

POSITIVE CHANGE TYPE

Row Labels	Count of I am most EXCITED about the following rule change (please choose ONE):	
I am excited about a change that is not listed above	3	
I am not excited about anything	15	25.4%
Only requiring a parent attestation when no expenses were made in a quarter	6	
Removing confusing references to Quarterly Expense Reports from Rule	13	22.0%
Requiring ADE to include the appeal process in the Parent Handbook	2	
Requiring the expense review process be included in the Parent Handbook	6	
Rules becoming consistent with in the Parent Handbook	14	
Grand Total	59	

***Note: Of the roughly 9,600+ Parents/Guardians on the program, 59 survey responses received**

POSITIVE CHANGE DETAILS

Row Labels	Count of COMMENTS	
ClassWallet's procedures replaces former quarterly expense repots	1	
Consistency - ADE Decisions	3	
Consistency - Parent Handbook/Rule	9	16.1%
Debit Card Issues Remedied	1	
Eligibility allows combination of time spent in public school from two previous years.	1	
Ending ADE changes happening without notice to Parents/Guardians	1	
Good	1	
Increased Eligibility	1	
Increased Flexibility	2	
Less Confusion	3	
Make Program more user friendly	1	
N/A	14	25.0%
Parent Handbook being complete with ALL necessary information on program vs. having to hunt around in various locations for information.	4	
Reduction in unnecessary tasks	2	
Removal of Expense Reports language	3	
Simplicity	8	
Time Savings	1	
Grand Total	56	

*Some comments expressing concerns were mistakenly placed here, but were reallocated to the concern tab

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POSITIVE CHANGE FREE RESPONSES

I am most **EXCITED** about this rule change due to:

- 1 Debit card expense approval
- 2 The vast amount of inconsistencies that we are experiencing with the program right now.
- 3 Na
- 4 Maybe a written expense review process will create more consistency in approvals that are coming from ADE.
- 5 Making this program more user friendly.
- 6 Confusion and not being notified about changes made, being unaware of rules or changes that happen without notice
Everything should be in the parent handbook. It's very frustrating that we have to search in so many places for information. It's also
- 7 incredibly disappointing that this survey was not sent out to every ESA family and instead is just on the website.
I am glad public school days an hours can be combined from the prior and current school years to qualify. It will help more kids that need an
- 8 alternative sooner. I'm also glad funds will be distributed during a stay on an appeal.
While I want to be most excited about the rules becoming more consistent with the handbook (because this is what ESA staff uses against us)
- 9 I don't feel like you've accomplished very much of that.
I think that the handbook should be consistent with the rules. Not the other way around. I think account holders should all be aware of the
rules and statute. Both should be included in the handbook. ADE staff currently use the handbook wording against account holders. This
practice instills fear and distrust. Account holders are confused and don't know what is allowed. This severely obstructs student
- 10 education. It is crucial that the handbook is consistent with the rules and actually includes all state statute and rules.
- 11 Unnecessary submittals - all payments through ClassWallet have to be approved in the first place.
- 12 Clarification that this process is no longer necessary
- 13 Less confusion
- 14 n/a
- 15 N/A
- 16 There are no more expense reports so it makes sense to remove.
- 17 Yes
- 18 Stress of missing a deadline that may or may not exist.
- 19 Too much confusion and monkey business between approved and unapproved items
- 20 N/A
- 21 n/a
- 22 Having everything read the same
- 23 It will be easier to not submit reports
- 24 N/A

