

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

IN THE MARION SUPERIOR COURT
CAUSE NO.: 49D07-1107-PL-025402

TERESA MEREDITH *et al.*,)
)
 Plaintiffs,)
)
 v.)
)
 MITCH DANIELS, *et al.*,)
)
 Defendants)
_____)

BRIEF *AMICUS CURIAE* OF INDIANA COALITION FOR PUBLIC
EDUCATION BOARD OF DIRECTORS
IN SUPPORT OF PLAINTIFFS

Joel D. Hand (18681-32)
THE LAW OFFICE OF JOEL D. HAND
120 East Market Street, Suite 807
Indianapolis, Indiana 46204
Telephone: 317-608-6621
Facsimile: 317-423-3534

Counsel for *Amicus Curiae*

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STATEMENT OF THE IDENTITIES AND INTERESTS OF AMICUS

Amicus is the Indiana Coalition for Public Education (ICPE). The ICPE is a not-for-profit, bi-partisan, Hoosier taxpayer group that was formed with the mission to focus public tax dollars on the K-12 education of public school students. The ICPE is comprised of individual members, who are private citizens and taxpayers in the State of Indiana currently representing sixty-four of Indiana's ninety-two counties. As a coalition of taxpayers, the ICPE objects to the use of taxes to support private schools at the expense of students in public schools. In furtherance of those interests, the ICPE files this brief in support of the Plaintiffs.

INTRODUCTION AND SUMMARY OF ARGUMENT

Amicus recognizes that the issue before this Court is whether the Indiana Choice Scholarship Program ("CSP"), Pub L. No. 92-2011, passes muster under Article 1, § 4, Article I, § 6, and Article 8, § 1 of the Indiana Constitution, not whether the Program has merit from an educational point of view. However, *amicus* is also aware that defendants seek to color the Court's consideration of these constitutional issues by presenting an inaccurate and highly misleading picture of both the state of public education in Indiana and of the effect of voucher programs on the public schools. Defendants contend that research shows that voucher programs are vitally necessary to address an education crisis in the state,

and that they improve the academic performance of the students that remain in public schools. *See* Defendants’ Memorandum In Opposition to the Motion for Preliminary Injunction. (“State’s Brief”).

In fact, the research does not support either of these contentions. *Amicus* submits this brief in order to provide a more comprehensive review of the available research. In Part A, we respond to the notion that the State of Indiana is in the midst of a serious education crisis. In Part B, we address the contention of defendants that voucher programs create a competitive environment that has a positive effect on the academic performance of students in public schools, and explain briefly how the diversion of funding from public to private schools under the voucher program will likely have precisely the opposite effect by depriving the remaining public school students of much needed resources.

ARGUMENT

A. RESEARCH DOES NOT SUPPORT THE STATE’S ASSERTION THAT STUDENT ACHIEVEMENT IN INDIANA IS “FLATLINING” OR “DECLINING” IN KEY AREAS

Amicus recognizes that there is ample room for improvement where the achievement of Indiana students is concerned. However, defendants’ analysis of the state of student achievement in Indiana, which paints a picture of an education

system in deep crisis, is based on disregard and misinterpretation of the available data on student achievement, and thus is highly misleading.

In fact, Indiana's schools have shown steady improvement in many areas in recent years, and the state consistently performs above the national average in the vast majority of recent studies on student achievement. In one recent national study, Indiana ranked seventeenth among the fifty states and the District of Columbia. Press Release, *Report Card Grades States on Education Performance, Policy*, Education Week (2010). In another recent study released by the American Legislative Exchange Council (ALEC), a decidedly pro-voucher group, our state ranked thirteenth, scoring above the national average in five out of six categories. Matthew Ladner, *et al.*, *Report Card on American Education*, American Legislative Exchange Council (2010). In order to arrive at its rankings, the ALEC study specifically focused on low-income students' scores on the NAEP exam¹ between 2003 and 2009. The ALEC study also noted that Indiana had improved its achievement standards between 2003 and 2007. *Id.*

