



Public Money, Private Choice

*The Components and Critiques of
Education Savings Accounts*

By Juliet Squire, Kelly Robson Foster,
Lynne Graziano, and Andy Jacob

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Beta[★]
BY BELLWETHER

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Introduction

Private school choice programs have grown rapidly in recent years. Approximately 22 million students — 40% of the K-12 student population — have access to private school choice program in their state. Education savings account (ESA)* programs in particular have expanded rapidly in recent years. As the number of ESA programs has grown, they have become one of the biggest flashpoints in K-12 policy debates. Yet the arguments on both sides of the issue often gloss over or misrepresent the details of ESAs and the evidence of their impact to date.

For starters, there is no single definition of an ESA program. As summarized by EdChoice, “Education savings accounts (ESAs) in K-12 education establish for parents a publicly funded, government-authorized savings account with restricted, but multiple uses for educational purposes.” But the specific details vary across 23 programs in 18 states, including which students are eligible, how much funding they receive, and what kinds of expenses the programs can pay for. Understanding ESA programs requires understanding details like these.

ESAs are also part of a broader array of private school choice programs, like vouchers, that have generated significant interest and debate among policymakers, analysts, and interest groups for decades. For some, ESAs are an extension of vouchers’ potential to provide families with more autonomy to seek alternatives to the public school system. For others, ESAs undermine the public education system by siphoning funding from community institutions.

This report establishes a common fact base about ESA programs that can inform all sides of the policy debate. How have ESAs emerged in state policy, and how are they designed? What are the common critiques of ESAs, and what evidence is available to evaluate them? What do other government programs that provide payments directly to families reveal about the design of ESAs?

“ESAs are more than school-choice programs. They are true parental-choice programs, and catalysts for real-world education pluralism and diversity ...”

—NICOLE STELLE GARNETT AND RICHARD W. GARNETT, CITY JOURNAL, 2023

“School vouchers — which include traditional private school subsidies, education savings accounts, and private school tuition tax credits — are diversions of public funds to private and religious schools ... [they] are key to the relentless and enduring campaign to defund and then privatize public education.”

—NINA MAST, ECONOMIC POLICY INSTITUTE, 2023

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Executive Summary (1/3)

ESAs are in some ways the successors to a long history of government programs that provide funding directly to families — but they are the first of their kind in K-12 education. Arizona passed the first ESA program in 2011. Today, there are 23 programs operating in 18 states and serving nearly 600,000 students.

While ESAs enjoy majority support among the public in polls, this support does not always translate to the ballot box. ESAs have become highly politicized, with the Republican Party supporting them and the Democratic Party opposing them. Nearly all ESA programs — 22 of 23 — have passed in states with Republican trifectas (i.e., states with a governor and both chambers of the legislature controlled by the same political party).

ESAs vary widely in their design. Who is eligible, how much funding eligible students receive, what the funding can pay for, and what oversight mechanisms are used differ substantially from program to program.



Executive Summary (2/3)

Because of the complexity and politicization of ESA programs, they are subjects of frequent critiques.

Critique	What We Know
ESAs do not benefit families furthest from opportunity.	<ul style="list-style-type: none">• Ten programs are or will be universal while 13 target students based on income level or disability status. Universal programs enroll 80% of all ESA students.• There is some evidence that universal programs enroll students from higher-income families at disproportionate rates; however, data are not available for all programs, leaving significant uncertainty about the breadth of this pattern.• Some evidence suggests that ESAs enroll many students who were already attending private schools, opening the door for criticism that they benefit wealthier families. Students who attend private school are more likely to be from high-income families — but many are not.
ESAs drain funding from public schools.	<ul style="list-style-type: none">• ESAs accounted for less than 1% of all state education funding in fiscal year (FY) 2024, but larger programs have larger impacts in individual state budgets.• Program design decisions such as participation caps or funding determinations, coupled with how states fund ESA programs (e.g., line item, appropriation, tax credit), affect the extent to which ESAs impact state education budgets.
ESAs are prone to fraudulent spending and misuse.	<ul style="list-style-type: none">• ESAs are designed to give families wide latitude over how they spend education dollars, opening the door for questions about what constitutes an “appropriate” use of funds and who gets to make those determinations.• Actual cases of fraud remain low.

Executive Summary (3/3)

Critique

What We Know

There is insufficient oversight of ESAs.

- Oversight of ESAs is challenging because program goals are varied and sometimes ambiguous.
- Holding ESA programs accountable requires careful consideration of trade-offs between data collection and regulation and trust in families and their autonomy.

ESA funding is insufficient.

- ESA funds can be used for many educational services; determining funding “sufficiency” depends on how families hope to use their ESA.
- Only five ESA programs provide enough per-pupil funding on average to cover their state’s average private school tuition rate.
- Home-schooling costs vary by family but averages generally fall well below state per-pupil funding for ESAs.
- The cost of additional services like tutoring or therapies also varies widely, as does the “dosage” a given child needs, making it difficult to determine whether a given ESA is sufficient for these purposes.

ESAs are too hard for families to access.

- Parents of students eligible for ESAs are generally satisfied with the existence of ESA programs that support educational decision-making.
- Parents indicate less satisfaction with some of the mechanics of ESA implementation, including delays in processing purchases, navigating program rules, identifying high-quality providers, and long wait times for reimbursements.

Where relevant, the analysis of critiques of ESAs leverages parallel evidence for two other direct payment programs — the Temporary Assistance for Needy Families (TANF) program and the Supplemental Nutrition Assistance Program (SNAP). Although the comparison between ESAs and TANF and SNAP are imperfect, they are meant to elevate similarities and differences that prompt discussions about how they vary, why they vary, and how those similarities and differences might push thinking about ESAs and/or other direct payment programs.

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ESA programs provide families with funds to spend on educational expenses.

When state legislatures pass and appropriate funds for ESA policies, the statute and funding reflect a series of choices that legislators have made to adapt the concept of an ESA to their state context.

The statute names an entity — typically the state education agency or state treasury, but sometimes an independent nonprofit — to implement the ESA program. Following procedures set up by the state agency, families can apply for their child to participate and, if they are confirmed as eligible and there is sufficient funding available, the program administrator creates an account for the child and deposits funding into the account. The amount of funding is typically determined in statute. Families can use the funding in their child’s account to pay for eligible educational expenses, also defined in statute. Participating in an ESA program requires that families unenroll their child from their local public school and provides them with more autonomy and responsibility for their education.

In some cases, ESAs are funded by tax credits rather than state funds. For these programs, individuals and/or businesses make donations to an independent nonprofit. The individuals and/or businesses receive a tax credit for their donation and the nonprofit uses the donations to fund ESAs for eligible families. Because of how they are structured, tax-credit ESAs are not a state *expense*; they are a reduction of state *revenue*. Despite this difference, they function similarly for families and have many of the same design features as ESAs. Tax-credit ESAs are included in this analysis.

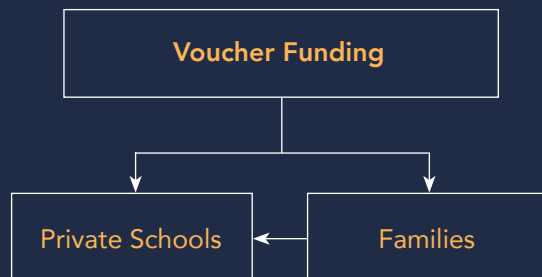
Many other details of ESA programs vary. Grasping these details is essential for understanding and assessing how these programs serve students, families, and communities.

ESAs are distinct from other school choice programs.

Private school vouchers and charter schools have existed since the early 1990s. Both allow families to enroll their children in schools other than their assigned district public school. ESAs are distinct from these programs in two important ways. First, ESA funding is directly available to families; second, families have more discretion over how to spend ESA dollars, which may or may not include the cost of attending a full-time school.

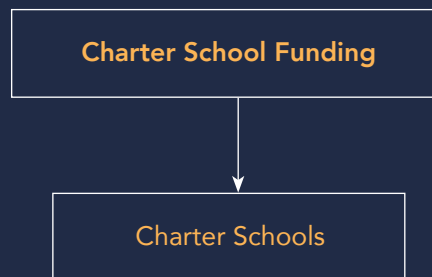
Private School Vouchers

Funds are distributed* either directly to the school of the parents' choice or to families, but they can only be used toward tuition or other fees at a participating private school.



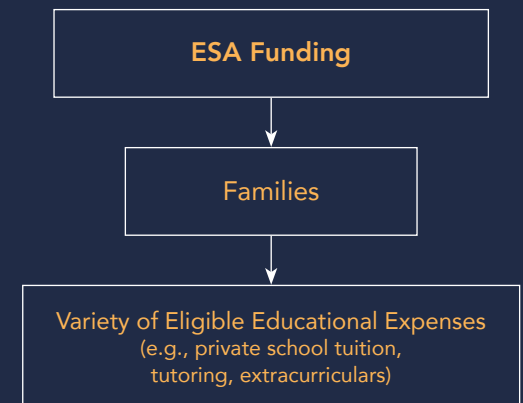
Charter Schools

The state sends funding directly to the charter school a student attends instead of a district school.



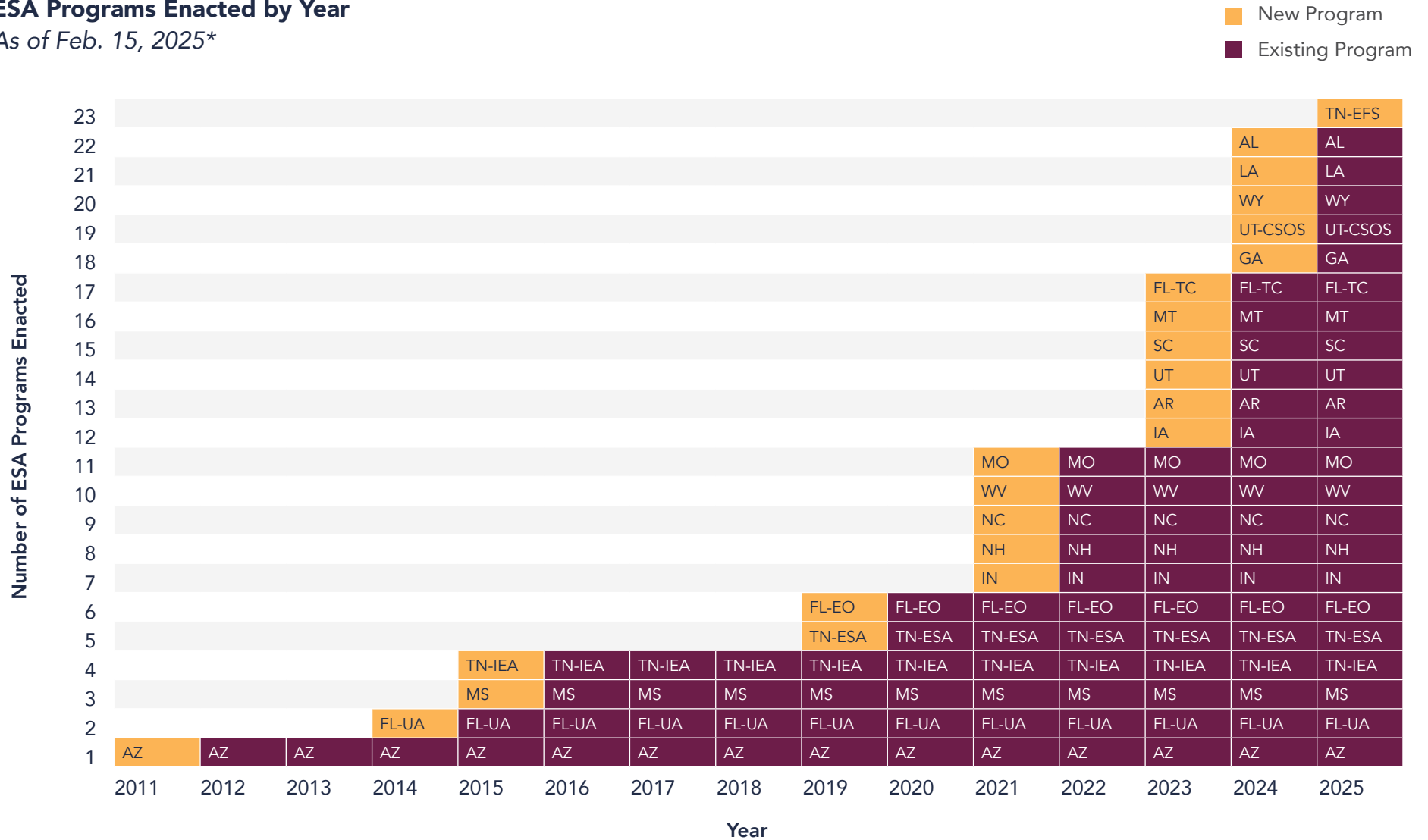
Education Savings Accounts

Funds are distributed* to savings accounts that families can access. Families use state funds to cover the eligible expenses of their choice.



Arizona passed the first ESA program in 2011. There are now 23 ESA programs in 18 states.

ESA Programs Enacted by Year
As of Feb. 15, 2025*

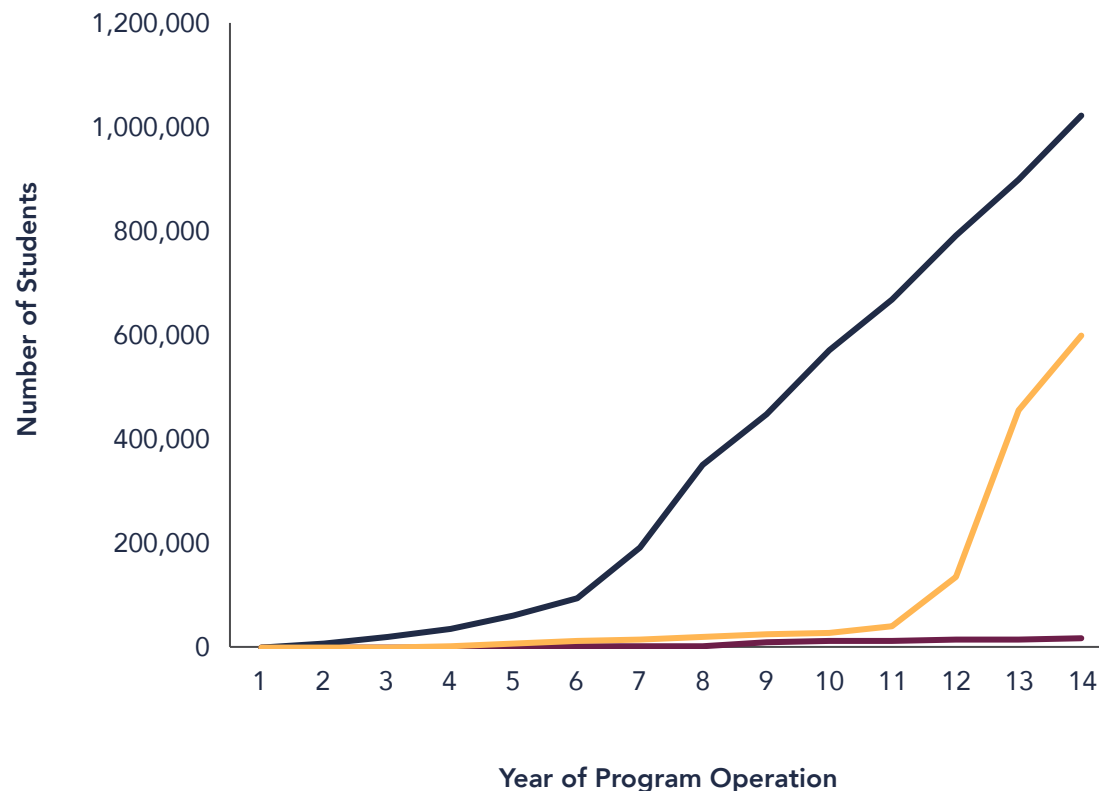


12 **Notes:** This report is current as of Feb. 15, 2025. It does not include the recently passed programs in Idaho or Wyoming. Florida Family Empowerment Scholarship for Students with Unique Abilities (Florida [UA]); Family Empowerment Scholarship for Educational Options (Florida [EO]); Florida Tax Credit Education Savings Account (Florida [TC]); Tennessee Individualized Education Account Program (Tennessee [IEA]); Tennessee Education Freedom Scholarship Act (Tennessee [EFS]); Tennessee Education Savings Account Program (Tennessee [ESA]); Carson Smith Opportunity Scholarship Program (Utah [CSOS]).

ESAs have grown faster than voucher programs did in their early years, but not as fast as charter schools.