POSITIVE CHANGE FREE RESPONSES

- 25 Its confusing when information is omitted or different depending on where it is located.
- 26 Consistency
- 27 ensuring that ESA staff is following the rules and not making up something to suit their needs.
The requirements for eligibility. I think reducing it from 100 days to 45 days of schooling is good. However, the subsections are a bit confusing. 200 hrs vs 400 hrs of online instruction seems unnecessary. Why not keep it simple? 45 days is 45 days. Online instruction days should be counted the same.
- 28 should be counted the same.
- 29 More flexible
- 30 Consistent and in writing
- 31 reduction in unnecessary tasks for parents
- 32 NA
- 33 Na
- 34 Consistency
- 35 The time it takes to complete.
- 36 Cohesion is helpful
- 37 Easy one-stop access to rules
- 38 â€”-
- 39 saving time
- 40 Expense reports were stressful
- 41 My frustration in the past regarding appeals and receiving no help or wiggle room along the way.
- 42 Previous lack of important information In The parent handbook
- 43 simplicity
- 44 How confusing some of the processes can be if not explained.
I am NOT excited. I am unhappy. Parents have completed surveys, written emails, and spoken to the staff and to the Board. Changes we requested regarding privacy and ADE communicating clearly about suspending or closing accounts have STILL not been addressed. Plus now a new rule has been slipped in to close accounts 10 days after a quarter ends if a card purchase has an error on its invoice/receipt. NOT
- 45 OK, or, it's exciting in a very negative way.
- 46 Some quarters are heavy expenses than others
- 47 Class wallet takes care of this requirement with the submission of an invoice.
- 48 Good changes, not exciting
- 49 That way i can pay a school or a tutoring agency upfront
- 50 nothing
I have a letter to submit from an OT and I have found it difficult to do so when trying to make a purchase. Having the ability to do this
- 51 without an extra step would be great.
- 52 N/a

POSITIVE CHANGE FREE RESPONSES

- 53 Because it gives us the chance to explain why there were no expenses.
- 54 makes it easier to follow.
- 55 easier to list services
- 56 I have no issues with current processes.
- 57 Not excited
- 58 Instructions being clear
- 59 Less confusion.

CONCERN TYPES

Row Labels	Count of I am most CONCERNED about the following rule change (please choose ONE):	
Clarifying process to re-activate ESA Accounts that were not renewed	1	
Clarifying when the Board will review appeal recommendations	1	
I am concerned about a change that is not listed above	13	
I am not concerned about anything	36	61.0%
Only requiring a parent attestation when no expenses were made in a quarter	1	
Other changing on timing of appeals	2	
Removing confusing references to Quarterly Expense Reports from Rule	2	
Requiring the expense review process be included in the Parent Handbook	1	
Rules becoming consistent with in the Parent Handbook	2	
Grand Total	59	

***Note: Of the roughly 9,600+ Parents/Guardians on the program, 59 survey responses received**

CONCERN DETAILS

Row Labels	Count of COMMENTS	
ADE	14	
Actions instills fear and distrust	1	
Approvals are still inconsistent	2	
Communication is not clear	1	
Debit card receipt being uploaded quarterly	1	
Debit Card transactions not reviewed timely (within 30 days)	1	
Excluding Access Fees for monthly school payments	1	
How Technology is approved/denied	1	
Inconsistency with expense reviews	1	
Parents are held to a higher expense review standard than ADE	1	
Privacy Concerns not addressed	1	
Reactivating ESA Accounts is confusing	1	
Staff uses handbook wording against Parents	1	
Supporting documentation submission redundant	1	
Board	3	
Parent feedback being ignored	1	
Parents don't understand appeals process	1	
Privacy Concerns not addressed	1	
Communication	5	
ADE emails are often routed to spam	1	
ADE should sent certified letters, not just emails	1	
ADE's database is not functional	1	
Database changes without communication	1	
Parents don't know what is allowed	1	
Handbook	4	
Not written correctly off of ESA Rules	1	
Parents have no way to know if their expenses are allowed	1	
Should be consistent with Rule. Not other way around	1	
Should include Statute and Rule	1	
N/A	42	59 Parents/Guardians responded to the survey
Privacy Concerns	2	71.2% of those surveyed have no concerns
Proof of payment method for reimbursements	2	Remaining 38 comments were made by 17 people
Risk-Based Audits	5	
Concerning since ADE is still very inconsistent	1	
Nothing regulating or defining risk-based audits	1	
Older purchases being open to ADE scrutiny can cause financial hardship for families; institute a time limit	1	
Relieve ADE of their responsibility to review expenses	1	
Render parents susceptible to large financial risk	1	
Rule	2	
Appeals should be as quick as possible	1	
Changes did not accomplish much	1	
Statute	3	
10 days notification prior to account closures is not enough time	2	
Change Online Schooling Eligibility Requirements	1	
Grand Total	80	

