

# Irreconcilable Differences? Education Vouchers and the Suburban Response

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## **Abstract**

This article discusses the limited use of education vouchers in an era of unprecedented growth in school choice. It is divided into two parts: first, a description of the policy, political, and legal barriers that may limit the expansion of large-scale voucher programs is presented. Discussion then shifts to the efforts of voucher advocates to build support among historically marginalized populations frustrated with the performance of public schools and open to limited forms of private school choice. The authors consider the consequences of these strategies and suggest that the very voucher programs that appeal to disadvantaged families may prove most offensive to middleclass and suburban voters who vigorously object to policies that undermine local authority and redistribute local resources. Specifically, vouchers have the potential to erase municipal boundaries, dissolve neighborhood ties, lower housing prices, and upset student enrollments.

**Keywords:** *school choice; privatization; vouchers; suburbs; local control*

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## Introduction

On June 27, 2002, education vouchers were once again the news of the day. The U.S. Supreme Court ruled in *Simmons-Harris v. Zelman* that the Cleveland Scholarship and Tuition Program (CSTP), which allows private sectarian schools to participate in the publicly funded program, did not violate the Establishment Clause of the U.S. Constitution.<sup>1</sup> The *Zelman* decision, as it became known, was lauded by school choice advocates and led to animated discussions about the potential for widespread expansion of private school choice. Policy makers in California, Minnesota, Pennsylvania, and other states made plans to introduce or revive voucher legislation (Gehring, 2002). And the U.S. House of Representatives began debate of a bill to create the nation's first federal voucher program (Robelen, 2002). To many observers, this rush of activity suggested not only that the number of students receiving vouchers would soon increase but that the whole of our public education system was being transformed. In an editorial in *The Washington Post*, then Secretary of Education Rod Paige (2002) compared the Supreme Court's decision to *Brown v. Board of Education* and described vouchers as integral to "a new civil rights revolution" (p. A29).

Needless to say, the impact of the *Zelman* decision has not been this grand. New voucher programs have emerged but have been small in scale, targeted at specific student populations and, at times, the product of unique circumstances. For example, in Utah's newly enacted program, only 250 special education students are voucher users (Alliance for School Choice, 2006). In Washington D.C., voucher legislation was passed by the U.S. Congress and not subject to the scrutiny of state lawmakers or seriously threatened by local objections ignored on Capitol Hill (Casey & Rivkin, 2003). In fact, despite gratuitous attention from policy makers and the media, vouchers continue to play a minimal role in the provision of education. Nationwide, only about 50,000 students use publicly funded vouchers, less than one-thousandth of 1% of all students (Alliance for School Choice, 2006; National Center for Education Statistics, 2006). This number is

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<sup>1</sup> The Supreme Court's decision in *Simmons-Harris v. Zelman* (2002) was based on the premise of neutrality. That is, the Cleveland Scholarship and Tuition Program is designed to aid low-income students residing in a school district taken over by the state (Belfield & Levin, 2002). Specific efforts are not made to support religious schools because parents are provided with a wide range of schooling options other than vouchers (e.g., public schools, charter schools, magnet schools, and private schools). Thus, the criteria of choice applied in the *Zelman* decision suggests that as long as any additional education alternative is available, and even if all schools participating in a voucher program are sectarian, the premise of neutrality is satisfied.

striking when compared to other forms of school choice. Charter schools now enroll more than 1 million students in 41 states (Center for Education Reform, 2006). Approximately, one fourth of these students attend schools run by for-profit education management companies (Molnar, Garcia, Sullivan, McEvoy, & Joanou, 2005). An additional 1 million students are home schooled each year (National Center for Education Statistics, 2006). Even the number of private school students, a historically stable population, has increased over the past decade from 4.8 million in 1994 to 5.1 million in 2004, accounting for nearly 11% of the total U.S. student population, compared to 9% in 1993 (National Center for Education Statistics, 2006).

In this article, we consider the limited use of education vouchers in an era of unprecedented growth in school choice. The article is divided into two parts. First, we describe the policy, political, and legal barriers that may limit the expansion of large-scale voucher programs. We discuss how recent evidence of voucher effectiveness is mixed and without conclusive findings, present political and ideological arguments that may hinder the successful passage of voucher legislation, and identify legal barriers contained within state constitutions that may challenge program implementation. Our discussion will then shift to the efforts of voucher advocates to build support among historically marginalized populations frustrated with the performance of public schools and open to limited forms of private school choice. We consider the consequences of these strategies and suggest that the very voucher programs that appeal to disadvantaged families may prove most offensive to middle-class and suburban voters who vigorously object to policies that undermine local authority (Kirp, 1995) and redistribute local resources (P. Peterson, 1981). Specifically, vouchers have the potential to erase municipal boundaries, dissolve neighborhood ties, lower housing prices, and upset student enrollments (Brasington, 2006; Brunner & Sonstelie, 2002; Catterall & Chapleau, 2003; Ferreyra, 2006; Fischel, 2002; Nechyba, 2003; Ryan & Heise, 2002). Thus, we argue that emphasizing the redistributive qualities of education vouchers will likely erode traditional bases of conservative suburban support that are frequently taken for granted but essential to passing voucher reform.

## **Potential Barriers to Voucher Reform**

Education vouchers are tuition certificates that students may redeem at participating public and private schools. For the purposes of this article, we refer only to publicly funded voucher programs that permit students to attend either sectarian or nonsectarian private schools (except where noted). Support for voucher reform is drawn from classic economic principles and based on the theory that increased competition for students will force both public and private schools to improve academic achievement, use resources more efficiently, and attend to the needs of students and their families (Friedman, 1962; Hoxby, 2000; Levin, 2002). In addition, allowing parents to choose schools that best match their preferences is thought to reduce conflicts at the school level and lead to more effective decision making by principals and school administrators (Chubb & Moe, 1990).

Critics argue that the theoretical underpinnings of voucher reform are unproven and highly contested and that a number of negative consequences attributable to voucher programs have been more persuasively demonstrated in recent research. Three arguments are commonly made against voucher programs. First, vouchers siphon money away from public schools. For example, an article associated with the People for the American Way (a well known anti-voucher group) claims that the 1st-year costs of the CSTP forced the elimination of all-day kindergarten in traditional public schools (McDonald, 2002). The first 5 years of the program are estimated to have cost \$27.6 million (McDonald, 2002). Second, voucher programs may lead to increased student sorting. Research indicates that more advantaged families have better access to information, transportation, and other education resources and use choice policies to seek out high-performing schools that enroll students with similar backgrounds (Schneider & Buckley, 2002; Schneider, Teske, & Marschall, 2000). In addition, private schools can use formal and informal strategies to limit applications from unwanted voucher users, which may further isolate disadvantaged families in low-performing schools. Studies of large-scale voucher programs in Chile and New Zealand find that unrestricted choice programs lead to student stratification, especially by race and class (McEwan & Carnoy, 2000; Ladd & Fiske, 2001). Third, voucher programs may undermine social cohesion (Levin, 2002). U.S. citizens rely on public schools to teach students to participate in democratic

processes, engage in public discourse, and respect divergent viewpoints. Vouchers may encourage families to separate themselves into school communities with competing value systems. Thus, vouchers contest the common school model and shift attention away from established public goals such as citizenship training and workforce preparation.

