Graduation information should be publicly reported and should include the program's overall graduation rate, each high school's graduation rate, and be cross-tabulated and disaggregated by all possible categories. Private schools are not currently held to the same civil rights standards as public schools, and it is critical that students' rights to a high-quality and equitable education are protected. The Department should collect all possible information about graduation rates in order to get the best possible picture of this problem.
7. *What percentage of students come from schools in need of improvement (SINI)?*
The voucher program was designed to help students from schools in need of improvement. AAUW is pleased that the Department is tracking how many enrolled students come from these schools in order to ensure that the vouchers actually serve the population they were created to help. AAUW is gratified that as of Fall 2012, 99.7 percent of enrolled students came from SINI institutions.¹¹
8. *What percentage of students attend religious schools?*
AAUW believes the Department should monitor the number of students enrolled in religious schools to ensure that students are offered as wide a variety of school choices as possible. It is not clear how many students attend private religious schools in the DC voucher program.
9. *What percentage of enrolled students have been diagnosed with a disability and disability eligibility category under IDEA?*
AAUW believes vouchers for special needs students is contrary to the Individuals with Disabilities Education Act's fundamental purpose as a civil rights law — to bring students with disabilities into the public school system, provide them access to the general education curriculum in the "least restrictive" way, and protect against the history of exclusion of students with disabilities from public schools. AAUW recommends that the Department collect information about these students and their involvement in the DC voucher program.

In addition to collecting the above information, AAUW recommends that the Department collect information regarding:

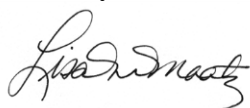
- 10. How many students attend single-sex or sex-segregated education programs and how do they monitor compliance with Title IX?*
- ~~*10. How many students attend single-sex or sex-segregated education programs?*~~
There is no information available about how many DC voucher recipients are enrolled in single-sex programs. AAUW recommends that this information be collected. In recent years, there has been a growing trend of separating students

on the basis of sex. This trend raises serious equality and policy concerns. Many single-sex programs claiming a basis in research are in fact based on claims that amount to little more than repackaged sex stereotypes — for instance, that boys need authority and excel at abstract thinking, while girls need quiet environments that focus on cooperation and following directions. In the classroom, separating boys and girls can reinforce stereotypes in ways that are stigmatizing and damaging to both groups.¹² Moreover, single-sex programs can discriminate against one group in allocating resources or educational opportunities.

AAUW encourages the Department to include these information categories in its data collection. Although AAUW will continue to oppose all forms of private school voucher programs, this data will help ensure accountability from schools and protect enrolled students' rights to a high-quality and equitable education.

Thank you for the opportunity to submit comments on this important issue. I look forward to working with you to improve students' educational opportunities. If you have any questions, please feel free to contact me at 202-785-7720, or Beth Scott, regulatory affairs manager, at 202-728-7617.

Sincerely,



Lisa M. Maatz
Director, Public Policy and Government Relations

¹ *The Federal Register*. (November 21, 2012). *Agency Information Collection Activities; Comment Request; DC Choice Evaluation*; Vol. 77, No. 225. Retrieved January 15, 2013, from www.gpo.gov/fdsys/pkg/FR-2012-11-21/pdf/2012-28317.pdf

² See National Coalition for Public Education. (February 8, 2011). *Oppose Restarting and Expanding the DC Voucher Program*. Retrieved January 16, 2013, from www.aclu.org/files/assets/NCPE_House_Coalition_Letter_-_Oppose_Restarting_and_Expanding_the_DC_Voucher_Program_2-8-2011.pdf; AAUW. (January 28, 2011). *Oppose Expanding DC School Vouchers*. Retrieved January 16, 2013, from www.aauw.org/act/issue_advocacy/actionpages/upload/SLetter_DCvoucher012811.pdf; and AAUW. (January 27, 2011). *Oppose Expanding DC School Vouchers*. Retrieved January 16, 2013, from www.aauw.org/act/issue_advocacy/actionpages/upload/HLetter_DCvoucher012611.pdf

³ National Center for Education Statistics. (July 2006). *Comparing Private Schools and Public Schools Using Hierarchical Linear Modeling*. Retrieved January 27, 2011, from <http://nces.ed.gov/nationsreportcard/pdf/studies/2006461.pdf>

⁴ U.S. Government Accounting Office. (August 2001). *School Vouchers: Publicly Funded Programs in Cleveland and Milwaukee*. GAO-01-914. Retrieved March 8, 2011, from www.gao.gov/new.items/d01914.pdf

⁵ National Center for Education Statistics. (2007). *The Condition of Education 2007*. Table 4-2. Retrieved January 27, 2011, from <http://nces.ed.gov/pubs2007/2007064.pdf>. The 90 percent statistic is derived from this table, which shows total private school enrollment at 9.7 percent.

⁶ *The Washington Post*. (June 25, 2011). *Parents Rush to Apply for D.C. Private School Vouchers*. Retrieved June 27, 2011, from www.washingtonpost.com/local/education/parents-rush-to-apply-for-dc-private-school-vouchers/2011/06/25/AG4Ju9kH_story.html

⁷ *The Washington Post*. (November 17, 2012). *Quality Controls Lacking for D.C. Schools Accepting Federal Vouchers*. Retrieved January 16, 2013, from www.washingtonpost.com/local/education/quality-controls-lacking-for-dc-schools-accepting-federal-vouchers/2012/11/17/062bf97a-1e0d-11e2-b647-bb1668e64058_print.html

⁸ *The Washington Post*. (June 25, 2011). *Parents Rush to Apply for D.C. Private School Vouchers*. Retrieved June 27, 2011, from www.washingtonpost.com/local/education/parents-rush-to-apply-for-dc-private-school-vouchers/2011/06/25/AG4Ju9kH_story.html

⁹ AAUW. (June 28, 2011). *DC School Choice Incentive Program; OMB #: 1855-0015*. Retrieved January 16, 2013, from www.aauw.org/act/issue_advocacy/actionpages/upload/Comments_DCVoucher.pdf

¹⁰ See D.C. Children and Youth Investment Trust Corporation. (Fall 2012). *D.C. Opportunity Scholarship Program Fact Sheet Summary – SY 2012-13*. Retrieved January 16, 2013, from www.dcscholarships.org/elements/file/OSP/Program%20Data/DC%20OSP%20Program%20Fact%20Sheet%20-%20SY%202012-13%20%28Summary%29%281%29.pdf and D.C. Children and Youth Investment Trust Corporation. (May 2012). *D.C. Opportunity Scholarship Program Fact Sheet Summary – SY 2011-12 (As of 10/3/2011)*. Retrieved January 16, 2013, from www.dcscholarships.org/elements/file/OSP/DC%20OSP%20Parental%20Satisfaction%20and%20Program%20Fact%20Sheet%20-%20revised%202012_05_17%29.pdf

¹¹ D.C. Children and Youth Investment Trust Corporation. (Fall 2012). *D.C. Opportunity Scholarship Program Fact Sheet Summary – SY 2012-13*. Retrieved January 16, 2013, from www.dcscholarships.org/elements/file/OSP/Program%20Data/DC%20OSP%20Program%20Fact%20Sheet%20-%20SY%202012-13%20%28Summary%29%281%29.pdf

¹² National Coalition of Women and Girls in Education. (2012). *Single Sex Education: Fertile Ground for Discrimination*. Retrieved January 16, 2013, from <http://ncwge.org/TitleIX40/Single-Sex.pdf>