Homeschooling in the United States: An Overview of the Washington State Regulations and Implementation

Homeschooling nos Estados Unidos: uma Abordagem dos Regulamentos e Implementação no Estado de Washington

Educación en el Hogar en los Estados Unidos: una Descripción General de las Regulaciones e Implementaciones en el Estado de Washington

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Abstract

In the past few years, there was a noticeable increase in homeschooling, parent or guardian-directed education, in the United States. This work has as its main objective to increase awareness on the topic using Washington State as a model. The methods were literature review, exploring State regulations and qualitative interviews on implementation- in practice, sampling users of this system. Challenges and advantages of this educational system were presented. The main reported benefits were flexibility or freedom to choose the curricula, to change the schedule, to determine priorities, as well as the direct involvement in their children’s education. Our results have shown that the significant increase on homeschooling, in these past years, can be related to different reasons such as faith-based or religious practices within the family, or as a product of the covid-19 pandemic, when the majority of parents were required to become closer to their children’s learning process, without in-person instruction.

Keywords: homeschooling; Washington State; North American Education.
Resumo

Nos últimos anos, observou-se um aumento no ensino domiciliar ou homeschooling, educação dirigida por pais ou tutores, nos Estados Unidos. Este trabalho tem como principal objetivo aumentar a conscientização sobre o tema utilizando o Estado de Washington como modelo. A metodologia qualitativa partiu de uma revisão da literatura explorando a regulação estatal, bem como entrevistas semiestruturadas sobre a implantação - na prática, utilizando uma amostragem de usuários deste sistema na parte Central do estado. Desafios e vantagens desse sistema educacional foram pesquisados e apresentados. Os principais benefícios relatados pelos entrevistados foram a liberdade e flexibilidade para escolher os currículos, alterar horários de instrução, determinar prioridades, bem como o envolvimento direto na educação dos filhos. Os resultados mostraram que o aumento significativo do homeschooling nos últimos anos, pode estar relacionado a diferentes razões, sejam elas enraizadas na fé ou religiosidade da família, ou um produto da pandemia de covid-19, onde a maioria dos pais foram obrigados a estar mais próximos do processo de aprendizagem de seus filhos, sem a instrução presencial.


Introduction

Homeschooling is a legal parent or guardian - directed education modality with increasing popularity in the United States (US). In all 50 States, homeschool is a valid choice. Parents or guardians can take charge of their children’s education and provide home-based instruction. Homeschooling can also have other definitions in the literature. For instance, according to Donnelly:
Homeschooling in the United States

depending on the philosophical underpinning, country of origin, and other factors, homeschooling is also known as home-based education, home education, unschooling, home-centered learning, home instruction, de-schooling, autonomous learning, and child-centered learning (2012, p. 2).

Students in the US generally go through a basic education system that includes pre-school, elementary, middle, and high school, in a total of 12 years of studies. In the public school system, admission to elementary school is between five to six years of age, with some exceptions. However, if the parents opt for homeschooling, they do not need to report anything until child is eight years old. In the US, each state has independent power to regulate basic education (BODAH; BODAH, 2017).

The Institute of Education Sciences (IES) defines that the following criteria for a student to be considered homeschooled must be met: “notification by those responsible to this choice rather than going to a public or private school; if enrolled in a school, enrollment may not exceed 25 hours per week; cases of homeschooling only due to temporary illness/disability are also not considered homeschool” (2019, p. 32).

The homeschooling movement in the US emerged in the 1970s, noting the impact of political radicalism both right and left, feminism, suburbanization, and public-school bureaucratization and secularization. It then describes how the movement, constituted of left- and right-wing elements, collaborated in the early 1980s to contest hostile legal climates in many states but was taken over by conservative. Despite internal conflicts, the movement’s goals of legalizing and popularizing homeschooling were set during the mid-1990s (GAITHER, 2009).

Families might choose to homeschool for different reasons, freedom being one of the top ones. Another reason can be faith-based because some families disagree with contents taught in the public-school curricula, especially in religion or science (i.e., evolution and sexual education). Other families choose homeschooling when their children have different learning capabilities due to medical conditions or group anxiety. Keeping a controlled environment for instruction and flexibility on schedule can also be viewed as benefits by parents or guardians.