Enrollment Growth in School Choice Programs

For the First 14 Years of Each Program



Charters

Charter school enrollment had a 102% compound annual growth rate (CAGR) in the first 14 years of their operation, from 1993 to 2006.

ESAs

ESA enrollment had a CAGR of 81% in the first 14 years of their operation, from 2012 to 2025.

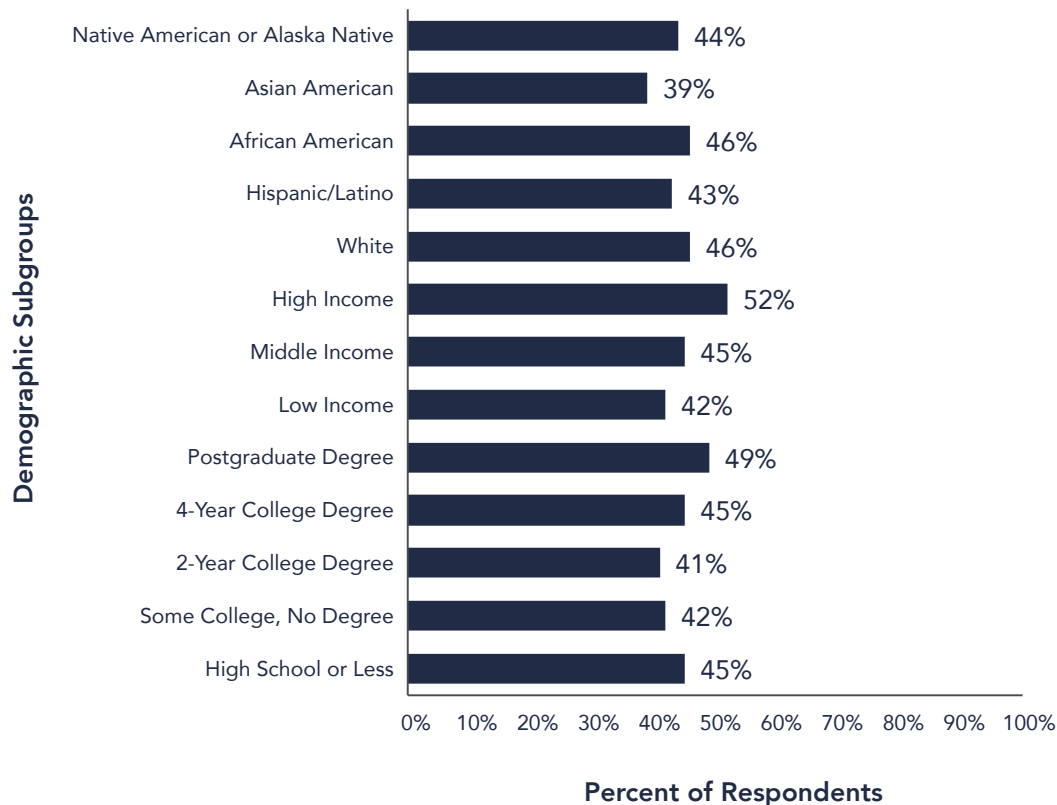
Vouchers

Voucher enrollment had a CAGR of 33% in the first 14 years of their operation, from 1991 to 2004.

ESAs are expanding at a time of rising parent frustration and interest in alternatives.

Less than 50% of parents are “very satisfied” with their child’s school.

School Satisfaction by Race and Ethnicity, Household Income, and Parent’s Educational Attainment



Many parents are looking for alternative options.

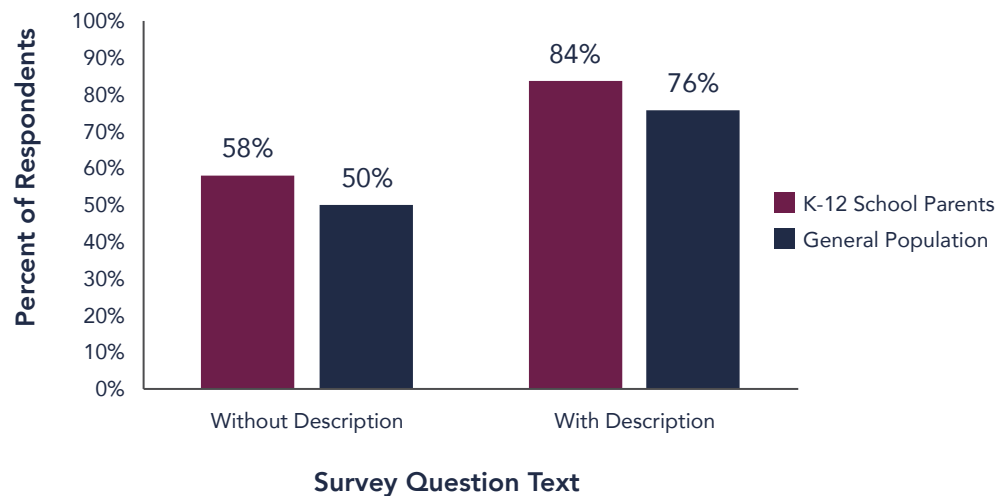
- **73% of parents** surveyed said that the K-12 education system in the U.S. needs a “complete overhaul/major changes.”
- **7 in 10 parents** are interested in exploring new learning options for their children, whether changing schools or finding different out-of-school options.
- **57% of parents** prefer one or more days of home-based schooling for their children.
- **12.2% of parents** enrolled their children in private school in 2023 (the most recent data available), an increase of 1.3 percentage points since 2010.
- Data on the rate of home-schooling is incomplete, but researchers and data analysts agree that it is increasing.

According to polls, ESAs are popular with the public and with parents specifically.

Survey Question Without ESA Description: “Based on what you know, or have heard from others... In general, do you favor or oppose ‘education savings accounts’ in K-12 education?”

Survey Question With ESA Description: “An ‘education savings account’ in K–12 education — often called an ESA — establishes for parents a government-authorized savings account with restricted, but multiple uses for educational purposes. Parents can then use these funds to pay for: school tuition; tutoring; online education programs; therapies for students with special needs; textbooks or other instructional materials; or save for future college expenses. In general, do you favor or oppose an ESA system?”

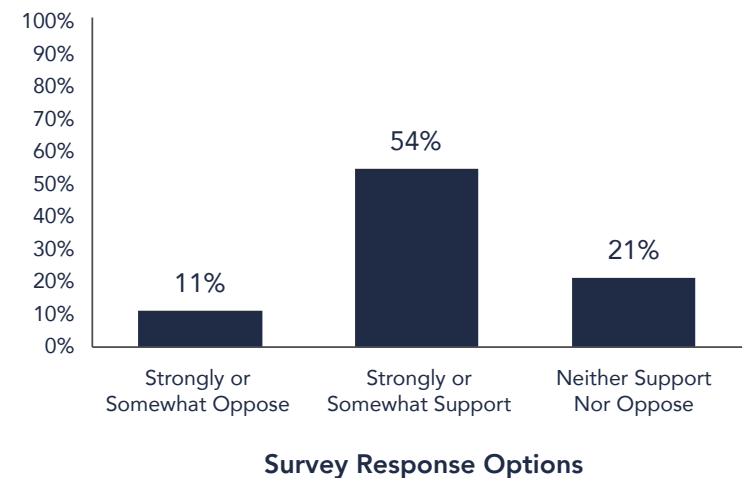
Percent Who Strongly or Somewhat Favor ESA Programs *ESA Favorability Without and With Description*



Public opinion surveys include different groups and describe ESAs differently, which may account for some variation in the level of support they receive.

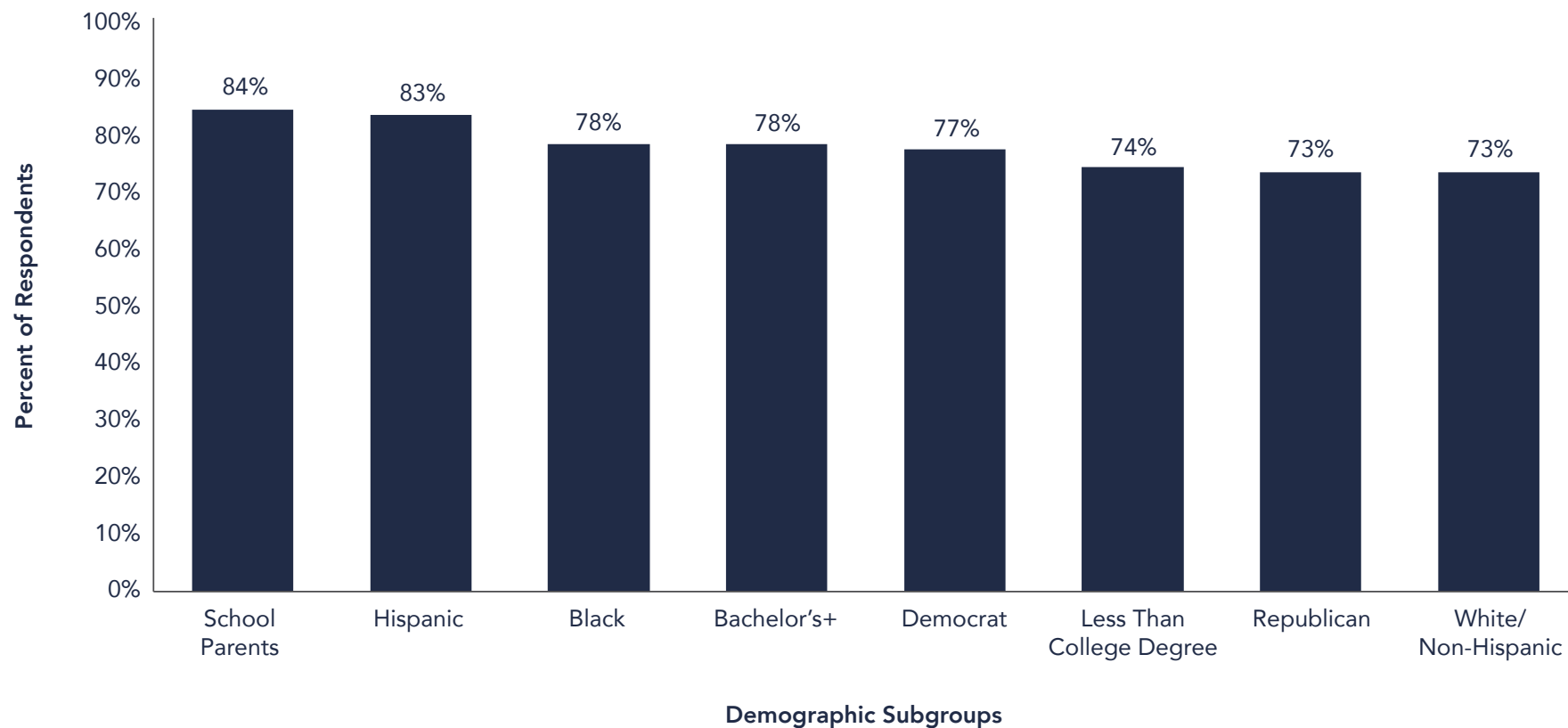
Survey Question: “Do you support or oppose ESA programs — publicly funded savings accounts that can be used for K-12 educational purposes such as school tuition, online education programs, and other instructional materials?”

Percent Who Support or Oppose ESA Programs *Registered Voter Support for ESAs*



Support for ESAs is high across different races, political affiliations, and educational attainment levels.

Support for ESAs Among Demographic Subgroups, When Given a Description of ESA Programs
General Population and K-12 Parents, 2024



But recent election results show that theoretical support for ESAs does not always show up at the ballot box.

Many more adults say they support ESA programs than voted in favor of choice in ballot initiatives during the 2024 election cycle.

State and Ballot Language	Adults' Support for ESAs	Adults Voting in Favor of Choice
<p>Colorado's Amendment 80 would have added text to the State Constitution to establish students' right to educational choice:</p> <ol style="list-style-type: none"> <i>The people of the state of Colorado hereby find and declare that all children have the right to equal opportunity to access a quality education; that parents have the right to direct the education of their children; and that school choice includes neighborhood, charter, private, and home schools, open enrollment options, and future innovations in education.</i> <i>Each K-12 child has the right to school choice.</i> 	69%	49%
<p>Kentucky's Amendment 2 would have amended the State Constitution to allow state funding to support private schools:</p> <p><i>The General Assembly may provide financial support for the education of students outside the system of common schools.</i></p>	67%	35%
<p>Nebraska's Referendum 435 would have repealed legislation:</p> <p><i>Section 1 of Legislative Bill 1402, enacted by the Nebraska Legislature in 2024, provides for \$10 million annually to fund education scholarships to pay all or part of the cost to educate eligible students attending nongovernmental, privately operated elementary and secondary schools in Nebraska. Shall Section 1 of Legislative Bill 1402 be repealed?</i></p>	67%	43%

Several factors could explain this gap between polling on ESAs and support for ESAs in elections.

Different Populations

Those responding to opinion polls are not the same as those who show up to vote, and polling data often varies slightly based on whether the population includes adults, registered voters, likely voters, or some other group.

Gaps Between Stated and Revealed Preferences

People may not always share their true opinion about an issue with a pollster. This happens for a variety of reasons, including social desirability bias (e.g., individuals provide the answer they believe they “should” give) and the difference between weighing a hypothetical idea and a real-life decision (e.g., some people may genuinely support the idea of ESAs and genuinely oppose the way a particular ballot initiative would implement them). People may also respond to polls about ESAs based on their perspective about educational choice but vote based on their understanding of real or perceived fiscal impacts.

Partisanship Wins Out

The two major political parties have opposing positions on school choice policies, including ESAs — the Republican Party platform specifically *supports* them, and the Democratic Party platform specifically *opposes* them.

Signals voters receive about which way they should vote on ESA ballot initiatives based on their partisan identification may outweigh their opinion about school choice policies in a vacuum.

Only Republican-controlled legislatures have passed ESA programs; nearly all were enacted with a trifecta.

State	Year ESA Program Was Enacted	Party Control in Year Enacted		
		Governor	House	Senate
Alabama	2024	Republican	Republican	Republican
Arizona	2011	Republican	Republican	Republican
Arkansas	2023	Republican	Republican	Republican
Florida (EO)	2019	Republican	Republican	Republican
Florida (TC)	2023	Republican	Republican	Republican
Florida (UA)	2014	Republican	Republican	Republican
Georgia	2024	Republican	Republican	Republican
Indiana	2021	Republican	Republican	Republican
Iowa	2023	Republican	Republican	Republican
Louisiana	2024	Republican	Republican	Republican
Mississippi	2015	Republican	Republican	Republican
Missouri	2021	Republican	Republican	Republican
Montana	2023	Republican	Republican	Republican
New Hampshire	2021	Republican	Republican	Republican
North Carolina	2021	Democrat	Republican	Republican
South Carolina	2023	Republican	Republican	Republican
Tennessee (EFS)	2025	Republican	Republican	Republican
Tennessee (ESA)	2019	Republican	Republican	Republican
Tennessee (IEA)	2015	Republican	Republican	Republican
Utah (CSOS)	2024	Republican	Republican	Republican
Utah (UFA)	2023	Republican	Republican	Republican
West Virginia	2021	Republican	Republican	Republican
Wyoming	2024	Republican	Republican	Republican

A Republican trifecta is not a guarantee for an ESA policy to pass. North Dakota, South Dakota, and Texas have Republican trifectas and have sought and failed to pass ESA policies in recent years.

Once enacted, some ESA programs have faced legal challenges, with some upheld and others overruled.

Legal challenges argue that ESA programs violate the state’s constitution. The continued growth of ESAs will depend in part on how active cases are resolved.

State Legal Challenge	Status
<p>Arizona’s ESA program was challenged as a “voucher program” because in 2009 the Arizona Supreme Court found vouchers to be unconstitutional. An appellate court overruled this definition since funding can be used for a variety of educational resources.</p>	<p>Upheld Constitutionality of ESA</p>
<p>South Carolina’s Supreme Court ruled in 2024 that the K-12 Education Scholarship Trust Fund, created to run the program, represented an unconstitutional use of public dollars by diverting them to religious or other private institutions.</p>	<p>Banned ESAs for Private School Use</p>
<p>Utah’s 3rd District Court will rule in early 2025 in response to a lawsuit filed by the Utah Education Association challenging the “voucher” program as unconstitutional for using public dollars for private and home-school tuition.</p>	<p>Pending</p>
<p>West Virginia’s Hope Scholarship program was challenged as a violation of five constitutional statutes ranging from violating “free public schools” to “usurping” the West Virginia Board of Education’s authority. In 2022 the West Virginia Supreme Court ruled the “circuit court erred by finding the Act unconstitutional and abused its discretion by permanently enjoining the State from implementing the Act.”</p>	<p>Upheld Constitutionality of ESA</p>
<p>A legal challenge to New Hampshire’s Education Freedom Account (EFA, the state’s version of an ESA) was dismissed in late 2023 when a judge ruled against the claim that EFA’s use of Education Trust Fund monies was illegal and unconstitutional, in part due to a statute change by the legislature.</p>	<p>Upheld Constitutionality of ESA</p>
<p>In 2022, the Tennessee Supreme Court ruled that the two plaintiff counties, Shelby and Davidson, had standing to challenge the ESA Act. The Act itself is not unconstitutional based on the Home Rule Amendment, as argued.</p>	<p>Mixed Result</p>

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ESA programs vary considerably in their design from state to state.

