



# The Stakes Are Too High to Ignore the Trump-DeVos Agenda

By Catherine Brown and Meg Benner      September 5, 2017

In the wake of the 2016 presidential election, some advocates<sup>1</sup> and philanthropists are shifting their focus and energy from the federal level to the state and local level in the hopes of maintaining the momentum of gains made by the Obama administration. As Ernest Young, a professor at Duke University, describes, “[f]ederalism is not a conservative or liberal thing. ... It offers a way of not having all your eggs in one basket.”<sup>2</sup> This approach is important but incomplete.

Since the nation’s founding, states and the school districts they created have been in the driver’s seat when it comes to education policy; they are central to the academic outcomes and well-being of children nationwide. While the No Child Left Behind era saw a strengthened federal role and increased federal funding for education,<sup>3</sup> states and localities have always provided the vast majority of school funding and made the majority of important decisions about how schools operate.

At the same time, the federal government also plays a critical role in the education sector. Despite President Donald Trump<sup>4</sup> and Secretary of Education Betsy DeVos’ dismissal<sup>5</sup> of the importance of this role,<sup>6</sup> the federal government is essential to building the capacity and overseeing the activities of states and localities. Regardless of the party affiliation or priorities of the administration, federal dollars and influence help shape the policies that govern every public school in the country.

DeVos and Trump have the potential to affect student achievement and well-being far beyond private school vouchers—seemingly their main priority.<sup>7</sup> Left unchecked, their approach to budget cuts,<sup>8</sup> their limited oversight of federal programs, and their attempts to scale back civil rights enforcement<sup>9</sup> will inhibit progress over the next four years; chip away at the potential for states to guarantee access to high-quality education; and hinder future administrations’ ability to advance student outcomes.

Advocates, policymakers, and philanthropists should consider the importance of the federal role in education before diverting all energy to state and district policies. Staunch advocacy can temper the Trump-DeVos agenda by offering alternatives to Congress, forcing the administration to adopt less radical policies, and holding the

administration accountable. Additionally, a focus on federal policy will help cultivate bold ideas to increase equity and advance student outcomes nationwide. This issue brief explains why it is critical to invest time and resources in federal advocacy and why federal dollars, discretion, and priorities matter. It also describes how federal policies affect students' education and well-being, as well as help determine future progress in the education sector.

---

## Federal dollars matter

Federal funding constitutes a small but critical portion of total education spending. As a result, any cuts to federal funding have a direct effect on students and schools. Trump's proposal to cut 13.5 percent of the U.S. Department of Education's budget and the Congressional appropriations process that implements some of these cuts would have a dramatic and devastating impact.<sup>10</sup>

On average, the federal government contributes about 10 percent to the total amount spent on public education, but these dollars account for a larger portion of many high-poverty districts' budgets.<sup>11</sup> For example, Los Angeles Unified School District and Chicago Public Schools—both high-poverty districts—receive about 15 percent of their budgets from the Education Department.<sup>12</sup> These dollars serve essential purposes, such as supplementing services for low-income students, defraying the cost of individualized education programs for students with disabilities, and compensating for a loss of property tax due to federally owned land. While federal cuts to education would cause all districts to either reduce services or compensate for deficits with state or local dollars, Trump's proposed budget would have the most severe impact on districts with high concentrations of poverty and other challenges.

Federal dollars are also critical to the viability, programming, and existence of state education agencies (SEAs). While the majority of federal dollars flow to localities and schools, SEAs also rely on federal funds to innovate and support districts. Most federal education funding formulas allow states to set aside, or reserve, a small portion ranging from 1 percent to 5 percent of state allocations to implement programs and support districts.<sup>13</sup> Even though 95 percent to 99 percent of funding flows to school districts, these set-asides are a significant source of SEAs' revenue.

For example, the federal government allocates \$2.1 billion to Title II Part A for teacher training, development, and salaries.<sup>14</sup> The 5 percent set-aside provides an estimated \$4.7 million for a large state such as Florida, \$1.1 million for midsized Oregon, and \$500,000 for a small state such as Maine.<sup>15</sup> Even in the smallest states, the set-aside is enough to fund a small team to develop and implement important teacher pipeline reforms. These include reforming certification and licensure; developing evaluation and support systems; establishing or expanding teacher or school leader academies; and developing

or supporting high-quality professional development and career ladder opportunities. Trump's recent proposal to eliminate Title II, which was advanced last month by a House Committee on Appropriations,<sup>16</sup> entirely puts at risk these evidence-based reform efforts, which are up to states to implement.<sup>17</sup> Advocates must work to minimize cuts to Title II and other federal programs to ensure that states and districts have operating funds and the ability to implement innovative policies and programs with fidelity.