Given these findings, defendants' claim that "[o]nly one in three of Indiana's eighth graders can pass the national math or reading exam" may come as a surprise. State's Brief at 2. This statement is highly misleading. The state most

¹ The NAEP, as the State's Brief notes, is "the best instrument for comparing the academic achievement trends of students in different states." State's Brief at 2 (quoting Matthew Ladner, *Florida's Lessons for Indiana K-12 Reform* 8 (2009)).

likely arrives at this number by assuming that students must score “proficient” on the NAEP in order to “pass” the exam. In fact, the NAEP reports *three* levels in its scoring that can fairly be regarded as “passing:” basic, proficient, and advanced. As one scholar noted, it is most useful to think of the highest level of NAEP performance, “advanced,” as equivalent to an A+ grade. Diane Ravitch, *The Myth of Charter Schools*, New York Book Review (2010). The next level, “proficient,” is equivalent to an A or a very strong B, and the “basic” level is equivalent to a grade of C. *Id.* Accordingly, most observers of NAEP data consider “passing” to be the percentage of students graded at least at the “basic” standard.² Even if one were to accept the state’s rather unconventional method of reporting passing NAEP scores, it should be noted for comparison’s sake that very few countries would likely improve upon this performance³ – and, based on the national rankings referred to *supra*, neither would the vast majority of U.S. states.

Armed with a better understanding of how NAEP scores are evaluated and how Indiana compares to other jurisdictions, it becomes clear that our students’

² See, *infra* note 3.

³ Indeed, several researchers have commented that the NAEP is exceedingly rigorous, and that only a handful of countries could place more than 50% of their students at the “proficient” levels of the test. Jim Hull, *The Proficiency Debate: A Guide to NAEP Achievement Levels*, The Center for Public Education, available at <http://www.centerforpubliceducation.org/Main-Menu/Evaluating-performance/The-proficiency-debate-At-a-glance/The-proficiency-debate-A-guide-to-NAEP-achievement-levels.html> (2008); Richard Rothstein, *et al.*, *“Proficiency For All” – An Oxymoron* (2006); Phillips, *Linking NAEP Achievement Levels to TIMSS*, American Institutes for Research (2007). In fact, by the standards set forth in the State’s Brief, the vast majority of students the world over are “failing.”

NAEP scores are above average. In 2009, the most recent year in which scores were reported, 87% of Indiana 4th graders and 78% of 8th graders passed the “basic” standard in math. National Center on Education Statistics, *The Nation’s Report Card State Snapshot Report, Mathematics, Indiana Grade 4, Public Schools* (2009); National Center on Education Statistics, *The Nation’s Report Card State Snapshot Report, Mathematics, Indiana Grade 8, Public Schools* (2009). In reading, 70% of Indiana 4th graders and 79% of 8th graders passed the “basic” standard. National Center on Education Statistics, *The Nation’s Report Card State Snapshot Report, Reading, Indiana Grade 4, Public Schools* (2009); National Center on Education Statistics, *The Nation’s Report Card State Snapshot Report, Reading, Indiana Grade 8, Public Schools* (2009). In each instance, Indiana students’ achievement was above the national average.

The numbers likewise negate the state’s claims that educational achievement in Indiana is either stagnating or declining. Indiana began the NAEP era in 1992 with 16% of 4th graders passing the proficient standard in mathematics, and 60% passing the basic standard. National Center on Education Statistics, *The Nation’s Report Card State Snapshot Report, Mathematics, Indiana Grade 4, Public Schools* (2009). In 2009, 42% of our 4th graders passed the proficient standard in math, and 87% passed the basic standard. *Id.* These scores were at or above the scores of all but 6 states. *Id.* The first scores for 8th grade math came in 1990,

when 17% of Indiana 8th graders passed the proficient level. In 2009, 36% passed the proficient level. National Center on Education Statistics, *The Nation's Report Card State Snapshot Report, Mathematics, Indiana Grade 8, Public Schools* (2009). At the basic level for 8th grade math, 56% passed in 1990 and 78% passed in 2009. *Id.* These scores were at or above the scores of all but 8 states. *Id.* Again, as the state has admitted, NAEP scores are the gold standard for measuring student achievement trends. State's Brief, *supra*. And in each of the NAEP categories, Indiana students have seen gains that range from modest to quite significant, and they have outperformed the national average in every NAEP category in every year measured. This hardly amounts to stagnation or decline.