		Design Category		
		ELIGIBILITY	FUNDING AND EXPENSES	OVERSIGHT
Dimensions	Student Eligibility	Student Eligibility Which students are eligible based on what criteria?	Amount of Funding How much funding do students get, and how do states determine that amount?	Family Accountability What are families' obligations when their child participates in an ESA?
	Student Participation Requirements	Student Participation Requirements What does the state require in terms of school enrollment for eligible students?	Eligible Expenses What goods and services can families purchase with their funds?	Vendor Accountability What requirements do various types of vendors need to meet to be eligible to receive ESA funds?
	Fund Access and Use	Fund Access and Use How do families access and use their funds?	Program Accountability What data do states require programs to track and report? What processes are in place to minimize fraud?	

States take one of two approaches to student eligibility for ESAs — universal or targeted.

Universal Eligibility

All K-12 students who reside in the state are eligible to participate in an ESA.

Several newly passed programs are designed to be universal over time, including specific eligibility requirements for the first few years and then opening to all students. This report categorizes these programs as universal.

Targeted Eligibility

Income

Only students from families meeting certain income thresholds are eligible for an ESA. Income thresholds vary by state. Tennessee's ESA program, for example, targets families whose household income does not exceed 200% of the standard used to qualify for free and reduced-price meals (FRL, which is 185% of the federal poverty level [FPL]). South Carolina's program targets students whose household income does not exceed 400% of the federal poverty level.

Students With Disabilities

Only students with disabilities are eligible for an ESA. States vary in the indicators they use to determine which students with disabilities are eligible. In Mississippi, students must have an active individualized education program (IEP), while in Montana, students must meet the federal definition of a "child with disabilities" under the Individuals with Disabilities Education Act. In North Carolina, students with certain disabilities qualify for a larger ESA amount.

Other Student Characteristics

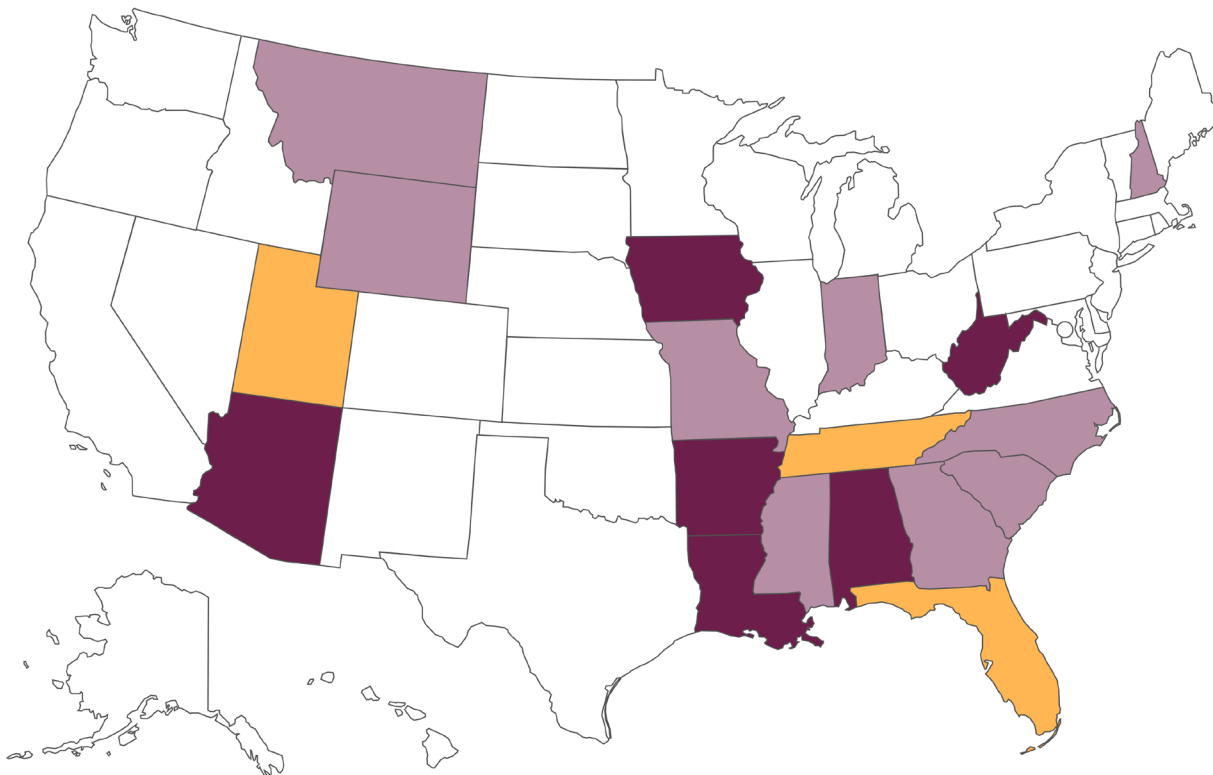
Some states offer ESA eligibility to students with other characteristics, such as:

- Children of members of the armed forces.
- Students who reside in cities meeting certain criteria (governance structure, size).
- Students whose neighborhood school districts are poorly performing.
- Students who are experiencing homelessness or are in the foster care system.
- Students who are siblings of eligible students.

Some programs limit eligibility to students who meet more than one eligibility criteria. Indiana's program, for example, is only available to students who both have an IEP and live in a family that meets certain income thresholds. Other programs sometimes prioritize certain groups of students even while all students are eligible. The Florida (EO) program, for example, gives priority to students with household incomes at or below 185% of the FPL as well as students in foster care.

Ten programs are, or will be, universal; 13 target one or more student groups.

ESA Program Eligibility by State



- Universal Eligibility
- Targeted Eligibility
- Multiple Programs With Different Eligibility

Florida

Florida's Family Empowerment Scholarship for Educational Options (EO) program and its Tax Credit Scholarship Program are universal, though both provide priority for students based on income. Florida's Family Empowerment Scholarship for Students with Unique Abilities (UA) program is targeted.

Tennessee

Tennessee's Education Savings Account (ESA) and Individualized Education Account (IEA) programs are both targeted; the newly passed Education Freedom Scholarship (EFS) program is targeted in its first year but will be universal in year two and beyond.

Utah

The Utah Fits All (UFA) program is universal, with priorities for students based on income level. The Carson Smith Opportunity Scholarship (CSOS) program is a tax-credit ESA targeted to students with special needs.

Many programs have prohibitions against public school enrollment or requirements for private school enrollment.

Requirement	Example
<p>All ESA programs prohibit full-time enrollment in a public school. This approach ensures that states are not double-paying for students.</p> <p><i>Some programs allow students to be enrolled in public schools in limited circumstances, such as part-time (for a smaller ESA award) or when a district school charges tuition (as is allowed in some open enrollment policies).</i></p>	<p>Arizona's ESA program prohibits families from enrolling their qualified students in a school district or charter school and requires them to release their local school district from all obligations to educate the qualified student.</p>
<p>Some ESA programs require prior attendance at a public school. This approach targets students in the public school system who may want other options, rather than families who have already opted out of the public system.</p>	<p>Tennessee's ESA program requires students to have been enrolled in a Tennessee public school for the full year preceding receipt of an ESA.</p>
<p>Some ESA programs require private school enrollment. This approach ensures that students are still enrolled in a full-time school, even if they are opting out of the public school system.</p>	<p>Iowa's program requires families to spend ESA funding on tuition and fees at a private school prior to using leftover funds for other eligible educational expenses.</p>
<p>Some ESA programs explicitly allow home-based education.* This approach allows families to use funds for education options outside the public or private sectors.</p>	<p>Missouri's ESA program includes home education in its legislative definition of a "Qualified School."</p>

ESA funding levels are based on an amount set in statute, a formula, or variations based on student characteristics (1/2).

States take one of two approaches to determining ESA award amounts.


Approaches	Examples
<p>Set Amount</p> <ul style="list-style-type: none"> States determine a set amount of funding per ESA. Some states include annual increases. 	<p>South Carolina's ESA is funded at \$6,000 per student.</p> <p>Mississippi includes an annual adjustment matching the adjustment to base student funding.</p>
<p>Formula Amount</p> <ul style="list-style-type: none"> States determine a method for calculating an annual ESA value. States' calculations vary but are typically based on a percentage of states' base per-pupil funding, exclusive of any local funding. Some states include categorical and other types of funding. Amounts vary from year to year. Some states set maximum values. 	<p>Arizona's ESA funding amount is 90% of what the student would receive if attending a charter school.</p>
<p>Variable Amount</p> <ul style="list-style-type: none"> States may use a set amount or a formula to determine the value of an ESA, but the value varies based on students' characteristics, such as whether they have a particular special need or meet an income threshold. 	<p>North Carolina's ESA program has a maximum allotment of \$17,000 for students with certain disabilities.</p> <p>Wyoming's ESA program provides more funding for students from lower-income families.</p>

ESA funding levels are based on an amount set in statute, a formula, or variations based on student characteristics (2/2).

The average value of an ESA is \$7,500 but, given the variation in states' approaches to determining ESA values, they range widely across states.

\$4,921

\$30,000



West Virginia's program allots 100% of the prior year's statewide average net per pupil state aid, equal to \$4,921 for school year (SY) 2024-25.

Arizona's program is funded at 100% of unweighted base per-pupil funding, plus per-pupil amounts of categorical funding and per-pupil funding students with special needs would receive — which can result in an ESA value of as much as \$30,000.

State laws explicitly name a range of eligible expenses for ESA funds; five programs require private school enrollment.

Most Common



Least Common

Eligible Expenses for ESA Funds

Private tutoring
Tuition and fees at a participating school or entity
Curricula or instructional materials
Fees for standardized testing
Therapies and instructional aides
Transportation
Contracted services provided by a public school
Services for students with disabilities
Tuition and fees for nonpublic online learning programs
Educational hardware
Textbooks
Tuition and fees for career and technical education, training, and credentialing
Tuition and fees at an institution of higher education (IHE)
Fees for after-school or summer educational programs
Fees to manage ESAs, including transaction fees
Educational software and applications
Textbooks required by an IHE
School uniforms
Insurance or surety bond payments
Consumable school supplies

Five state programs require participating students to enroll in a private school:

1. Florida (EO)
2. Iowa
3. Mississippi*
4. Tennessee (EFS)
5. Tennessee (ESA)

These programs are more similar to voucher programs. However, while voucher programs often require that the entire scholarship amount be used to pay tuition, these ESA programs allow families to use excess funds to pay for other educational expenses.

There are three ways families may access their ESA funds; all come with benefits and drawbacks.

Direct Transfers

Either through a third-party platform or a state's own portal, families send money directly from their ESA account to a specific vendor.

- **Simplifies process for families:** Families do not have to front their own money for educational expenses.
- **Can minimize the risk of the misuse of funds:** With preselected expenses and vendors that are prepopulated for families to search, this approach helps ensure funds are used for intended purposes.
- **Payment delays for families and providers:** Depending on what oversight mechanisms and processes are in place, this could delay payment to providers and slow down services rendered for families.

Reimbursements

Families pay up front for services and then upload receipts and other documentation to a portal; the state then reimburses families for those costs.

- **Empowers families to make decisions:** Gives families more control over their spending.
- **Streamlines transactions:** Allows for a more immediate provision of services.
- **Financial burden on families:** Requires up-front payments, creating barriers for families that do not have the means to spend on services and await reimbursement; creates the possibility that families spend funds on what they believe are eligible expenses but are denied for reimbursement.
- **Payment delays for families:** Families might experience delays in receiving their reimbursements as their expenses are reviewed by the program administrator.

Debit Cards

Families are given a preloaded debit card they can spend on approved educational expenses.

- **Simplifies process for families:** Families do not have to front their own money for educational expenses.
- **Can minimize the risk of the misuse of funds:** With preselected expenses and vendors that are prepopulated for families to search, this approach helps ensure funds are used for intended purposes.
- **Payment delays for families and providers:** Depending on what oversight mechanisms and processes are in place, this could delay payment to providers and slow down services rendered for families.

Most states have turned to “digital wallets” to facilitate families’ access to ESA funds and approved services.

States have moved away from issuing ESA funds through debit cards and reimbursements in favor of “digital wallets.” Once admitted to an ESA program, parents obtain a login to an online marketplace, where they can check their account balances, upload invoices, see a vetted list of supplies and services and, often, pay providers and vendors directly.

Whitelisting Approach*

Digital platforms offer pre-approved categories of goods and services from which families may make purchases, but families may make other purchases as well. Multiple payment options are intended to maximize flexibility for families but require more documentation review from program staff.

Example — Jane is a student in Arizona, where the ESA program uses a digital wallet for payment management. The digital wallet provider offers four different options to make purchases or payments, so Jane’s parents can:

- Purchase eligible goods or services from a pre-approved vendor in the online marketplace.
- Upload an invoice from a registered vendor for the vendor to be paid through a digital wallet platform.
- Request a prepaid debit card and upload receipts to the digital wallet platform for verification.
- Upload a receipt for reimbursement.

Restricted Marketplace

Digital platforms curate the selection of products and services that families can purchase directly. Vendors must register with the digital wallet once they have been approved by the administering state agency to begin receiving payments from families. Families cannot make purchases outside the digital wallet platform.

Example — John is a student in Alabama, where the ESA program also uses a digital wallet for payment management but restricts how purchases can be made. John’s parents can:

- Purchase eligible educational goods (e.g., supplies, technology) from a pre-approved vendor in the online marketplace.
- Make payments and submit invoices for pre-approved education service providers.

ESA policies typically include oversight provisions for families, vendors, and the program.

Oversight for Families

- Eligibility verification
- Signing an attestation promising to adhere to program rules
- Penalties for the misuse of funds

Oversight for Vendors

- Accreditation
- Licensing or certification
- Pre-approval as an eligible provider
- Documenting compliance with health and safety regulations
- Committing to nondiscrimination

Oversight for Programs

- Pre-approval of eligible providers and expenses
- Review of receipts before expense reimbursement
- Program audits
- Hotlines and departments for reporting fraud
- Annual or quarterly reports
- Data collection and reporting

Families who participate in ESAs are accountable for verifying their eligibility and following program rules.

Oversight

Examples

Eligibility Verification

Families must demonstrate that they meet the eligibility requirements outlined in statute, which could range from providing proof of residence and guardianship to providing documentation of income, IEP, or student or school performance.

In **Florida**, families can prove their residence using a recent utility bill or government correspondence, rent, mortgage, or deed agreement, verification of homeless status, or similar documentation.

In **Alabama**, families must provide proof of residence; verification of income such as tax returns, W-2s, or TANF or SNAP benefit statements; and verification of guardianship, such as tax returns, birth certificates, or adoption records. Families interested in priority eligibility must also provide documentation of a disability or a parent who is an active-duty military member.

Attesting to Adhere to Program Rules

Families must sign an agreement committing to adhere to program rules and to provide for their child's education.

In **Arkansas**, families must sign a petition that they shall (a) not enroll their child full-time in a public school, (b) only use ESA account funds for qualifying expenses for the participating student, (c) comply with program requirements, and (d) if not enrolling their child full-time in a participating school, provide an education in at least English language arts, mathematics, social studies, and science.

Penalties for the Misuse of Funds

Families face consequences for misusing ESA funds, which can include fund recapture, revocation of the ESA account, and/or criminal prosecution.

In **Iowa**, a family who is found to misuse funds will (a) have their account closed and funds returned to the state's general fund, (b) be required to repay funds improperly disbursed, (c) be prohibited from participating in the ESA program in the future and, (d) if the case indicates a "substantial misuse" of funds, be guilty of fraudulent practices under the state's criminal law. Parents may appeal decisions to the State Board of Education.

Vendors that participate in ESAs must meet requirements that can vary based on the type of service they provide.

