

*Opportunities Lost:  
The Hidden Cost of Public Education in Pennsylvania K–12 Schools*

In practice, educational fines and fees are nearly impossible to avoid. Contrary to common beliefs, they are not simply extra charges for special school activities. Rather, public schools in Pennsylvania can, and do, impose fines, fees, and charges for things both large and small: everything from expensive technology, textbooks, and uniforms, to required “class dues,” to replacements for lost identification cards and bathroom passes, to overdue library books, and even late student drop off and pick up.

Over the past decade, research and advocacy has brought critical attention to the persistent use of unjust economic sanctions (e.g., fines, fees, charges, costs, etc.) in children-serving systems and institutions, including public libraries<sup>1</sup> and the juvenile justice system<sup>2</sup>. Whether measured by their disproportionate negative impact on low-income and racialized and marginalized communities<sup>3</sup>, failure to promote public safety<sup>4</sup> or creation of barriers to learning<sup>5</sup>, public policy reforms have focused on eliminating financial sanctions and obstacles that limit children’s immediate and future opportunities. Despite systemic changes at local and state levels<sup>6</sup>, the use of economic sanctions in K-12 public schools—and the unique harmful collateral consequences<sup>7</sup> that follow— have remained largely underexamined and unaddressed.

This research brief presents information on the prevalence of educational school-based fines and fees provisions in Pennsylvania public schools’ codes of conduct and student and family handbooks, which convey schools’ rules, and highlights the significant impact of their imposition on students, caregivers and families. In a state where education is a “fundamental right,”<sup>8</sup> and in which existing educational inequities have been shown to severely impact the learning opportunities of children, the elimination of unjust educational fines and fees is a key next step to promoting supportive school environments in which learning is *free, equitable, and accessible*.

## ***Contextualizing Educational School-Based Fines and Fees: Inequity in Pennsylvania Schools***

Pennsylvania is home to some of the nation's most inequitable educational environments<sup>9</sup> and economically and racially segregated schools in the nation.<sup>10</sup> This is evident whether measured by per student funding<sup>11</sup>, students and families living in poverty<sup>12</sup>, intersectional disparities in student exposure to exclusionary school discipline<sup>13</sup> and police contact and arrests.<sup>14</sup>

- In 2024, 70% of students were affected by an over \$4 billion adequacy gap.
- In school year 2019–20, highest poverty districts received \$2,867 or 16.7% less per pupil than what is deemed necessary for adequate funding. Lowest poverty districts received \$10,045 or 151.5% more per pupil.
- Since 2019, more than half of students qualified for free or reduced-price lunch.
- In 2023, 1 in 6 children under 18 lived in poverty.
  - 3 in 10 Black children
  - 3 in 10 Latina/o/x children
  - 3 in 10 Native Hawaiian/Pacific Islander children
  - 2 in 10 American Indian/Alaska Native children
  - 1 in 10 white children
- Since 2019, suspended Black students ten times more than white students.
- Since 2019, increasingly suspended Black students with disabilities at a much higher rate.
- In school year 2018–19, arrested Black girls fourteen times the rate of white girls in similar school related matters.
- In school year 2018–19, arrested students with disabilities two to four times the rate of their non-disabled peers.

To examine the issue of unjust educational school-based fines and fees in Pennsylvania public schools, a systematic review was conducted of more than 700 student and family handbooks and codes of conduct<sup>15</sup> published by 704 Local Education Agencies<sup>16</sup> during the 2021-2022 school year across the Commonwealth. Using a closed set of primary set of terms<sup>17</sup> each student and family handbook and code of conduct was coded line-by-line for content.<sup>18</sup> Analysis yielded a key finding—***across Pennsylvania public schools 3,846 unique educational fines and fees provisions existed.***<sup>19</sup>

Common Categories of Educational Fine and Fees	Cost
Library book fine <sup>20</sup>	\$0.25/day
Late pick up and drop off fees <sup>21</sup>	\$1/minute
Hall pass replacement charges <sup>22</sup>	\$5
ID replacement charges <sup>23</sup>	\$20
Parking fines <sup>24</sup>	\$25
Participation charges <sup>25</sup>	\$50
Activity fee <sup>26</sup>	\$100
Technology charge <sup>27</sup>	\$100
Yearly class dues <sup>28</sup>	\$250
Laptop replacement fee <sup>29</sup>	\$500-800