Furthermore, objective data shows that over the past twenty-one years, eight out of ten common indicators of public school performance have improved to currently stand at or near their highest points in Indiana history. *See A Twenty-one Year Review: Improvement in Indiana's Schools*, Dr. Victor Smith, Indiana Coalition for Public Schools, *available at* http://www.icpe2011.com/Good_News_about_Schools.html. The indicators which have shown improvement over the past twenty-one years include: the statewide graduation rate, the statewide attendance rate, ACT scores, National Assessment scores, ISTEP+ English/Language Arts scores, ISTEP+ Math scores, the percentage of students aspiring to college and the percent of students who earned

the Academic Honors Diploma or the CORE 40 Diploma. *Id.* The only two indicators for which Indiana students are not at or near historic highs are SAT verbal scores and SAT math scores. And, even in those areas, the drop-off has not been substantial despite having a higher percentage of graduates taking the SAT than the national average. *Id.*

Indiana's graduation rate has seen dramatic improvement over the past four years despite the switch to a more rigorous measure of graduation rates, which now only count as graduates those students who graduate from high school within four years or less. *See:* <http://www.doe.in.gov/gradrate/>. Specifically, the graduation rate for the Class of 2007 was 76.4% and then rose to 77.8% for the Class of 2008, rose again to 81.5% for the Class of 2009 and for the Class of 2010 rose again to 84.1%. *Id.* Certainly, such a dramatic rise of nearly 8% over a four year span defies the State's assertion that Indiana's graduation rates have been in decline. State's Brief at 1.

Additionally, Indiana has witnessed dramatic improvement in the dropout rate, cutting it nearly in half within a four year span. According to the Indiana Department of Education website, in 2007, the dropout rate in Indiana was 12% but had fallen to 6.4% for the Class of 2010. *See* <http://www.doe.in.gov/dropoutprevention/data.html>. *See also* Media Advisory: *Indiana Grad Rate improves again*, December 20, 2010 available at

http://www.doe.in.gov/news/2010/12-December/ma_gradrate.html. Such a dramatic decline in the State's dropout rate, coupled with significant increases in the graduation rate, and the fact that the State is at or near its historically highest level of achievement on eight out of ten common indicators for public school performance, entirely refutes the State's misleading contentions that Indiana's public schools are failing their students to such an extent as to justify a radical and unconstitutional system of private school vouchers.

Amicus in no way wish to suggest that Indiana's public schools are exemplary in every respect; there will always be room for more improvement. However, the fact that there is room for *more* improvement should not be used to negate the achievements that Hoosier students have made. Nor should it be used to justify a program that is more likely to harm than to improve the educational outcomes for the majority of public school students.

B. RESEARCH DOES NOT SUPPORT THE CONTENTION THAT VOUCHER PROGRAMS CREATE A COMPETITIVE ENVIRONMENT AMONG SCHOOLS THAT HAS A POSITIVE EFFECT ON THE ACADEMIC PERFORMANCE OF STUDENTS IN THE PUBLIC SCHOOLS

Even if every one of the state's claims about the quality of public education in Indiana were true, it would not support their claim that vouchers have been proven to improve the performance of students who remain in public schools.

Defendants contend that the CSP will “contribute to the overall competitive model” so that “for every student that is educated outside the traditional public school of legal settlement, that school is deprived of the student’s tuition support dollars... [t]his gives traditional public schools incentives to improve in order to attract and retain students.” State’s Brief at 25. Putting aside the fact that charter schools in Indiana already provide competition to traditional public schools, this claim rests on questionable empirical research.