Requirement	Examples
PRIVATE SCHOOLS	
<p>Accreditation</p> <p>Some programs require participating private schools to be accredited. Accreditation is the process of evaluating a school to ensure it meets certain requirements (e.g., fiscal, operational, and educational standards).</p>	<p>In Georgia, a participating school must be accredited or in the process of becoming accredited.</p>
<p>Standardized Testing</p> <p>Some programs require participating private schools to administer a standardized test to students who enroll using ESA funds. Programs vary in the tests they require; some require schools to administer the state standardized test, while others require a nationally norm-referenced assessment, such as the Stanford 10 or the NWEA MAP. Portfolio assessments may be allowed for students with disabilities.</p>	<p>In Indiana, a private school that accepts tuition and fee payments from an ESA account must administer the statewide summative assessment unless otherwise indicated for students with special needs.</p>
TUTORS OR THERAPISTS	
<p>Credentials, Licenses, or Certifications</p> <p>Some programs require that certain providers have credentials, licenses, or certifications, in some cases including credentials for providing a particular type of therapy.</p>	<p>Alabama and South Carolina require that tutors have a bachelor's degree.</p> <p>Missouri requires providers offering educational therapies to be licensed or accredited.</p>
OTHER PROVIDERS	
<p>Health and Safety</p> <p>Programs typically require participating private schools to comply with all relevant health and safety laws or codes, including background checks.</p>	<p>West Virginia requires providers to complete criminal background checks.</p>
<p>Nondiscrimination</p> <p>Programs typically require participating private schools to comply with nondiscrimination laws.</p>	<p>Utah requires that all providers comply with antidiscrimination laws.</p>

ESA programs are subject to accountability and oversight from policymakers.

Requirement

Audits

Legislation requires the administrative agency or a contracted agency to conduct an audit of the program. Some programs explicitly require audits of just the ESA accounts while others also audit service providers. States may implement different degrees of auditing: Some states audit every expense while others take a more “spot check” approach.

Fraud Hotlines and Departments

Legislation authorizes the administrative agency to develop the rules necessary to create a fraud hotline or notifying department for individuals to report any instances of fraud.

Annual or Quarterly Reports

Legislation explicitly requires the administering agency or another authority to compile an annual report to the state beyond the financial audit.

Data Collection

Legislation requires the collection of a range of data, from the number of students participating to students’ standardized assessments and graduation rates.

Examples

Georgia’s ESA policy requires the program be audited annually.

Utah’s ESA policy requires annual, random audits of scholarship accounts.

Arkansas policy requires annual, random audits of scholarship accounts, providers, and schools.

Alabama’s ESA policy requires its Department of Education to “establish and publicize means for citizens to report fraud or other potential misuse of program funds, including websites and a toll-free phone number.”

Tennessee’s ESA policy requires the department to produce and publish on its website an annual report, including the number of participating students, participating students’ performance on annual assessments, graduation outcomes for students in grade 12, and parent satisfaction survey results.

Louisiana’s ESA policy requires its Department of Education’s annual report to include “the total number of students participating; a list of all participating schools and service providers”; the total enrollment, participating student enrollment, and percent of participating students in a school; “aggregate test result data for participating students; the percentage of funds used for each type of qualified education expense; an analysis of the program’s fiscal impact; the amount withheld by the department for the administration of the program;” and the “amount of program funds received by each participating school or provider.”

The complexity and rapid growth of ESAs create implementation challenges for leaders and policymakers.

Devising ESA program regulations.

Regulations must establish processes for program participation, balance transparency and privacy in establishing norms and expectations for sharing program information, and provide families with flexibility while ensuring the integrity of the program.

Informing families.

Program administrators, sometimes in partnership with local organizations, must build awareness of the program and provide navigation support to help families complete the enrollment process and identify and choose among learning options.

Enrolling families.

Program administrators must develop application instructions and processes and verify which families demonstrate eligibility or priority status. Some practices can ease the application process for families. For instance, if family income is a criteria for eligibility, program administrators can accept documentation of TANF participation.



Establishing a payment system.

Program administrators must establish how families will access ESA funds, whether through a state-owned and state-developed portal, a digital wallet platform, or debit cards. They must often execute a formal request for proposal process to select a third party to support the implementation of the chosen approach.

Recruiting providers.

Program administrators must recruit providers to participate in the program, establish practices for confirming provider eligibility and necessary reporting, and ensure the payment system allows for timely transfers to providers.

Ensuring transparency.

Program administrators must comply with requirements for transparency, which may include collecting and sharing data on student participation, provider participation, use of funds, and family satisfaction.



Microgrants are another direct funding approach in education with similarities to ESAs.

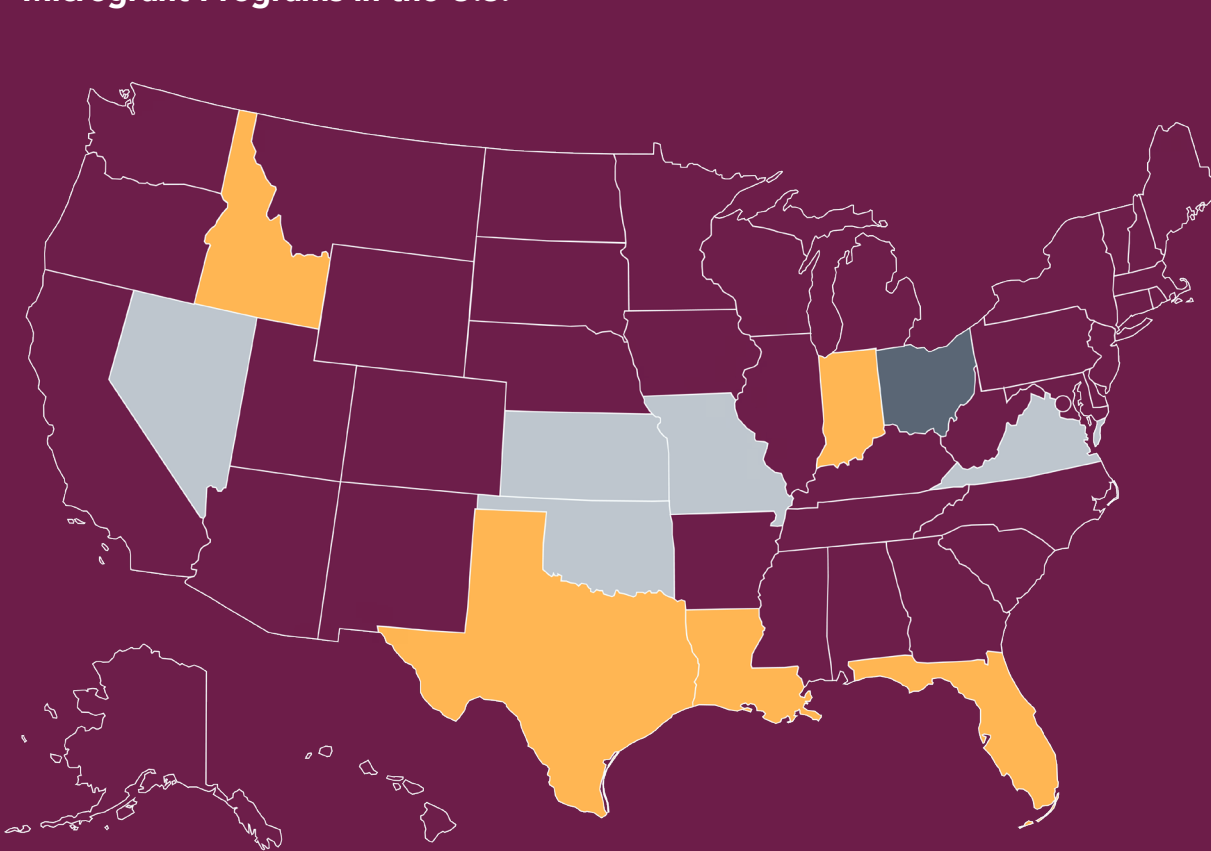
A microgrant is a small amount of money given to families to support access to supplementary educational activities. Like ESAs, families have considerable discretion over how they spend microgrant funds. But unlike ESAs, microgrants are typically one-time investments rather than annual allotments, and are much smaller amounts.

At least 11 states have created microgrant programs that provide families between \$500 and \$3,000 to spend on supplementary learning supports such as tutoring, instructional materials, and occupational or behavioral therapy. Most of these microgrant programs launched during and immediately after the COVID-19 pandemic and were funded by federal relief dollars. Some states have adapted pandemic-era microgrants into permanent, state-funded programs.

Microgrant programs share some similarities with programs that provide individual tax credits and deductions for educational expenses, which predate the pandemic and exist in at least 12 states. Like microgrants, individual tax credits and deduction programs allow families to access them and keep their children enrolled in their local public school. Unlike microgrants, however, families typically only receive the benefit once they submit their expenses when they file their taxes.

Many microgrant programs were short-term by design and have expired or are winding down.

Microgrant Programs in the U.S.



- Active
- Expired
- Winding Down

State, Program Name, Year Launched

Florida*	New Worlds Scholarship Accounts, 2018
Idaho	Empowering Parents Grant, 2022
Indiana	Indiana Learns, 2022
Kansas	Learning Recovery Grant, 2023
Louisiana	Steve Carter Tutoring Program, 2021
Missouri	Close the Gap Tutoring Program, 2023
Nevada	Transforming Opportunities for Toddlers and Students Program, 2021
Ohio	Afterschool Child Enrichment Educational Savings Accounts, 2022
Oklahoma	Bridge the Gap Digital Wallet Program, 2020
Texas	Parent-Directed Special Education Services, 2021
Virginia	K-12 Learning Acceleration Grant, 2023

Like some ESAs, microgrant programs target or prioritize students based on demonstrated academic, financial, or special needs.

State	Eligibility
Florida	Students who have demonstrated deficiencies in reading or mathematics or have exhibited dyslexia or dyscalculia (grades K-5).
Idaho	Universal but prioritizes students based on their households' Adjusted Gross Income (ages 5-18).
Indiana	Students who have demonstrated deficiencies in reading or math and qualify for FRL (grades 3-8).
Kansas	Students based on their household income level (ages 5-18, unless a student has a disability in which case students are eligible until they are age 21 or while still in high school).
Louisiana	Students who have demonstrated deficiencies in reading or math (grades K-12).
Missouri	Universal but prioritized students based on their households' income level (grades K-12).
Nevada	Students with disabilities who qualified to open an ABLÉ account (under age 18).
Ohio	Students living in districts that have high rates of chronic absenteeism or based on their household income level (ages 6-18).
Oklahoma	Universal but prioritized students based on their households' income level.
Texas	Students with disabilities who are served under an IEP in a special education program.
Virginia	Universal but students above a certain income threshold received a lower grant amount (school-age children).

Like ESAs, microgrant programs support families' access to a variety of educational services.

State	Funding	Eligible Expenses
Florida	\$1,200	Includes but is not limited to tutoring, after-school programming, resources, and materials that are related to literacy or mathematics.
Idaho	\$1,000 to \$3,000*	Includes but is not limited to tutoring, after-school programming, resources, materials, camps, internet access, and physical education equipment.
Indiana	\$1,000	Only high-dosage tutoring.
Kansas	\$1,000	Includes but is not limited to tutoring, camps, instructional materials and resources, and extracurricular classes.
Louisiana	\$1,500	Tutoring and instructional materials and textbooks.
Missouri	\$1,500	Included but was not limited to tutoring, camps, extracurricular classes, instructional materials, and internet access.
Nevada	\$5,000	Included everyday expenses related to education, transportation, housing, health care, assistive technology, other disability-related expenses.
Ohio	\$1,000	Includes tuition and fees for learning pods, tutoring, study skills, field trips, camps, and other extracurricular classes, after-school programs, and instructional materials for home-schooled students.
Oklahoma	\$1,500	Included tutoring services, technology, and curriculum content.
Texas	\$1,500	Includes but is not limited to tutoring, therapies, instructional materials, and resources.
Virginia	\$1,500**	Included tutoring, therapies, and assistive technology.

Microgrant programs have oversight mechanisms similar to those in place for ESAs.

Oversight for Families

- Eligibility verification
- Attesting to adhere to program rules
- Penalties for the misuse of funds

Example — Texas retains the right to close or suspend an account and reclaim all or a portion of funds if purchases are in violation of the guidelines, if a student is no longer eligible for the program, or if the parent fails to sign the parental agreement within 30 days.

Oversight for Vendors

- Accreditation licensing or certification
- Committing to nondiscrimination
- Criminal background checks

Example — Florida requires tutors to have a teaching certification, an adjunct teaching certification, a bachelor's or graduate degree in the subject area, or other demonstrated proof of mastery of the subject area.

Oversight for Programs

- Pre-approval of eligible providers and expenses
- Review of receipts before expense reimbursement
- Program audits
- Annual reports

Example — Louisiana requires that its Department of Education submit an annual report to the state's House and Senate education committees, including the number of students served, the public school in which students are enrolled, the total dollars paid to providers, a list of providers who received payments, and information on the performance of providers in improving students' reading and math abilities.

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ESAs continue a long history of government programs that provide direct payments to families.

- **1800s:** Public assistance or “public relief” is limited and primarily provided by local governments and charitable organizations. The federal government provides veterans’ pensions (aid to veterans who were killed or wounded in war and their families).
- **1832:** The Bureau of Pensions is created to help administer veterans’ pensions.
- **1911:** Illinois passes the first statewide program of mothers’ pensions (aid to poor, widowed mothers with young children).
- **1926:** 40 states have mothers’ pension programs in place.
- **1929:** State relief systems collapse during the Great Depression; the federal government steps in to finance states’ public relief programs, ultimately taking on the primary role in financing direct funding programs.
- **1933:** President Roosevelt proposes then signs the temporary Federal Emergency Relief Act, which distributes more than \$1 billion to states to shore up their public relief programs.
- **1935:** President Roosevelt signs the Social Security Act, which provides grants to states to support the welfare of elderly, disabled, or unemployed individuals as well as mothers and children. The law also creates the Aid for Families with Dependent Children (AFDC) program, which provides assistance to families with children who had low or no income, and Unemployment Insurance, which provides temporary assistance to workers who are unemployed through no fault of their own.
- **1956:** Amendments to the Social Security Act create the Social Security Disability Insurance program, which provides monthly payments to people who have a disability that stops or limits their ability to work.
- **1964:** Congress passes the Food Stamp Act, creating a federally funded, state-run program that provides families with assistance to purchase food. (The 2008 Farm Bill changed the program’s name to the Supplemental Nutrition Assistance Program.)
- **1973:** Congress combines existing programs serving needy adults into the Supplementary Security Income program.
- **1996:** Congress passes the Personal Responsibility and Work Opportunity Reconciliation Act, replacing the AFDC program with the TANF program. It provides grants to states, which use the funds to operate their own programs.

Similar to ESAs, TANF and SNAP provide direct payments to families and children.

TANF

- Provides services and direct payment benefits to “needy” families; the definition of “needy” families is left to the states and varies widely.
- Is intended to help meet families’ basic needs.
- Provides direct payments to families, typically through Electronic Benefit Transfer (EBT) cards, which can be used for any goods or services.
- States receive funding from the federal government, combining it with a required maintenance-of-effort amount of state funding.
- States decide how to use funds across a range of programs, including direct payments and services such as child care and job training.

In FY23:

- Approximately 1 million families received direct payments through TANF.
- Monthly direct payments amounts ranged from \$204 in Arkansas to \$1,370 in Minnesota.
- States used an average of 26% of their TANF dollars (\$8.3 billion) on direct payments.

SNAP

- Provides direct payment benefits to households whose gross incomes meet a federal definition based on income, assets, and the presence of an elderly or disabled household member.
- Is intended to increase the ability of households to purchase a “nutritionally adequate low-cost diet.”
- Provides direct payments to families, typically through an EBT card, and can only be used for food at licensed retailers.
- States receive funding from the federal government, which funds 100% of the program, and states distribute benefits to eligible households.

In FY23:

- Monthly SNAP participation averaged 42.2 million individuals in 22.3 million households.
- Monthly SNAP benefits averaged \$212 per person and \$400 per household.
- SNAP federal spending totaled \$113 billion.

TANF, SNAP, and ESAs all raise fundamental questions about government's role in meeting family needs.

