

# How California Can Respond to the Threat of Private School Vouchers

May 2026

With nearly six million children attending public schools across the state,<sup>1</sup> it is no surprise that Californians overwhelmingly believe public education that prepares students for college, careers and engaged citizenship is a top priority.<sup>2</sup> Yet, California is not immune to escalating efforts to establish private school voucher programs that inevitably weaken public schools. Across the country, voucher programs have proliferated, decimating state budgets and putting public education at risk.

This report explains the many dangers of private school vouchers, highlights recent developments in the state and federal landscapes, and provides recommendations and resources on how to prevent vouchers from taking hold in California.

## WHAT ARE VOUCHERS?

Private school voucher schemes have many different names and structures, including “education savings accounts” (ESAs) and “tax credit scholarships.” Originally, voucher programs sent funds from state coffers to pay for students’ private school tuition. ESA voucher programs deposit public funds into a personal account that can be used to pay for a student’s private school tuition and a broad range of other private educational expenses. Tax credit scholarship voucher programs provide individuals or corporations with up to a 100% credit for sending to “scholarship granting organizations” (SGOs) money they would otherwise owe in taxes, with the SGOs then handing out vouchers.

## PRIVATE SCHOOL VOUCHERS HARM PUBLIC SCHOOLS AND STUDENTS

**Funding Diversion.** Regardless of name or type, all vouchers divert public funds from public schools to pay for private educational expenses.<sup>3</sup> This loss of funding results in cuts to public school programs and services, and in some cases, threatens the very existence of local public schools.<sup>4</sup> The challenges faced by rural schools, which serve roughly one in five California public school students,<sup>5</sup> are exacerbated by the decreased enrollment and

funding caused by vouchers. School closures are particularly devastating for rural communities, where schools also serve as centers of economic, social, and civic life.<sup>6</sup>

**Taxpayer Burden.** Vouchers also increase the financial burden on taxpayers. For example, a 2018 study found that instead of the promised savings, vouchers cost taxpayers in Arizona 75% more than public school education.<sup>7</sup> When the state instituted universal vouchers in 2022, the program “blew a massive hole in Arizona’s budget,”<sup>8</sup> and fueled declines in public school enrollment costing districts hundreds of millions of dollars in per-pupil funding.<sup>9</sup> Florida’s universal voucher program cost taxpayers almost \$4 billion in 2024-25,<sup>10</sup> creating a budget crisis that set off school closures and mass layoffs in districts across the state.<sup>11</sup>

**Fraud, Waste, and Abuse.** There are few safeguards in place to protect against the waste and misuse of voucher funds.<sup>12</sup> For example, recent reporting has revealed that Arizona’s ESA vouchers have been used to buy items such as jewelry, lingerie, and luxury travel, and that prohibited purchases may account for almost 20% of transactions paid for with these taxpayer funds.<sup>13</sup> A 2025 audit of one of Florida’s ESA voucher programs found that the state could not account for over \$270 million in voucher funds.<sup>14</sup>

**Academic Harm.** In addition to harming public schools and the students and communities that depend on them, vouchers are not beneficial to students who use them. Not only do vouchers fail to improve educational outcomes,<sup>15</sup> they have a *detrimental academic impact* on participating students.<sup>16</sup> In Louisiana, to take just one example, participation in the state’s voucher program “dramatically reduce[d] academic achievement” in math, reading, and other subjects.<sup>17</sup> Professor Josh Cowen, who spent decades studying the academic effects of vouchers, found that their negative educational impacts are “on par with what the COVID-19 pandemic did to test scores, and larger than Hurricane Katrina’s impacts on academics in New Orleans.”<sup>18</sup>

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**Discrimination.** Moreover, vouchers fund schools that actively discriminate against students, disproportionately impacting students of color, LGBTQ+ students, and students with disabilities.<sup>19</sup> In fact, private schools can refuse to admit students with disabilities or decline to provide them with special education programs and related services.<sup>20</sup> Additionally, for California’s more than 800,000 students with disabilities,<sup>21</sup> families using vouchers would have to cover any difference between the voucher amount and the cost of tuition, specialized services, and ancillary expenses like transportation.<sup>22</sup>