The support that the state offers for its claim that voucher programs improve public schools stems entirely from two bases. First, the state cites a “supposition” of Dr. Milton Friedman in 1962 that competition amongst a variety of schools might have the effect of stimulating the improvement of all schools affected. Milton Friedman, *Capitalism and Freedom* 93 (1962). Second, the state cites a “meta-study” by Dr. Greg Forster, a senior fellow at Dr. Friedman’s own organization, the Friedman Foundation for Educational Choice. Greg Forster, *A Win-Win Solution: The Empirical Evidence on School Vouchers*, The Foundation for Educational Choice (2011) (“Forster Report”).⁴ Advocates of a particular position are certainly capable of producing rigorous, unbiased studies. However, the Forster Report cited in the State’s Brief does not survive scrutiny.

⁴ This paper is an update of a 2009 paper with the same title.

The Forster Report claims to review all of the existing empirical studies that have examined how vouchers affect academic achievement in public schools, and concludes that “the empirical evidence consistently shows that vouchers improve outcomes for both participants and public schools.” *Id.* at 1. This decisive-sounding conclusion is patently false. In fact, another recent review of voucher studies found that the empirical evidence on vouchers is inconclusive and that any gains in student achievement are modest at best. Alexandra Usher & Nancy Kober, *Keeping Informed about School Vouchers: A Review of Major Developments and Research*, Center on Education Policy (2011) (“CEP Meta-Study”).⁵ The CEP Meta-Study was exceedingly thorough, reviewing twenty-one studies of voucher programs and six reviews and critiques of such studies, including the Forster Report. *See* CEP Meta-Study Appendix at 49-55. It examines the findings of each study, critiques its methodology, and offers suggestions as to how future studies can ensure that research is high-quality and objective. CEP Meta-Study.

⁵ Other reviews over the years have made similar findings. *See, e.g.*, Clive R. Belfield and Henry M. Levin, *The Effects of Competition on Educational Outcomes: A Review of U.S. Evidence* (2002); Christopher Jepsen, *The Effects of Private School Competition on Student Achievement* (1999) (reviewing available research on school competition and finding no consistent effect on academic performance); Gregory Elacqua, *School Choice in Chile: An Analysis of Parental Preferences and Search Behavior* (2004) (finding that data from Chile do not support the claim that school competition results in improved academic performance).

Among other things, the CEP Meta-Study found that “achievement gains for voucher students are similar to those of their public school peers” among students with similar prior achievement, mobility, and minority status. *Id.* at 9. With respect to the supposed competitive effect that voucher programs may have, the CEP Meta-Study noted gains in public school student achievement in a few cases, but also warned that “it is difficult, if not impossible to decisively attribute the causes of achievement gains” to voucher programs – particularly since many other programs ran concurrently with the voucher programs in each instance. *Id.* at 11. In other words, there were so many other reform programs underway at the same time as the voucher programs – like accountability measures or charter school expansion – that causation for the marginal improvements seen, where they occurred at all, could not be determined. Overall, the CEP Meta-Study concluded that “[w]hile some studies have found limited test score gains for voucher students in certain subject areas or grade levels, these findings are inconsistent among studies, and the gains are either not statistically significant, not clearly caused by vouchers, or not sustained in the long run.” CEP Meta-Study at 9.

The statement from the Forster Report that the defendants cite also ignores the fact that even voucher advocates acknowledge that there is wide disagreement over whether the competition effect mentioned by the Forster Report actually takes place. *See* Matthew Carr, *The Impact of Ohio’s EdChoice on Traditional Public*

School Performance, Cato Journal 260 (2011) (examining existing literature on whether voucher programs have a competitive effect that improves public schools, and concluding that “no one theory appears to be predominant among the research community”).