To understand the use and harms of such provisions, the research team worked with attorneys at the Education Law Center-Pennsylvania (ELC-PA) to assess primary and collateral outcomes. Below, this brief provides three client vignettes to highlight three significant consequences. As these examples and the overall review of files indicated, ELC-PA clients not only faced serious and compounding economic barriers, but students' access to their fundamental right to public education<sup>30</sup> was meaningfully undermined. Additionally, students faced post-graduation barriers as a result of incurring educational debt in their public schools with the potential for long-term harm.

Under the extensive educational fines and fees provisions children and families inability to pay results in a cascade of primary and secondary harms, including:

- *Restricting physical entry to into school.*<sup>31</sup>
- *Enacting barriers to graduation.*<sup>32</sup>
- *Excluding participation in graduation ceremonies.*<sup>33</sup>
- *Excluding participation in school activities and extracurricular activities.*<sup>34</sup>
- *Withholding of educational materials, report cards, and transcripts.*<sup>35</sup>
- *Limiting access to library materials.*<sup>36</sup>
- *Referrals to debt collection agencies.*<sup>37</sup>
- *Referrals to county prosecutor's offices.*<sup>38</sup>
- *Additional fines and fees within the court systems.*<sup>39</sup>

As these findings indicate, the use of educational school-based fines and fees across the Commonwealth is not simply an issue of economics. Instead, it is as importantly an issue of equitable access to learning for students. Research has shown that equitable access to education fundamentally shapes children's lives far beyond the schoolhouse doors.<sup>40</sup> The benefits associated with educational opportunity and attainment can last a lifetime. Even a single year of additional education can increase lifetime earnings by 10 percent<sup>41</sup> and decrease adult mortality risk.<sup>42</sup> By age twenty-five, individuals with a high school degree can expect to live over 10 years longer than those without one, and people with the most educational privilege can live nearly 11 years longer than people with the least educational privilege.<sup>43</sup>

Conversely, the clear harms caused by educational deprivations, can ripple across generations. Reduced access to education has been linked with lower earnings<sup>44</sup>, serious health problems<sup>45</sup>, and increased mortality rates.<sup>46</sup> Additionally, the lack of a high school diploma or GED correlates more strongly than any other risk factor with experiences of youth homelessness.<sup>47</sup>

The imposition of school-based economic sanctions also adversely impacts parents and caregivers, as well as the relationship between school staff and the families and students they serve. As the following real-life examples illustrate, the imposition of educational fines and fees shift schools away from being supportive and inclusive to places in which students and families feel unwelcomed, punished, and excluded.

#### ***Chloe's story: how educational fines and fees undermine students' right to education***

*Chloe<sup>48</sup> was a Pennsylvania high school student living in an emergency shelter without access to supportive services from her school. Because she was unable to afford a five-dollar student ID replacement fee, she was forced to miss many days of school. To make matters worse, the school insisted on charging Chloe an additional dollar for every day she was missing her ID. There was no limit on the per-diem fee and the fines just accumulated. The school did not provide Chloe and her family with notice before imposing these fees—further violating Chloe's rights. Each day that Chloe turned up without an ID, she was fined again and turned away from school. Eventually, Chloe missed so many days of school that her school threatened to refer her to the local district court for violating compulsory school law where she and her family could be subject to further fines and fees or potentially jailtime.<sup>49</sup>*

#### ***Emma's story: how fines and fees restrict students' opportunities after graduation***

*After graduating from high school, Emma (a student parenting on their own and experiencing homelessness after ageing out of the child welfare system) was unable to pay the 15-dollar fee to obtain a replacement diploma due to severe financial hardship. As a result, they were unable to enter a specialized training program that would have provided a living wage and opportunities for advancement and additional education. Despite Emma's repeated efforts to obtain their diploma, the school refused to waive the fee.*