	TANF	SNAP	ESAs	
Program Goals	Purpose	To help meet families' basic needs	To help ensure families have adequate food	To help families access education options; to spur innovation
	Beneficiary	Low-income families	Low-income families	Variable by state
Program Design	Eligible Uses of Direct Payments	Unrestricted	Nutrition	Education
	Disbursing Entity	State	State	State
	Funding Source	State and federal funding	Federal funding only	State funding only
	Form of Benefits	Direct payments to families and/or government services	Direct payments to families	Direct payments to families
	Relationship to Government Services	Single program that provides both direct payments and government services	Stand-alone program but complementary to direct payments and government services in other programs	Separate from public schools, but pulls resources from state budgets that also provide most funding for public schools

What types of needs should government help address? For whom?

Who should receive government funds? How are funds disbursed and used? What degree of freedom should beneficiaries have?

How do direct-payment programs compete for resources with government-provided services?

ESAs are subject to many critiques; parsing the evidence and comparisons to TANF and SNAP can help shed light.

The rapid growth and politicization of ESAs has opened them to a variety of critiques. This section uses available evidence to consider six of the most common.

The critiques considered in this report come from all sides of the debate about ESAs — some from detractors who wish to see the programs eliminated, some from those who seek to limit or target ESAs in various ways, and some from those who wish to see them expand. Six of the most common critiques include:

- 1. ESAs do not benefit families furthest from opportunity.**
- 2. ESAs drain funding from public schools.**
- 3. ESAs are prone to fraudulent spending and misuse of funds.**
- 4. There is insufficient oversight of ESAs.**
- 5. ESA funding is insufficient.**
- 6. ESAs are too hard for families to access and use.**

The analysis of critiques of ESAs leverages parallel evidence for TANF and SNAP, where relevant.

The parallels to TANF and SNAP are imperfect. For one, TANF and SNAP are intended to help families who are struggling to meet their most basic needs; the support is intended to be temporary until families can become self-sufficient. In contrast, ESAs are intended to provide ongoing support for families to access an alternative to a universal service that the government provides itself, through the public school system. Unlike government assistance for families' basic needs, K-12 education is a public investment often enshrined in state constitutions.

The comparisons are not meant to imply that the programs should be more similar in their design; they are meant to elevate similarities and differences that prompt discussions about how they vary, and why — especially useful since some of the critiques of ESAs are reminiscent of critiques of TANF and SNAP.

Critique 1

ESAs do not benefit families furthest from opportunity.

“The majority of participants in most universal private school choice programs were already attending private school before the programs cropped up.” —MARK LIEBERMAN, EDUCATION WEEK, 2024

“ESAs ... drain financial resources from public schools while subsidizing wealthier parents who already home-school or enroll their children in private schools or online schools.” —NETWORK FOR PUBLIC EDUCATION, 2021

Targeting ESAs toward specific students (or not) is almost always an intentional choice by policymakers.

Universal ESA Programs

Universal programs do not target a specific type of student or family by design.

These programs reflect a broader belief in educational freedom and parental autonomy, such that all families should have access to public funds to direct their children's education.

Targeted ESA Programs

Targeted programs limit eligibility to certain students or families based on specific characteristics (most often, income or disability).

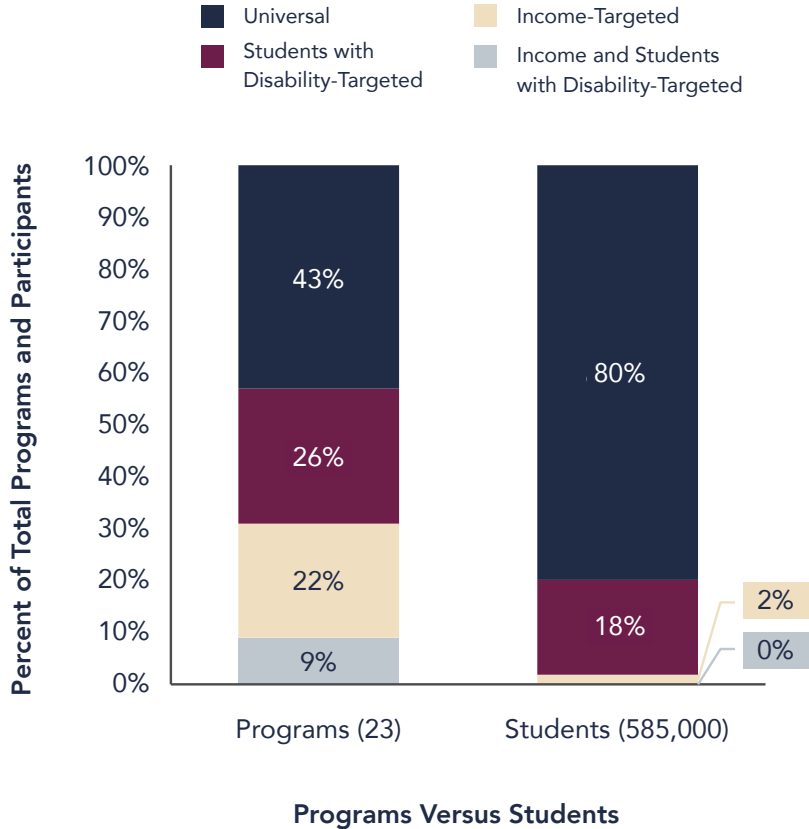
These programs also reflect a belief that all families should have access to options — but additionally a belief that public funding should be used to increase access for families who would not otherwise have the means to take advantage of those options.

There are different perspectives on the merits of universal ESA programs that deliberately do not target the highest-need students and families. On one hand, the origins of the private school choice movement lie in leveling the playing field so that lower-income families could access private schools. Universal ESAs do not explicitly uphold this goal.

On the other hand, many advocates of universal ESAs have embraced the adage that “a program for the poor is a poor program” — arguing that expanding access to a broader population of families, including wealthy families, can help build a broader coalition of support, which in turn can ensure programs are high-quality and long-standing. Programs with more students can also incentivize more providers to participate, create more robust markets with more options for families, and foster the conditions for innovation.

Thirteen of 23 programs are targeted, restricting eligibility to certain students based on disability or family income.

Percent of Total Programs and Participants by Program Eligibility Type, 2025



Seven ESA programs have income ceilings for eligibility.

Tennessee’s ESA program has the lowest income eligibility threshold, while Indiana and South Carolina have the highest:

- **Tennessee:** 200% FRL, or \$98,606 for a family of 3
- **Georgia:** 400% FPL, or \$106,600 for a family of 3
- **Wyoming*:** 500% FPL, or \$133,250 for a family of 3
- **Missouri:** 300% FRL, or \$147,908 for a family of 3
- **New Hampshire:** 350% FRL, or \$172,559 for a family of 3
- **Indiana:** 400% FRL, or \$197,212 for a family of 3
- **South Carolina**:** 400% FPL, or \$197,212 for a family of 3

The seven programs with income ceilings enroll about 13,000 students, less than 3% of the more than 585,000 students enrolled in ESAs nationwide.

In addition to the seven programs with income ceilings, at least six programs prioritize students based on income.

49 **Notes:** The 2025 FPL for a family of three is \$26,650. FRL eligibility is defined as 185% of FPL, or \$49,303 for a family of three. *Wyoming’s program is graduated, meaning families who earn more receive less in their ESA. For example, families earning at or below 150% of FPL receive \$6,000 while families earning between 450% to 500% of FPL receive \$600. **South Carolina’s program is 200% of FPL for SY24-25 but will phase in to 400% of FPL for SY26-27 and beyond.

Some universal programs disproportionately enroll students from higher-income families — but data are limited.

Evidence from Arizona and Florida suggests that universal ESAs support wealthier families:

- **Arizona's** lowest-poverty communities, those that have the highest median income, and those that have the highest college-going rates have the highest participation rates in the state's ESA program.
- In **Florida**, approximately 39% of students participating in the Educational Options (EO) and Tax Credit (TC) ESA programs combined qualify for FRL, compared to 54% of students statewide.

Similar data are not yet available for other universal programs, including programs that are slated to become universal over time, leaving significant uncertainty about whether trends in Arizona and Florida are, or will be, present in other states.

Because universal programs, by definition, do not target families furthest from opportunity, they tend to dominate conversations about the extent to which ESA programs as a whole support low-income families. Arizona's and Florida's universal programs are also the largest of all ESA programs by far, accounting for about 70% of all ESA participants nationwide — so trends in those programs also tend to dominate perceptions of ESAs overall.

For other ESA programs, there is limited demographic data on the students and families participating, making it difficult to understand how they compare. To date, very little is known about the distribution of family income within targeted programs or within newer universal programs. More data will become available as new programs mature.

Some evidence also suggests that universal ESAs attract students already attending private school.

Many state ESA programs support students who were already enrolled in private schools:

- In the first fiscal year (FY23) of **Arizona's** universal ESA, only 21% of students previously attended public school; this percentage increased to 47.6% in FY24 and 56.6% in FY25.
- In **Arkansas**, 95% of students participating in the state's ESA program during its first year of implementation (SY22-23) were either starting kindergarten or already enrolled in private schools. This dropped to 82% in SY23-24.
- In **Iowa**, one-third of ESA recipients during SY23-24 already attended private school.

Students who attend private school are more likely to be from high-income families — but many are not.

The demographic differences in the families who choose private school (without an ESA) drive concerns that ESAs disproportionately benefit wealthier families. Data on the demographics of private school students are limited, but suggest two key trends:

1. A larger percent of students from high-income families attend private schools compared to students from middle- and low-income families (approximately 16% versus 7% and 4%, respectively, in 2013), and the percent of children from middle-income families attending private schools declined between 1968 and 2013.
2. Private schools serve a larger percentage of white students than public schools (65% versus 44% in fall 2021 and fall 2022, respectively).

But demographics and tuition rates among private schools vary considerably. Catholic schools in particular serve an increasing percentage of students with disabilities and Hispanic/Latino students. Some schools subsidize the cost of tuition from charitable sources, while others may offer a sliding tuition scale based on family income. Some students receive privately funded scholarships to cover their tuition.

Among programs that are income-targeted, ESAs have higher income ceilings than TANF and SNAP.

Income-targeted ESA programs have much higher eligibility ceilings than TANF and SNAP. Tennessee has the lowest income eligibility threshold among income-targeted ESA programs. Only families earning up to \$98,606 are eligible — still more than four times the maximum annual income for families to be eligible for TANF in the same state. Indiana, which has the highest eligibility threshold for an ESA at \$197,212, also has the third-lowest income eligibility for TANF among all 50 states, at just \$4,536.

	ESAs	TANF	SNAP
Eligibility Guidance	Seven ESA programs have income thresholds; they range from 200% of FRL eligibility (Tennessee ESA) to 400% of FRL eligibility (Indiana).	Federal law requires assistance to be provided to “needy” families; states set maximum monthly income amounts* that range from \$278 (Arkansas) to \$2,679 (Minnesota).	Families must meet three types of income requirements: gross monthly income (at or below 130% of FPL), net income (at or below FPL), and maximum assets requirements that vary based on whether a family has a member age 60-plus or with a disability.
Maximum Annual Income To Be Eligible (Family of 3)	Tennessee: \$98,606 Indiana: \$197,212	Tennessee: \$21,576 Indiana: \$4,536	Net: \$26,650 Gross: \$34,645

Those who critique ESAs for not benefiting low-income families should consider whether they would support ESAs if they were more narrowly targeted. Those who defend broader access to ESAs should consider whether TANF and SNAP should also broaden eligibility to serve more families.

Critique 2

ESAs drain funding from public schools.

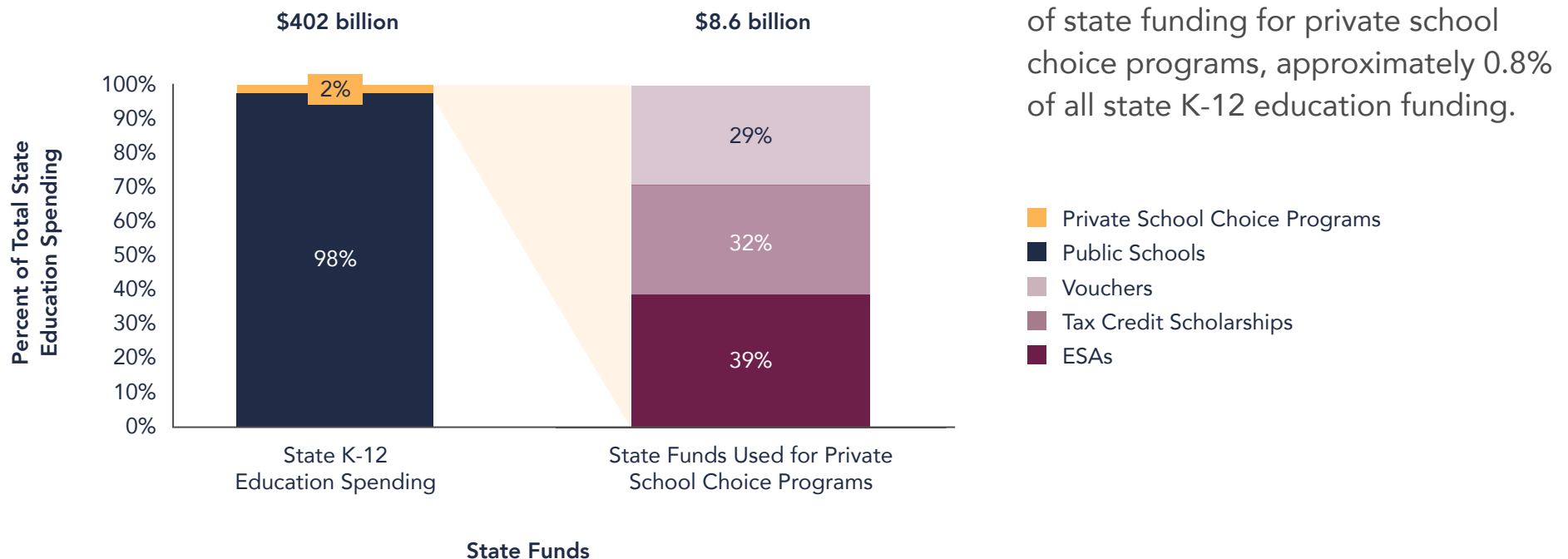
“Opponents argue [Georgia’s ESA] program will subtract resources from public schools, even as other students remain behind.” —THE ASSOCIATED PRESS, 2024

“Too many families participating [in ESAs] could lead school districts to suffer unsustainable funding losses when children leave and take the funding with them.” —ETHAN DeWITT, NEW HAMPSHIRE BULLETIN, 2021

ESAs account for approximately \$3.2 billion in funding — less than 1% of all state education funds.

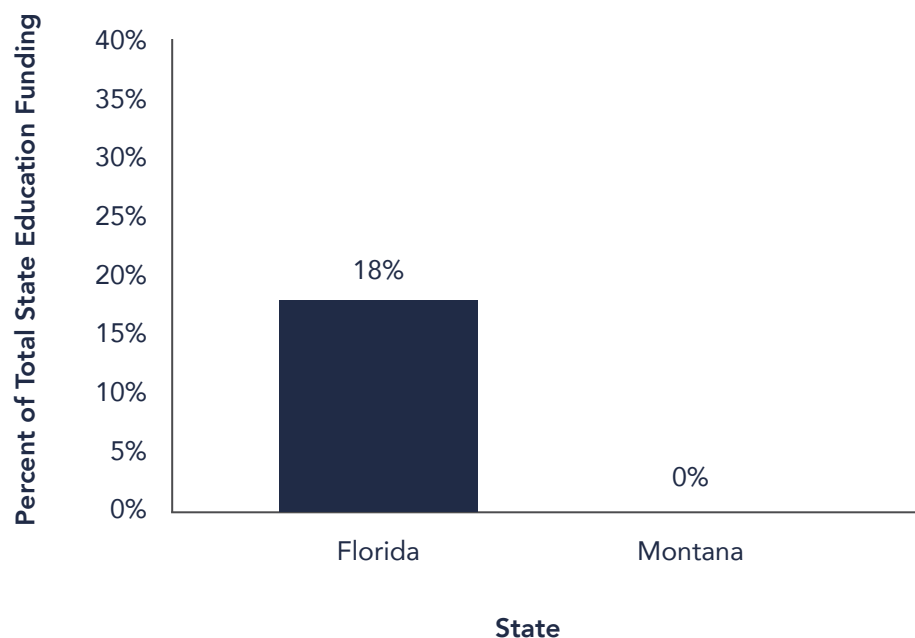
Of the \$402 billion that states spent on education in FY24, 2% (\$8.6 billion) went toward private school choice programs (ESAs, vouchers, tax credits). Of that \$8.6 billion, about 39% (\$3.2 billion) funded ESA programs.

State Spending on Private School Choice Programs, FY24



While ESAs represent a small portion of state education spending overall, larger programs have larger impacts.