The first voucher program was enacted in Milwaukee, Wisconsin, in 1989. The Milwaukee Parental Choice Program (MPCP) granted students from families with incomes not exceeding 175% of the federal poverty line vouchers to attend nonsectarian private schools. Student participation was capped at no more than 1% of total district enrollments (Witte, 2000). In 1995, new legislation expanded the program to include sectarian schools and raised the student cap to 15% of the total district enrollments or roughly 15,000 students (Wisconsin, Assembly Bill 150, 1995). Over the past decade, encroachments against this new cap again prompted legislation. In 2005, the number of potential MPCP participants was increased to 22,500 and eligibility was extended to students from families with incomes at or below 220% of the federal poverty line (Wisconsin, Senate Bill 618, 2005).

Four additional states and the District of Columbia now run voucher programs. The Cleveland Tuition and Scholarship Program and the Washington D.C. Opportunity Scholarship Programs also target low-income students. In 2006, Ohio expanded voucher reform statewide and passed legislation providing vouchers to students enrolled in schools designated as *academic watch* or *academic emergency* for 3 consecutive years with priority given to students from low-income families. Students in the city of Cleveland remain eligible to receive vouchers regardless of the school they attend. The Arizona Scholarship for Pupils with Disabilities, Florida's John M. McKay Scholarships for Students with Disabilities, and Utah's Carson Smith Special Needs Scholarship provide tuition assistance to students who meet state definitions of learning disabled, such as assignment of an individualized education program or participation in special education services during the normal school day. Table 1 provides more detailed information on the eligibility requirements, student enrollments, and allocations of current programs.

**Insert Table 1 here**

Table 1 indicates that voucher reform has experienced small, incremental growth over the past decade. Yet closer inspection reveals that all current voucher programs explicitly target disadvantaged or special populations of student groups for the purpose of redistributing educational resources. This finding may seem surprising given the rhetoric of market-based opportunities and demands for new schooling options that frequently accompany voucher proposals, but it is not entirely unexpected and suggests three conclusions that we posit in this article. First, voucher advocates have yet to persuade potential allies as well as the general public that widespread access to large-scale voucher programs will improve educational outcomes. Second, the successful passage of voucher legislation requires support from political factions that favor tightly regulated voucher programs, which may limit the purpose and scope of the reform. Third, looming legal objections to the public funding of sectarian and nonsectarian private schools encourages voucher plans that are explicitly designed to remedy shortcomings in public education. In the sections below, we defend each of these conclusions by detailing the policy, political, and legal barriers to voucher reform.

### *Policy Barriers*

Voucher advocates have stated that private school choice will lower total education spending because private schools typically spend less per pupil than comparable public schools do (Coleman & Hoffer, 1987; Hoxby, 1998). However, a closer examination of private school operations suggests that using per-pupil expenditures to estimate the potential cost of voucher programs may be inappropriate. Public schools routinely enroll greater numbers of special education, vocational education, and limited English-speaking students who require more expensive educational services than are typically found in private schools (McEwan, 2000). In addition, church subsidies and private endowments, access to low-cost facilities, and the willingness of teachers to accept lower wages in exchange for smaller and better behaved classes depress tuition costs and estimates of private school spending (McEwan, 2000). Adding new students to private school attendance rolls, many of whom are likely to be drawn from less advantaged families, may tax institutional supports and reduce cost advantages.

It is perhaps more important to note that voucher programs entail new administrative and financial burdens for the public school system. For example, applications for the MPCP and CSTP consistently exceed the total number of available seats in private schools, requiring public officials to hold lotteries or apply other equity-based strategies when allocating limited spaces (Gill, Timpane, Ross, & Brewer, 2001). More broadly, Levin and Driver (1997) identified five key issues related to the implementation of education voucher programs that may force changes in the organizational structure of central administrative offices and local school districts, including the following: oversight burdens linked to record keeping and monitoring of voucher programs; information services for educating the public about program eligibility and services; transportation services for students participating in voucher programs; enrollment and integration of existing private school students into systems designed to manage public school students; and adjudication policies that can mitigate disputes between families, schools, and government agencies (Levin & Driver, 1997).

Expanding public services to accommodate new administrative burdens required for the distribution of educational resources directly to eligible households is likely to add new costs to education budgets. Estimates by Hill (2003) for a theoretical voucher program similar in size and design to the CSTP suggest that net (additional) costs for state and local educational agencies may approach \$3 million to \$3.5 million annually. Universal voucher programs are likely to result in substantially greater costs because they bypass local districts and schools and entail large increases in the number of transactions between the state and education consumers. Estimating in 1995 dollars, Levin and Driver (1997) reported that the central costs of a national voucher program could be as large as one quarter of total public education expenditures, or \$72.7 billion.

Of course, the added costs associated with voucher programs may be surmounted, and even seem justifiable, if private school choice leads to improved educational outcomes. Research into the effectiveness of voucher programs has been widely reported and is not discussed at length here. Rather, through select examples, we demonstrate that evidence of voucher effectiveness remains uncertain, highly contested, and unconvincing to policy makers when considered alongside more reliable policy alternatives.

Measurements of voucher effectiveness may occur at either the school or student level. A substantial number of school-level analyses have focused on Florida's A+ Opportunity Scholarship Program (which has since been declared unconstitutional and is not included in Table 1), concluding that vouchers targeted to students in low-performing schools create incentives for schools to improve or risk losing per-pupil funding (see Greene, 2000; Greene & Winters, 2003; West & Peterson, 2005). Most recently, West and Peterson (2005) reported that students enrolled in schools graded F and eligible for vouchers achieved .04 standard deviations higher on the Stanford Achievement Test, 9th edition, than did students in comparable D schools. Students in schools graded D, where access to vouchers appeared imminent, improved .04 standard deviations over students in C schools. The authors attributed these achievement gains, in part, to the threat posed by vouchers.