#### ***Nova's story: how fines and fees affect parents and caregivers<sup>50</sup>***

*Nova is a Black single mother of four public-school children. When she indicated that she was unable to afford the over 300-dollar school uniform fee<sup>51</sup> for one of her children, school officials informed Nova that her child was not allowed at the school—and that her child would be sent home if she showed up without a full uniform. Nova faced an impossible decision: either purchase the uniform and forego her car and utility payments that month, or allow the school to refuse to educate her daughter—in violation her fundamental right to a public education. In “choosing” her daughter's education, Nova*

*was unable to make her car payment and pay for her utilities. Halfway through the school year, she was still unable to pay off the cost of the uniform.*

## ***Recommendations***

To advance educational access and equity and reduce unjust and unnecessary childhood and familial economic stress, this brief concludes with the following recommendations.

### ***For Community Members***

- **Learn more about your local school's policies and practices** regarding fines and fees to determine if existing exemptions, such as those afforded under the federal McKinney-Vento Act or Pennsylvania's Act 1, apply to you, and exercise your rights under existing laws.
- **Advocate to your school board** to end the practice of school-based educational fines and fees and return any fees collected.
- **Share this research brief with others** to build knowledge and power in communities about the enduring harms of fines and fees.
- **Join the movement** against school-based fines and fees and continue to follow this important work.

### ***For School Leaders***

- **Impose an immediate moratorium on collecting educational school-based fines and fees** while policies, practices, and procedures are being revised.
- **Review current policies, practices, and procedures** to identify where educational school-based fines and fees are imposed, including those that are not reflected in Codes of Conduct, Handbooks, or internal procedures.
- **Prohibit the imposition or collection of educational school-based fines and fees** in policies, practices, and procedures to ensure that public education is both equitable and accessible.
  - **Train district-level and building-level administrators** to ensure that they know that educational school-based fines and fees are prohibited and to ensure that schools within a school district or charter network are not deviating from the district or network's policy.
  - **Inform students and caregivers that educational school-based fines and fees are banned, and that no child can be penalized or denied educational opportunities due to non-payment.**
  - **Develop and implement a complaint mechanism** that caregivers and students can use to report the issuance of fines and fees after they are banned.
- **Eliminate practices that deny children educational opportunities** in response to nonpayment of an educational school-based fine or fee.
- **Return all fines and fees collected during the school year and zero out any balances** that current or former students have incurred.

- **Reverse any punishments for current students** stemming from educational school-based fines and fees, and expunge children’s disciplinary records, if punishments were formally recorded
- **Offer automatic expungements to former students** if disciplinary consequences were recorded in their school records and provide notice to former students about the expungement process.

*For Policymakers at the Local, State, and Federal Level*

- **Impose a moratorium on all educational school-based fines and fees** until legislation is passed that formally bans the practice.
- **Advocate for passage of legislation** banning educational school-based fines and fees and requiring that children’s current balances be zeroed out.
- **Direct all State Education Agencies (SEAs) and Local Education Agencies (LEAs) to undertake equity audits**, including an analysis of whether previously collected educational school-based fines and fees were disproportionately imposed on students of color and/or students living in poverty.
- **Undertake economic impact assessments** to determine the upstream and downstream impacts caused by educational school-based fines and fees.
- **Recommend that the United States Department of Education and the State Departments of Education (e.g. the Pennsylvania Department of Education) issue guidance** advocating the prohibition of educational fines and fees in public schools, outlining the enduring harms caused by these practices, advocating for a moratorium on all public school-based fines and fees until legislation is passed banning the practice, and reiterating existing rights to be free from school-based fees under applicable federal and state law.

## **Conclusion**

Education plays a critical role in students’ lives, and students in Pennsylvania deserve the right to attend schools in which their opportunities are not limited by unjust educational fines and fees. The entitlement to a free education and the right to a comprehensive, effective, and contemporary system of public education that gives every student a “meaningful opportunity to succeed academically, socially, and civically”<sup>52</sup> should guide immediate policy reforms. Following the lead of other children-serving systems and institutions, Pennsylvania schools must recognize and eliminate school-based economic sanctions practices and policies that restrict learning access, exacerbate existing educational inequalities, and compound economic hardships for low-income and racialized children, families, and communities.