Homeschooling policies vary from state to state in the US, setting a very heterogeneous scenario. The New York State, for example, has one of the strictest state laws that regulate homeschooling. It requires notification to the superintendent of the school district, lesson plans, cover required contents each school cycle, and student enrollment in a degree-granting institution. The student should attend for 12 hours every six months or equivalent every year. While in Texas, the second largest US state, there are flexible requirements such as the instruction be of good faith (bona fides); the
curriculum is in visual format; and that it includes the subjects of reading, spelling, grammar, mathematics and good citizenship (VIEIRA, 2012)

In other states, parents or guardians that opt for homeschooling can receive free resources that include guidelines, curricula, optional testing, and even financial compensation. Parents or guardians can become the student’s tutor. It is important to note that during the covid-19 pandemic, the concept of homeschooling has become ambiguous, as parents mix home, school, and online instruction, adjusting often to the twists and turns of school closures and public health concerns (HAMLIN and PETERSON, 2022). Many families seem to have started explore homeschooling from then on.

There is no national requirement for the parents to have specific training before start homeschooling but Washington State have specific ones discussed in the next section. Upon completion of homeschooling a high school diploma can be symbolic offer by the parents or the student can take an equivalent test to get a general education diploma (GED). In this paper, we focused on the Washington State to understand and increase awareness on this topic.

An Overview of the Homeschool Regulations in Washington State

Parents can choose to purchase private curricula for homeschooling or just follow guidelines provided by the government for subjects and contents similar to the public system. In the State of Washington, homeschool regulations are specific. For instance, there is a “home-based” instruction Law. The following statutes were amended to the law on Chapter 441: RCW 28A.225.010 for attendance, mandatory age, and exceptions; RCW 28A.195.010 for extension programs for parents to teach children in their custody, and scope of state control; and RCW 28A.150.350 for part-time students, defined enrollment, authorized reimbursement for costs, funding, authority recognition, rules and regulations.

According to the Washington Homeschool Organization – WHO, new sections were added as well to Chapter 28A.225 RCW for compulsory school, attendance and admission. The major homeschool organization, in addition WHO, is the Christian Heritage Home Educators of Washington. The State Board of Education is authorized to develop rules relating to the approval of private schools. The Office of Superintendent of Public Instruction is responsible to implement the statute relating to part-time attendance and high school equivalency GED certificates Rules and regulations governing extension programs in private schools and part-time attendance in the public
schools of students receiving home-based instruction were adopted in 1987 (WHO, 2022).

To follow the State regulations, parents must meet qualifications to homeschool, file notice of intent with local school superintendent, teach the required subjects, choose curriculum that best meets their children needs, participate in annual assessments, and keep records and ensure these include the student’s annual test scores. The qualifications for parents or guardians are: to have earned 45 college quarter credits, complete a parent qualifying course, work with a certified teacher one hour per week minimum.

The legal age that parents or guardians need to report homeschooling for their kids is between the ages of 8 and 18, and need to have covered 1,000 hours each academic year. RCW 28A.225.010 requires all parents of any child that is eight years and under 18 years of age in this state to cause such children to attend the public school of the district in which the child resides for the full time when the school is in session, unless: The child is attending an approved private school or is enrolled in an extension program of an approved private school; the child is receiving home-based instruction; the child is attending an education center; the school district superintendent has excused the child from attendance because the child is physically unable (WHO, 2022).

Understanding homeschooling in practice

In regards to actually implementing homeschool – in practice, a group of parents and guardians (n=10) served as a sample and were interviewed in a central area of Washington State. Following a qualitative approach, ten questions were used to guide semi-structured interviews (Table 1).

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Introductions, disclosure and privacy choice were presented as question one, along with the educational purposes of the interviews. A total of 60% of the interviewers opted to disclose their last name in this work. In addition, 10% were comfortable with an interview number and 30% prefer not to be quoted, just having their contributions listed in the groups.

On question two, it was determined that the range of students homeschooled by the interviewed parents or guardians varied from two to 12 at a time, with two being also the most frequent number (30%) of homeschool kids at the time.

Parents explained why they choose homeschooling on question three. A total of 70% of the interviewed parents chose homeschooling in order to have more control on their children’s education. Some of the specific reasons listed were mistrust in the public system, opportunity to choose curricula, lack of a good schools in the surroundings (rural area or missionary field), flexibility for travels and vacations, and the fact that their own families assumed it from the beginning.