*Includes comments expressing concerns that were mistakenly placed in the incorrect survey section

*Note: Of the roughly 9,600+ Parents/Guardians on the program, 59 survey responses received

CONCERN FREE RESPONSES

I am most **CONCERNED** about this rule change due to:

1 N/A

2 Concerned that there is not enough expansion on the Risk-based audit system.

3 Na

I am concerned that parents are still held to a two-year audit period, but the Department is being relieved of their duty to review expenses on a quarterly basis or allowed only risk-based audits. We still have no functional database and very inconsistent approvals coming from department staff. This leaves parents with no way of knowing if/when our expenses are approved or allowed. This is extremely stressful and opens parents up to the potential for a large financial risk if a weekly/monthly expense was later ruled as disallowed but had been paid for two years. A

4 required repayment in this scenario would financially devastate many ESA families.

5 The handbook should be written off the rules. The handbook is a guideline.

6 This could cause hardship to research older purchases if there isn't a time limit on reviewing

I am very concerned that ESA now will be closing accounts within ten day of an issue with receipts. ESA only sends emails, and they often change the email address they are using, so the go to spam. An account should not be shut down without multiple different types of contact attempts, including certified mail. It also should not be allowed to happen that fast. It will completely ruin children's educational opportunities over what is likely a simple receipt error with a one-time notice that went to the parent's spam folder.

7 Requiring debit card receipts to be uploaded by the end of the quarter instead of every 20 transactions IS like having an expense report again. This isn't a helpful change at all. Requiring proof of payment method for reimbursements is a financial privacy concern. Why does it matter
8 how it was paid for - it still needs to be reimbursed.

I'm concerned about some of the changes to requirements from parents like "providing proof of method of payment for reimbursements." We already provide receipts. I'm not sure what more you want us to provide. Anything I have purchased online has my name attached to it and shows the method of payment as being a card transaction. When I purchase from a store in person, the receipt shows that the purchase was made with a card or cash. Those should be sufficient. I can't imagine that we are being asked to provide confidential bank statements to show the transactions or security footage from stores to show we are the ones who made the purchase when paying in cash. This just feels like one more
9 checkmark at making this program more difficult for parents and proving that we are all expected criminals.

I am concerned about the inclusion of risk based approvals. There is nothing to support this process. Account holders cannot rely on consistent staff approvals, the approved item list or that previous purchase approvals will not be rescinded. Account holders have ESA accounts to educate their children. They want to know and follow the rules. In most cases, public school failed ESA students. This scholarship is life changing and allows account holders to provide the education that their students deserve. Account holders should not have to worry that approvals can be changed or taken back. Students deserve clear, logical processes and rules. It should be made very transparent that once an order is approved by ADE, it cannot be rescinded or changed. When items are removed or changed from the allowed items list, account holders should be informed. Debit card transactions should be reviewed within 30 days so that if there is an issue, parents can resolve it. When time has passed, it is

10 impossible to acquire further receipts and paperwork.

CONCERN FREE RESPONSES

- 11 I believe appeals need to be dealt with as quickly as possible; a child's education is at stake.
- 12 N/A
- 13 N/A
- 14 N/A
- 15 N/A
- 16 Nothing to be concerned about.
- 17 Yes
- 18 N/A
- 19 Approved vs unapproved expenses
- 20 N/A
- 21 N/A
- 22 Not concerned
- 23 N/A
- 24 N/A
- 25 N/A
- 26 Want to be sure I understand appeals process
- 27 N/A
- 28 The confusing subsection under requirements for eligibility if you received online schooling.
- 29 My concern regarding with the monthly school payment they're not including the access fee with the Monthly payment payment
- 30 No comment
- 31 N/A
- 32 NA
- 33 N/a
- 34 NA
- 35 I am so grateful for all you do for our kids.
- 36 Seems fairly straight forward
- 37 N/A
- 38 N/A
- 39 N/A
- 40 No concerns
- 41 N/A
- 42 How they determine if technology is approved
- 43 n/a
- 44 None.