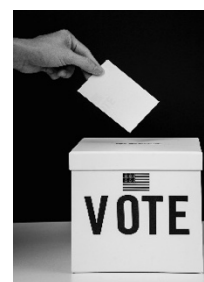
California also has the largest English Learner (EL) population in the country.<sup>23</sup> The provision of an adequate education for EL students requires distinct programs and resources,<sup>24</sup> yet

private schools are not under the same legal obligations as public schools to meet their needs.<sup>25</sup> A study across 16 states and Washington, D.C. found that not one state-based voucher law required private schools that take vouchers to provide services that meet ELs' language learning needs.<sup>26</sup>

The California Department of Education has limited legal authority to regulate or monitor private schools in the state.<sup>27</sup> Furthermore, private schools, in California and throughout the country, are not obligated to comply with an array of federal antidiscrimination and other requirements that apply to public schools.<sup>28</sup>

### **PRIVATE SCHOOL VOUCHERS ARE UNPOPULAR AND UNCONSTITUTIONAL**

Vouchers are also deeply unpopular. Polls consistently show that most voters across the political spectrum want public funds spent on public, not private, schools.<sup>29</sup> Every single time voters have had the opportunity to weigh in at the ballot box, they have rejected voucher programs.<sup>30</sup> In the 2024 election alone, voters rejected vouchers in Nebraska, Colorado, and Kentucky.<sup>31</sup>



State courts have also repeatedly struck down laws enacting voucher programs for violating state constitutional provisions, such as those that prohibit the use of public funds for private education.<sup>32</sup> California's constitution contains similar provisions; for example, it prohibits appropriations for schools "not under the exclusive control" of public school officers.<sup>33</sup>

### **CALIFORNIA IS NOT IMMUNE TO EFFORTS TO SPREAD VOUCHERS**

Unfortunately, two-thirds of states currently operate private school voucher programs.<sup>34</sup> Eighteen of these states have universal or near-universal programs, meaning that practically every child, regardless of family income or prior enrollment in public schools, is eligible to receive public funding for private education expenses.<sup>35</sup> The amount of public funds diverted to these programs has accelerated dramatically. A report examining voucher programs in seven states found that each state significantly increased expenditures of public funds on vouchers over a ten-year period, with growth in Georgia, for example, reaching 883 percent, and other states more than doubling their voucher expenditures.<sup>36</sup>

Like many states, California has a long history of efforts to enact voucher programs. Voucher measures were placed on the ballot in California in 1993 and 2000, with voters rejecting them, as they have in all other states with such ballot measures.<sup>37</sup> Still, there is a continued effort by well-funded special interest groups to promote school privatization in California, and the Trump administration has made clear that it will preference states that adopt voucher programs.<sup>38</sup>

Recent efforts to bring vouchers to California, through ballot initiatives and legislation:

### Proposed Ballot Measures

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**In 2021**, two statewide ballot measures were submitted to the Office of the Attorney General by California-based pro-voucher groups. The *Educational Freedom Act* proposed constitutional and statutory amendments to establish ESA vouchers for private school and homeschooled students.<sup>39</sup> The Legislative Analyst's Office estimated the program, which would hand out \$14,000 vouchers, would increase annual state costs between \$4.7 and \$7 billion dollars.<sup>40</sup> A similar ballot initiative aimed to establish ESA vouchers capped at \$13,000 per student,<sup>41</sup> with an estimated annual cost of \$4-6 billion dollars.<sup>42</sup> Each of the programs' costs would be offset by reductions in public school funding.<sup>43</sup> Both measures failed to gain the necessary signatures to be on the 2022 ballot.

**In 2023**, a California-based pro-voucher group<sup>44</sup> submitted a proposed statewide ballot measure for the 2024 election.<sup>45</sup> The *Children's Educational Opportunity Act* proposed constitutional and statutory amendments to create ESA voucher accounts funded with \$17,000 annually—from General Fund and property tax revenues currently allocated to public schools—to be used on private or homeschool expenses.<sup>46</sup> The estimated cost was \$6.3-10 billion annually “to provide funding for students currently enrolled in private school,”<sup>47</sup> plus several billion dollars more per year for public school students moving to private schools, which would be offset by reducing spending on public schools.<sup>48</sup> The measure did not gain enough signatures to be placed on the 2024 ballot.<sup>49</sup>

**In 2025**, the same group<sup>50</sup> again submitted a proposed ballot measure to enact the *Children's Educational Opportunity Act*.<sup>51</sup> It now proposed constitutional and statutory amendments to create ESA voucher accounts funded with \$17,000 annually from existing Proposition 98 dollars guaranteed to public schools.<sup>52</sup> Once again, this measure failed to gain the necessary signatures, and will not appear on the November 2026 ballot.<sup>53</sup>