Building a Christian-faith bond was also listed as an important reason. A parent elaborates saying that “I chose because of the amount of time I could spend influencing my children, building bonds of friendship with them, and teaching them about God and the Bible” (RYAN, 2022). Other parent states that “being a Christian household, it was very important to my family that our curriculum was free of overly worldly material and we were given the opportunity to learn about our faith and other religions” (INT.TEN, 2022).

Keeping family traditions was also a reason to homeschool as noted:

I was homeschooled and I chose homeschooling for my kids because I want to be able to interact to my children more. I also disagree with some of the teachings of the public school system. I want to teach values and good education at the same time at home. I want them to get grounded in our core values… then maybe go out (KLEMPEL C, 2022).

Some parents, simply want to stay longer with their children as noted:

Initially, we chose to homeschool when our local school district decided to go from half-day kindergarten to full-day kindergarten… a week before school started. I was not prepared to send my daughter away all day. We continued to homeschool because we enjoyed it so much and I desire to build strong family roots, despite our busy schedules (DEPEW, 2022).

The covid-19 put the parents to test and give opportunity to explore home-based education (note: the parent emphasized that it was not homeschooling, as in the traditional definition):
It was required during the pandemic, the option for the in-person went away. The local schools were scrambling. At the time I was not working, but the school district came up with lessons and content. I just made sure they were on it. The quality was not near of the in-person education. It was incredibly challenging for me and not pleasant at time. In the US it is illegal for children not to be in enrolled in school, unless they are homeschooled… it was the only option (BODAH B, 2022).

When asking to describe their weekly routine on question four, parents have different answers. Only 10% of the interviewees stated they followed a routine determined by State guidelines, for example, the K-12 Stride Inc. grade-appropriate program. Stride Inc. also provides home-based education through online/virtual academies. The Washington State Virtual Academy (WAVA) is free, including materials and supplies. Lessons are uploaded daily and the parents just follow the given routine. Students meet teachers for assessment and tests are periodically taken throughout the year.

The other 90% of the interviewed parents agreed to have a somewhat flexible routine. Some involved beginning with the core subjects “we started with English, and went through each subject, taking as much time as each child needed, sometimes I needed to add more explanation” (WOODS, 2022). Another parent also prefers to begin with the core subjects then move to “classical conversations - history, art, and science. One day a week my mom helps them too, but I leave the lesson plan for that day” (KLEMPEL C, 2022). Other parent prefers a rotating schedule where children “work with me, work independently, and with each other. Chores and meals are a part of the schedule” (DEPEW, 2022).

Overall, the routine reported by the parents included mostly 5 days a week. One of the programs followed cited by different parents is called Classical conversations. However, there is still a degree of flexibility on the subjects:

Every child works on reading, writing and math four days a week. They also work in Latin, Math, English, Science, Geography, History. The fifth day of schooling we get together with other friends to practice the work we have been doing, do a science project, an art project, practice public speaking, and review the past seven weeks of memory work together. This program is called Classical Conversations (RYAN, 2022)

Other interviewer, pointed out routine similarities when their homeschool routine was compared to a regular school:

I would say our weekly routine was very similar to that of a public or private school. In certain days, we would study specific subjects, and this would all take place in a typical school week (Monday through Friday). We typically started the school day at 7 or 8am and would finish between 3 to 5pm. Homework was finished within the school day, since we were already at
home and did not have to travel there to finish it! We would take occasional field trips and perform science experiments as well, but obviously there would only be the school aged children in the family participating instead of a whole class (INT. TEN, 2022).

On question five, all the interviewees reported that the curricula were decided along with a qualified teacher or by the parents when they met the Washington State qualifications mentioned earlier in this paper. Most families noted that they received advice from friends and family members while choosing the curricula as well.

Regarding question six, when asked if the students were tested, all parents (100%) answered yes, but most answers varied greatly on how testing occurred. Some of the families “ordered State achievement tests every year, and then submitted the results to the field counselor-board” (WOODS, 2022). Official testing generally started when their children were at least eight years old: “in our State we do not have to report our children as being homeschooled until third grade, which is the age of my oldest. So, this year will be the first year he will be tested in the public school system” (RYAN, 2022).