---

## Federal discretion and priorities change the policy debate

Big-ticket programs are not the only source of Washington's influence in the education sector. The Department of Education's discretion and priorities shape the education reform debate and, as a result, affect state and district policies.

The Education Department oversees the implementation of every national education law. While Congress articulates state and district requirements and the uses of funds in legislation, the education secretary interprets and enforces those provisions. For example, the Education Department is currently reviewing the Every Student Succeeds Act (ESSA) consolidated state plans. In addition to other objectives, these plans will describe the accountability framework that each state will use to measure and improve its schools' performance.<sup>18</sup>

ESSA indicates that states must use evidence-based strategies to support low-performing schools, but Education Secretary DeVos will evaluate whether the strategies described in each state plan conform to that requirement.<sup>19</sup> During an exchange with Sen. Chris Murphy (D-CT) at a hearing to defend the fiscal year 2018 proposed presidential budget, DeVos refused to dismiss painting walls as a evidence-based strategy to improve school performance.<sup>20</sup> And after a celebrated bipartisan effort to reauthorize ESSA—in addition to other federal education policies—the possibility of progress rests largely in the hands of the Education Department. Surely, many states will employ proven turnaround strategies regardless of the Education Department's oversight. But without a strong backstop at the federal level, the country may regress to the patchwork of school quality that the No Child Left Behind era sought to correct.<sup>21</sup>

Furthermore, each federal administration has its own policy agenda—conveyed in competitive priorities in grants, technical assistance, and rhetoric. Using these levers, the Education Department can create incentives for states to adopt certain policies. Through the Race to the Top initiative, for example, the Obama administration succeeded in incentivizing states: Even with relatively small pots of money—just \$4 billion, or less than 2 percent of federal education spending—the administration encouraged states to prioritize innovative teacher and principal reforms and develop rigorous academic standards.<sup>22</sup> Thirty-four states modified their policies in response to the federal initiative, even though only 19 states received federal funding to do so.<sup>23</sup>

If advocates and funders don't strongly oppose the Trump administration's priorities in education, many states are likely to follow the administration's lead. States are already responding to the Trump administration's unfounded priorities.<sup>24</sup> In 2017 alone, 34 states have proposed voucher legislation<sup>25</sup> and 18 states have introduced anti-Common Core legislation<sup>26</sup>—both DeVos and Trump have attacked these standards.<sup>27</sup> States need support to resist conforming to the administration's vision.

---

## Enforcement of civil rights affects student well-being

The Department of Education, along with the U.S. Department of Justice, enforces students' civil rights, which are fundamental to ensuring that every child has equal access to educational opportunities and feels safe and secure in school. Every administration has a different philosophy that governs the work of the Education Department's Office for Civil Rights (OCR).<sup>28</sup> Education Secretary DeVos' actions show a clear deprioritization of the office: Under her leadership, the Education Department announced that the OCR will not actively investigate patterns of discriminatory practices,<sup>29</sup> rolled back guidance to prevent discrimination against transgender students,<sup>30</sup> and refused to commit to continue the Civil Rights Data Collection.<sup>31</sup>

The Trump administration does not have the authority to roll back civil rights laws, but it can decide the extent to which they are enforced and it can cut the staff and slow the rate of claims that it investigates. Previous administrations have adjusted the pace of enforcement based on their ideology and political will.<sup>32</sup> For example, then-President Richard Nixon ordered the OCR to not issue clarification to guidance around school integration in hopes of slowing desegregation.<sup>33</sup> Then-OCR Director Leon Panetta was forced to resign after he contradicted the president and agreed to issue clarification.<sup>34</sup> At any given time, the OCR must evaluate violations of federal civil rights laws; it will now be up to Education Secretary DeVos to decide if violations are addressed or swept under the rug.

Furthermore, voucher programs—which Trump and DeVos seek to expand—often do not require participating private schools to follow federal civil rights laws. This means that these private schools may accept or dismiss students on the basis of religion, gender identity, and disability status. When asked specifically about this in a House Appropriations Subcommittee on Labor, Health and Human Services and Education, and Related Agencies meeting in May, Education Secretary DeVos refused to guarantee that she would prohibit private schools from receiving federal dollars if they discriminate.<sup>35</sup>

Continuous, rigorous oversight of civil rights enforcement will make it far more difficult for the administration to turn a blind eye to discrimination.