### Proposed Legislation During the 2025-26 Legislative Session

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**SB 64**, the *School Choice Flex Account Act of 2025*, would have established ESA vouchers in the amount of \$8,000 per student, and \$16,000 for students with exceptional needs, starting in the 2027-28 school year.<sup>54</sup> The bill would have required the state to “rebase” Proposition 98,<sup>55</sup> which established an annual minimum funding level for public education, and would have drastically changed the school funding system in California. The bill failed in committee on March 19, 2025.<sup>56</sup>

**SCA 1**, a companion bill to SB 64, would have proposed to voters an amendment to the state constitution to allow public funds to be used for religious instruction and to allow disbursement of such funds pursuant to the *School Choice Flex Account Act of 2025*.<sup>57</sup> The bill has not moved since being referred to committees in January 2026.<sup>58</sup>

**AB 19**, the *Education Choice and Parental Empowerment Act of 2025*, would have established a state-funded trust to administer ESA vouchers in the amount of \$18,500 for each eligible student, subject to family income limits.<sup>59</sup> The bill failed in committee on January 31, 2026.<sup>60</sup>

*While all proposals to enact a voucher program in California have failed, public school advocates must remain vigilant in identifying and opposing voucher campaigns.*

## THE NEW FEDERAL VOUCHER PROGRAM THREATENS PUBLIC EDUCATION IN THE STATES

The federal voucher program contained in the budget reconciliation bill passed by Congress in July 2025 is the latest attempt to push vouchers into all states, including those that have historically rejected them. The program creates a 100% federal tax credit for contributions to “scholarship granting organizations” (SGOs) that distribute school vouchers. In states already operating similar voucher programs, SGOs have repeatedly been shown to lack adequate accountability and transparency, resulting in fraud, waste, and abuse of public funds.<sup>61</sup> By design, the federal voucher program diverts to private education billions in federal tax dollars that should be used for key public services including public education. It provides wealthy families with vouchers, even those that have already chosen and are paying for private education. And it lacks any antidiscrimination requirements for SGOs or the private schools they will fund.

The annual decision of whether to opt in to the federal voucher program resides with each state’s governor or another entity if designated by state law. The program will begin in 2027. Some states have already announced their intention to opt in or out.



There has never been a federal voucher program before, but the harms are foreseeable based on years of data and research on state voucher programs, including the near inevitability that the program and its negative impacts will grow from year to year.<sup>62</sup> Put simply, if California opts in, this program will take critical funding away from public schools and harm students, families, and communities across the state.

### RECOMMENDATIONS AND RESOURCES

#### *Opt Out of the Federal Voucher Program*

The expansion of private school vouchers through the new federal voucher program is part of a broader assault on public education designed to privatize one of the most important common goods underpinning American democracy. For this reason, as well as the many negative effects of vouchers noted above, California should opt out of the program. For more information about the federal voucher program’s potential impact on California, see Public Funds Public Schools’ resource [Debunking the Trump Administration’s Claims about the Federal Voucher Program](#), as well as our [Frequently Asked Questions](#) and [Explainer](#) about the program. Additional information and talking points can be found in these op-eds:

[States Should Reject Federal School Voucher Scheme](#) and [Opinion: Take Note, Gov. Polis: Coloradans Have Repeatedly Said No to School Vouchers](#).

### ***Monitor and Mobilize Against Efforts to Bring Vouchers to California***

Public school advocates should monitor efforts to bring vouchers into the state by using the Public Funds Public Schools [Voucher Bill Tracker](#), which allows users to track bills that aim to create, modify, or expand private school voucher programs. The tracker also allows users to see where similar bills have been proposed in other states. Public Funds Public Schools can connect advocates to share strategies and resources. Additionally, California's public school advocates can use the Public Funds Public Schools [Universal Voucher Price Tag Tool](#) to quantify the potential fiscal impact vouchers would have on the state.