Some curricula used by the parents have tests included on them, depending of the subject: “certain subjects like math have weekly tests, as well as unit tests. We also have always requested to participate in local school testing and college entrance exams. Our present state requires some form of independent testing each year as well” (DEPEW, 2022).

Reflecting on his own experience on homeschooling, one parent comment about testing:

We did not do testing often, at the end of a book there was testing. When I left the house at age of 19, I needed a GED and I got a practice study book. I was going to escape, but my boss picked me up and hauled me in. I took all in one sitting. Two weeks later, I received the noticed that I passed. I guess the bar is not as high as it should be… always learning (KLEMPEL A, 2022).

The need for test standardization or regulations was also noted:

I think we should have exams in a testing center, like SAT and GRE requiring to proof id and tests being proctored. I understand that in this country people take their freedoms very seriously, but students should get a comparable way of education at home. So, students have to be in a level of equity with other students from different systems. Also, the State should provide materials. Education is funded by property taxes. You pay but you do not utilize some of that money (BODAH B, 2022).
On question seven on challenges of homeschooling the responses varied greatly as well, from curricula to time. Some parents used to struggle themselves with a subject “English was hard, vocabulary and pronouns, I was bored with that myself” (WOODS, 2022). Scheduling, balancing work and school, working with their unique kids’ personalities, some perfectionism, the need for reassurance were also listed as challenges.

Home and School or drawing the line between being a parent and a teacher, or being a son/daughter and a student can be another hard challenge:

I would say one of the biggest challenges… was the home life and school separation. Life still continued even while we were studying, so it could be a bit distracting with the sounds and routines found in a home. Our family also had the children help out with chores, so there would be interruptions at time because of that. I would say that another challenge I am aware of is just a particular parent’s capacity to teach. There are some people (teachers) that are very well rounded and can teach any subject matter with ease but many have their strengths and weaknesses in particular subjects. This often results in needing to find someone to assist you in teaching particular subject (INT. TEN, 2022).

Socialization was another factor that posed a challenge: “one challenge of homeschooling is keeping your kids socialized and meeting up with others. We do that by meeting with others weekly, participating in local sports, doing music lessons, and going to church” (RYAN, 2022). A total of 40% of the parents mentioned to participate in a co-op.

Multiple children being homeschooling at the same time can impact learning, as a parent drew from his own experiences:

The biggest challenge was consistency, my mom had 12 students and was managing a household… She got overwhelmed at times… She is very detailed oriented person, so she built a schedule for the whole family in a 15 min increment, but it can impossible to learn in that system. It would be overwhelming for a week and then done. Setting goals is good but if you cannot achieve them you should reach out (KLEMPEL A., 2022).

Financial and time investment can become challenging. Homeschooling demands commitment, it was noted that:

Homeschooling is a huge time-commitment, especially as students get older. There are expenses and often income sacrifices and financial difficulties. Space can be an issue as well and there are extra materials to store and records to keep. More meals happen at home…and more messes! Also, when you are home during the day, others expect you to be readily available, and there are many distractions (DEPEW, 2022).
The covid-19 pandemic also posed challenges without giving the time for parents to prepare

Lots of challenges. From in-person to suddenly at home, looking at a screen… before the pandemic there was a change in the Math learning system too. The way children learn right now is different from when I learned. There was a conflict between what the schools wanted and what the parents could do. Severe challenge to the students on the first year of covid. They basically lost that year. Challenges to learn new online systems like zoom, google classroom and connection dropping. It was very laborious to start, it took 5 to 10 min, and the student ended up missing instruction and got lost. Also, there are many distractions at home, they would need to be reminded to pay attention, and be looking at the other classmates on video, where teacher might not have seen the screen. Extra help was limited by the teacher. The kids in the house all day, managing two in school and a baby, keeping track of time… The students did not enjoy the online system during the first year of covid but it was the only option (BODAH B, 2022).

On question eight, main advantages of homeschooling were reported: flexibility or freedom to choose the curricula, to change the schedule, to determine priorities, as well as to be involved with their children.

Choice of curriculum and having a flexible schedule are big advantages. Most rigorous elementary age curriculums can be finished before lunch, allowing more time for free play and the arts... The most beautiful advantages for us have been family closeness. My children get along with each other and I am thankful that they spend so much time together (DEPEW, 2022).

Adjust schooling according to travel plans is another advantage related to flexibility: “homeschooling often leaves one with more freedom for their schedule, so people who have strenuous job situations, and would like to take vacations while school is in session could find homeschooling to be a welcome freedom” (RYAN, 2022).

