



December 12, 2016

Re: Comment on VSBE Proposed Rulemaking on Independent School Approval

To the esteemed members of the Vermont State Board of Education:

On behalf of the Vermont Family Network (VFN), I would like to offer input in support of the State Board to move forward with its proposed rulemaking regarding Vermont-based Independent Schools. VFN is the federally designated Family to Family Health Information Center and the Parent Training and Information Center for Vermont, and the state's Family Voices and Parent to Parent affiliate. The organization was founded by parents of children with disabilities and is governed by a nonprofit board of directors. We are a family organization whose mission is to empower and support all Vermont families of children with special needs. VFN has had many years of experience in building capacity to educate and support families so they may help their at-risk children improve their early learning, school-aged, and post-secondary outcomes.

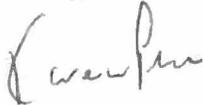
The proposed rules ensure open enrollment and that students in all categories of disabilities can be served by independent schools receiving public funding and have equity of school choice when an independent school is an option for all students living in districts where there is no public school and/or where school choice is available. Some independent schools have close to 90% of their students publicly funded and can deny access to students because they need special education services. We believe this practice is a violation of the constitutional rights of students with disabilities to access the same programs and services available to their non-disabled peers.

We have helped families whose children with disabilities have struggled with receiving appropriate services in an independent school. In one example, students were placed into a "one-size fits all" classroom for a portion of each day in an independent school, rather than receiving the individualized services they needed. Other students have had their specialized services removed, with the school claiming that educational goals were embedded into the existing curriculum/activities. When the public school sends their LEA service providers to the independent school site to provide services, coordination/communication between the LEA

service providers and the independent school can sometimes be difficult. In addition, other families have faced barriers enrolling their children in independent schools, ranging from waitlists where children with the most severe disabilities never seem to get to the top of the list while children with less severe disabilities get admitted, to parents who have been encouraged to obtain additional educational evaluations to “change” the qualifying disability category to one that the independent school was approved for in order for the child to gain admission.

These updated rules are crucial to ensuring that all students, regardless of their disability or protected class status, are able to enroll with their peers in any independent school that is funded with public education dollars and have successful outcomes. Our most vulnerable students need equal access to sound educational practices and we hope that the State Board will move forward with the proposed rulemaking to ensure that ALL of Vermont’s children have equitable access to a quality education.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Price". The signature is fluid and cursive, with the first name "Karen" being more prominent than the last name "Price".

Karen Price

Family Support Director, Vermont Family Network
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