ESA Program Funding as a Percent of Total State Education Funding



Florida's EO and UA ESA programs combined enroll nearly 320,000 students.* In FY25, the state forecasted more than \$2.8 billion in funding between them, accounting for approximately 18% of the more than \$15 billion in state public school funding.

On the other end of the spectrum, Montana's program enrolled just 14 students as of November 2024 — amounting to approximately \$100,000 and a negligible impact on the \$1 billion in state education funding.

55 **Note:** *Florida's tax-credit ESA is not included here because it is funded via donations to nonprofit scholarship-granting organizations rather than directly through the state's education budget.

Program design decisions influence the extent to which ESAs impact state education budgets.

Prior public school enrollment requirements can mitigate new state spending.

- When students already enrolled in private schools are eligible for and receive an ESA, the state incurs new spending, because the state was not previously paying for that student's education. This is not the case when a student previously enrolled in a district school receives an ESA. In this case, the state was already funding that student's education. Requirements for students to have previously been enrolled in a public school to be eligible for an ESA help mitigate the number of "new" students the state is funding.

Different approaches to funding ESAs can limit the impact on states' education budgets.

- Several states fund ESAs at a portion of the per-pupil funding they give districts (e.g., Arizona, Arkansas, and Indiana all fund their respective ESA programs at 90% of the base per-pupil funding for school districts). If a student leaves a public school district, 90% of the funds that would have gone to the district now go to the parent, while the state retains the remaining 10%. In this case, the state saves money on that student (while the district no longer receives that student's per-pupil funds).
- Tax-credit ESA programs, like those in Florida, Missouri, and Utah, are not funded out of the state's education budget. Instead, students' ESAs are funded by nonprofits that accept charitable donations from individuals and companies in exchange for tax credits. This approach reduces a state's revenue (via the tax credits provided) but does not increase its expenses.

ESA program participation caps can help states manage program costs.

- Limiting the number of students who can participate in an ESA program helps states set expectations and manage costs. Utah, for example, has an \$82.5 million budget cap on its program, which limits participation to about 10,000 students. More than 27,000 students applied in the first year of the program which, without the expenditure cap, would have more than doubled program costs. Tax-credit ESAs also cap the total annual value of tax credits that can be made.

The way states fund their ESA programs also shapes their effect on education budgets.

Approach	Examples
<p>Funding Formula ESA participants receive a percentage of the student funding formula amount.</p>	<ul style="list-style-type: none"> • Florida’s UA program is “funded by formula rather than appropriation.”
<p>Appropriation ESA programs are funded separately from the education student funding budget.</p>	<ul style="list-style-type: none"> • Utah’s ESA program bases its per-student amount on the funding formula, but requires legislative appropriation for that funding.
<p>Tax Credits ESAs are funded through private donations to scholarship organizations in return for tax credits.</p>	<ul style="list-style-type: none"> • In Missouri, contributors making eligible donations to educational assistance organizations receive a tax credit up to 100% of the amount (not to exceed 50% of donor’s annual state tax liability).
<p>Dedicated Tax ESAs could be funded by targeted or “sin” tax revenue.</p>	<ul style="list-style-type: none"> • No current ESA programs are funded this way; however, in 2021 Colorado voters considered (and ultimately defeated) a microgrant program that would have been funded by an increase to the state’s marijuana tax. • Several states fund their universal pre-K programs through these taxes.

States that use the funding formula approach draw directly from state education funds to support ESAs; states that use an appropriation or tax credit do not have a direct impact on their education budgets but do have an impact on their state budgets overall.

All government programs compete for limited public funds, some more directly than others.

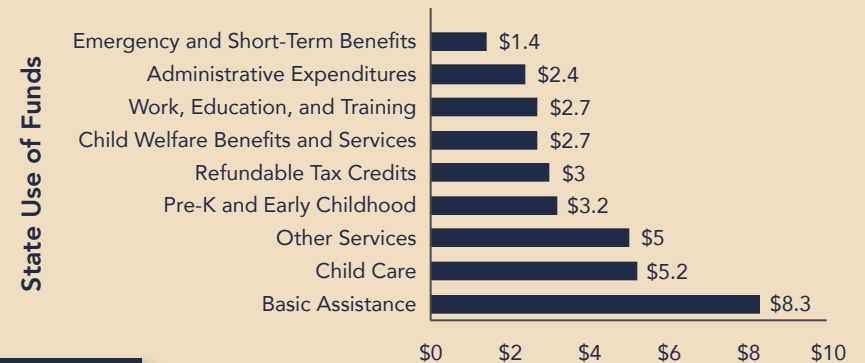
Policymakers and government program administrators are constantly weighing trade-offs and making decisions about how much funding to direct to which programs.

- **TANF** and **SNAP** compete with each other for federal dollars; they also compete with other programs that serve low-income populations, such as Housing Choice Vouchers, Medicaid, the Children’s Health Insurance Program, and the Community Services Block Grant. All federal poverty programs further compete with other government expenditures, including Medicare, Social Security, and the military.
- At the state level, **TANF** incentivizes other state expenditures. TANF’s maintenance-of-effort requirement incentivizes states to dedicate funds to related services, such as job training, child care, or foster care programs. These maintenance-of-effort requirements compete for funding with other state-funded programs.
- At the state level, **ESAs** compete for funding with K-12 education, as well as other state funding priorities. Other state-funded programs include not only **TANF** maintenance-of-effort requirements but also state funding priorities like transportation infrastructure and economic development initiatives.

TANF provides a useful juxtaposition for understanding the tension among government programs. It requires states to decide how much funding to direct to providing services and how much to provide via direct payments to families.

The decisions that states with **ESAs** are making are similar: How much funding to reserve for government services (i.e., the public K-12 education system) versus how much funding to provide directly to families so that they can use it to meet their students’ needs.

State Use of TANF Funds, FY23



Total Funding (in Billions of U.S. Dollars)

Those who critique ESAs for diverting funds from public schools should consider whether they find the same critique compelling when applied to the choices states make about TANF.

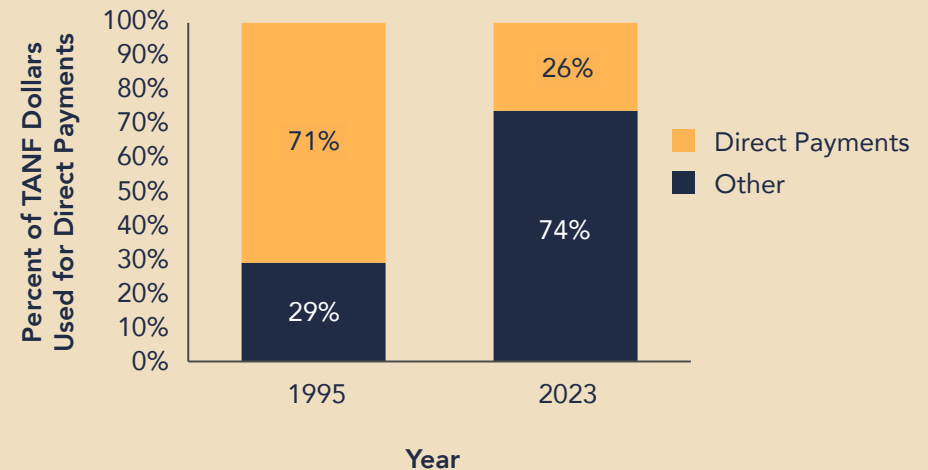
Some states that provide families ESAs appear to make different decisions about direct payments via TANF.

State With an ESA	Percent of TANF Funds for Direct Payments, 2020
Arkansas	5%
Indiana	5%
Mississippi	5%
North Carolina	6%
Louisiana	7%
Alabama	8%
Missouri	8%
Tennessee	11%
Arizona	13%
Florida	14%
Iowa	16%
Utah	18%
National Average	22%
Georgia	23%
West Virginia	28%
South Carolina	29%
Montana	36%
Wyoming	39%
New Hampshire	42%

States that have enacted ESAs tend to use a lower percent of TANF funds for direct payments than the national average.

Since welfare reform in the 1990s, and in response to concerns over misuse and dependence on public support, the average percentage of TANF dollars used for direct payments has significantly declined.

Average Allocation of TANF Funds



Those who support ESAs because they give families autonomy to make the decisions best for them should consider whether they find the same argument compelling for TANF.

Critique 3

ESAs are prone to fraudulent spending and misuse of funds.

“Some states have approved questionable home-schooling expenses such as game consoles, trampolines, snack food, televisions, and theme park passes.” —DANA GOLDSTEIN, THE NEW YORK TIMES, 2024

“Moreover, the absence of public accountability for voucher funds has contributed to rampant fraud, waste, and abuse in current voucher programs.” —NATIONAL EDUCATION ASSOCIATION, 2025

Some uses of ESA funds make headlines and spark questions about the “proper” use of public funds.

ESAs are designed to give parents latitude over how they spend funds to best meet the needs of their child. That latitude raises important questions for policymakers and the public to grapple with:

- Who gets to decide what an “appropriate” use of funds is?
- Public schools use public dollars for many of these same items (e.g., trampolines, chicken coops, Legos, TVs) with much less media scrutiny; why is that more acceptable than parents purchasing these items?
- How can policies balance trusting parents to make decisions that meet their children’s needs while ensuring proper oversight of public funds?

Chicken Coops, Trampolines and Tickets to SeaWorld: What Some Parents are Buying with Education Savings Accounts

Florida school vouchers can pay for TVs, kayaks and theme parks. Is that OK?

A new list of allowable expenses for the publicly funded program is raising eyebrows.

Parents of private voucher students spent over \$1 million of public money buying Lego sets

The brick sets are an allowable purchase under the state's ESA program. But the volume and the type of sets are controversial.

Actual cases of fraud in ESA programs remain low.

There have been some high-profile instances of fraud in both ESAs and microgrants. Most notably:

- **Oklahoma** filed a lawsuit (later dismissed) against ClassWallet for improperly disbursing microgrant funds, alleging the vendor failed to enforce spending restrictions.
- In **Arizona**, a grand jury indicted two Colorado residents for falsifying applications to Arizona's ESA program and receiving approximately \$110,000 in funds that they used "for their personal living expenses."

Despite the high-profile nature of these cases and the sensational headlines that follow, data suggest that actual cases of ESA fraud are low. In **Arizona**, for example, the Auditor General's 2023 report found only one instance of a successful transaction at an unapproved merchant — for just \$30. In **Idaho**, an external audit of the state's Empowering Parents microgrant program found that just 0.29% of the nearly \$40 million in grant funds were misused.

LOCAL

State of Oklahoma sues ClassWallet over COVID-19 education funds misuse

Two people from out of state charged with defrauding Arizona school voucher program

The two are accused of submitting Empowerment Scholarship Account (ESA) applications for 50 children, 43 of whom do not exist

State review finds up to \$180,000 in improper Empowering Parents purchases

Most ESA dollars support private school tuition; a smaller percent pay for other expenses that are sometimes questioned.

Relatively little public data is currently available on how families use ESA dollars. The data that exist suggest most families use ESAs for tuition.

- Some programs, like **Iowa's** and **Tennessee's EFS**, require families to use ESA dollars for private school tuition *before* purchasing other approved expenses, resulting in a majority of ESA dollars supporting tuition.
- In SY23-24, 54% of **Arizona** ESA dollars covered tuition, textbooks, and fees.
- A study of **Florida's** ESA program between SY14-15 and SY18-19 found that, on average, families spent most (57%) of their ESA funds on private school tuition. Black and Hispanic families used a greater portion of their funds on tuition compared to white families. The study also found that as families continued to participate in the program, they spent a greater share of their ESA funding on non-tuition expenses over time.



Fraud and misuse are concerns across government programs.

TANF

The block-grant nature of TANF and considerable flexibility states have over their funds makes it difficult to quantify total fraud. And because states spend most (77% on average as of 2022) of their TANF funds on services other than direct assistance, concerns about fraud in TANF primarily reside with how states are using their non-assistance funds.

- Citing a 2022 Mississippi state audit that found **at least \$77 million in state TANF funds were misspent**, in 2023, the Congressional House Ways and Means Committee called on the U.S. Government Accountability Office (GAO) to investigate how states are using their non-assistance TANF funds.
- A 2024 GAO report reviewed states' own audits of their TANF programs and found 155 unresolved issues across 35 states. Thirty-one of these involved "questioned costs," with the largest **costing \$107 million repeated annually for two years**.

SNAP

Improper payments, fraud, and theft in the SNAP program account for billions of dollars annually:

- The U.S. Department of Agriculture (USDA) estimates that in FY23, **nearly 12% (about \$10.5 billion) of the SNAP benefits it paid out were improper**. Most of these improper payments were a result of states not properly verifying recipients' eligibility for the program.
- USDA tracks fraud — primarily in the form of benefit trafficking, where retailers exchange SNAP benefits for other goods or services — separately from improper payments. The most recent data estimate **SNAP benefit trafficking to be about \$1 billion annually between 2015 and 2017**.
- SNAP is addressing an increase in EBT skimming fraud by switching to more secure chip cards. One analysis **estimated that SNAP fraud alone could be as high as \$20 billion**, out of a total of \$236 billion across 71 federal programs in FY23.

Those who critique ESAs for fraud and misuse of funds should consider whether they find the critique as compelling when applied to fraud and misuse of funds in the TANF and SNAP programs. Those who bemoan the regulations meant to prevent fraud in ESA programs should consider whether they would support lifting similar regulations in TANF and SNAP programs.

Critique 4

There is insufficient oversight of ESAs.

“This lack of oversight can lead to misallocation and misuse of public funds, discrimination, and questionable educational quality, all of which undermine the principles of fairness and equity in education.”

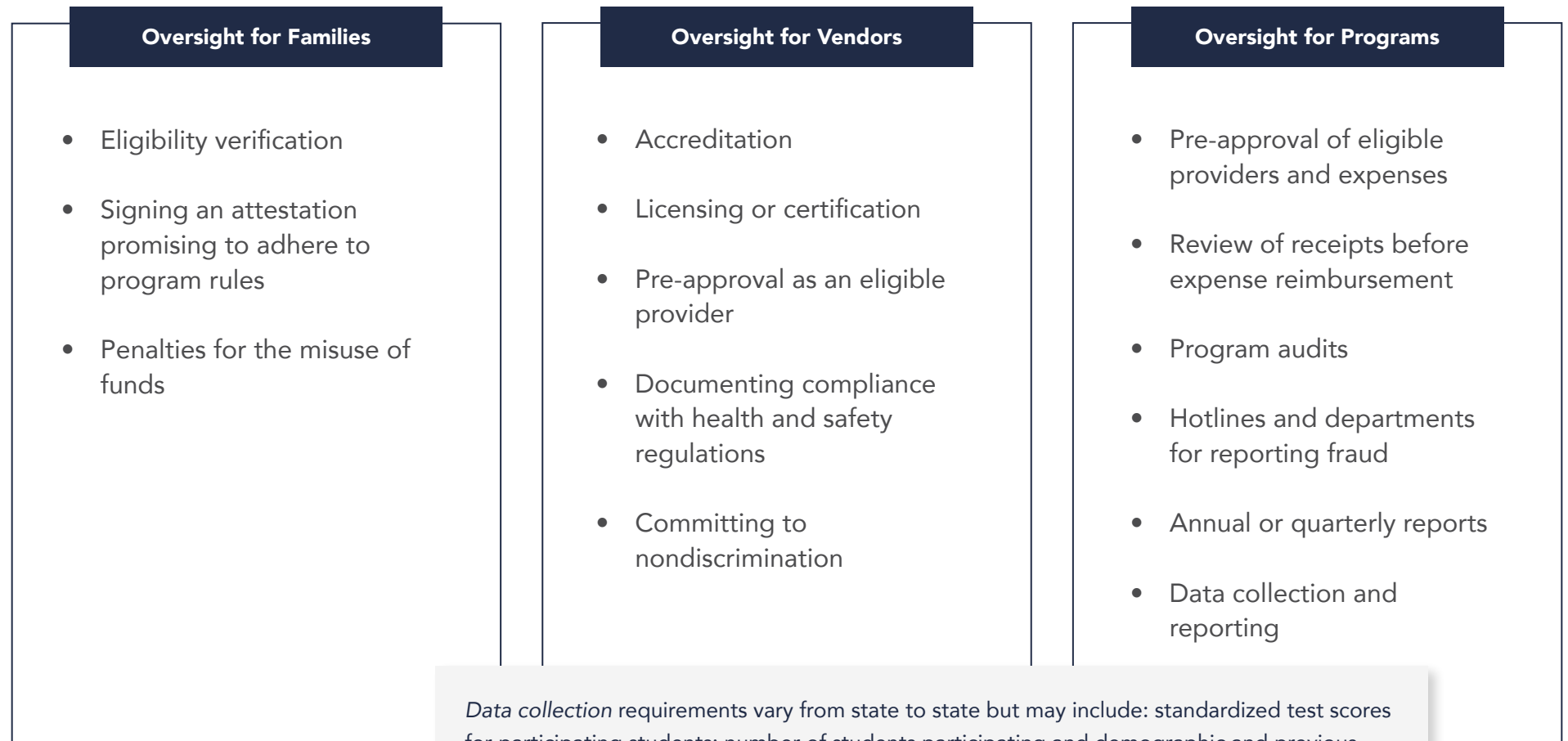
—THE EDUCATION TRUST (EDTRUST), 2024

“We need to recognize that, when lots of money is floating around, some folks will grab for it by starting shoddy (but lucrative) schools, filling boards and staff with friends and relatives, leasing a facility at exorbitant rates from themselves or their cousins, and deploying nothing that resembles a coherent curriculum.”