Parents are more involved with their children “staying focused on each child, no need to do classroom management’ (KLEMPEL C, 2022). And education can become personalized education as noted:

I would say one of the biggest advantages is the ability to teach each student one-on-one, and executing the learning style best suited for them. This is huge because not everyone learns the same way. Expecting students to excel with a one size fits all educational program can really set a student for a tough road ahead. Another advantage I talked about earlier is having control over what curriculum your child uses and the freedom to incorporate faith-based material in it if that is something important to you. While homeschooling costs more out of pocket than public school, it is an extremely affordable route to go especially if Christian or private school is out of someone’s means financially (INT. TEN, 2022).
When interviewers were asked about the future perspectives for this educational system on question nine. All of them, 100%, agreed that homeschooling is growing. For instance:

In America homeschooling has been big but in the last couple of years, it is exploding. Parents were able to watch what the school system was doing, teachers unions more concerned about the teacher than the students (I understand that is their job though) … However, students are the next generation so we need to prepare them. Washington State changed rules about attendance that might encourage parents to keep their children at home (KLEMPERL A, 2022).

The pandemic was mentioned as a factor for the recent increase on homeschooling:

I think this pathway to the educational system is going to continuously grow. As we saw with the covid-19 pandemic, many parents faced the decision whether to send their children back to school or homeschool them themselves. Early in the pandemic, many parents did not have the option and had to start attempting to homeschool for the sake of their children’s education! I think some people actually preferred this route after trying it and want to continue homeschooling as long as they can. Another dilemma with the public school system is the curriculum that is used. Depending on a family’s political and/or religious beliefs, some parents are very worried about what their children are being taught (INT. TEN, 2022).

Some parents believe that having more recognition and support will encourage the adoption of this system:

The cost per pupil in the states where my family has homeschooled is $13-$18,000+ per year. There were years where sending my kids to school would have a price tag of about $50,000. I am thankful to hear that there are now curriculum and activity reimbursement programs that some families are able to participate in. I am sure that alleviates a lot of financial burdens and believe much more of this should happen (DEPEW, 2022).

However, some parents point out that the increase might be limited to certain areas “Homeschool is growing though but in specific communities… where parents choose to leave some curricula. It is a way to control what is taught and keep their faith as a priority” (BODAH B, 2022).

Finally, in question ten a total of 40% of the interviewers provided additional information, commenting more on homeschooling. Some prefer homeschooling to keep a better learning environment: “the school systems caused anxiety on my kids” (WOODS, 2022). The importance of co-ops was reinforced “homeschooling is done
best in community, even the most independent people need others support to thrive while homeschooling” (RYAN 2022).

Advances in the overall educational system were also noted: “the State now allows our homeschoolers to be part-time students and participate in band, sports... Our present school district is especially welcoming, and this has been a blessing for our family” (DEPEW, 2022).

Drawing from her own experiences in this system, an interviewer reported succeeding in homeschooling:

As someone who was homeschooled K-12, I would definitely recommend this route to any parent looking for an alternative to public school. I had a very positive experience during my school years and was successful in attending university and obtaining a bachelor of science degree afterwards. There is a lot of good information online about this educational pathway and I encourage you to read about it and consider this rewarding opportunity for your family (INT. TEN, 2022).

Moreover, evidence suggests that homeschoolers perform equal to or better than their conventionally schooled peers on measures of achievement and socioemotional functioning, but methodological limitations, especially selection effects, make it premature to draw definitive conclusions (VALIENTE et al., 2022).

When we compare our study with others, we noted similar reasons why parent homeschool, such as concern about the school environment such as safety, drugs or negative pressure from colleagues, dissatisfaction with the academic background of schools and desire to provide religious formation. Other motivations were children with special needs other than physical or mental, desire for a non-traditional approach in education, child with mental or physical health problems and desire to provide moral education (IES, 2019).

Schafer and Khan (2016) conducted a comparison between homeschoolers, flexi-schoolers, and enrolled students presenting a profile of prevalent homeschoolers that were from skilled parents, in the higher income categories, owning their own home and living at the same address for a considerable period. We have not performed socio-economic analysis in this study; however, we understand that family structure and dynamics is vital to the success of homeschooling.