### ***Continue to Improve Funding for Public Schools Rather Than Undermining Them with Vouchers***

California enacted the Local Control Funding Formula (LCFF) in 2013, and this investment in a more equitable school funding formula is paying off. According to Education Law Center's 2025 [Making the Grade](#) report, the state has dramatically improved on all three school funding measures (level, distribution, and effort).<sup>63</sup> Per-pupil funding increased 124% between 2014 and 2023 (from \$8,887 to \$19,894) rising from 47th in the nation to 13th.<sup>64</sup> Also, California now has the second most progressive school funding distribution in the country, meaning more state funds are directed to higher-need districts.<sup>65</sup> Evidence shows that the LCFF has increased students' math and reading achievement for tested grade levels, particularly for students in districts that received LCFF concentration grants.<sup>66</sup> Indeed, "the impacts on student achievement grew with years of exposure to increased funding and with the amount of the funding increase."<sup>67</sup> The LCFF has also shown significant impacts on reducing grade repetition and increasing the likelihood of graduating from high school.<sup>68</sup>

California should stay the course, continuing this positive trajectory on critical public school funding measures, rather than diverting tax dollars to private schools.<sup>69</sup> Advocates in California can consult Education Law Center's annual [Making the Grade](#) report to track the state's progress on measures of school funding fairness and access [state specific interactive tools](#).

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Visit the new PFPS webpage on the [Federal Voucher Program](#) for more information. Access additional PFPS webinars, tools, and resources on the PFPS [Advocacy page](#). Visit the PFPS [Research](#) page for an extensive catalogue of research about the negative effects of vouchers on academic outcomes, civil rights, school integration, public school funding, and more. PFPS is a national campaign directed by [Education Law Center](#).

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- <sup>1</sup> [2024-25 Fact Sheet: California State At-a-Glance](#), Cal. Dep't of Educ. (last visited on Dec. 12, 2025).
- <sup>2</sup> Tani Catil-Sakauye & Mark Baldassare, [Californians and Civic Education](#), Public Policy Institute of California 6 (June 2025).
- <sup>3</sup> Samuel E. Abrams & Steven J. Koutsavlis, [The Fiscal Consequences of Private School Vouchers](#), Public Funds Public Schools & Southern Poverty Law Center 4 (Mar. 2023); Robert Shand & Henry M. Levin, [Estimating a Price Tag for School Vouchers](#), National Education Policy Center 19 (May 2021).
- <sup>4</sup> Public Funds Public Schools & Advancement Project, [Save Neighborhood Schools – Say No to Private School Vouchers!](#) 1, 3 (Apr. 2025).
- <sup>5</sup> Public Funds Public Schools, [Private School Dashboard](#), California 2021-22 School Year Public School Student Population by Locale (last visited on December 12, 2025).
- <sup>6</sup> [Save Neighborhood Schools](#), *supra* note 4, at 3.
- <sup>7</sup> Dave Wells, [\\$10,700 Per Student: The Estimated Cost of Arizona's Private School Subsidy Programs](#), Grand Canyon Institute 4 (Sept. 2018).
- <sup>8</sup> Eli Hager, [School Vouchers Were Supposed to Save Taxpayer Money. Instead They Blew a Massive Hole in Arizona's Budget](#), ProPublica (July 16, 2024).
- <sup>9</sup> Casey Tolan, Rene Marsh & Nelli Black, [Arizona is sending taxpayer money to religious schools — and billionaires see it as a model for the US](#), CNN (June 19, 2024).
- <sup>10</sup> Mary McKillip, [Universal Vouchers to Cost Florida Nearly \\$4 Billion in 2024-25 School Year](#), Education Law Center (2024).
- <sup>11</sup> See, e.g., Gerard Albert & Kate Payne, [As schools lose students, Broward's superintendent grapples with possibility of closures](#), WLRN Public Media (Nov. 21, 2023); Megan Mallicoat, [3 Duval elementary schools will close soon; 3 more after a year](#), Jacksonville Today (Nov. 5, 2024).
- <sup>12</sup> See, e.g., U.S. Gov't Accountability Office, GAO-19-664, [Private School Choice: Accountability in State Tax Credit Scholarship Programs](#) 17 (Sept. 2019).
- <sup>13</sup> Craig Harris, [I-TEAM: ESA parents bought diamond rings, lingerie, and Kenmore appliances with education tax dollars](#), 12News (Aug. 18, 2025); Craig Harris, [Voucher supporters say Empowerment Scholarship fraud is 1%. New records peg mispending closer to 20%.](#), 12News (Feb. 12, 2026).
- <sup>14</sup> Ana Goñi-Lessan, [Florida school voucher audit warns of deepening financial chaos](#), Tallahassee Democrat (updated Nov. 20, 2025).
- <sup>15</sup> David DeMatthews, Torri Hart, & David Knight, [Taxpayer-funded private school vouchers and market failure: A policy scan and review from 1869 to 2024](#), 33 Ed. Pol'y Analysis Archives, at 22 (Sept. 11, 2025).
- <sup>16</sup> Christopher Lubienski & Joel Malin, [The new terrain of the school voucher wars](#), The Hill (Aug. 30, 2019).
- <sup>17</sup> Atila Abdulkadiroğlu, Parag A. Pathak & Christopher R. Walters, [Free to Choose: Can School Choice Reduce Student Achievement](#), 10 Am. Econ. J.: Applied Econ. 1 175, 176 (2018).
- <sup>18</sup> Joshua Cowen, [How School Voucher Programs Hurt Students](#), Time (Apr. 19, 2023).
- <sup>19</sup> Julie Mead & Suzanne Eckes, [How School Privatization Opens the Door for Discrimination](#), National Education Policy Center (Dec. 2018).
- <sup>20</sup> National Center for Learning Disabilities (NCLD), [Private School Vouchers, Education Savings Accounts, and Tax Incentive Programs: Implications and Considerations for Students With Disabilities](#) 13-14 (2024).
- <sup>21</sup> [2024-25 Special Education Enrollment by Program Setting](#), Cal. Dep't of Educ. (last visited on Apr. 30, 2026).
- <sup>22</sup> NCLD, *supra* note 20, at 16-18.
- <sup>23</sup> [English Learners in California Schools](#), California Department of Education (last visited on Apr. 19, 2026).
- <sup>24</sup> [Funding Student Needs Through State Policies Fact Sheet](#), Learning Policy Institute 1 (Jan. 2025).
- <sup>25</sup> Kevin G. Welner & Preston C. Green, [Private School Vouchers: Legal Challenges and Civil Rights Protections Working Paper](#), UCLA Civil Rights Project 8-9 (Mar. 5, 2018).
- <sup>26</sup> Suzanne Eckes, Julie Mead & Jessica Ulm, [Dollars to Discriminate: The \(Un\)intended Consequences of School Vouchers](#), 91(4) Peabody J. of Educ. 537, 546-47 (2016).
- <sup>27</sup> [Private Schools Frequently Asked Questions](#), California Department of Education (last visited on Apr. 19, 2026).
- <sup>28</sup> [How School Privatization Opens the Door for Discrimination](#), *supra* note 19, at 8.
- <sup>29</sup> Anna Saavedra, et al., [Searching for Common Ground: Widespread Support for Public Schools but Substantial Partisan Divides About Teaching Potentially Contested Topics](#), Univ. of Southern Cal. 12 (Feb. 2024).
- <sup>30</sup> For more than 50 years, voters have rejected voucher programs on the ballot in: Colorado, Kentucky, and Nebraska 2024; Arizona 2018; Utah 2007; Michigan and California 2000; Colorado 1998; Washington 1996; California 1993; Colorado 1992; Oregon 1990; Utah 1988; Washington, D.C. 1981; Michigan 1978; Maryland 1972;