CONCERN FREE RESPONSES

- I am concerned that if an invoice/receipt from the CW card has an error, the student will be REMOVED from the program 10 days into a new quarter.
- 45 quarter.
- 46 N/A
- 47 N/a
- 48 Not concerned
- 49 Confusing references can put a stop or prolong the process
- 50 nothing
- 51 N/A
- 52 N/a
- 53 I think some of us don't completely understand the process sometimes.
- 54 every is good..
- 55 not needing to clarify no useage
- 56 I have no problem with current processes.
- 57 I'm not concerned at all.
- 58 I am not concerned about anything
- 59 None.

NOTIFICATION PREFERENCES

Row Labels	Count of How would you prefer to receive appealable actions from the Department?	
All electronic (email, parent portal, ClassWallet)	21	Statistically, these responses merit a 3-way tie.
Both electronic and physical mail	20	
Mostly electronic, but also by physical mail when facing termination	18	
Grand Total	59	

Other Available Survey Choices that were not chosen by Parents/Guardians:

All Physical Mail	0
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OTHER COMMENTS AND FEEDBACK DETAILS

Row Labels	Count of COMMENTS	
ADE	11	
Certified Mail is necessary so Parents/Guardians don't miss communication	1	
Database not being maintained	2	
Ignoring Parent input	1	
More Communication Needed	2	
No responses about ClassWallet contract language	1	
Parents/Guardians are begging for guidance and information	1	
Rejected reimbursements should allow for rebuttal response	1	
Risk Based Audits should only be implemented once Database is properly implemented	1	
Should not be allowed to use team of attorneys	1	
ADE	1	
Parent Advisory Council staffing changes are inappropriate	1	
ADE - Certified mail for all decisions	1	
Statute - 10 days unacceptable	1	
Board	4	
Fix ClassWallet problems	1	
Hearing Officer in inadequate vs. ALJ and OAH	1	
Ignoring Parent input	1	
Should include Parents/Guardians in rulemaking	1	
ClassWallet	2	
Difficult and stressful	1	
Often double and triple charges Parents/Guardians	1	
Handbook	2	
Contains information not found in Rule	1	
Seriously outdated	1	
N/A	44	59 Parents/Guardians responded to the survey
Privacy Concerns	6	74.6% of those surveyed have no concerns
Expense documentation creates more issues for private information to be leaked	1	Remaining 55 comments were made by 17 people
Not being addressed	2	
Parents/Guardians are not allotted standard privacy protections	1	
Should have complete and responsive safety protocol	1	
Should include privacy requirements	1	
Rules	13	
All for show	1	
Changes are hurtful to Parents/Guardians	1	
Definition of "enrolling" should include "funding"	1	
Do not reflect Parent/Guardian concerns	1	
Expense documentation places heavy burden on Parents/Guardians	1	

Focus should be on helping special needs children	1
Focuses on denying purchases and closing accounts	1
Miss the mark on many issues	1
Not all Parents/Guardians included	1
Parent/Guardian requests and comments are being ignored	1
Revised Appeals Process is intimidating	1
Simplification appreciated	1
Very discouraging	1
State Board	10
All for show	1
Appreciate honesty about issues that could not be answered and follow ups provided	1
Catcher is very helpful	1
Catcher unaware of what multiple Parents/Guardians have previously communicated	1
How do Parents/Guardians know the Board is actually reading our emails	1
Meetings are appreciated	1
Parent/Guardian concerns being ignored	2
Seems like Parent/Guardian emails do not get forwarded to the Board	1
Very discouraging	1
Statute	5
Electronics and Laptops should be allowed for all students	2
Expand to include older siblings	1
HB2898 requires privacy laws be enacted	1
Public School Enrollment shouldn't be required	1
Grand Total	99