## Children are affected by more than just education policy

Just as the Department of Justice has a hand in protecting students' civil rights, other federal agencies' policies and budgets influence children nationwide. Immigration, nutrition, health care, and housing policies shape the stability, safety, and well-being of children. Outside of education, many cuts proposed in President Trump's fiscal year 2018 budget—including stripping funding for Medicaid, school breakfast and lunch programs, and short-term federal income assistance for low-income families—would slash much-needed services or leave states holding the bag.

The needs of students and families are inherently interconnected. And the elimination of these services would not make these needs disappear. If early childhood education is cut, children will enter kindergarten less prepared. If housing assistance is cut, children may be forced to move, meaning that they change schools more often—and lose what is often their strongest source of stability. If immigrants are targeted, children whose parents are immigrants or who are immigrants themselves will live in fear of deportation.<sup>36</sup> If Medicaid is cut, not only will it increase the number of uninsured children without access to needed medical care, but it will also put the jobs of thousands of school nurses, psychologists, and physical therapists at risk.<sup>37</sup> This would hurt health outcomes for many children, especially those with disabilities.

With less federal funding, states would have to cut programs and jobs such as these, or draw funding from other programs to make up the difference. States will be forced to triage students' basic needs, leaving states and districts with less funding that they can use to innovate and improve schools.

Thanks to the relentless advocacy, however, it is clear that Trump will have an uphill battle to realize his proposals in various policy areas. Congress did not approve a plan to repeal the Affordable Care Act, no matter how many times congressional Republican leadership tried.<sup>38</sup> Judicial review delayed and minimized the impact of his travel ban.<sup>39</sup>

---

## Bold federal policy ideas will foster future progress

Federal action that reverses hard-fought advances in accountability, student protections, or federal investment moves back the starting point for future progress. Changes enacted by the Trump administration today—such as slashing the capacity of the OCR,<sup>40</sup> eliminating the regulation to improve the quality of teacher preparation programs,<sup>41</sup> or weakening rules that protect students from deceptive borrowing practices<sup>42</sup>—will require policymakers and advocates to revisit debates in the future in order to recover previously achieved successes.

Some of President Trump's proposals are in motion. For example, the House Appropriations Committee spending bill notably reflects elements of Trump's proposed fiscal year 2018 budget, including zeroing out Title II.<sup>43</sup> This should come as no surprise, as House Speaker Paul Ryan's (R-WI) work is the inspiration for much of the budget proposal. As both the former House Budget Committee chairman and as speaker, Ryan has proposed large cuts to education.<sup>44</sup>

For this reason, it is critical to fight to maintain—not just advance—programs and policies that boost student outcomes and well-being. For example, every dollar preserved in the budget for key federal programs has an impact. Even small cuts can make the difference between states and districts being able to creatively implement promising ideas such as personalized learning or teacher career ladders and struggling to maintain current resources. As demonstrated by the fiscal year 2017 budget deal, Congress can be more level-headed. It passed a bipartisan bill that did not fund Trump's border wall and increased funding for Title I of ESSA.<sup>45</sup> As with health care, advocacy can prevent Congress' passage of detrimental policies.

With this in mind, advocates and policymakers should develop a forward-looking vision for federal policy to inspire current members and future policymakers. The federal education space is currently engrossed in debates about the merits of the Department of Education<sup>46</sup> and the need for federal protections against discrimination in schools.<sup>47</sup> This is a departure from last year's substantive conversations around refining state accountability systems, modernizing the teaching profession, and lowering college tuition. Advocates and policymakers should invest energy and resources to develop bold federal policies to combat the current administration's agenda and to serve as a road map once the political powers in Washington change.

---

## Conclusion

It is critical to maintain a focus on federal education and related policies, even if federal progress will be an uphill battle over the next four years. The dollars and messages that the federal government sends to states and districts transform the education policy debate and shape opportunities for the nation's students. Additionally, it is critical to resist an effort to roll back the influence of the federal government now, since it would be hard to correct for in future administrations.

There is an alternative to the Trump-DeVos agenda, however. Advocacy has and can temper the administration's policy proposals and compel Congress to act in the best interest of its constituents. It is necessary to preserve the importance of the Department of Education, maintain a watchful eye on the implementation of federal programs and protection of civil rights, and resist the administration's proposed harmful policies.