---

The full study highlighted this brief is available **here**. To learn more about educational fines and fees across the country, a companion FAQ on educational fines and fees is available **here**.

---

**Citation:** Thalia González & Paige Joki, *Opportunities Lost: The Hidden Cost of Public Education in Pennsylvania K-12 Schools (Research Brief)*, Center for Racial and Economic Justice, UC Law SF (2025).

**About the Center for Racial and Economic Justice at UC Law SF:** The Center for Racial and Economic Justice (CREJ) works to advance equity and justice through legal education, research and scholarship, and academic-community partnerships and collaborations. To learn more about CREJ visit <https://www.uclawsf.edu/academics/centers/center-racial-economic-justice/>.

<sup>1</sup> *Fine Free Map*, URB. LIBRS. COUNCIL, <https://www.urbanlibraries.org/initiatives/democracy/fine-free-map> (last visited July 17, 2025).

<sup>2</sup> KANSAS APPLESEED & JUV. L. CTR., MAKING CHILDREN PAY: THE HIDDEN COST TO KANSAS OF JUVENILE FEES AND FINES (2024).

<sup>3</sup> THE FINANCIAL JUSTICE PROJECT, <https://www.sfgov.org/financialjustice/> (last visited July 17, 2025).

<sup>4</sup> Amy Miller, *The Negative Effect of Fines and Fees in Juvenile Justice*, YOUTH, RIGHTS & JUSTICE (MAR. 5, 2020), <https://youthrightsjustice.org/the-negative-effect-of-fines-and-fees-in-juvenile-justice/>; DEBT FREE JUSTICE, <https://debtfreejustice.org/> (last visited July 17, 2025).

<sup>5</sup> *Economic Barriers to Information Access: An Interpretation of the Library Bill of Rights*, AMERICAN LIBRARY ASSOCIATION (July 26, 2006), <https://www.ala.org/advocacy/intfreedom/librarybill/interpretations/economicbarriers>; *Welcome to the Fine Free Library!*, FREE LIBRARY OF PHILADELPHIA, <https://libwww.freelibrary.org/campaign/fine-free/> (last visited July 17, 2025).

<sup>6</sup> *2023 State Legislative Round-Up: Fines and Fees Reform Across the Country: Juvenile Justice Fines and Fees Reforms*, FINES & FEES JUST. CTR. (Jan. 29, 2024), <https://finesandfeesjusticecenter.org/2024/01/29/2023-state-legislative-round-up-fines-and-fees-reform-across-the-country/>; *2024 Legislative Roundup: Fines and Fees Reform Around the Country: Juvenile Justice Fines and Fees Legislation*, FINES & FEES JUST. CTR. (Feb. 5, 2025), <https://finesandfeesjusticecenter.org/2025/02/03/2024-legislative-roundup-fines-and-fees-reform-around-the-country/>; *Economic Justice*, JUV. L. CTR. (Aug. 10, 2023), <https://jlc.org/issues/economic-justice>.

<sup>7</sup> THALIA GONZÁLEZ, CTR. FOR RACIAL & ECON. JUST., U.C.L.S.F., FAQ: EDUCATIONAL FINES AND FEES IN K – 12 PUBLIC SCHOOLS (2025).

<sup>8</sup> William Penn Sch. Dist. v. Pa. Dep’t of Educ., No. 587 M.D. 2014, op. at 646, 775 (Pa. Commonw. Ct., Feb. 7, 2023) (“[T]he right to public education is a fundamental right explicitly and/or implicitly derived from the Pennsylvania Constitution.”); William Penn Sch. Dist. v. Pa. Dep’t of Educ., No. 587 M.D. 2014, op. at 2 (Pa. Commonw. Ct., June 21, 2023) (“the right to public education is a fundamental right explicitly and/or implicitly derived from the Pennsylvania Constitution[.]” (quoting William Penn Sch. Dist. v. Pa. Dep’t of Educ., No. 587 M.D. 2014, op. at 646, 775 (Pa. Commonw. Ct., Feb. 7, 2023))).