However, a second body of research has questioned the methodologies, findings, and interpretations of studies attributing school achievement gains directly to vouchers. (For further reading see Camilli & Bulkley, 2001; Carnoy, 2001; Figlio & Rouse, 2005). Kupermintz (2001) analyzed student achievement data from the Florida Comprehensive Assessment Tests and concluded that F schools remedy failing grades by tailoring instruction to the test, especially assessments of writing proficiency. The author did not interpret this outcome as evidence of whole school improvement. Hacsı (2004) noted that other policy reforms were enacted in Florida just prior to or in concert with the Florida A+ Opportunity Scholarship Program, and achievement gains may have resulted from unmeasured and unrelated factors. Ladd (2002) argued that grading schools creates a public stigma that may lead to improvement regardless of whether vouchers are made available. For example, she found that students in low-performing schools in North Carolina experienced "almost identical" (2002, p. 15) achievement gains to students in Florida.

Findings on the benefits of vouchers for individual student recipients are equally contested. Research by Rouse (1998), which has been widely cited as an accurate analysis of the MPCP (Gill et al., 2001), concludes that voucher students outperform comparable groups of public school students in math but not in reading and that gains accumulate to between .3 and .5 standard deviations after 4 years. Greene, Peterson, &

Du (1999) supported these findings and reported positive gains for MPCP in both math and reading after 4 years. Still, results should be interpreted with caution. First, different researchers have come to different conclusions about the effectiveness of the MPCP program using different methodologies. Witte (2000) reported no gains for voucher recipients in either math or reading. Second, the majority of studies of the MPCP, including the three just referenced, analyze data collected prior to 1995, when sectarian schools were prohibited from participation. Third, studies of other publicly funded voucher programs find no positive effects for voucher users. Belfield (2006) compared CSTP participants to three control groups—public school students, rejected voucher applicants, and nonusers (which includes former recipients)—and found no differences in academic achievement. Attempts to clarify the effect of vouchers on student achievement through the study of privately funded programs have also resulted in mixed findings. Most notably, findings from studies of New York voucher recipients have been debated on methodological grounds and remain unresolved (Myers, Peterson, Meyer, Chou, & Howell, 2000; Howell, Wolf, Campbell, & Peterson, 2002; Krueger & Pei, 2004; Fuller, Huerta & Ruenzel, 2000).

In sum, evidence on the effectiveness of voucher reform is decidedly mixed, leaving policy makers with few reasons to push for voucher reform or expend time and effort rallying support. Policy makers have shown only a passing interest in voucher reform and frequently push aside voucher initiatives for more “pressing” legislative matters. A survey of policy makers in six states found that a minority of policy makers (48%) support some sort of voucher (Laitsch, 2002). Yet vouchers were considered the least important policy initiative out of 11 possible choices including early childhood education, teacher preparation, class size reduction, and increased accountability.<sup>2</sup> Three additional points are worth mentioning: First, the six states surveyed were Florida, Ohio, and Wisconsin, which have all enacted voucher programs, and Michigan, New Mexico, and Pennsylvania, which have all seriously considered voucher legislation. It is possible that a national sample of policy makers would produce less support for vouchers. Second, two public-choice policies, open enrollment programs and charter schools, were viewed

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<sup>2</sup> The 11 policies were ranked by survey participants as follows: 1 = teacher preparation; 2 = early childhood education; 3 = phonics; 4 = technology; 5 = accountability; 6 = class size reduction; 7 = site-based management; 8 = open enrollment; 9 = increasing salaries; 10 = charter schools; 11 = vouchers (Laitsch, 2002).

as higher priorities than vouchers. It may be that policy makers believe these programs are easier to implement and that survey responses reflect strategic decision making. But public choice programs still divert attention away from voucher reform. Third, a number of policy makers view vouchers solely as a mechanism for helping disadvantaged students. Two thirds of survey respondents who supported targeted vouchers for poor students preferred no voucher program to a universal voucher program (Laitsch, 2002). Thus, disputes over research findings means that empirical evidence plays only a small role in determining support for voucher reforms. In the next section, we review how political and ideological debates may limit voucher expansion.

### *Political Barriers*

Given the inconclusive and conflicting evidence on the achievement effects of voucher programs, popular understandings of the purpose of public education and political ideologies may also influence wider support for voucher reforms. As Belfield and Levin (2005) explained, “Although different political groups and their organizational representatives search for evidence that supports their positions, they oppose or favor vouchers largely on the basis of their ideologies” (p. 550). Voucher advocates rely primarily on support from political conservatives, libertarians, and other groups that view education as an individual commodity and not a social welfare reform (Apple & Pedroni, 2005). But appeals to these constituencies have not produced widespread interest in vouchers. The 37th Annual PDK/Gallup Poll (Rose & Gallup, 2005) reports that 57% of survey respondents oppose permitting students to attend private schools at public expense, an indication that the general public appears to be largely invested in improving and maintaining local public schools.

It is important to note that researchers have questioned the PDK/Gallup Poll results and observed that survey responses are influenced by the way questions are framed (for further reading see Moe, 2001). Also, voucher programs grow slowly as information, support services, and administrative structures are developed. For example, families must be informed about potential choices and provided with necessary support services such as transportation. Schools must establish eligibility, market their services, and build brand loyalty. State and local districts must develop the capacity to effectively

finance and monitor voucher recipients (Gill et al. 2001; Levin, 2002). Perhaps it is most important that voucher advocates are still challenged in mobilizing federal support for vouchers at the state and local levels. As James Frazier, Dean of Education at Northeastern University, noted shortly after the *Zelman* decision, “It could be 10 to 20 years before the full impact of the voucher ruling is realized” (Walsh, 2002, 5th section, ¶ 3).

To build support for voucher reform, advocates have aggressively educated potential beneficiaries. A two-pronged strategy is applied: The failures of public schools are made clear while vouchers are presented as an effective solution because they provide families with new schooling options and access to better services. These claims target historically marginalized populations who remain frustrated with the performance of public schools. But increasing support for vouchers is difficult and requires compromises. Many targeted families are highly reliant on public services and require assurances that vouchers will not threaten gains made through public education. An emphasis is placed on escape-valve or targeted vouchers, defined as policies that restrict eligibility to disadvantaged populations such as low-income or special-education students. These programs are more easily defended as a supplement to public schooling and, in the extreme, a tool for redistributing resources. It may be concluded that advocates hope to reframe vouchers as a necessary service for needy families to make reform more acceptable to traditional liberal constituencies.

However, it remains unclear whether expressed preferences for voucher programs targeted at low-income and minority students will widen support for voucher reform. Historically, social policies aimed at underserved communities have been sponsored by Democrats and other political liberals. These same groups generally oppose privatization and are reliant on political support from special interest groups with a material stake in public education. (Of course, voucher advocates similarly depend on special interest groups that stand to benefit from increased privatization.) Teachers’ unions, school board associations, and other organizations involved in the daily running of public education generally oppose vouchers. Privatization threatens not only the political power of these groups but also their material interests where shrinking public education budgets may affect salaries, benefits, and job security.