*Catherine Brown is the vice president of Education Policy at the Center for American Progress. Meg Benner is a senior consultant for the Center.*



---

## Endnotes

- 1 Emma Green, "The Ideological Reasons Why Democrats Have Neglected Local Politics," *The Atlantic*, January 4, 2017, available at <https://www.theatlantic.com/politics/archive/2017/01/the-ideological-reasons-why-democrats-have-neglected-local-politics/512024/>.
- 2 Ibid.
- 3 *No Child Left Behind Act of 2001*, Public Law 107–110, 107th Cong. (January 8, 2002)
- 4 Erica L. Green, "Trump Orders Review of Education Policies to Strengthen Local Control," *The New York Times*, April 26, 2017, available at <https://www.nytimes.com/2017/04/26/us/politics/trump-education-policy-review.html?mcubz=0&r=0>.
- 5 Casey Quinlan, "Betsy DeVos' interviews show a willingness to cut the Department of Education," ThinkProgress, February 17, 2017, available at <https://thinkprogress.org/betsy-devos-education-policies-46608a6da03a>.
- 6 U.S. Department of Education, "U.S. Secretary of Education Betsy DeVos' Prepared Remarks at the 2017 Conservative Political Action Conference," Press release, February 23, 2017, available at <https://www.ed.gov/news/speeches/us-secretary-education-betsy-devos%E2%80%99-prepared-remarks-2017-conservative-political-action-conference>.
- 7 Emma Brown, Valerie Strauss, and Danielle Douglas-Gabriel, "Trump's first full education budget: Deep cuts to public school programs in pursuit of school choice," *The Washington Post*, May 17, 2017, available at [https://www.washingtonpost.com/local/education/trumps-first-full-education-budget-deep-cuts-to-public-school-programs-in-pursuit-of-school-choice/2017/05/17/2a25a2cc-3a41-11e7-8854-21f359183e8c\\_story.html?utm\\_term=.2724c4067939](https://www.washingtonpost.com/local/education/trumps-first-full-education-budget-deep-cuts-to-public-school-programs-in-pursuit-of-school-choice/2017/05/17/2a25a2cc-3a41-11e7-8854-21f359183e8c_story.html?utm_term=.2724c4067939)
- 8 U.S. Department of Education, *Fiscal Year 2018 Budget Summary and Background Information* (2017), available at <https://www2.ed.gov/about/overview/budget/budget18/summary/18summary.pdf>.
- 9 Erica L. Green, "Education Dept. Says It Will Scale Back Civil Rights Investigations," *The New York Times*, June 16, 2017, available at <https://www.nytimes.com/2017/06/16/us/politics/education-department-civil-rights-betsy-devos.html?mcubz=0>.
- 10 Kim Soffen and Denise Lu, "What Trump cut in his agency budgets," *The Washington Post*, May 23, 2017, available at [https://www.washingtonpost.com/graphics/politics/trump-presidential-budget-2018-proposal/?utm\\_term=.e3480b483fad](https://www.washingtonpost.com/graphics/politics/trump-presidential-budget-2018-proposal/?utm_term=.e3480b483fad).
- 11 National Center for Education Statistics, *Revenues and Expenditures for Public Elementary and Secondary School Districts: School Year 2011-12 (Fiscal Year 2017)* (U.S. Department of Education, 2015), available at <https://nces.ed.gov/pubs2014/2014303.pdf>.
- 12 Ibid.
- 13 Council of Chief State School Officers, "Summary of Significant Spending and Fiscal Rules in the Every Student Succeeds Act" (2016) available at <http://www.ccsso.org/Documents/Summary%20of%20Significant%20Spending%20and%20Fiscal%20Rules%20in%20ESSA%20-%2003092016.pdf>.
- 14 U.S. Department of Education, *Supporting Effective Instruction State Grants* (2016), p. 8, available at <https://www2.ed.gov/about/overview/budget/statetables/17stbypprogram.pdf>.
- 15 Ibid.