<sup>9</sup> Peter Greene, *Pennsylvania Leads the Nation in Educational Inequity*, FORBES (Oct. 13, 2022, 12:58 PM), <https://www.forbes.com/sites/petergreene/2022/10/13/pennsylvania-leads-the-nation-in-educational-inequity/?sh=68a8e6d12b7e>.

<sup>10</sup> Stephen Kotok & Katherine Reed with John Kucsera & Gary Orfield, *Is Opportunity Knocking or Slipping Away? Racial Diversity and Segregation in Pennsylvania*, in SCHOOL SEGREGATION TRENDS IN THE EASTERN STATES (2015); Halley Potter, *School Segregation in U.S. Metro Areas*, The Century Foundation (May 17, 2022), <https://tcf.org/content/report/school-segregation-in-u-s-metro-areas/>; Dale Mezzacappa, *Philadelphia area schools among the most segregated in the country*, Chalkbeat Philadelphia (May 23, 2022, 7:52 AM), <https://philadelphia.chalkbeat.org/2022/5/23/23137855/philadelphia-area-schools-among-most-segregated-country#:~:text=Students%20in%20the%20Philadelphia%20area,from%20the%20Century%20Foundation%20says.&text=Schools%20in%20the%20Philadelphia%20area,a%20new%20report%20has%20found>.

<sup>11</sup> *School District Data*, PA SCHOOLS WORK, <https://paschoolswork.org/school-district-data/> (last visited July 17, 2025); DAVID LAPP, RSCH. FOR ACTION & PA. CLEARINGHOUSE FOR EDUC. RSCH., STATE OF INEQUITY: DISPARITIES IN PENNSYLVANIA SCHOOL DISTRICTS BY DEGREE OF FUNDING ADEQUACY (2025); Molly Basdeo Mountjoy, *Addressing Educational Inequities in Pennsylvania*, SCHOLARS STRATEGY NETWORK (Apr. 19, 2023), <https://scholars.org/contribution/addressing-educational-inequities-pennsylvania>.

---

<sup>12</sup> *Digest of Education Statistics: Number and Percentage of Public School Students Eligible for Free or Reduced-Price Lunch, by State: Selected School Years, 2000-01 through 2021-22*, NAT'L CTR. FOR EDUC. STAT., [https://nces.ed.gov/programs/digest/d22/tables/dt22\\_204.10.asp](https://nces.ed.gov/programs/digest/d22/tables/dt22_204.10.asp) (last visited July 17, 2025); PENNSYLVANIA PARTNERSHIPS FOR CHILDREN, 2024 STATE OF THE CHILD – PENNSYLVANIA (2024).

<sup>13</sup> Lajja Mistry, *Pittsburgh School Suspensions Returned to Pre-Pandemic Levels, as Black Students with IEPs See a Big Jump in Discipline*, PITTSBURGH'S PUB. SOURCE (Apr. 17, 2025), <https://www.publicsource.org/pittsburgh-public-school-suspensions-discipline-black-white-disparity-iep/>.

<sup>14</sup> HAROLD JORDAN & GHADAH MAKOSHI, ACLU-PA, STUDENT ARRESTS IN ALLEGHENY COUNTY PUBLIC SCHOOLS: THE NEED FOR TRANSPARENCY AND ACCOUNTABILITY 10, 27 (2022).

<sup>15</sup> Data collection occurred over a 4 month period in the 2021 – 2022 academic year and included only 2021 – 2022 handbooks and codes of conduct that were publicly available.

<sup>16</sup> *General Information Regarding Child Accounting*, COMMONWEALTH OF PA., <https://www.pa.gov/agencies/education/programs-and-services/schools/grants-and-funding/school-finance/reporting/child-accounting/general-information-regarding-child-accounting#accordion-46a279f2ee-item-13a88a2b9a> (last visited July 26, 2025) (“LOCAL EDUCATION AGENCY (LEA): A board of education or other legally constituted local school authority having administrative control and direction of public elementary or secondary schools in a city, county, township, school district, or political subdivision in a state, or any other public educational institution or agency having administrative control and direction of a career and technical education program. This term includes state correctional education agencies.”). Our analysis covered handbooks and codes of conduct put forth by public school districts (including handbooks put forth by schools within school districts), charter schools, and cyber charter schools that serve students at the elementary and secondary levels. Handbooks and codes of conduct from the state correctional educational agencies and from the 29 Intermediate Units were excluded from analysis.