A careful review of the Forster Report further reveals that it “selectively reads the evidence” in many of the studies that it cites, “most of which were produced by voucher advocacy organizations,” Christopher Lubienski, *Review of a Win-Win Solution*, National Education Policy Center (2009),⁶ and many of the studies undertaken by the voucher advocacy organizations cited in the Forster Report were lacking in “methodology, interpretation, and generalizability.” *Id.* at 5. For example, the Report cites a number of studies from voucher advocate Jay Greene that have been roundly criticized. Jay Greene and Marcus Winters, *Competition Passes the Test*, Education Next (2004); Jay Greene, *An Evaluation of the Florida A-Plus Accountability and School Choice Program*, Manhattan Institute (2001).

Rutgers researchers Gregory Camilli and Katrina Bulkley wrote a particularly scathing analysis of Greene’s initial results, cataloguing serious flaws in his study design and conclusions. As Camilli and Bulkley explained, Greene

⁶ Dr. Lubienski’s paper reviews the 2009 version of Dr. Forster’s meta-study rather than the 2011 version. However, the 2011 paper commits substantially all of the same flaws in methodology and analysis as the 2009 paper.

vastly overstates the competition effect because he computes aggregate school gains rather than individual gains, fails to account for an average trend in score growth that has nothing to do with the competition effect, and declines to account for the regression to the mean that one statistically expects when observing the extreme low end of the distribution. See Gregory Camilli and Katrina Bulkley, *Critique of “An Evaluation of the Florida A-Plus Accountability and School Choice Program”* (Educ. Pol’y Analysis Archives, Vol. 9, No. 7, 2001). Offering an alternative reading of the evidence that takes those factors into account, Camilli and Bulkley concluded that Greene’s results “were implausible and should have been submitted to additional methodological scrutiny.” Camilli and Bulkley, *supra*, at 13. Even the Forster Report acknowledges that the study was “methodologically simple” and did not account for other possible causes of improvement for low-performing public schools that are part of voucher programs. Forster Report at 18-19.

Where the Forster Report cites more rigorous independent studies, it often distorts or misrepresents their findings. Lubienski at 5-6. One example of this is the Report’s misrepresentation of a 2007 case study of the Milwaukee voucher program. The report, written by Martin Carnoy and his colleagues, actually describes two analyses undertaken by the researchers. Martin Carnoy, *et al.*, *Vouchers and Public School Performance: A Case Study of the Milwaukee*

Parental Choice Program, Economic Policy Institute (2007). The first analysis was a replica of an earlier study by Caroline Hoxby. Such replicas are often done by researchers in order to check a study's data and methods. The replica study essentially confirmed the short-term gains seen in the first two years of the program among public school students, and is the portion of the Carnoy study that the Forster Report quotes. However, the Carnoy paper also noted that the lack of student progress in subsequent years, even while the number of voucher students increased, and raised questions about "whether traditional notions of competition among schools explain these increased scores in the two years immediately after the voucher plan was expanded." Carnoy, *supra*, executive summary. In addition, the second Carnoy analysis consisted of an independent – and more sophisticated – original analysis of the program, which revealed that "test score gains are generally *not* significantly related to various indicators of direct competition associated with families' increased potential choice of schools." *Id.* (emphasis in original). The Forster Report essentially glosses over these latter two findings as if they were insignificant. Forster Report at 17.

As previously mentioned, more rigorous studies of voucher programs have consistently found no reliable evidence of the competitive effect that the Forster

Report insists is widespread.⁷ Usher, *supra*; See also Cecilia E. Rouse & Lisa Barrow, *School Vouchers And Student Achievement: Recent Evidence, Remaining Questions*, Federal Reserve Bank of Chicago (2008) (“the best research to date finds relatively small achievement gains for students offered education vouchers, most of which are not statistically different from zero”). Furthermore, there is no basis whatsoever for concluding that a large program like Indiana’s would produce such an effect, and studies that have attempted to speculate about large programs have so far been unable to sufficiently control for the enormous number of variables that could also explain changes in student achievement. Rouse, *supra*. (“what little evidence exists about the likely impact of a large-scale voucher program on the students who remain in the public schools is at best mixed, and the research designs of these studies do not necessarily allow the researchers to attribute any observed positive gains solely to school vouchers and competitive forces”).