Few voucher proposals, including those that target special student populations, have garnered the necessary political support to pass through state legislatures or win popular referenda. In 2005, at least 16 states considered voucher legislation (K. Peterson, 2005). Only two bills were passed, and one expanded an already existing program.<sup>3</sup> Since 1972, seven referenda on vouchers in five states have been put before voters. All have been defeated (People for the American Way, 2006). Most recently, voucher referenda were proposed in California and Michigan in 2000 and rejected by 71% and 69% of voters respectively (People for the American Way, 2006). Finally, voucher policies that were successfully authorized often succumbed to legal challenges. For example, voucher programs in Colorado, Florida, and Vermont were all ruled unconstitutional according to state-level restrictions following the *Zelman* decision. The *Zelman* decision determined that vouchers do not offend the U.S. Constitution but state courts remain free to apply far stricter antiestablishment provisions found in state constitutions. (This point will be discussed more fully below.)

The primary objection to vouchers continues to be support for public education. Although the public may worry about public education as a whole, most support the public schools within their community. Of survey respondents on the 37th Annual PDK/Gallup Poll (Rose & Gallup, 2005), 69% believe that the school their oldest child attends deserves a rating of A or B. And 68% would rather reform the existing public education system than find an alternative solution. Research by Moe (2001) identifies two additional reasons why support for vouchers is weak: First, less-educated families often have lower standards for public schools where failing schools produce fewer objections in depressed urban settings, resulting in fewer calls for choice. Second, few families adequately understand how voucher plans work. Thus, policy makers and voters tend to avoid unfamiliar and potentially risky policies. As Belfield and Levin (2002) noted, “Ideology, inertia, and incomprehension all suggest that parental support for voucher programs will not be high” (p. 8).

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<sup>3</sup> In 2005, Utah created the Carson Smith Scholarships for Students With Special Needs. The program served 250 students during the 2004-05 school year. Also in 2005, Ohio expanded the Cleveland Scholarship and Tuition Program statewide and linked it to the state’s accountability system.

## *Legal Barriers*

Providing public funding to religious and sectarian institutions remains state governments' primary objection to education voucher programs. Even though the *Zelman* decision is a permissive ruling that states that vouchers do not offend the Establishment Clause in the U.S. Constitution, vouchers may still be found to violate language contained in state constitutions. For example, in *Witters v. Washington Department of Services for the Blind* (1986), the U.S. Supreme Court ruled that the Establishment Clause did not prohibit the provision of vocational rehabilitation services to aid a blind student enrolled at a Christian college. But the state of Washington was permitted to consider the far stricter dictates of its own constitution. Subsequently, the Washington Supreme Court ruled the aid program unconstitutional (Flygare, 1986).

More than 30 states contain some form of constitutional provision limiting the transfer of public funds to sectarian schools (Bolick, 2004).<sup>4</sup> These provisions are popularly referred to as *Blaine amendments*. In 1875, Representative James Blaine of Maine proposed an amendment to the Constitution to prevent public funding of Catholic schools. Blaine's proposal failed to gain a two thirds majority in the U.S. Senate (by only 4 votes) but prompted a number of states to adopt his cause and elements of his proposal.

Research by Kemerer (2002) examines the constitutional viability of voucher programs at the state level. He found that 16 state constitutions prohibit both direct and indirect public aid to sectarian schools, although language varies.<sup>5</sup> For example, Massachusetts simply requires public monies to be spent on public schools. An additional 14 state constitutions restrict direct aid to sectarian schools but are silent regarding indirect aid. The remaining 19 state constitutions appear to permit voucher programs either because they do not contain strict antiestablishment language or because of previous court rulings (Kemerer, 2002). For example, state supreme courts in Alabama, Illinois, Maine, New Jersey, North Carolina, and Pennsylvania have explicitly stated that

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<sup>4</sup> The number of states that restrict public funding of sectarian institutions varies based on how legal scholars interpret constitutional language as well as precedents in state law.

<sup>5</sup> Constitutions in Florida, Georgia, Michigan, Montana, New York, and Oklahoma prohibit direct or indirect aid to religious private schools. Constitutions in California, Colorado, Delaware, Illinois, Minnesota, Missouri, North Dakota, South Dakota, and Wyoming prohibit assistance that supports or sustains religious private schools. Constitutions in Hawaii and Kansas prevent support for all private schools, religious or not. The Massachusetts Constitution requires public monies to be spent on public schools only (Kemerer, 2002).

religious clauses in state constitutions are equivalent to the Establishment Clause in the First Amendment (Kemerer, 2002).

However, interpretations of state constitutions must be made cautiously. A host of additional legal objections can be made against voucher programs. For example, the Colorado Opportunity Contract Pilot Program was designed to provide vouchers to students in low-performing public schools. More specifically, 11 school districts with at least eight schools that were rated low or unsatisfactory by the state's accountability system were required to offer vouchers to students eligible for free or reduced lunch. The Colorado Opportunity Contract Pilot Program was challenged on grounds that Colorado's state constitution explicitly grants local school boards control over public schools as well as claims that the program violated the state's Blaine amendment (*Kotterman v. Killian*, 1999, p. 21; Medler, & Ziebarth, 2004). Imposing vouchers on local districts was seen as a violation of this principle and the program was declared unconstitutional (Mitchell & Sanko, 2004). Appeals have been filed and the final status of the program has not been determined.

In Florida, the Opportunity Scholarship Program provided vouchers to nearly 700 students from failing schools. In 2006, the Florida Supreme Court determined that the Florida Opportunity Scholarship Program diverted money from public schools for the purpose of establishing a parallel private system of education in competition with public schools (see *Bush v. Holmes*, 2006). The program was declared unconstitutional because Florida's Constitution requires a uniform system of free public schools (Dillon, 2006).

In Vermont, vouchers are provided to students residing in rural communities without public schools. The Vermont Supreme Court determined that vouchers could not be redeemed at sectarian schools because it violates the state constitution's compelled support clause (Ackerman, 2003, *Chittenden Town School District v. Vermont Department of Education*, 1999), which delineates that no citizen in Vermont can be "compelled to attend any religious worship, or erect or support any place of worship" (Vermont Constitution, Chapter I, Article 3), which extends to religious education. Additional legal hurdles include constitutional provisions that confine public funding to public schools, such as in Massachusetts, and public purposes doctrines that more generally require public monies to be spent on public purposes. Thus, voucher programs

that fail to explicitly describe public goals might be found unconstitutional (Godwin & Kemerer, 2002). Finally, public funding that is channeled to private institutions has been prohibited in some states on the basis of non-delegation of legislative authority doctrines. For delegation to be valid, two criteria must be fulfilled: First, the public purpose of legislation must be clearly established. Second, sufficient regulations must be enforced to prevent private entities from pursuing their own self-interests (Godwin & Kemerer, 2002). Voucher programs that fail to carefully qualify eligible students and schools may violate these standards.

