

To: The Commission for the Future of Public Education in Vermont

From: Pam Reed, VCSEA President

Re: Public Comment Date: October 21, 2024

The Vermont Council of Special Education Administrators (VCSEA) has been one of the cornerstones of educational leadership in Vermont for over 35 years. Our organization has consistently supported special education administrators and leaders, fostering close collaboration with superintendents, principals, the Agency of Education, family support organizations, and various state entities. We remain vigilant regarding legislative developments at both the state and federal levels. Our partnership with our national organization, the Council of Administrators of Special Educators (CASE), a division of the Council for Exceptional Children, enriches our understanding and informs our practices on a national scale. Our mission is to provide leadership, support, collegiality, and mentoring to all educators in Vermont, especially those involved in special education. We take pride in being part of a state that prioritizes the future of all its children. With this commitment in mind, VCSEA offers the following insights for the Commission's consideration.

**Special Education Investment:** Special education serves as a vital support system, ensuring that children with disabilities can access a free and appropriate public education. When general education fails to meet the needs of these students, special education becomes a required investment. The costs associated with special education directly correlate with the resources necessary to create accessible classrooms and facilitate educational progress. The Commission should prioritize discussions around accountability in implementing Act 173 and the expectations surrounding Universal Design for Learning as it relates to special education spending. Special education is as expensive as it is needed to create access. The higher the level of access to the general education environment, the less expensive special education will be.

**Maintenance of Effort:** It is crucial for schools across Vermont to maintain both local and state investments in special education by ensuring consistent funding levels year over year. The Commission must recognize the federal implications of reducing special education spending. Should local education agencies (LEAs) cut back on expenditures, we risk losing federal funding due to Maintenance of Effort requirements—a loss we cannot afford, especially given the current challenges in education funding in Vermont.

**Governance:** VCSEA advocates for effective and efficient governance structures in Vermont that facilitate student access to quality education within reasonable distances from their homes. Class sizes, teacher-to-student ratios, governance models, and school configurations are all critical areas that warrant further investigation by the Commission. However, changes or standards in any of these areas must be carefully considered through understanding the state-wide impact of any recommendation.

**School Infrastructure:** Investment in school infrastructure is essential for enhancing educational delivery in Vermont. Achieving cost savings alongside improved educational outcomes requires careful consideration of our aging facilities. While we understand the goals of the Commission, it is important to consider this need when developing recommendations.

**Cost Containment:** We urge a thorough analysis of the potential consequences of indiscriminate cost containment measures. Schools have diverse needs, and communities face unique challenges. Any cost containment strategies should be scrutinized for their impact district by the district before implementation.

**Data Analysis:** Lastly, VCSEA recommends a comprehensive analysis of the state's spending drivers before making any recommendations. This should include a thorough statistical review of budgets and student counts, both before and after applying weighting factors and the Vermont funding formula. This process should be approached with diligence, as understanding the intricacies of cost drivers is crucial to avoid unintended and detrimental outcomes from misguided recommendations.

Thank you for your efforts. We look forward to reviewing your recommendations as you progress through this legislative session.