MEMORANDUM

TO: Census Based Funding Advisory Group

FROM: Tom Lovett, Headmaster St. Johnsbury Academy

Mark Tashjian, Headmaster Burr & Burton Academy

Twila Perry, Headmaster Lyndon Institute

Bill Bugg, Headmaster Thetford Academy

DATE: January 7, 2019

We have been partners with our communities in serving the needs of our children for nearly two centuries. We are committed to continuing our missions, serving our communities, and providing excellent educational opportunities for students.

We appreciate the role our schools have in our educational system, and we understand that reimbursing us differently than public schools in this model would pose challenges. We stand ready to continue our community partnership in this new endeavor with the goal of providing students with high quality special education services. As we all move forward in the rule making process, we ask for consideration of the following issues:

- Reforms must be comprehensive for both public schools and the town academies in the
 census-based model. Service plans for students attending town academies must reflect
 the same systemic changes that are anticipated in service plans for students attending
 public schools. In other words, we would like assurance that restructuring of services
 required under IEP's will go hand-in-hand with restructuring of funding and will be
 consistent with public school IEP requirements.
- The rules should clearly identify services that will constitute excess costs and explain
 how those costs will be adequately reimbursed. We would like to be assured that costs
 for extraordinary services associated with specific students, as determined by the IEP
 team and approved by the LEA's, are appropriately reimbursed.
- The pilot studies that supported Act 173 demonstrate some promising methods for
 modifying the delivery of services. However, we were not participants in the pilot and we
 have concerns about the impact of funding and service changes of this magnitude.
 Along with our partners in the public sector, we will make our very best effort to serve
 students successfully and work to improve opportunities and outcomes.
- We hope that parents have a meaningful mechanism for their voice to be heard throughout the rulemaking process to ensure that our new system truly addresses the needs of those we are committed to serving.

Thank you for your consideration.