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OTHER COMMENTS AND FEEDBACK RESPONSES

Please provide any other comments or feedback here for the Board's consideration:

- 1 (no response)
I truly believe that a lot of things could be remedied with equal sided communication. Parents are BEGGING for guidance and information, only to be met with canned answers, or incomplete information. Inconsistencies abound. I understand there could be staffing issues, but communication would GREATLY help. I like the rules changes, so far. I just hope to see further empowerment of our children's educations, and parents abilities TO educate in a way that these (mostly) special kids need!
- 2 (no response)
ADE uses multiple email addresses and keeps changing the domains for their emails. This results in a huge number of their email communications being missed and landing in people's spam folders. It is imperative that certified mail be used for appeals and prior to an account being terminated.
- It's disappointing that repeated requests and comments from parents this entire year continue to be ignored. While it is in rule for ADE to maintain a database, this is not being done. This single thing could eliminate a huge amount of time and work for both parents and ADE staff. A good, well-maintained database has the potential to drastically reduce phone calls, Help Desk tickets, and disallowed orders and could facilitate much-needed transparency and consistency from ADE. Can it be put into SBE rule that risk-based auditing can only be implemented when a full, up-to-date approvals database is implemented and maintained on a weekly basis?
- The revised appeals process is still very intimidating to parents.
- It is disappointing that nothing was included in rule regarding protecting the privacy of ESA participants. There have been ongoing and repeated security breaches, doxing, and distribution of names, contact information, and even our student's disability statuses and account balances from both ADE and ClassWallet. ESA students and families desperately need rules included for the protection of our privacy. These rules sound more focused on denying purchases and closing accounts. Many of our students are special needs and have individual needs that vary from child to child. I think the focus should be on finding ways to provide those special needs to each child so they are able to obtain an education their special way of learning.
- I appreciate your meetings. I stopped attending town halls because they aren't town halls anymore. This was amazing and I thought Catcher was very helpful. I didn't say anything, but it was so helpful to me to sit back and listened. My concerns were addressed by other parents and it was nice to hear those discussed. I respect and value that people listened and did the best that they could to answer on the fly. I also liked that when there was an issue that couldn't be answered, there was an acknowledgment to follow up.
- Why isn't this being sent to all parents? How do we know that our emails are actually being read by anyone on the board? Catcher asked for specific examples this past week, and I've emailed in so many. It has often seemed like those emails do not get forwarded on, and this is at least the second time that Catcher seems unaware of what multiple people have emailed in. Honestly, this is incredibly discouraging. I clear my schedule for every meeting and send in emails in advance. I feel like it's all for show at this point.
- 8 (no response)
I feel like overall, we as parents and educators, are not being listened to. It seems like we are giving feedback on specific items, tell you what isn't working, how it's not working and how we can make it better but I feel like it's all being ignored. The new changes mostly seem to reflect items that I'm not seeing other parents having issues with or concerned with. One of your changes is to make the handbook and rules match up more closely. While I agree that's a phenomenal change and is something we have been advocating for, I feel like you've heavily missed the mark on that. There are still so many items in the handbook that are heavily outdated and should be changed. Items that aren't listed in the rules but are listed in the handbook. Unfortunately that is a disservice to us who are educating our children, our students, because ESA staff chooses to use what the handbook says against us.
- I am concerned that language has been added to the current rule revision that is detrimental to account holders. While account holders have provided countless surveys, emails, calls and contributed at public forums/meetings, many concerns have not been addressed. As the users of this program, it makes the most sense that account holder feedback would be included and valued. ADE contributions that could be detrimental are added without any further discussion. For example, language was added by ADE to insist that method of payment is included when submitting for reimbursement. This was explained as a method to prevent fraud. It seems that ADE is highly focused on preventing fraud, but not the empowerment of student education. This language is illogical and places a heavy burden on account holders. The burden of further unnecessary paperwork. The burden of providing more sensitive information to ADE, when data is not protected or secure. Account holders should never have to risk their credit, security and livelihood to provide unnecessary confidential information.
- In this same vein, account holders are Arizona students, they deserve privacy rights up to and including FERPA. Account holders should not have to worry about the next data breach. Students and their families have experienced enough. Data should be safe guarded and protected. ADE should have a complete and responsive security protocol. Account holders deserve to feel confident in the ESA program. Students deserve to be kept safe and most importantly empowered to learn.
- 11 I believe electronics (ie. computers) should be allowed if Special Education and classes are all online.
- 12 N/A
- 13 N/A
- 14 N/A
- 15 N/A
- 16 N/A