Godwin and Kemerer (2002) asserted that voucher programs are most likely to survive litigation if they incorporate rather than challenge public education goals. This means tailoring voucher amounts to state and local per-pupil expenditures, applying accountability measures used to monitor public schools, and nurturing an alternative system of public school choice. It is most important that the public purpose of voucher legislation (e.g., aid to disadvantaged students) be clearly stated and potential public benefits be outlined. Thus, state courts may look more favorably on voucher programs that help improve public school outcomes rather than voucher programs that create a competing system of education (see *Bush v. Holmes*, 2005).

However, integral to understanding the above decisions is acknowledging that courts are political institutions. The *Zelman* decision illustrates this point. Belfield and Levin (2002) observed that the Supreme Court's ruling was premised on expanding school choice for disadvantaged students. The CSTP program was found neutral with respect to religion in part because a wide range of schooling options other than vouchers had already been made available to Cleveland families, including magnet schools, charter schools, and open-enrollment programs. Judges can be expected to disagree about the benefits of expanded school choice, which makes it difficult to anticipate legal outcomes. The fact that Blaine amendments are the product of nativist and prejudicial sentiments make future court decisions all the more unpredictable. One conclusion is certain though: Legal barriers to voucher reform provide advocates with strong incentives to design voucher programs that explicitly identify public goals.

The policy, political, and legal barriers that confront voucher reform have led to policies that explicitly target special-needs populations, redistribute educational

resources, and are designed to supplement the larger public education system. These policies may produce short-term gains for voucher advocates and lead to the successful implementation of new voucher programs, but limit the widespread appeal of voucher reforms. In the next section, we discuss how voucher expansion may ultimately depend on the ability of advocates to build support among suburban and middleclass constituents whose economic, civic, and family interests may be threatened by expanded voucher programs.

### **Suburban Response and Resistance**

The goals of education have been described in multiple ways. Labaree (1997) identified three competing and simultaneously existent processes: democratic equality, social efficiency, and social mobility. Democratic equality and social efficiency define education as a public good, where schools are expected to train democratic citizens and prepare workers to enter the job market. Integral to this process is providing all citizens with fair and equitable opportunities to succeed. Social mobility defines education as a private good. Schools award credentials that provide individual students with important advantages when competing for scarce resources (Labaree, 1997). Levin (2002) focused on four policy outcomes: equity, social cohesion, productive efficiency, and freedom of choice. Again, both shared and discrete goals are identified. An emphasis on equity and social cohesion presents all students with similar opportunities to learn standardized skills and content as well as gain access to varying perspectives. An emphasis on freedom of choice grants individual households the authority to direct their child's education. Finally, productive efficiency emphasizes maximizing education outputs for a given amount of resources and, dependent on policy design, may benefit individuals and society (Levin, 2002). Both Labaree and Levin acknowledged that support for any particular learning process or outcome often comes at the expense of others. Thus, tradeoffs are inevitable, and policy makers are forced to reconcile competing interests.

The point here is that nearly all definitions of education identify both public and private goals and that frequently these goals are in conflict. Popular support for a given reform is largely determined by how policy makers balance existing educational norms

with the distribution (or redistribution) of potential benefits. This understanding is especially pertinent to discussions of school choice policies because most Americans have already expressed their schooling preferences. Previous research indicates that 29 million students (59%) attend schools of choice and that a majority of these students exercise choice through place of residence (Henig & Sugarman, 1999). That is, families move to communities with high-performing public schools, which signifies a tacit agreement with local educational goals and requires a substantial private investment, such as purchasing a house. For these reasons, Coons (2005) argued that private schools and suburban public schools should be viewed as synonymous institutions where school quality and student enrollments are carefully regulated either through admissions standards and tuition costs or attendance zones and property taxes. Threats to preexisting implicit arrangements between parents, schools, and local communities are likely to be met with vigorous opposition, which may help explain differences in the growth and acceptance of various school choice policies and especially the limited endorsement of education voucher schemes.

As noted above, the past decade has witnessed an unprecedented expansion of school choice but only minimal use of school vouchers. More than 1 million students are now home schooled and 1 million students now attend charter schools but fewer than 50,000 students participate in publicly funded voucher programs (Alliance for School Choice, 2006). An important reason for this disparity is that home schools and charter schools do not upset the established norms of public education, at least not to the same degree as education vouchers. Home schooling is entirely privatized and not substantially different from attending a private school. Parents absorb the full cost of educating their child and state involvement is minimal, reducing threats to local school districts.<sup>6</sup> Charter schools remain entirely within the purview of public education, are subject to oversight by state and local authorizing agencies, and may be closed if contractual obligations are not fulfilled. More importantly, charter schools were originally conceived as a compliment to public education—a movement to expand school-level authority and

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<sup>6</sup> Notable exceptions are home school and cyber charter schools. Home school charter schools function like traditional home schools but at public expense. Cyber charter schools are subject to greater government oversight. However, they are still radically decentralized and enroll large numbers of previously home schooled students. Home school charter schools are legal in California and Alaska. Fifteen states have authorized cyber charter schools. Both home school and cyber charter schools have come under intense legal scrutiny and have encountered political resistance (Huerta, González, & d'Entremont, 2006).

encourage classroom innovation (Fuller, 2000).<sup>7</sup> Although some conflicts have inevitably emerged between charter schools and individual communities, a substantial number of suburban communities have authorized charter schools to help improve children's learning experiences (Jain, 2002).<sup>8</sup>

In contrast, education voucher programs coordinate public and private activities and are likely to be perceived as a threat to suburban communities because they erase municipal boundaries and provide public funding directly to eligible students to pay for private school tuitions. This process may challenge traditions of local governance because school districts have minimal authority over the enrollment decisions of eligible students as well as the teaching and learning methodologies used by participating private schools. Large-scale voucher programs may allow low-income students to enter affluent suburban school districts, subsequently encouraging high-income residents to exit. Thus, we may predict that suburban residents will vigorously oppose policies that reduce local control (Kirp, 1995) and threaten to redistribute local resources (P. Peterson, 1981). To be fair, other choice policies may produce similar objections but rarely are local school districts entirely excluded from the regulation and oversight of publicly funded educational activities, even in the case of charter schools. Local school districts are viewed by suburbs as essential to exerting political influence, protecting housing prices and other private investments, building social capital, and maintaining school quality (Brasington, 2006; Brunner & Sonstelie, 2002; Catterall & Chapleau, 2003; Ferreyra, 2006; Fischel, 2002; Nechyba, 2003; Ryan & Heise, 2002). Therefore, we do not anticipate that other school choice policies, as compared to education voucher programs, will produce the same variety of fears or degree of resistance from suburban residents. In the following sections, we develop each of these points to demonstrate why suburban communities are likely to oppose voucher reform.