⁷ Nor is there any agreement among educational researchers that voucher programs even improve the performance of students who themselves receive vouchers. A recent study by the Brookings Institution reviewed three voucher programs and found that “the evidence has been inconclusive with no clear consensus that any of them are having strong effects on test scores.” Ron Zimmer, *et al.*, *School Choice: Options and Outcomes, in Urban and Regional Policy and its Effects*, (Nancy Pindus, Howard Wial, & Harold Wolman, eds. 2008). Another study of the voucher program in Milwaukee found “no difference” in performance between achievement gains of private school voucher recipients and a matched sample of public school students. John F. Witte, *et al.*, *The MPCP Longitudinal Educational Growth Study Third Year Report* (2010).

Rather than addressing the flaws in the studies that it cites and the lack of reliable evidence for its conclusion, the Forster Report instead tends to either downplay these factors or insist – rather cavalierly – on the curious conclusion that the lack of empirical support for voucher programs is itself evidence of a need for more *expansive* voucher programs. Forster Report at 27-29. This suggestion is premised, in part, on the notion that voucher programs at least do not *hurt* our system of education. Forster Report at 8. Aside from the fact that “do no harm” is hardly an appropriate measure of good policy, the notion that voucher programs do no harm is hotly debated among scholars, and is by no means a foregone conclusion.

Diverting public funding from public schools to private school voucher programs is a fundamental feature of the CSP, and the predicted level of this diversion has been documented by the nonpartisan Legislative Services Agency (LSA) of the Indiana General Assembly in a Fiscal Impact Statement. *See*, www.in.gov/legislative/bills/2011/PDF/FISCAL/HB1003.009.pdf. In its Fiscal Impact Statement for House Bill 1003, LSA reported that for every 714 voucher scholarships awarded, \$2.9 million in tuition support would leave the public schools, but \$1 million in anticipated tuition savings would be redistributed back to the public schools resulting in a net loss to the public schools of \$1.9 million. *Id.* at 4. Extending these figures to the statutory limits of the CSP of 7,500 vouchers

in the first year of the program (the 2011-12 school year) and to 15,000 vouchers in the second year (the 2012-13 school year), the net loss to public school students over the course of the next two school years is calculated at \$59.9 million. For the 2013-14 school year and beyond, when statutory caps would no longer be in effect and more than sixty percent (60%) of all Indiana students would be eligible for CSP vouchers based on household income, the potential loss of public funding available to fund instruction and programs for the remaining public school students in public schools could skyrocket into the hundreds of millions of dollars.

Diverting already scarce resources from public schools to voucher programs can indeed “do harm” to the students who remain in public schools where they limit the ability of public schools to take the types of actions that have proven to be effective in improving academic performance. There is little doubt, for example, that small classes have a positive impact on student achievement. *See, e.g.*, Brian P. Gill *et al.*, RAND, *Rhetoric Versus Reality* 75 (2001); Alex Molnar, *Smaller Classes, Not Vouchers, Increase Student Achievement*, Keystone Research Center (1998). But Wisconsin’s highly successful SAGE program, which among other goals seeks to keep student/teacher ratios below 15:1, lost funding as a result of the Milwaukee voucher program.⁸ The positive effect that pre-kindergarten and after-

⁸ *See* 2001-03 Wisconsin State Budget Summary of Governor's Budget Recommendations, Legislative Fiscal Bureau, 537, 544 (March, 2001); People For the American Way Foundation,

school instruction have on academic performance likewise is beyond dispute. See, e.g., William T. Gormley Jr. et al., *The Effects of Universal Pre-K on Cognitive Development* (2004); Patricia A. Lauer et al., *The Effectiveness of Out-of-School-Time Strategies in Assisting Low-Achieving Students in Reading and Mathematics: A Research Synthesis* (2003). But in Cleveland, funding for the voucher program was siphoned off from the Disadvantaged Pupil Impact Aid budget the school district receives from the state – which also funds the school district’s pre-K and after-school programs with whatever is left.⁹ Vouchers in fact do incalculable harm by diverting from public to private schools the resources that are necessary to implement programs that have proven to be effective in improving the academic performance of public school students.