<sup>17</sup> The study codebook was developed in collaboration with the Education Law Center-PA beginning with an initial seven terms: *fine, fee, outstanding balance, charge, cost, due and pay*. These terms represented the most commonly used definitional text describing fines, fees, charges, costs and/or payments based on the Education Law Center-PA’s legal expertise and experience representing caregivers and students in Pennsylvania public schools.

<sup>18</sup> A full description of methods is available in Thalia González & Paige Joki, *Reproducing Inequality: Racial Capitalism and the Cost of Public Education*, 65 B.C. L. Rev. 317 (2024).

<sup>19</sup> The first is *fine* ( $n = 959$ ), *fees* ( $n = 847$ ) and *cost* ( $n = 736$ ). The second is *pay/paid* ( $n = 461$ ) *charges* ( $n = 369$ ) and *purchase* ( $n = 259$ ). The third is *price* ( $n = 72$ ), *outstanding balance* ( $n = 55$ ), *dues* ( $n = 55$ ), and *buy* ( $n = 33$ ). Appendix 1 presents the disaggregation by categories and subcategories of analysis. For this study the research team applied the following closed set of terms or codes to each student handbook, code of conduct and technology/ virtual handbook: Fine, Fee, Outstanding Balance, Charge, Cost, Due, Pay/ Paid, Price, Purchase. More generalized terms associated with fines and fees, such as including Technology, Device and Punishment (Suspension and Expulsion) were excluded as they yielded a high number of results that fell outside the study scope.

<sup>20</sup> CAMERON COUNTRY JR/SR HIGH SCHOOL, STUDENT HANDBOOK 2021-2022, 27 (2021) (on file with authors).

<sup>21</sup> HATBORO-HORSHAM SCHOOL DISTRICT, HATBORO-HORSHAM SCHOOL DISTRICT C CHILD CARE 43 (2021); INQUIRY CHARTER SCHOOL, STUDENT AND FAMILY HANDBOOK 2020-2021, 7 (2020).

<sup>22</sup> PHILIPSBURG-OSCEOLA AREA SD: SR HIGH SCHOOL, PHILIPSBURG-OSCEOLA HIGH SCHOOL STUDENT HANDBOOK 2021-2022 10 (2021) (on file with authors).

<sup>23</sup> LOWER MERION SCHOOL DISTRICT, DISTRICT HANDBOOK 27 (2021) (on file with authors).

<sup>24</sup> AVON GROVE SECONDARY SCHOOLS, SECONDARY SCHOOLS HANDBOOK 2021-2022, 24 (2021) (In addition to fines for parking, permit applications cost \$150 to complete) (on file with authors).

<sup>25</sup> ENVIRONMENTAL CHARTER SCHOOL AT FRICK PARK, FAMILY HANDBOOK 2018-2019 47 (2018) (on file with authors).

<sup>26</sup> KEYSTONE SCHOOL DISTRICT, PANTHERS STUDENT HANDBOOK 2021-2022, 32 (on file with authors).