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and Nebraska 1970. National Coalition for Public Education (NCPE), [Votes on State Voucher & Tuition Tax Credit Referenda](#) (last visited on Dec. 12, 2025).

<sup>31</sup> NCPE, *supra* note 30.

<sup>32</sup> See, e.g., *Schwartz v. Lopez*, 132 Nev. 732 (2016); *Commonwealth ex rel. Cameron v. Johnson*, 658 S.W.3d 25 (Ky. 2022); *Labresh v. Cox*, No. 240904193 (Utah 3d. Dist. Apr. 18, 2025).

<sup>33</sup> Cal. Const. Art. IX § 8.

<sup>34</sup> Mark Lieberman, Libby Stanford & Victoria A. Ifatusin, [Which States Have Private School Choice?](#), EducationWeek (updated Mar. 26, 2026).

<sup>35</sup> Lieberman, Stanford & Ifatusin, *supra* note 34.

<sup>36</sup> *The Fiscal Consequences of Private School Vouchers*, *supra* note 3, at 4.

<sup>37</sup> NCPE, *supra* note 30.

<sup>38</sup> *Exec. Order No. 14191*, 90 Fed. Reg. 8859 (Jan. 29, 2025); [U.S. Departments of Education and Treasury Release Joint Fact Sheet on Historic Education Freedom Tax Credit](#), U.S. Dep't of Education and Treasury, (Jan. 27, 2026).

