

Taconic and Green Regional School District
Bennington-Rutland Supervisory Union

December, 2, 2023

Dear members of the Vermont State Board of Education,

This letter is being submitted on behalf of the Taconic and Green Regional School District and Bennington-Rutland Supervisory Union Boards, and is in response to The State Board of Education's request for comments on the proposed amendments to the Independent School Program Approval Rules designed to incorporate the principles and goals of Act No. 1 (2019).

The Taconic and Green Regional School District (T&G) is one of three public school districts operating under the Bennington-Rutland Supervisory Union (BRSU). No district in the BRSU operates a school serving grades 9 -12. All our districts have operated with school choice for grades 9 -12 for our entire history. Our districts pay tuition for grade 9 – 12 students, to schools chosen by our families, at approved rates, and subject to those schools meeting the requirements set by the State of Vermont for qualification to receive public tuition. Because of this structure, our districts have always had a keen interest in the regulatory structure in place for independent schools to qualify to receive public tuition dollars.

The T&G and BRSU have strongly supported and appreciated the changes made to Rule Series 2200 in recent years. These changes have helped Rule Series 2200 to be more consistent with the values considered important by our school boards and our communities.

We also strongly support the State Board of Education's work to incorporate the principles and goals of Act No. 1 (2019) into Rule Series 2200. Again, we consider these changes to be important to maintain consistency with the values and principles our communities consider to be important.

We believe it is important to note that this statement on the values important to our communities is not speculation. We included a question to gauge community views in our 2023 Ballot – and over 90% of voters indicated support for the statement copied at the end of this letter, which we believe to be consistent with the recent and proposed changes to Rule Series 2200.

Our school boards look to Rule Series 2200 to provide broad and stringent tests that must be met by independent schools for them to qualify as options for our families to educate their children with tuition being paid by our districts under Vermont's long-standing school choice structure.

We fully support the provisions of Act No. 1 (2019), and we believe that the logical approach for its application to independent schools is the rule making process and updates to Rule Series 2200.

We are aware that there have been arguments that implementation of Act No. 1 as it relates to independent schools should follow some alternate course. Our districts believe that attempting to require our nonpublic schools to operate entirely the same way as public schools is impractical on the basis of governance differences alone. One of the items voters overwhelmingly supported in the ballot

item quoted below is "The electorate supports the current structure of independent schools having autonomy over their governance and operations within the current regulatory framework."

Therefore, we consider it to be fundamentally logical to maintain and update the parallel regulatory structure we have long relied upon to ensure that independent schools to which we pay tuition must meet strict qualification criteria. Our boards' expectation from Rule Series 2200 is that it provides our districts with a mechanism to ensure that the students we tuition to any independent schools under our school choice program receive the same quality of education we strive to provide in our schools, in an environment consistent with that we strive to maintain in our own schools.

We thank the State Board of Education for its work to continue to improve Rule Series 2200. This is particularly important work for districts like ours that have a long history of partnering with independent schools to educate our kids. A strong Rule Series 2200 helps to ensure a level playing field for the schools serving our children.

Best regards,

Herbert Ogden, Chair, Taconic and Green Regional School District

Jim Salsgiver, Chair, Bennington-Rutland Supervisory Union

cc: T&G/BRSU local legislators

2023 Taconic and Green Regional School District Ballot question (received 90.7% support):

Shall the Taconic & Green Regional School District advise the School Board, the Vermont General Assembly and Governor that:

1. Because our district does not operate a public high school, students have the opportunity to choose from a variety of public and independent high school options;
2. The electorate does not support the public funding of any school that discriminates against students or staff on the basis of race, creed, color, national origin, disability, marital status, sex, sexual orientation, or gender identity;
3. The electorate supports the current structure of independent schools having autonomy over their governance and operations within the current regulatory framework. This structure of oversight has enabled our districts to make high school education available, as required by the State of Vermont, while maintaining confidence that the schools serving our students provide a high quality of education; and
4. The electorate opposes efforts to change the current structure in a way that eliminates educational opportunities made possible by our current practice of high school choice. The electorate believes our current local educational system, in a great example of Vermont traditions, has evolved within this current structure, through a high level of community commitment and an appropriate exercise of local control, to provide high quality, equitable educational opportunities for our students.