- 
- <sup>27</sup> BRISTOL TOWNSHIP ELEMENTARY SCHOOL, ELEMENTARY HANDBOOK AND PROCEDURES 2021-2022 26 (2021) DISCOVERY SCHOOLS, STUDENT-PARENT HANDBOOK PREK - 12TH GRADES 2021-2022, 71 (2021) (on file with authors).; CHESTER COUNTY SCHOOL DISTRICT – CHESTER COUNTY FAMILY ACADEMY, STUDENT LEADERSHIP HANDBOOK 44 (2019) (on file with authors).
- <sup>28</sup> See, e.g., *Class Dues Information*, CENTRAL HIGH SCHOOL, <https://centralhs.philasd.org/parents-2/class-dues-information/> (last visited July 17, 2025).
- <sup>29</sup> At City High School, a charter school in Allegheny County, students are charged \$500 the first time they lose a laptop, and \$800 if they lose a laptop a second time. *Acceptable Use of Technology Policy*, CITY CHARTER HIGH SCHOOL, <https://www.cityhigh.org/school-policies#tech-policy> (last visited July 17, 2025).
- <sup>30</sup> William Penn Sch. Dist. v. Pa. Dep’t of Educ., No. 587 M.D. 2014, op. at 646, 775 (Pa. Commonw. Ct., Feb. 7, 2023); William Penn Sch. Dist. v. Pa. Dep’t of Educ., No. 587 M.D. 2014, op. at 2 (Pa. Commonw. Ct., June 21, 2023); see also William Penn Sch. Dist. v. Pa. Dep’t of Educ., 294 A.3d 537, 886 (Pa. Commonw. Ct. 2023) (expressly holding that our school funding system must ensure that every student receives “a meaningful opportunity to succeed academically, socially, and civically, which requires that all students have access to a comprehensive, effective, and contemporary system of public education”). *Id.* at 964 (denying respondents’ Motion for Post-Trial Relief and requiring respondents to undertake “delivering a system of public education that the Pennsylvania Constitution requires – one that provides for every student to receive a meaningful opportunity to succeed academically, socially, and civically, which requires that all students have access to a comprehensive, effective, and contemporary system of public education”). The Feb. 7, 2023, and June 21, 2023, opinions can be accessed online through the ELC at the respective links: <https://www.elc-pa.org/wp-content/uploads/2023/02/Memorandum-Opinion-Filed-2.pdf>, and <https://www.elc-pa.org/wp-content/uploads/2023/06/2023-06-21-Opinion-Post-Trial-Relief-Denied.pdf>.
- <sup>31</sup> See, e.g., LOWER MERION SCH. DIST., LOWER MERION SCHOOL DISTRICT 2021–2022 (2021) (on file with authors).
- <sup>32</sup> See, e.g., CORNWALL-LEBANON SCH. DIST., CEDAR CREST HIGH SCHOOL STUDENT HANDBOOK 2020–2021 10 (2020) (on file with authors).
- <sup>33</sup> See, e.g., FELL CHARTER ELEMENTARY SCH., STUDENT/PARENT HANDBOOK 36 (2021) (on file with authors); FERNDAL AREA JUNIOR-SENIOR HIGH SCH., STUDENT-PARENT HAND-BOOK 2021–2022 18 (2021) (on file with authors); IMHOTEP INST. CHARTER HIGH SCH., 2021– 2022 STUDENT/PARENT HANDBOOK 28 (2021) (on file with authors).
- <sup>34</sup> See, e.g., NORTHERN LEHIGH SCH. DIST., STUDENT HANDBOOK 2021-2022 55 (2021).
- <sup>35</sup> See e.g., LINCOLN LEADERSHIP ACADEMY CHARTER SCH., 2021-2022 STUDENT AND PARENT MANUAL 7 (2021) (on file with authors).
- <sup>36</sup> Cameron Cnty. Sch. Dist., CAMERON CNTY. JR/SR SCH. STUDENT HANDBOOK 2021– 2022 47 (2021) (on file with authors).
- <sup>37</sup> Collection agencies specifically cater to public schools. See e.g., *School Debt Collection Agency: Public and Private Schools*, Nexa Collections, <https://nexacollect.com/debt-recovery/school-fee-collection-private/> (last visited July 17, 2025) (“Proudly Serving Schools Nationwide.”).
- <sup>38</sup> See e.g., *Mom Jailed Over Truancy Died From Heart Failure*, ASSOC. PRESS (Aug. 14, 2014), <https://apnews.com/article/26529cd62c0f42939ee4c2c00026e051> (woman was sentenced to two days in jail because she was unable to pay over \$2,000 in school fines and fees).
- <sup>39</sup> Under Act 138, if a court finds a student to be truant, the student (if 15 years old or older) or the parent may be fined up to \$750. 24 P.S. § 13-1333.1(a).
- <sup>40</sup> Anna Zajacova & Elizabeth M. Lawrence, *The Relationship Between Education and Health: Reducing Disparities Through a Contextual Approach*, 39 ANN. REV. PUB. HEALTH 273 (2018).
- <sup>41</sup> *The Effects of Education on Health*, National Bureau of Economic Research (Mar. 2007), <https://www.nber.org/digest/mar07/effects-education-health>.
- <sup>42</sup> Brian L. Rostron, John L. Boies & Elizabeth Arias, *Education Reporting and Classification on Death Certificates in the United States*, 151 VITAL HEALTH STAT. 1, 7–8 (May 2010).
- <sup>43</sup> Viju Raghupathi & Wullianallur Raghupathi, *The Influence of Education on Health: An Empirical Assessment of OECD Countries for the Period 1995–2015*, 78 ARCHIVES PUB. HEALTH 1, 3 (2020); Global Burden of Disease US Health Disparities Collaborators, *Life Expectancy by County and Educational Attainment in the USA, 2000–19: An Observational Analysis*, 10 THE LANCET PUB. HEALTH e136, e144 (2025).