<sup>39</sup> [A.G. File No. 21-0006, Amend. #1](#), (Sept. 7, 2021).

<sup>40</sup> Gabriel Petek, [Legislative Review of A.G. File No. 21-0006, Amend. #1](#), Legislative Analyst's Office, California Legislature 6, 8 (Sept. 27, 2021).

<sup>41</sup> [A.G. File No. 21-0011, Amend. #1](#), (Sept. 27, 2021).

<sup>42</sup> Gabriel Petek, [Legislative Review of A.G. File No. 21-0011, Amend. #1](#), Legislative Analyst's Office, California Legislature 8 (Oct. 13, 2021).

<sup>43</sup> [Legislative Review of A.G. File No. 21-0006, Amend. #1](#), *supra* note 40, at 8; [Legislative Review of A.G. File No. 21-0011, Amend. #1](#), *supra* note 42, at 9.

<sup>44</sup> Children's Educational Opportunity Act, [Meet the Team](#) (last visited on Apr. 29, 2026).

<sup>45</sup> [Amendments to the Children's Educational Opportunity Act - 23-0026](#), (Oct. 3, 2023).

<sup>46</sup> [Title and Summary \(23-0026A1\)](#), Office of the Attorney General of California (Nov. 17, 2023).

<sup>47</sup> [Title and Summary](#), *supra* note 46.

<sup>48</sup> [Title and Summary](#), *supra* note 46.

<sup>49</sup> Ballotpedia, [California Education Savings Accounts Initiative \(#23-0026\)](#) (last visited on Apr. 29, 2026).

<sup>50</sup> Children's Educational Opportunity Act, [Meet the Team](#) (last visited on Apr. 29, 2026).

<sup>51</sup> [A.G. File No. 25-0014](#) (Aug. 14, 2025).

<sup>52</sup> [A.G. File No. 25-0014](#), *supra* note 51.

<sup>53</sup> Ballotpedia, [California Establish Education Savings Account and Repeal Blaine Amendment Initiative \(#25-0014\)](#), (last visited on Apr. 18, 2026).

<sup>54</sup> [S.B. 64](#), Reg. Sess. (Ca. 2025-26).

<sup>55</sup> Senate Committee on Education, [SB 64 Bill Analysis](#), Reg. Sess. (Ca. 2024-25).

<sup>56</sup> [S.B. 64](#), *supra* note 54.

<sup>57</sup> [S.C.A. 1](#), Reg. Sess. (Ca. 2025-26).

<sup>58</sup> [S.C.A. 1](#), *supra* note 57.

<sup>59</sup> [A.B. 19](#), Reg. Sess. (Ca. 2025-26).

<sup>60</sup> [A.B. 19](#), *supra* note 59.

<sup>61</sup> See, e.g., Dr. Sarah Butzin, [Step Up for Students Preliminary Investigative Report](#), League of Women Voters of Florida (Mar. 2021).

<sup>62</sup> Shar Porier, [ESA vouchers have cost Arizona taxpayers nearly \\$1 billion](#), Herald Review (Jan. 31, 2024); Leslie Postal, [Florida's voucher plan could cost public schools nearly \\$4 billion, report says](#), Orlando Sentinel (updated Jan. 27, 2023); Laura Hancock, [Private school vouchers: Scholarships blow past estimates as state spending nears \\$1 billion](#), Cleveland.com (updated Mar. 26, 2024).

<sup>63</sup> Danielle Farrie & Robert Kim, [2025 Making the Grade: How Fair Is School Funding In Your State?](#), Education Law Center 13, 17, 23 (2025).

<sup>64</sup> [Making the Grade Funding Level Profile California](#), (last visited on May 4, 2026).

<sup>65</sup> Farrie & Kim, *supra* Note 63, at 12-13.

<sup>66</sup> Rucker Johnson, [School Funding Effectiveness: Evidence From California's Local Control Funding Formula](#), Learning Policy Institute iv-v (Aug. 2023).

<sup>67</sup> Johnson, *supra* Note 66, at 1.

<sup>68</sup> Johnson, *supra* Note 66, at 20-22.

<sup>69</sup> See, e.g., Ballotpedia, [California Renew State Income Tax Increase for Education Funding Initiative \(#25-0016\)](#); [Our Fight for School Funding: Prop 55 Extension](#), California Teachers Association (last visited on Apr. 30, 2026).