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<sup>7</sup> The first charter schools were proposed by individuals heavily invested in public education, including Ted Kolderie, Joe Nathan, and Al Shaker, the former president of the American Federation of Teachers.

<sup>8</sup> Charter schools have evolved with a policy that is closely linked to the poor performance of urban schools. Nevertheless, charter schools have made inroads into suburban communities that far exceed vouchers. More than a quarter of the charter schools authorized in Colorado (47%), New Jersey (39%), Georgia (34%), Florida (33%), Connecticut (31%), and Arizona (28%) are in suburban communities (Jain, 2002).

### *Local Control*

Public education in the United States is governed by a tradition of local control. In general, the state sets broad learning standards and oversees student performance but school districts maintain primary authority over the daily operation of public schools. Suburban communities staunchly support local control for three reasons. First, citizen self-government is a basic premise of American political thought (Tocqueville, 2000). Local control harkens back to an era of small towns and one-room schoolhouses, and whereas the management of public schools has been steadily centralized (Tyack, 1993) a preference for local government has not waned. Surveys by news-gathering organizations consistently report that respondents place greater faith in parents, teachers, and local school boards to run public schools than in state or federal agencies (McDermott, 1999). Second, local control is thought to be more efficient and effective than policies handed down by large bureaucracies (Fung, 2004). Community members are more attuned to student needs and unlikely to ignore local problems. Furthermore, educational outcomes can be closely monitored, increasing accountability. Third, differences between communities, schools, and individual students are accommodated and allowed to persist. For example, affluent suburban school districts may choose to allocate more funding per pupil than nearby inner-ring suburbs and urban areas would. Essentially, local control helps suburbs protect and maintain school quality.

The commitment of suburban communities to local control can be characterized by a phenomenon that Bryk, Sebring, Kerbow, Rollow, and Easton (1998) identified as unitary politics. In short, stable high-performing schools develop a core set of principles held in common by local community members that guide decision-making processes. Unitary politics appear most frequently in small settings where members have a shared history, similar educational values, and the time and opportunity to participate in collective planning (Bryk et al., 1998). In affluent suburbs, where parents and local residents are heavily invested in educational outcomes, unitary politics may logically extend beyond classroom walls to include larger policy decisions. This is not to suggest that suburban education policies will serve the best interests of all community members. Efforts by local leaders to build consensus and expel deviant individuals may undermine public deliberation and encourage peer pressure, social conformity, and the manipulation

of political processes (Barber, 1984). Rather, the notion of unitary politics suggests that suburban residents share normative understandings that govern local public schools.

It appears that families heavily invested in local public schools are unlikely to support education voucher programs. Catterall and Chapleau (2003) examined California Proposition 38, a 2000 referendum that proposed a \$4,000 tuition subsidy to attend both religious and nonsectarian private schools, and found that areas with higher public school test scores expressed less support for education vouchers. In addition, support for Proposition 38 was inversely related to a concurrent referendum on public school bonds. Vouchers are opposed by suburban communities with quality public schools because they present a direct challenge to local control and unitary politics by bypassing local school districts. Typically, voucher programs are authorized by state legislatures and subject to state oversight. Local administrators might be unable to control a potential influx of new students, and they almost certainly cannot monitor or hold accountable private schools that receive public funds.<sup>9</sup> But perhaps more important than state intrusions is that vouchers emphasize individual needs over community needs. Families are not expected to make collective decisions or participate in public discourse, which limits the importance of local policies. As Barber (1984) explained, vouchers may be fundamentally incompatible with the idea of neighborhoods because “the abstract market displaces the concrete neighborhood, just as the self-interested client displaces the community-minded neighbor” (p. 297).

### *Private Investments*

The loss of local control and associated political will reduces the capacity of suburban school districts to protect their own interests. Families prefer to live in communities that match their preferences for public services (Tiebout, 1956) and public school quality is an important determinant of household residential decisions (Oates, 1969). Moving to the suburbs requires a substantial private investment; the typical family purchases a house and assumes other cost-of-living expenses. To protect these investments, suburban communities carefully regulate student enrollments to include only

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<sup>9</sup> The Colorado Supreme Court recently declared a voucher program passed by the state legislature unconstitutional. It was perceived as a direct attack on the ability of local school districts to best serve their own interests (*Owens v. Colorado Congress of Parents, Teachers, and Students*, 2004).

families that live within school district boundaries. Used in tandem with policies that limit the supply of affordable housing, such as zoning ordinances, subdivision restrictions, and minimum lot size requirements, student attendance zones reduce the proportion of low-income and other potentially low-performing students in public schools (Salins, 1993). Viewed in this context, local education essentially acts as a private good where families are expected to purchase access to good schools (Fischel, 2002).

As a result, there is a strong relationship between the quality of local public schools and the willingness of residents to pay high costs to live in affluent suburbs (Black, 1999; Bogart & Cromwell, 2000; Downes & Zabel, 2002; Weimer & Wolkoff, 2001). Black (1999) found that for 22,679 house sales in three Massachusetts counties from 1993 to 1995, a 5% increase in student test scores is associated with a 2.1% increase in housing prices. In other words, an \$188,000 house will rise in price by \$3,948. This finding was substantiated by Figlio and Lucas (2000), who further suggested that state intrusions into local policymaking lead to fluctuations in the housing market. Florida assigns all schools a grade based on student performance. Houses located in student attendance zones graded B are worth \$9,876 more than similar houses in student attendance zones graded C. Finally, Chiodo, Hernandez-Murillo, and Owyang (2005) considered the added possibility that school quality in high-income communities has a greater influence on housing prices than in low-income communities. Using a nonlinear model, they found that a 5% increase in test scores is associated with a 3.5% or \$5,392 gain in house prices at the sample mean price, similar to the estimate by Black. However, for houses one standard deviation above the mean house price, a 5% increase in test scores is associated with a \$10,936 gain in price. In contrast, almost no penalty is observed for declines in school quality in low-income areas. For houses one standard deviation below the mean house price, a 5% decline in test scores was associated with only a \$321 drop in price (Chiodo, Hernandez-Murillo, & Owyang, 2005).

Vouchers may threaten the private investments of suburban residents because they minimize the importance of student attendance zones and grant users access to quality schools independent of where they live. Families may migrate to more affordable communities, assume smaller tax liabilities, and send their children to private schools (Ferreyra, 2006). This action could reduce demand for housing in affluent neighborhoods

with high-quality schools and lead to a decrease in housing prices. Previous research suggests that education policies that undermine local regulation of student enrollments create fluctuations in the housing market. For example, Haynes and Taylor (1996) reported that in southern Dallas consumers refused to pay a premium for housing in high-performing school district after busing was introduced to desegregate public schools. In addition, statistical simulations of education voucher programs by Nechyba (2003) show that when private school markets are allowed to operate within the public system the ratio for property values between rich school districts and poor school districts falls from 2.39 to 1.59. Nechyba concluded that private school vouchers would receive the most support from homeowners in low-income neighborhoods and the least support from homeowners in high-income neighborhoods.