There is a common-sense critique that homeschooling isolates children from mainstream society, depriving them of social experiences that they need to thrive as adults. Some parents in our study try to be part of co-ops to address this concern. Research shows that homeschooled children, for all or most of their K-12 education, had less exposure to mainstream school-based social opportunities but reflected that
homeschooling had not hindered their ability to navigate society effectively (HAMLIN and CHENG, 2022).

The role of the covid-19 pandemic

The covid-19 pandemic significantly contributed to increase homeschooling numbers. In the past two years, parents learned that they can keep their children safe at home while contributing to their intellectual growth. A concern for these new families choosing homeschool could be the readaptation to the in-person system. The Washington Office of Superintendent of Public Instructions reports that the 2021 homeschool enrollment count was about 32,000 students in 20,304 families. That is nearly double from 2019 when there were 20,844 homeschoolers in 13,614 families enrolled (MAJORS, 2022).

It is important to note though that the homeschooling enrollment numbers were already growing. According to the Institute of Education Sciences, the number of homeschool students increased from 850,000 in 1999 to 1,690,000 in 2016, and the percentage of those who were homeschooled nearly doubled from 1.7% to 3.3% in the same period (IES, 2019). These same figures differ from those raised by the National Home Education Research, which estimated 1,000,000 in 1997 and 2.3 million para 2016 (RAY, 2022). Although there is great divergence in estimates, both institutions show that the number of students in this modality has been growing every year.

During the pandemic and isolation period, many students transition to precarious and hostile realities, without access to technological resources and without support. There were few or no pedagogical support going to remote education. In addition, the lack of investment in education, and continuing education programs for teachers, also caused difficulties for teachers to adapt to the pandemic teaching scenario (AVELINO and MENDES, 2020).

Another problem refers to the boundary between school and home, which used to be physical and then became symbolic. Even if momentarily, the end of the autonomous construction of subjectivity can result in a lack of engagement with learning (SOUZA, 2021). The consequences of the pandemic on education are yet to be fully measured. Many problems not only extend from a pre-pandemic scenario, but are exacerbated by it.

In the readaptation process to return to school levels of indiscipline have also noticeably increased. It is inconvenient because it breaks the stability of an environment conducive to learning. The family structure is fundamental while preparing the
children to school, having a significant impact on the learning process (NAZARIA et al, 2020).

Although there is no evidence to show that homeschoolers have compromised academic or socio-emotional outcomes (VALIENTE et al, 2022) but experience diversity might be limited. In the same line, despite the fact that education without school produces good academic results, it might deny the possibility of living with a plurality of people, values and worldviews. (PICOLI, 2020).

Parents and guardians must find ways to address the concerns above through other activities that present an inclusive environment such as co-ops, community groups, church and other associations. Otherwise, the lack of exposure might result in problematic experiences later on (ARENDT, 2016). Regulations are also important because “growing up in a family environment has positive effects on development and well-being, but for many children this arrangement is unstable” (KVC, 2017, p. 54).

Overall, homeschooling can provide a healthier learning environment due to the possibility of focusing on areas of interest that take into account the subjectivity of each individual. Conducting the learning process with greater freedom and focus on the children’s needs is important. Cogan noted that:

Descriptive analysis reveals homeschool students possess higher ACT scores, GPAs and graduation rates when compared to traditionally-educated students. In addition, multiple regression analysis results reveal that students, at this particular institution, who are homeschooled, earn higher first-year and fourth-year GPAs when controlling for demographic, pre-college, engagement, and first-term academic factors (2010, p. 24)

Final Considerations

Homeschooling is a legal education modality in all states of the US, with increasing number of registered families. In this paper, we looked at Washington State regulations as well as implementation – in practice by surveying parents and guardians. There are many challenges and advantages described by the families while homeschooling.

The main reported benefits were flexibility or freedom to choose the curricula, to change the schedule, to determine priorities, as well as the direct involvement in their children’s education. Our results have shown that the significant increase on homeschooling, in these past years, is related to different reasons such as faith-based or family religious practices, and a product of the covid-19 pandemic.
With the pandemic, many families were forced to be at home with their children and realized that they could explore homeschooling from then on. Overall, the heterogeneity in the US homeschooling, ruled differently in each State, can cause difficulties in summarizing the topic and provide straight-forward guidelines or national regulations.

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