—CHESTER E. FINN JR., THOMAS B. FORDHAM INSTITUTE, 2023

ESA policies have mechanisms in place to provide oversight to families, vendors, and programs.

Many ESA programs are too new to have collected or reported much data, but more research and oversight will be possible as programs implement data collection and reporting requirements.



Lack of consistency and clarity on the goals of ESA programs makes it challenging to assess their effectiveness.

The stated goals of ESA programs are varied and sometimes ambiguous. Even within a state, an ESA program might be designed to accomplish multiple things.

State	Purpose (as stated in legislation)
Alabama	"It is the intent of the Legislature that educational savings accounts <i>be made available to parents of participating students</i> beginning with the 2025-2026 academic year."
Arizona	"Arizona Empowerment Scholarships are established <i>to provide options for the education of students</i> in this state."
Florida	"The Family Empowerment Scholarship Program is established <i>to provide children of families in this state which have limited financial resources with educational options</i> to achieve success in their education."
Montana	"There is a Montana special needs equal opportunity education savings account program ... which gives authority to the legislature <i>to provide for educational programs and institutions in addition to a basic system of public schools that will fulfill the goal of the people to have an overall system of education that offers equal opportunity</i> for all to reach their full educational potential."
North Carolina	"There is established the North Carolina Personal Education Student Accounts for Children with Disabilities Program <i>to provide the option for a parent to better meet the individual educational needs</i> of the parent's child."

To answer the question of whether ESAs "work," oversight entities would need to more clearly understand the intentions of the legislators who created each program and the goals of the families who opt into the program, to assess the extent to which the program is having its intended impact.

The design of ESA programs also complicates oversight efforts.

The individualized, flexible funding mechanisms created by ESAs inherently broaden policy goals and potential measures of success, making a rigorous assessment of their impact challenging.

Challenge	Implication for Evaluation
Legislation is often ambiguous about the intent of ESA policies, and stakeholders have differing and competing goals for them.	Diverse perspectives and expectations about outcomes can lead to a desire for multiple, sometimes contradictory measures of success.
Most policies allow a large degree of flexibility in how families use ESA funds.	The individualized nature of how families choose to spend funds and why they make those choices translates into high variability in students' experiences and the outcomes that might result from them.
ESA programs often operate with limited data collection, particularly if families use funds for nontraditional learning models (e.g., home-schooling, microschools).	Without consistent, high-quality data, oversight agencies may struggle to understand how participation in an ESA program is correlated with academic performance or long-term outcomes like postsecondary readiness or employment.
ESA policies can produce unintended consequences that complicate the evaluation process.	To fully assess a program's impact, oversight agencies must examine broader system effects, such as reduced funding for public schools or inequitable access for low-income families.

Any ESA oversight or accountability approach requires careful consideration of the trade-offs.

Data can help policymakers and families understand key questions about program scope and outcomes ...

Limitations in ESA programs' current data collection make it challenging to understand how these programs impact outcomes such as student academic success or states' education budgets. Additional data collection and reporting requirements could improve transparency, oversight, and accountability and allow policymakers and researchers to answer important questions about who these programs serve, whether participation improves academic or other outcomes, how the funds are being spent, and the extent to which they impact states' education budgets. Data is also critical for families — it can help them make decisions about which services best meet their children's needs amid a crowded ecosystem of providers.

... but there are real concerns that over-regulation undermines trust in families and harms program quality.

Families have different needs and perspectives on what constitutes a "quality" program or service; when states focus too much on collecting data, reporting outcomes, and making decisions about providers based on those outcomes, it can undermine trust in families' ability to make choices that best meet their unique needs. Moreover, some research suggests that over-regulation of voucher programs led to worse academic outcomes for students and that higher-performing private schools choose not to accept voucher students because of the additional regulatory and administrative requirements for doing so. Because of the similarities between voucher programs and ESAs, some advocates are fearful that adding more data collection and reporting requirements to ESA programs may have similar impacts.

There is no "best" way to regulate ESA programs, and existing school choice accountability mechanisms are not a great fit. Policymakers must explicitly confront trade-offs among regulation, provider quality, and market demand. More regulation can help ensure poor providers are removed from the system (or never join to begin with) but may also dissuade some high-quality providers from jumping through hoops to join — resulting in fewer options for families.

ESA oversight varies, but states' approaches are generally aligned to those of TANF and SNAP.

	ESAs	TANF	SNAP
Provider Eligibility Certification	Varies by state, but vendors often must apply to the program administering agency for approval, which typically require things like accreditation (for schools) or credentials (for individual providers like tutors or therapists).	There are no requirements for vendors to be able to accept TANF basic assistance funds.	Retailers must be authorized by USDA to accept SNAP funds. To be eligible, retailers must sell a certain amount of SNAP-eligible foods (called "staple foods").
Data Collection Requirements	Varies by state but often requires things like number and demographics of participating students, standardized test performance, and uses of ESA funding, among others.	There are no requirements for tracking the use of basic assistance funds; however, states are required to collect other info about TANF programs (work participation, caseloads by family type, applications, case closings, sanctions, time limit clocks, and family characteristics, among others).	SNAP benefits are provided exclusively via EBT; all EBT transactions are electronically processed and recorded. USDA has access to records of all transactions including date, time, and dollar amount.

States' approaches to ESA data collection and accountability generally fall within the bounds of the federal government's approach with TANF and SNAP. Those who criticize ESAs for lack of oversight should consider whether they are satisfied with the similar approach to oversight of TANF and SNAP.

Critique 5

ESA funding is insufficient.

“Private school tuition and other associated costs — such as transportation, uniforms, books — often run thousands of dollars more than vouchers provide, making these programs inaccessible to low-income students.”

—LILY KLAM AND CHRIS BECKER, *FIRST FOCUS ON CHILDREN*, 2025

“ESAs provide options for only some parents, mostly those who can pay the extra costs the ESAs don’t cover.”

—NETWORK FOR PUBLIC EDUCATION, 2021

Success for an ESA could mean many things, each of which sets a different threshold for “enough” funding.

Threshold 1

Does ESA funding cover what families spend on private school tuition?

Threshold 2

Does ESA funding cover what families spend on home-schooling?

Threshold 3

Does ESA funding cover what students would otherwise receive as a public per-pupil expenditure?

Threshold 4

Does ESA funding cover the costs of services necessary to meet students’ needs?

Threshold 1

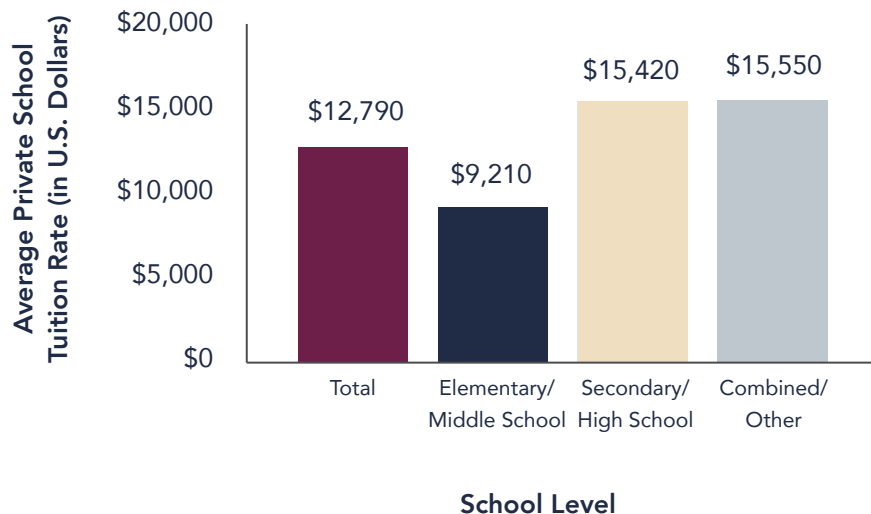
**Does ESA funding cover what families
spend on private school tuition?**

Private school tuition rates vary widely; the national average is well above most states' ESA funding amounts.

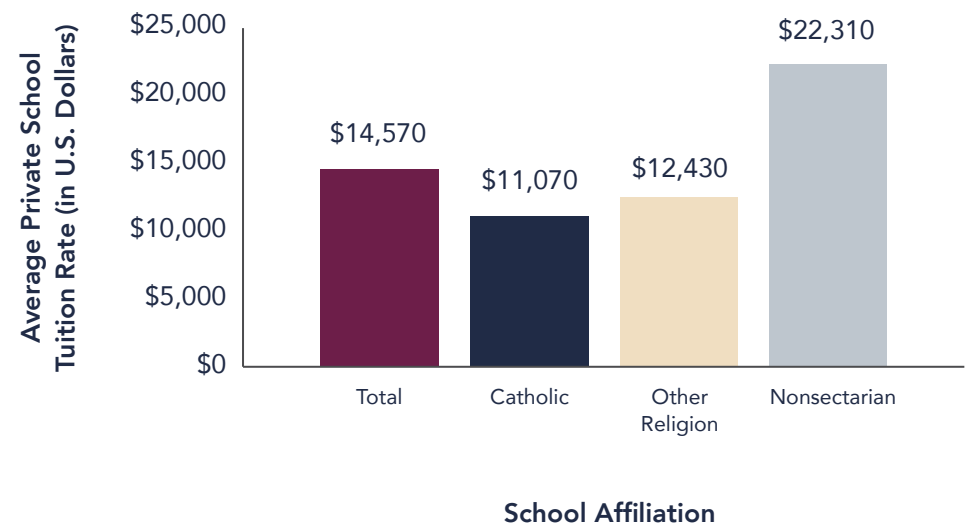
In SY20-21, the average private school tuition rate nationwide was \$14,570. Schools serving high school grades are more expensive on average than those serving elementary and middle grades. The average nonsectarian school tuition (\$22,310) is about twice that of Catholic (\$11,070) and other religious schools (\$12,430). A majority (75%) of the students enrolled in private schools are enrolled in religiously affiliated schools, which tend to be the least expensive.

The average annual ESA benefit to families is \$7,500 — substantially less than the national average private school tuition rate.

Average Private School Tuition Rate by School Level

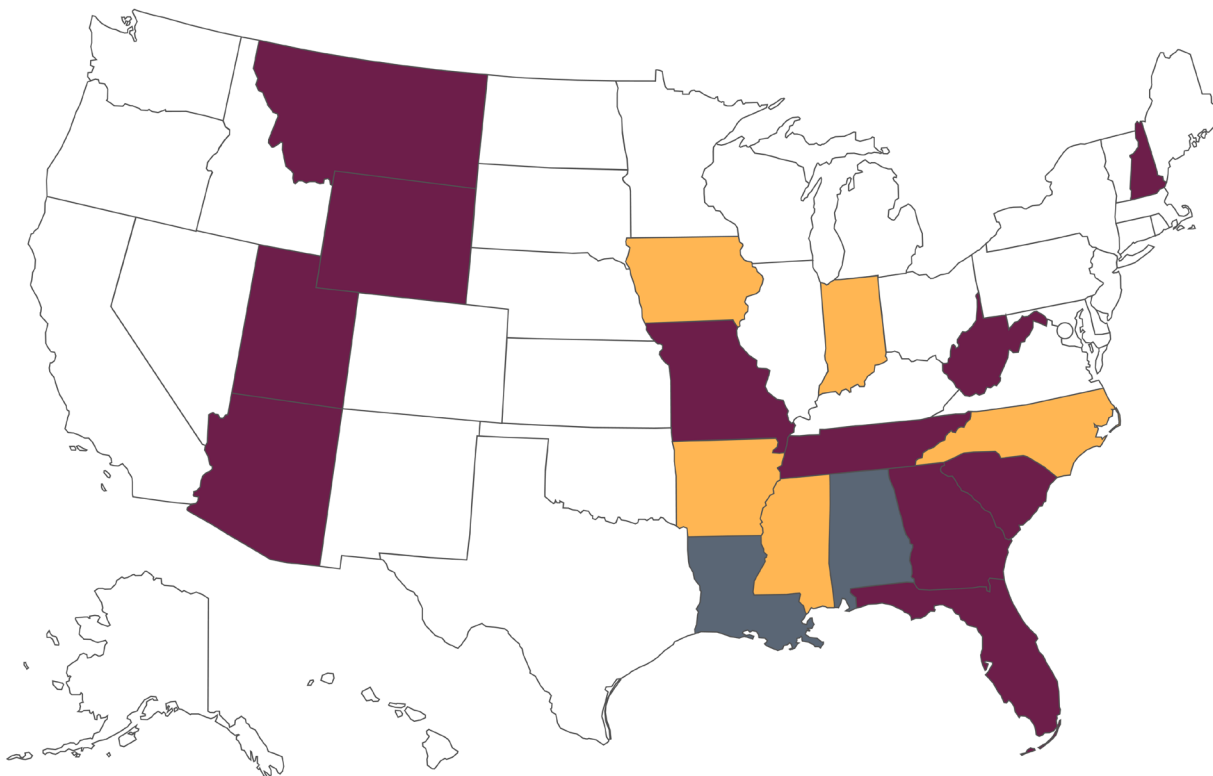


Average Private School Tuition Rate by School Affiliation



Only five of 18 states offer ESA benefits that fully cover the average cost of private school tuition.

Average ESA Account Values Compared to Average Statewide Private School Tuition Rate in the U.S.



Average Private School Tuition > ESA Amount
Families participating in states with ESA amounts lower than average private school tuition are more likely to pay out of pocket to make up the difference, potentially limiting participating families who can do so.

Average Private School Tuition < ESA Amount
The ESA programs in Arkansas, Indiana, Iowa, Mississippi, and North Carolina are more likely to provide sufficient funding to cover a private school education, increasing the chances that families can participate without needing to supplement educational costs.

Program Data Not Available
Alabama's and Louisiana's programs have not launched and therefore do not have average funding amounts.

Averages aside, whether ESAs provide enough funding to access private school varies family by family.

Whether an ESA can help a family access private school varies based on many factors beyond the amount of the ESA benefit, like proximity to lower-cost private school options. As a hypothetical set of examples, **Caleb**, **Jayden**, and **Maya** all live in Iowa. They are all eligible for the state's ESA program. Iowa law requires ESA recipients to attend a private school, so their parents are all exploring private school options.

CALEB

Caleb's parents want to enroll him in the only private school in their community, but the tuition is several thousand dollars more than the ESA value. Caleb's family cannot afford the difference, and there are no other private schools nearby. Unless the school can afford to provide Caleb a scholarship, he has to remain in public school. For Caleb, the ESA does not help him access options, even if there are options his family wants to pursue.

JAYDEN

Meanwhile, Caleb's neighbor Jayden's parents can afford to pay the difference between the ESA amount and tuition at the nearest private school. They apply for an ESA and use the funds to offset the cost of private school tuition for Jayden. The ESA enables Jayden's family to access their only private school option, but only because his family can afford to pay the difference between the ESA value and the school's tuition.

MAYA

On the other side of town, Maya's parents are going to enroll her in the private school down the street. Its tuition is several thousand dollars less than the value of the ESA. They not only enroll her in the school but are able to use the remaining funds to hire a tutor a few hours a week and purchase additional textbooks and materials to help her study. The ESA provides Maya's family with the greatest flexibility, because she happens to live near a less-expensive private school. This allows her family to both use the ESA for private school tuition, as required by law, and take advantage of other covered services.

Threshold 2

**Does ESA funding cover what families
spend on home-schooling?**

Home-schooling expenses vary widely, and the full cost of home-schooling must consider parents' lost income.