Indiana’s voucher program is deserving of additional scrutiny due to the fact that – as we have noted – scholars from a wide variety of organizations especially disagree about the potential effect of larger voucher programs. Patrick J. Wolf, *School Voucher Programs: What the Research Says About Parental School Choice*, 2008 *BYU Law Rev.* 415, 417 (2008) (cautioning that empirical studies

Punishing Success: The Governor’s Proposed Education Budget and the SAGE and Voucher Program (2001).

⁹ See Dan Murphy et al., Am. Fed’n of Tchrs., *The Cleveland Voucher Program: Who Chooses? Who Gets Chosen? Who Pays?* 16 (1997); see also U.S. Gen. Accounting Office, GAO-01-914, *School Vouchers: Publicly Funded Programs in Cleveland and Milwaukee* 4 (2001).

that have found positive effects were “targeted,” and the same rules may not apply to “universal” programs such as those that cover an entire state); *see also* Brian P. Gill, *et al.*, *Rhetoric Versus Reality: What We Know and Need to Know About Vouchers and Charter Schools*, RAND Corporation 94 (2d ed. 2007) (“even if the results of the voucher experiments are read in their most favorable light, they provide only weak guidance about the academic effects of a large-scale voucher program”); Rouse, *supra*.¹⁰ Thus, a large program such as the CSP should be approached with particular caution; it is not safe to assume that it will have a positive effect on students in the program, let alone on students who remain in public schools.

CONCLUSION

While the issues before the Court are whether the CSP violates Article 8, § 1, Article I, § 4 and Article I, § 6 of the Indiana Constitution, the Court’s consideration of these constitutional issues should not be colored by the unsupported and inaccurate claims about the necessity and educational merit of voucher programs that have been made by defendants. We hope that the foregoing has been helpful in explaining the relevant literature on voucher programs and the

¹⁰ Even the Forster Report concedes that apparent gains from voucher programs do not manifest themselves on a larger scale. Forster Report at 27.

actual condition of the Indiana public school system and the academic achievements of Indiana's public school students.

Respectfully submitted,

Joel D. Hand (18681-32)
120 East Market Street, Suite 807
Indianapolis, Indiana 46204
317-608-6621

Counsel for *Amicus Curiae*

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Brief *Amicus Curiae* of the Board of Directors of the Indiana Coalition for Public Education, were furnished, this 3rd day of August, 2011, by electronic mail and regular mail, to the following:

Andrew W. Hull
Alice M. Morical
HOOVER HULL, LLP
111 Monument Circle, Suite 4400
P.O. Box 44989
Indianapolis, IN 46244-0989

Thomas M. Fisher
Solicitor General
Office of the Indiana Attorney General
302 W. Washington Street
IGC-South, Fifth Floor
Indianapolis, IN, 46204

Attorney for Defendants

John M. West
Joshua B. Shiffrin
BREDHOFF & KAISER, PLLC
805 15th Street, NW, Suite 1000
Washington, DC 20005

William H. Mellor
Robert W. Gall
Richard D. Komer
901 N. Glebe Road, Suite 900
Arlington, VA 22230
wmellor@ij.org
bgall@ij.org
rkomer@ij.org

Alice O'Brien
Kristen L. Hollar
NATIONAL EDUCATION ASSOCIATION
1201 16th Street, NW
Washington, DC 20036

J. Lee McNeely
McNeely Stephenson Thopy & Harrold
2150 Intelliplex Drive, Suite 100
Shelbyville, IN 46176-8547
jlmeneely@msth.com

Attorneys for Plaintiffs

Attorneys for Interveners

Joel D. Hand (18681-32)

JOEL D. HAND
The Law Offices of Joel D. Hand
120 East Market Street, Suite 807
Indianapolis, Indiana 46204
317- 608-6621