- 16 U.S. House of Representatives Committee on Appropriations, "Appropriations Committee Approves the Fiscal Year 2018 Labor, Health and Human Services, Education Funding Bill," Press release, July 19, 2017, available at <https://appropriations.house.gov/news/documentsingle.aspx?DocumentID=395026>.
- 17 U.S. Department of Education, *Fiscal Year 2018 Budget Summary and Background Information*.
- 18 U.S. Department of Education, "ESSA Consolidated State Plans," available at <https://www2.ed.gov/admins/lead/account/stateplan17/plans.html> (last accessed July 2017).
- 19 *Every Student Succeeds Act*, Public Law 114–95, 114th Cong., 1st sess. (December 10, 2015).
- 20 Andrew Ujifusa, "ESSA Plans Have to Follow the Law, Not Conform to My Beliefs, DeVos Says," *Education Week*, June 7, 2017, available at [http://blogs.edweek.org/edweek/campaign-k-12/2017/06/essa\\_plan\\_approval\\_devos\\_hearing.html](http://blogs.edweek.org/edweek/campaign-k-12/2017/06/essa_plan_approval_devos_hearing.html).
- 21 "Text: Bush on Education," *The Washington Post* via eMediaMillWorks, January 8, 2001, available at [http://www.washingtonpost.com/wp-srv/onpolitics/transcripts/bush-text\\_010802.htm](http://www.washingtonpost.com/wp-srv/onpolitics/transcripts/bush-text_010802.htm).
- 22 The White House of President Barack Obama, "Race to the Top," available at <https://obamawhitehouse.archives.gov/issues/education/k-12/race-to-the-top> (last accessed July 2017).
- 23 Ibid.
- 24 Mark Dynarski, "On negative effects of vouchers" (Washington: Brookings Institution, 2016), available at <https://www.brookings.edu/research/on-negative-effects-of-vouchers/>.
- 25 Sarah Tully, "Most States Are Pushing Private School Choice Bills, But Some Are Faltering," *Education Week*, April 5, 2017, available at [http://blogs.edweek.org/edweek/charterschoice/2017/04/most\\_states\\_are\\_pushing\\_private\\_school\\_choice\\_bills\\_but\\_some\\_may\\_stall\\_out.html](http://blogs.edweek.org/edweek/charterschoice/2017/04/most_states_are_pushing_private_school_choice_bills_but_some_may_stall_out.html).
- 26 College and Career Readiness State Legislation, "2017 Overview," available at <http://www.ccrslegislation.info/legislation-by-year/twenty-seventeen/> (last accessed July 2017).
- 27 Gabby Morrongiello, "DeVos vows to end Common Core at Michigan rally with Trump," *Washington Examiner*, December 9, 2016, available at <http://www.washingtonexaminer.com/devos-vows-to-end-common-core-at-michigan-rally-with-trump/article/2609326>; Cory Turner, "Can A President Trump Get Rid Of Common Core?," NPRED, November 10, 2016, available at <http://www.npr.org/sections/ed/2016/11/10/501426803/can-president-trump-get-rid-of-common-core>.
- 28 James S. Murphy, "The Office for Civil Rights's Volatile Power," *The Atlantic*, March 13, 2017, available at <https://www.theatlantic.com/education/archive/2017/03/the-office-for-civil-rights-volatile-power/519072/>.
- 29 Green, "Education Dept. Says It Will Scale Back Civil Rights Investigations."
- 30 Jeremy W. Peters, Jo Becker, and Julie Hirschfeld Davis, "Trump Rescinds Rules on Bathrooms for Transgender Students," *The New York Times*, February 22, 2017, available at <https://www.nytimes.com/2017/02/22/us/politics/devos-sessions-transgender-students-rights.html?mcubz=0>.
- 31 U.S. Senate Committee on Health, Education, Labor, and Pensions, "Nomination of Betsy DeVos to serve as Secretary of Education," January 17, 2017, available at <https://www.help.senate.gov/hearings/nomination-of-betsy-devos-to-serve-as-secretary-of-education>.
- 32 Murphy, "The Office for Civil Rights's Volatile Power."
- 33 Ibid.
- 34 Ibid.