OTHER COMMENTS AND FEEDBACK RESPONSES

- 17 Yes
18 N/A
19 There is so much ambiguity throughout the whole of the ESA process. Rules exist for things that don't need them, and don't exist where they are needed. Parents should be actually and actively included in helping administrators understand how the ESA program is used in real life.
20 I would absolutely love to see the enrollment in any public school removed. It's a waste of time for parents and students to take part in a school just to get in the required days. It's a serious disruption in education flow for a family.
21 N/A
22 Thank you for your time in clarifying the rules
23 N/A
24 N/A
25 N/A
26 Nothing at this time
27 N/A
28 I like the overall simplification.
29 N/A
30 N/A
31 N/A
32 N/A
33 Thank you
34 (no response)
35 (no response)
36 (no response)
37 (no response)
38 (no response)
39 none
40 (no response)
41 (no response)
42 (no response)
43 (no response)
44 (no response)

Any time an ESA is suspended, or particularly if it will be closed, ADE needs to communicate by email and ALSO by physical mail. This needs to happen not just for appealable actions, but for EVERY time ADE suspends or closes an ESA account.

Accounts should *not* be REMOVED 10 days into a quarter if a card purchase has an error on the invoice or receipt. That rule change is UNACCEPTABLE.

Privacy still has not been addressed, even though it is explicitly part of HB2898.

Funding new accounts is STILL not part of "enrolling" in ESA, even though an ESA is essentially useless until it funded.

An administrative hearing officer might not do as well as an OAH judge at discerning reality when ADE sends their team of lawyers against ESA parents.

The allowed list of purchases is STILL not being updated. It has barely been updated since Aug, when many items were removed, though it's unfathomable that nothing not on the list has been purchased since then.

Updating the list communicates what is allowed, and if it is not updated and ADE moves to risk-based audits, then parents will have NO WAY to know if their purchases are acceptable or not.

Can SBE do anything about Class Wallet not returning authorization charges? Accounts are being charged 2x or 3x per purchase, and parents are spending hours chasing the return of their student's funds. ADE is deaf to parent concerns.

Will parents ever have meaningful input to the program? ADE has changed the parent advisory council to be largely about S Raybon, an ADE employee. Other ESA parents are muted during the meetings. ADE no longer accepts any verbal input from parents. Emails often go unanswered if parents ask hard questions, like questioning the relationships between ADE staff and Class Wallet and how those contracts got written as they are.

- 45 Since all accounts are now on CW, this program is extremely difficult to use for students who are not enrolled in a private school. This has led to lots of additional stress for parents of special education students.
46 When a reimbursement is rejected there should be a space for rebuttal or additional reason the expense should be applicable.
47 (no response)
48 (no response)
49 I don't understand why my homeschooling child cannot order a laptop. He has been using my work laptop and it makes things that much difficult for us.
50 (no response)

OTHER COMMENTS AND FEEDBACK RESPONSES

51 (no response)

52 (no response)

53 (no response)

54 (no response)

55 (no response)

56 (no response)

57 I wish older siblings were Eligible for ESA. That is all.

58 (no response)

59 None.