Part of the draw of home-schooling is it gives parents the ability to choose how to educate their child(ren), including what they do and do not spend money on. Some families may purchase minimal supplies at a cost of just a few hundred dollars per child annually, while others may invest in extensive resources, technology, tutors, and field trips amounting to several thousand dollars per child annually.

Total home-schooling expenses will vary by family based on the individual choices they make in these and other categories. Some research suggests that, on average, home-schooling families spend approximately \$600 per student annually, though that estimate does not include loss of income.

Common home-schooling expenses include:

- **Curriculum:** Families may choose to purchase books and lesson plans to support learning; these costs vary but are likely a few hundred dollars per year. For example, Power Homeschool, an online provider of courses for home-schooling families, is \$31.25/month per student. Keystone School, online education provider K12's home-schooling branch, costs about \$500 per year.
- **Home-Schooling Pods, Co-Ops, and Microschools:** Some may be free, while others may cost between several hundred and several thousand dollars per year.
- **Extracurricular Activities/Lessons:** Families may choose to pay for music, art, or sports lessons. Costs vary widely.
- **Field Trips:** Families may choose to take their children on field trips as part of home-schooling. Some locations are free (e.g., library) while others may have admission fees (e.g., museums).
- **Tutors:** Some home-schooling families hire tutors, whose rates range from \$25 to \$100 or more per hour. Tutoring center rates are typically a few hundred dollars per month. National math tutoring center Mathnasium, for example, costs between \$250 and \$400 per month and up to \$1,000 for its summer tutoring programs.
- **Specialized Therapies:** Therapies with highly trained and specialized therapists can be quite costly. Speech therapy, for example, is typically \$100 to \$250 per hour. Physical therapy may cost \$75 to \$150 per session without insurance.
- **Online Courses:** Online educational platform Outschool offers individual courses for \$10 to \$25 per class; access to Rosetta Stone's online language courses starts at \$12/month.
- **Loss of Income:** Home-schooling may mean one parent needs to give up some or all of their income to support their child's education.

Threshold 3

Does ESA funding cover what students would otherwise receive as a public per-pupil expenditure?

Comparisons between average ESA values and average per-pupil expenditures are not straightforward.

State	Average ESA Value (2025)*	Average State PPR (2022)	Average Total PPR (2022)
Alabama	N/A	\$7,415	\$14,300
Arizona	\$7,409	\$5,482	\$13,360
Arkansas	\$6,845	\$9,553	\$14,268
Florida (EO)	\$8,100	\$4,285	\$13,275
Florida (TC)	\$8,100	\$4,285	\$13,275
Florida (UA)	\$10,000	\$4,285	\$13,275
Georgia	\$6,500	\$6,517	\$16,401
Indiana	\$11,601	\$8,860	\$15,397
Iowa	\$7,826	\$8,138	\$16,331
Mississippi	\$7,829	\$5,719	\$13,049
Missouri	\$6,375	\$5,483	\$15,758
Montana	\$5,000-\$8,000**	\$6,256	\$15,805
New Hampshire	\$5,100	\$6,681	\$22,738
North Carolina	\$11,846	\$7,505	\$13,448
South Carolina	\$6,000	\$7,403	\$17,110
Tennessee (EFS)	\$7,075	\$5,516	\$13,628
Tennessee (ESA)	\$9,329	\$5,516	\$13,628
Tennessee (IEA)	\$10,709	\$5,516	\$13,628
Utah (CSOS)	\$1,891	\$5,549	\$11,623
Utah (UFA)	\$8,000	\$5,549	\$11,623
West Virginia	\$4,299	\$7,515	\$15,947
Wyoming	\$6,000	\$11,518	\$22,102

Average amounts suggest that ESAs are sometimes above and sometimes below state per-pupil revenues (PPRs), but always below total revenues (including local and federal dollars).

However, local, state, and federal dollars are often weighted based on student characteristics (e.g., low-income status, whether they are English learners, and whether they have a disability).

ESA amounts are not consistently weighted to provide more funding to students with specific characteristics.

A full comparison of ESA and public school funding levels is not possible without an analysis of student-level data, and claims about how funding levels compare should be interpreted with caution.

Threshold 4

Does ESA funding cover the costs of services necessary to meet students' needs?

There is significant room for debate about what is *necessary* to meet students' needs.

Numerous lawsuits in the 1990s and 2000s demonstrated ways to calculate the cost of education. Between the mid-1990s and mid-2000s, 45 states had some kind of litigation regarding state funding for K-12 education. Where state constitutions include provisions that promise students an adequate education, lawsuits sought to establish that current levels of funding were not adequate and to create methods for determining what funding levels should be. Litigants used a variety of approaches to determine adequacy:

- **Professional judgment:** Educators are asked what resources would be required for students to meet state standards.
- **Exemplary schools approach:** Researchers study resource levels at schools where students are meeting state standards and adjust funding estimates for the student population.
- **Cost-function analyses:** Statistical analyses are conducted to estimate the resources necessary to meet state standards and are adjusted based on the student population.
- **Costs of evidence-based practices:** Research is used to estimate the resources necessary for a prototypical school and is validated by state or school officials.

Families' spending patterns provide another way to think about the cost of an education. Research provides some evidence of how much families spend on education, including but not limited to private school tuition, and how spending patterns vary by family income.

Even before the pandemic, families reported spending a total of more than \$200 billion on education outside of public education, only \$75 billion of which was dedicated to private school enrollment or home-schooling. Other educational expenditures that families made to support or enrich their child's education included, in aggregate:

- \$32 billion in social enrichment.
- \$29 billion in academic enrichment.
- \$25 billion in sports/athletics.
- \$5 billion in computer learning apps.
- \$4 billion in textbooks.

It is easy for lines to blur between education and enrichment, and between an educational expense and expenses related to other elements of a child's growth and development — without a clear limiting principle.

Calculations used for determining SNAP are similarly complex and imperfect; TANF benefits vary by state.

TANF

TANF benefit levels are set at the state level and range widely from \$204 per month in Arkansas to \$1,151 per month in New Hampshire (as of July 2022). Nationwide, the median cash benefit for families is \$492.

SNAP

SNAP benefits are based on a Thrifty Food Plan (TFP) developed by the USDA. The TFP is intended to meet minimum nutritional requirements as devised by USDA's Center for Nutrition Policy and Promotion and is described as a "Market Basket" — that is, the "weekly amounts (i.e., pounds) from categories of foods and beverages in purchasable forms, and associated costs, to support a healthy diet" — for a four-person family consisting of two parents between the ages of 20 and 50 with two children, one between the ages of 6 and 8 and one between the ages of 9 and 11.

Calculations take numerous variables into account, including dietary guidelines, consumption patterns, total calories needed by age-sex groups with activity-level considerations, and current food prices.

Benefit amounts are not adjusted by geography, except for Alaska, Hawaii, Guam, and the U.S. Virgin Islands given substantially different food costs.

Benefit calculations require many considerations, judgment calls, and trade-offs. While TANF and SNAP are intended to meet minimum, basic needs, ESAs are intended to provide optionality. How critics and advocates of TANF, SNAP, and ESAs assess the sufficiency of funding must include considerations of whether a program is intended to *meet a need* or *enable a preference*.

Critique 6

ESAs are too hard for families to access and use.

“Parents ranged in the concerns they voiced to the board over recent changes made, wait times for reimbursements, and issues with a vendor that helps distribute ESA funds.” —COLLEEN SIKORA, 12NEWS ARIZONA, 2023

*“Navigating private school-choice programs can be challenging, frustrating, and isolating for families.”
—NICOLE STELLE GARNETT AND MICHAEL Q. MCSHANE, MANHATTAN INSTITUTE, 2023*

Early evidence suggests that the mechanics of ESA programs create barriers for some families.

Surveys suggest parents of students eligible for ESAs are very satisfied with the existence of ESA programs that support educational decision-making; ...

Surveys of parents with children participating in ESA programs in **Arizona, Indiana, North Carolina, and Tennessee** indicate high levels of satisfaction with the ESA program due to the freedom and flexibility it provides.

... however, parents indicate less satisfaction with some of the mechanics of ESA program implementation.

- In **Arizona**, parents surfaced several challenges, including delays in processing purchases and reimbursements and long wait times for help desk tickets and email and phone assistance.
- In **Indiana**, a small survey of parents participating in the ESA program surfaced challenges such as navigating the rules, identifying high-quality providers, understanding what the funds can be used for and how to use them, adhering to standardized testing requirements for students with disabilities, and poor communication and information-sharing from the state.
- ESA programs that reimburse families for expenses can make it difficult for families to access funds and participate. Families who either cannot afford up-front payments may not have been able to participate in the program to the fullest degree. Most programs provide other ways for families to purchase eligible goods or services, but some still allow for payments to be made via reimbursement.

Design features in TANF and SNAP make it hard for people to access — and keep — benefits.

Both TANF and SNAP have been criticized for creating application processes and eligibility restrictions that make the programs difficult to access. Strict work requirements, time limits for program eligibility, and behavioral requirements (e.g., drug testing) make TANF difficult to access, while a major barrier to SNAP access is the frequency of eligibility recertification requirements. Across both programs, administrative burdens — in particular, in-person interview requirements — hamper access.

The families that TANF and SNAP serve are, by definition, very low income. They are also disproportionately Black and Hispanic. Considerable literature demonstrate that historical and current program requirements — such as the 1940s morals-based laws that required women to be married to receive Aid to Dependent Children benefits (the precursor to AFDC, which became TANF) — were designed to keep Black families ineligible. More contemporary design decisions, such as giving states considerable leeway over their TANF spending and eligibility requirements, have resulted in Black children being more likely to live in states where benefits are the lowest and where the program reaches the fewest families in poverty. While some of these requirements may simply be attempts by government officials to minimize risk and fraud in the programs, others acknowledge they can be a “subtle way for politicians ... to reduce government spending on low-income households while undermining support for those same programs by convincing the public that they are ineffective.”

Those who believe ESAs should be easier for families to access should consider whether they would also support lowering barriers to accessing TANF and SNAP.

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ESAs are likely here to stay, though the fates of individual programs may vary.

History suggests that direct funding programs start small and gradually expand over time. What started as modest pension programs for soldiers and later mothers eventually grew to become Social Security. The Aid to Dependent Children program (later AFDC), evolved into TANF. Both now serve large populations and are deeply embedded in the country's social safety net, making them incredibly hard to dismantle.

ESA programs seem to be following a similar pattern. Arizona's ESA, the first in the nation, initially targeted a small number of students with disabilities. Over time, lawmakers expanded eligibility until it became the first universal ESA program. Today, it is one of the largest ESA programs in the country. Florida's ESA offerings have also grown substantially over the past decade, as lawmakers have expanded eligibility and created new programs. Across the country, more and more states are creating ESA programs. They are becoming embedded in the education landscape in a way that would be hard to walk back.

That said, because ESAs are creatures of state governments and the relative size and strength of each program varies from state to state, **individual programs may see different fates.** It is unlikely that large programs like Arizona's or Florida's would be terminated altogether given the size of their constituencies. But evolving political dynamics could spark changes to established ESA programs that slow their growth. And in states with large coalitions of opponents, it is not impossible that programs could be eliminated (as was the case with Illinois' tax-credit scholarship program, which lapsed in 2023).

As the landscape of ESAs evolves, public data and research will be crucial to understanding programs' impact.

Important areas for further research include:

ESA Design and Implementation

- Policymakers make myriad design decisions when creating ESA programs. Research could help show how different decisions about eligibility, allowable expenses, program oversight, and other factors affect program implementation and outcomes.

Impact of ESAs

- ESA program goals (as outlined in legislation) tend to be broad, and families choose to participate for a variety of reasons — all of which complicates evaluation efforts. But attempting to understand the extent to which an ESA program accomplishes the goals of legislators and participants remains important.
- It is similarly important to understand the impact of ESAs on a variety of factors, including students' academic and nonacademic outcomes, family satisfaction, states' education budgets, and the public education system more broadly.
- Researchers can also help understand what services beyond traditional school options families access with ESAs — including the quality of those services and whether they meet families' needs.

The ability for researchers to answer these questions hinges on states collecting and sharing high-quality data about ESA programs.

As debates about ESAs continue, a grounding in facts, data, and research will be essential.

Debates will continue about whether ESAs are good for students, families, communities, and the education system more broadly. Those questions are unlikely to be unequivocally settled.

But as legislators, policymakers, advocates, parents, and the public continue the dialogue, they should ground conversations in research, evidence, and a clear-eyed understanding of how ESAs work and be open to adjustments as new data and research emerge.



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Appendix A

ESA PROGRAM LEGISLATION

State	Program Name	Statute
Alabama	The Creating Hope and Opportunity for Our Students' Education (CHOOSE) Act of 2024	Statute
Arizona	The Empowerment Scholarship Account (ESA) Program	Statute
Arkansas	Arkansas Children's Educational Freedom Account Program	Statute
Florida (EO)	Family Empowerment Scholarship for Educational Options Program	Statute
Florida (TC)	Florida Tax Credit Education Savings Account	Statute
Florida (UA)	Family Empowerment Scholarship for Students with Unique Abilities	Statute
Georgia	Georgia Promise Scholarship Program	Statute
Indiana	Indiana Education Scholarship Account Program	Statute
Iowa	Education Savings Account Program	Statute
Louisiana	Louisiana Giving All True Opportunity to Rise (LA GATOR) Scholarship Program	Statute
Mississippi	Equal Opportunity for Students with Special Needs Program	Statute
Missouri	Missouri Empowerment Scholarship Accounts Program	Statute
Montana	Montana Special Needs Equal Opportunity Education Savings Account Program	Statute
New Hampshire	Education Freedom Account Program	Statute
North Carolina	Education Student Accounts (ESA+)	Statute
South Carolina	Education Scholarship Trust Fund	Statute
Tennessee (EFS)	Tennessee Education Freedom Scholarship Program	Statute
Tennessee (ESA)	Education Savings Account Program	Statute
Tennessee (IEA)	Tennessee Individualized Education Accounts	Statute
Utah (CSOS)	Carson Smith Opportunity Scholarship Program	Statute
Utah (UFA)	Utah Fits All Scholarship	Statute
West Virginia	Hope Scholarship Program	Statute
Wyoming	Wyoming Education Savings Account Program	Statute

Appendix B

MICROGRANT PROGRAM LEGISLATION

State	Program Name	Year Passed	Status	Source
Florida	New Worlds Scholarship Accounts	2018	Active	Statute
Idaho	Empowering Parents Grant	2022	Active	Statute
Indiana	Indiana Learns	2022	Active	Statute
Kansas	Learning Recovery Grant	2023	Expired	Program Website
Louisiana	Steve Carter Tutoring Program	2021	Active	Statute
Missouri	Close the Gap Tutoring Program	2023	Expired	Statute
Nevada	Transforming Opportunities for Toddlers and Students Program	2021	Expired	Application Process (PDF)
Ohio	Afterschool Child Enrichment Educational Savings Accounts	2022	Active but Winding Down	Program Website
Oklahoma	Bridge the Gap Digital Wallet Program	2020	Expired	State Announcement
Texas	Parent-Directed Special Education Services	2021	Active	State Website
Virginia	K-12 Learning Acceleration Grant	2023	Expired	ClassWallet Service Provider Guide

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About the Authors



JULIET SQUIRE

Juliet Squire is a senior partner at Bellwether in the Policy and Evaluation practice area. She can be reached at juliet.squire@bellwether.org.



KELLY ROBSON FOSTER

Kelly Robson Foster is a senior associate partner at Bellwether in the Policy and Evaluation practice area. She can be reached at kelly.foster@bellwether.org.



LYNNE GRAZIANO

Lynne Graziano is a senior analyst at Bellwether in the Policy and Evaluation practice area. She can be reached at lynne.graziano@bellwether.org.



ANDY JACOB

Andy Jacob is the senior director of external relations at Bellwether and leads the External Relations team. He can be reached at andy.jacob@bellwether.org.

About Beta by Bellwether

Beta by Bellwether is an initiative to jump-start bold solutions to structural problems in the education sector. Beta moves beyond imagining a new sector by bringing together viewpoint- and experience-diverse teams from across education to create blueprints and tools for leaders around the United States. Our goal is to help build an education system that better serves all young people — particularly those from systemically marginalized communities — and models a new way forward for the sector. For more, visit bellwether.org/beta.

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About Bellwether

Bellwether is a national nonprofit that exists to transform education to ensure systemically marginalized young people achieve outcomes that lead to fulfilling lives and flourishing communities. Founded in 2010, we work hand in hand with education leaders and organizations to accelerate their impact, inform and influence policy and program design, and share what we learn along the way. For more, visit bellwether.org.



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