- 35 Emma Brown, "DeVos won't say whether she'd withhold federal funds from private schools that discriminate," *The Washington Post*, May 24, 2017, available at [https://www.washingtonpost.com/local/education/devos-to-testify-on-trumps-budget-her-first-time-before-congress-since-rocky-confirmation-hearing/2017/05/23/db2934e8-3fe2-11e7-adba-394ee67a7582\\_story.html?utm\\_term=.c9a1822a7cc3](https://www.washingtonpost.com/local/education/devos-to-testify-on-trumps-budget-her-first-time-before-congress-since-rocky-confirmation-hearing/2017/05/23/db2934e8-3fe2-11e7-adba-394ee67a7582_story.html?utm_term=.c9a1822a7cc3).
- 36 Fernando Stein, American Academy of Pediatrics, "AAP Statement on Protecting Immigrant Children," Press release, January 25, 2017, available at <https://www.aap.org/en-us/about-the-aap/aap-press-room/pages/aapstatementonprotectingimmigrantchildren.aspx>.
- 37 Lisette Partelow and Kami Spicklemire, "Proposed Cuts to Medicaid Could Mean Big Cuts to School-Based Health Services," Center for American Progress, March 24, 2017, available at <https://www.americanprogress.org/issues/education/news/2017/03/24/429032/proposed-cuts-medicaid-mean-big-cuts-school-based-health-services/>.
- 38 Robert Pear and Thomas Kaplan, "Senate Rejects Slimmed-Down Obamacare Repeal as McCain Votes No," *The New York Times*, July 27, 2017, available at <https://www.nytimes.com/2017/07/27/us/politics/obamacare-partial-repeal-senate-republicans-revolt.html?mcubz=0&r=0>.
- 39 Garrett Epps, "Trump's Limited Travel Ban Victory," *The Atlantic*, June 26, 2017, available at <https://www.theatlantic.com/politics/archive/2017/06/the-trump-administrations-limited-victory/531708/>.
- 40 Juliet Eilperin, Emma Brown, and Darryl Fears, "Trump administration plans to minimize civil rights efforts in agencies," *The Washington Post*, May 29, 2017, available at [https://www.washingtonpost.com/politics/trump-administration-plans-to-minimize-civil-rights-efforts-in-agencies/2017/05/29/922fc1b2-39a7-11e7-a058-ddbb23c75d82\\_story.html?utm\\_term=.507acbe441c8](https://www.washingtonpost.com/politics/trump-administration-plans-to-minimize-civil-rights-efforts-in-agencies/2017/05/29/922fc1b2-39a7-11e7-a058-ddbb23c75d82_story.html?utm_term=.507acbe441c8).
- 41 Brenda Iasevoli, "Trump Signs Bill Scrapping Teacher-Prep Rules," *Education Week*, March 28, 2017, available at [http://blogs.edweek.org/edweek/teacherbeat/2017/03/trump\\_signs\\_bill\\_scrapping\\_tea.html](http://blogs.edweek.org/edweek/teacherbeat/2017/03/trump_signs_bill_scrapping_tea.html).
- 42 Danielle Douglas-Gabriel, "Attorneys general sue DeVos over delay of rule to protect students from predatory colleges," *The Washington Post*, July 6, 2017, available at [https://www.washingtonpost.com/news/grade-point/wp/2017/07/06/attorneys-general-sue-devos-over-delay-of-rule-to-protect-students-from-predatory-colleges/?utm\\_term=.84b025bd30cc](https://www.washingtonpost.com/news/grade-point/wp/2017/07/06/attorneys-general-sue-devos-over-delay-of-rule-to-protect-students-from-predatory-colleges/?utm_term=.84b025bd30cc).
- 43 U.S. House of Representatives Committee on Appropriations, "Appropriations Committee Releases the Fiscal Year 2018 Labor, Health and Human Services, Education Funding Bill," Press release, July 12, 2017, available at <https://appropriations.house.gov/news/documentsingle.aspx?DocumentID=394995>.
- 44 Richard Kogan and Issac Shapiro, "House GOP Budget Gets 62 Percent Cuts From Low- and Moderate-Income Programs" (Washington: Center on Budget and Policy Priorities, 2016), available at <https://www.cbpp.org/research/federal-budget/house-gop-budget-gets-62-percent-of-budget-cuts-from-low-and-moderate-income>.
- 45 Andrew Ujifusa, "Budget Deal for 2017 Includes Increases for Title I, Special Education," *Education Week*, May 1, 2017, available at [http://blogs.edweek.org/edweek/campaign-k-12/2017/05/budget\\_deal\\_2017\\_title\\_i\\_special\\_education\\_spending.html](http://blogs.edweek.org/edweek/campaign-k-12/2017/05/budget_deal_2017_title_i_special_education_spending.html); Burgess Everett, John Bresnahan, and Sarah Ferris, "Congress strikes budget deal that shortchanges Trump," *Politico*, April 20, 2017, available at <http://www.politico.com/story/2017/04/30/budget-deal-congress-shutdown-237822>.
- 46 Quinlan, "Betsy DeVos' interviews show a willingness to cut the Department of Education."
- 47 Brown, "DeVos won't say whether she'd withhold federal funds from private schools that discriminate."