---

<sup>44</sup> *Education Pays, 2024*, U.S. BUREAU OF LAB. STAT.: CAREER OUTLOOK (May 2025), <https://www.bls.gov/careeroutlook/2025/data-on-display/education-pays.htm>; NAT'L CTR. FOR EDUC. STAT., *Annual Earnings by Educational Attainment*, in *THE CONDITION OF EDUCATION 2024* (2024).

<sup>45</sup> *Education as a Social Determinant of Health*, TULANE UNIVERSITY SCHOOL OF PUBLIC HEALTH AND TROPICAL MEDICINE (Jan. 27, 2021), <https://publichealth.tulane.edu/blog/social-determinant-of-health-education-is-crucial/>.

<sup>46</sup> Robert A. Hummer & Elaine M. Hernandez, *The Effect of Educational Attainment on Adult Mortality in the United States*, 68 *POPULATION BULLETIN* 1 (2013).

<sup>47</sup> Young people without a diploma or GED are 346% more likely to experience homelessness than their peers who completed high school. *Homeless Education Research*, NATIONAL CTR. FOR HOMELESS EDUCATION, <https://nche.ed.gov/research/#:~:text=Significantly%2C%20the%20lack%20of%20a,peers%20who%20completed%20high%20school> (last visited July 17, 2025).

<sup>48</sup> Pseudonyms have been used to protect privacy and confidentiality. This story is based on a client served by the Educational Law Center-PA through its Intake System. ELC-PA also provides direct individual legal representation to families and students facing educational barriers in addition to undertaking impact litigation. Some details have been changed to prevent identification of students.

<sup>49</sup> 24 P.S. §§ 13-1327, -1333, -1333.1, -1333.3 (authorizing the student (if 15 years old or older) or the parent to be fined up to \$750, or jailtime up to 3 days for the parent if the fine is not paid).

<sup>50</sup> If Nova had chosen to not pay the uniform fee, both she and her daughter would have faced significant consequences. Parents and caregivers can be subjected to fines under Act 138 (§ 13-1333.3(a)) or be subject to three days in jail for a child's non-attendance (§ 13-1333.3(f)) which may leave their children without a caregiver and result in the children entering child welfare systems. For example, in 2014, a mother of seven was forced to serve a 48-hour jail sentence for truancy fines and court costs of close to \$2,000. *Mom Jailed Over Truancy Died From Heart Failure*, ASSOC. PRESS (Aug. 14, 2014), <https://apnews.com/article/26529cd62c0f42939ee4c2c00026e051>. She died in jail of heart failure.

<sup>51</sup> The school's uniform had many components, including a blazer, a sweater, a button-up shirt, a tie, black shoes, a skirt and pants, and socks. All of the items had to be purchased from a specific retailer or from the school itself because most of the required components had to include the school's logo, which required an additional charge to have affixed.

<sup>52</sup> *William Penn Sch. Dist. v. Pa. Dep't of Educ.*, 294 A.3d 537, 886 (Pa. Commonw. Ct. 2023).