Suburban voters appear to recognize the threat vouchers pose to local house prices and have rejected voucher referenda for this reason. Brunner and Sonstelie (2002) analyzed California's 2000 voucher referendum and found that local school quality influenced voting behavior among homeowners without school-age children. The probability that homeowners without school-age children who live in communities with inferior schools would vote for vouchers was 56%. The probability that homeowners without school-age children who live in communities with good schools would vote for vouchers was 39%. As long as vouchers pose a threat to the private investments of suburban residents, support is likely to be minimal.

### *Social Capital*

It is misleading to suggest that households base residential decisions entirely on the quality of public services. In fact, only 5% of respondents on the American Annual Housing Survey (a longitudinal survey begun in 1973) reported moving in response to public services, whereas 50% reported moving because of the location of family, friends, and employment (Rhode & Strumpf, 2003). The same sensibilities influence decisions to attend suburban schools. Parents value educational experiences that match their own particular values and beliefs. Fuller (2000) noted that school choices are often an expression of tribalism. Suburban residents frustrated by groups-rights politics seek to remove themselves from the larger public sphere and build smaller communities around

ethnic identities, religious convictions, or pedagogical and child-rearing practices. Public schools are central to this process, expected to foster a common set of experiences. In such debates over ethnic identities, parents also want their child's education to reflect their values and beliefs and conform to their range of experiences (Rofes & Stulberg, 2004). As a result, suburban public schools not only educate students but they also foster a sense of belonging through shared experiences among local residents.

The role of public schools in suburban communities makes them an important source of community-specific social capital. Social capital is described as the resources that result from interpersonal relationships and other social networks and the advantages gained by those who possess such social resources (Bourdieu, 1986; Coleman, 1988). In the context of public schools, social capital is generated as a result of public schools introducing community members to each other, including those without children, and providing a venue for personal relationships to develop. Social capital facilitates parent involvement in local schools, grassroots movements, and other forms of bottom-up civic participation in government (Fischel, 2002). Community members may come together in support (or opposition) of changes in education policy or to address non-education matters such as local tax policies and commercial developments. Community members are better able to share information and mobilize resources to achieve desired ends. For these reasons, families often develop personal attachments to local public schools and view private schools, even those that are high-performing, as poor substitutes (Brasington, 2006).

Vouchers are likely to undermine local relationships because voucher recipients may attend schools outside their immediate communities, causing families to pay little attention to the values and beliefs of their neighbors. Finding common ground becomes more difficult and popular interest in local policymaking may wane. Alesina, Baqir, and Easterly (1999) noted that in more diverse communities public goods are undervalued and policymaking is corrupted by political patronage. As a result, spending on public education is likely to decline as local residents become more heterogeneous. Many community members may not fully verbalize these objections but they may recognize vouchers as a threat to the status quo and the social networks they have fostered, and they may reject vouchers on this basis.

### *School Quality*

Voucher programs may not only encourage wealthier families to exit suburban communities but they also present the possibility that disadvantaged families will gain access to local schools (Ryan & Heise, 2002). Along with housing prices, perceptions of school performance are likely to decline. Student achievement and attainment are only two criteria used by informed families to judge the quality of local public schools. Parents also take into account per-pupil spending, school location, teacher quality, school climate, and perhaps most importantly peer-group composition (Bradbury, Mayer, & Case, 2001; Schnedier & Buckley, 2002; Schneider, Teske, & Marschall, 2000). Parents use all of these criteria as shorthand measurements of local school quality and are wary of abrupt changes that upset previous choices.

Vouchers threaten the perceived quality of suburban public schools in three ways. First, they may reduce per-pupil expenditures. Shrinking political support for public schools leads to reduced local education budgets. Brasington (2006) predicted that President Bush's \$1,500 voucher bill in 2001 would reduce demand for public schooling by 5.1%, forcing schools to increase class sizes or cut special programs and extracurricular activities. At the same time, local tax burdens may rise as new administrative burdens and the influx of formerly private-schooled students increase total education costs (Nechyba, 1999). Second, vouchers may increase student diversity. School districts with higher test scores tend to be Whiter, wealthier, and more educated (Bayer, Ferreira, & McMillan, 2003). Vouchers and privatization efforts may prevent school districts from functioning as a sorting mechanism and reduce inter-district diversity in income and race. Evidence drawn from both the MPCP and CSTP indicates that vouchers provide low-income and minority students with greater access to more integrated schools (Gill et al., 2001). Results from statistical simulations by Nechyba (2003) support this finding and report that a \$2,500 voucher reduces the ratio of average income in rich school districts to average income in the poor districts from 2.13 to 1.74.<sup>10</sup> Third, vouchers may lead to greater social unrest. Integrating low-income and minority

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<sup>10</sup> It is important to note that although vouchers appear to reduce inter-district variance in race and income, by minimizing the importance of school district boundaries, they simultaneously appear to increase intra-district variance as families with greater access to information, transportation, and other educational resources isolate themselves in select schools (Nechyba, 2003).

students into suburban schools may introduce problems commonly associated with urban areas. Suburban residents, who have managed to build safe and disciplined school communities around effective school leaders, may worry that vouchers will not only undermine their accomplishments but also provide an excuse for the failure of urban schools (McDermott, 1999).

It is important to note that we are not arguing that low-income and minority students are a cause of educational failings or even that voucher programs will necessarily bring about any of the three outcomes described above. Rather, we have attempted to accurately describe suburban fears about voucher programs. Perhaps Brownstein (2003) reinforced our point more simply when he suggested that school-choice programs that cross school district lines “reopen one of the most divisive issues of the school desegregation era: whether largely White suburban districts should be required to accept Black and Hispanic inner-city children” (p. 8).

Previous research suggests that White and minority families seek out schools where their children are less likely to be economically and racially isolated (Schneider & Buckley, 2002). In practice this means that White families prefer schools where contact with minority students is limited. Studies of school desegregation policies in urban areas find that White students exit city public schools in response to increased integration (Clotfelter, 1979; Coleman, Kelly, & Moore, 1975; Farley, Richards & Wurdock, 1980). This trend intensifies in cities with high proportions of African American students and in cities adjacent to suburban school districts with few minority residents (Robin & Bosco, 1976). Recently, Clotfelter (2001) examined student enrollment patterns in 238 metropolitan areas containing almost 4,000 school districts from 1987 to 1996 and found that a 1% increase in the exposure rate of White families to non-White families in large urban school districts was associated with a 7% decrease in the annual growth rate of White student enrollments.<sup>11</sup> Furthermore, a tipping point was observed. Public schools experienced gains in White enrollments when exposure rates remained below .25 and losses above this point. Finally, segregation increased between school districts as White families fled from urban centers to more homogeneous suburban communities.

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<sup>11</sup> Exposure rate is defined as the percentage of non-white students in the average white student’s school. Large urban school districts are defined as school districts that enroll at least 10% of the total student population in a metropolitan area. Clotfelter (2001) referred to these districts as the most important for understanding student segregation patterns.

Education policies designed to reduce the effect of White flight and facilitate the movement of minority families out of urban areas and into suburban school districts have been historically resisted. For example, Ryan and Heise (2002) posited that school integration plans achieved measurable gains in the late 1960s and early 1970s following court orders to end de jure segregation in Southern school districts but just prior to the widespread introduction of busing plans to address de facto segregation in both Southern and Northern cities. Busing introduced the possibility that suburban schools would be forced to accommodate urban minority students, prompting immediate and fierce opposition. Then President Nixon claimed that busing would challenge local leadership and lead to the deterioration of local neighborhoods. Nixon was joined by prominent members of the U.S. Congress with one representative going so far as to propose a bill that would have cut off gasoline supplies to any school bus traveling beyond the closest neighborhood school (Ryan & Heise, 2002). Of course, resistance was not limited to political elites. A number of local officials, community activists, and parents expressed their displeasure through protests and other forms of civil disobedience. The U.S. Supreme Court soon weighed in and through *Milliken v. Bradley* (1974) ruled that forced busing between urban and suburban school districts was unconstitutional absent evidence that multiple districts had deliberately encouraged segregation.

Although it is impossible to gauge the full impact of elite and middleclass protests on the Court's decisions, two outcomes are worth noting. First, according to Ryan and Heise (2002), inter-district busing plans have been ordered in only four metropolitan areas—Indianapolis, Little Rock, Louisville, and Wilmington—since *Milliken*. It appears that integrating urban and suburban school districts is no longer a policy imperative. Second, the role of suburban school districts in aiding the plight of minority as well as low-income urban students is largely perceived as voluntary. This is true of school choice policies in general and vouchers in particular. For example, students participating in CSTP are allowed to enroll in any suburban public school that is willing to accommodate them but thus far no suburban schools have agreed to receive voucher users (Ryan & Heise, 2002). As long as suburban participation in voucher programs remains voluntary, programs should remain small in scale. If participation becomes mandatory, a political backlash among middle-class constituencies, similar to responses to inter-district busing,

appears inevitable. In either case, the substantial expansion of voucher users appears unlikely.

### **Conclusion**

In sum, suburban parents may perceive education policies that lead to large-scale integration as an attack on local control, private investments, social values, and public school quality. Voucher advocates do not appear to have anticipated that voucher programs designed to overcome the most pressing policy, political, and legal objections may prompt new sources of resistance. Education vouchers aimed at special groups of students are likely to be perceived as a tool for redistributing educational resources and ignite vigorous opposition if they intrude on suburban communities. As David Kirp (1995) observed,

The suburbanites' view, consistently expressed and at the ballot box, is that their tax dollars should be returned to their own communities, not distributed in the fashion of a Lady Bountiful to the needy elsewhere (p. 6).

Reconciling the preferences of a suburban voting block, which may be offended by vouchers, with the wider policy, political, and legal challenges that limit voucher expansion may be insurmountable for voucher advocates. As we have discussed, the additional cost associated with voucher expansion together with inconclusive evidence on voucher effectiveness have made voucher programs unattractive for policy makers. The lack of public support, both for universal or targeted voucher programs, has deemed vouchers a politically unpalatable school reform. The legal barriers that exist within state constitutions, including Blaine amendments, compelled support, and uniform education clauses, will result in stymieing state-level expansion of vouchers despite the federal constitutional precedent set by *Zelman*.

If the continuous push for the expansion of private school choice begins to directly threaten suburban communities, resistance to voucher reform may not be determined by partisan ideologies but result from efforts to protect personal and material interests. Higher income families may remain tied to substantial private investments and

committed to specific geographic locations while lower income families and other special student populations are free to move to better schools. Bases of conservative support vital to initial calls for private school choice, frequently taken for granted, may erode as suburban residents worry that vouchers will lead to a decline in the quality of suburban schools and negatively influence substantial financial, political, and social stability. At present, the potential for education vouchers to serve as a long-term education policy solution is unconvincing.

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**Table 1: Publicly-Financed Education Voucher Programs Within the United States, 2006**

State	Arizona	Florida	Ohio	Utah	Wisconsin	Washington D.C.	
Scope	Statewide	Statewide	Cleveland	Statewide	Statewide	Milwaukee	Citywide
Authorized	2006	2001	1995	2006	2005	1989	2004
Last Amended	--	--	2003	--	2006	2005	--
Eligibility							
<i>Eligible Students</i>	Students with learning disabilities	Students with learning disabilities	All students with priority given to low-income students	Students in low-performing schools for 3 consecutive years	Students with learning disabilities	Families with incomes ≤ 220% FPL	Families with incomes ≤ 185% FPL
<i>Number Eligible</i>	125,000	402,000	60,000 to 90,000	46,000	52,000 - 60,000	86,000	41,000
<i>Participating Students</i>	New program; not available	17,300	6,300	2,272	141	14,875	1,716
<i>Participating Schools</i>	New program; not available	609	45	263	26	121	68
Spending							
<i>Amount Allocated (in millions)</i>	\$2.5	\$108	\$19.3	Determined annually	\$2.5	\$93.7	\$12.1
<i>Scholarship Size</i>	New program; not available	\$6,225	90% of \$2,700-\$3,000 for families < 200% FPL and 75% for families ≥ 200% FPL	\$4,250	\$6,042.50 for services ≥ 3 hr., \$3625.50 for services < 3 hr.	\$5,854	6,802
<i>Student cap</i>	None	None	None	14,000 students	None	22,500 students	1,600 to 1,700 students

Sources: Alliance for School Choice (2006); Gill, Timpane, Ross, & Brewer (2001); People for the American Way (2006); Ziebarth, (2003).

Note: FPL = federal poverty line. It is important to note that school districts in Main and Vermont may provide eligible students with public funds to attend private schools. The table does not include these voucher programs for two reasons. First, students in both states are eligible to use vouchers only when the school district in which they reside does not provide a public school. Both programs are intended to aid students in low-density, rural areas. Second, voucher users are prohibited from attending sectarian schools. This, Maine's and Vermont's voucher programs differ markedly from the voucher programs described above.