# Report on Public High School Choice 16 V.S.A. §822a (m)



**Report/Recommendations to the House and Senate Committees on Education** 

# Submitted by Secretary of Education Rebecca Holcombe



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#### **Legislative Reporting Requirement**

Act No. 129 of 2012

Act 129, Sec. 34 of 2012 re-codified Public High School Choice, from 16 V.S.A. §§1621 and 1622, to 16 V.S.A. § 822a. Section 822a (m) requires the Agency of Education to:

"[R]eport annually in January to the Senate and House Committees on Education on the implementation of public high school choice as provided in this section, including a quantitative and qualitative evaluation of the program's impact on the quality of educational services available to students and the expansion of educational opportunities."

# I. Background

On an annual basis, the Agency collects data on public high school choice, including the number of students taking part, by gender, grade, and eligibility for Free or Reduced Price Lunches (FRL).

Last year's submission is located here: 2016 AOE Public High School Choice Report

Act 129 provides for statewide public high school choice. The responsibility for implementation resides at the local and regional levels. Local and regional staff put into effect the provision that allows students to apply to any other public high school in the state.

Due to capacity constraints, the Agency did not collect qualitative data for the current year's report. Collection of qualitative data would necessitate an interview or survey of every high school student partaking in public high school choice as well as personnel at each high school.

# II. Implementation, School Year 2016 - 2017 (SY2017)

# A. Participation by Students

Participation in public high school choice has remained relatively steady for the past three years, with this year showing a slight increase of students to 391 from 380 in SY2016. SY2015 had 381 participants. During the same period, the total student population statewide has continued to decline. Enrollments shown in this report, both for a school and grades 9-12, are current year enrollments (SY2017).

Of the 60 schools in Vermont that offer grades 9-12, 56 schools have students participating in public high school choice. The four schools that have no students participating, either by sending or receiving students, are listed in Table 1.



Table 1: Schools with no participation in public high school choice in SY2017

Schools offering grades 9 - 12 Count = 4	- 12Enrollment% FRL for SchoolN = 4School		Grade Configuration	Grades 9-12 Enrollment
Totals	905			356
Rivendell Academy	204	38.73%	7-12	144
Canaan Schools	192	43.75%	PK-12	80
Danville School	367	37.06%	PK-12	99
Rochester School	142	53.52%	PK-12	33

Figures for the 56 schools with students participating in public high school choice during SY2017 are included in Table 2 below.

Schools offering grades 9 - 12 Count = 56	Enroll- ment N = 56	% FRL for School	Grade Config- uration	Grades 9-12 Enroll- ment	<b>Sent</b> N = 53	<b>Received</b> N = 51	Net Gain N = 24	<b>Net</b> <b>Loss</b> N = 27	<b>Neutral</b> N = 5
Totals	27,020			22,421	391	391	188	-188	
Arlington Memorial High School	208	42.31%	6-12	129	2	8	6		
Bellows Falls UHS #27	332	45.18%	9-12	332	27	2		-25	
Bellows Free Academy HS (Fairfax)	284	22.18%	9-12	284	14	3		-11	
Bellows Free Academy UHS #48	906	27.81%	9-12	901	0	15	15		
Black River UHS #39	153	41.18%	7-12	109	6	5		-1	
Blue Mountain USD #21	410	56.83%	PK-12	108	7	3		-4	
Brattleboro UHS #6	757	34.21%	9-12	752	0	20	20		
Burlington Senior High School	1,012	45.06%	9-12	1,011	9	9			0
Cabot School	184	47.83%	PK-12	52	3	0		-3	
Champlain Valley UHS #15	1,257	10.74%	9-12	1,257	10	29	19		
Chelsea Public School	194	56.19%	PK-12	55	2	0		-2	
Colchester High School	676	20.27%	9-12	669	6	10	4		
Craftsbury Schools	196	51.02%	PK-12	70	2	5	3		
Enosburg Middle-High School	439	54.90%	6-12	328	1	5	4		
Essex High School	1,222	22.75%	9-12	1,216	6	18	12		
Fair Haven UHS #16	407	48.16%	9-12	407	19	10		-9	
Green Mountain UHS #35	320	42.19%	7-12	215	8	14	6		
Hartford High School	489	25.36%	9-12	479	2	3	1		
Harwood UHS #19	506	21.15%	9-12	496	5	4		-1	
Hazen UHS #26	337	62.31%	7-12	231	7	1		-6	
Lake Region UHS #24	394	48.73%	9-12	394	1	20	19		
Lamoille UHS #18	483	52.38%	9-12	481	7	3		-4	
Leland And Gray UHS #34	314	40.76%	7-12	216	3	11	8		
Middlebury Union High School	615	25.20%	9-12	605	5	13	8		

Table 2: Participation in public high school choice SY2017, alphabetical by school



Schools offering grades 9 - 12 Count = 56	Enroll- ment N = 56	% FRL for School	Grade Config- uration	Grades 9-12 Enroll- ment	<b>Sent</b> N = 53	<b>Received</b> N = 51	Net Gain N = 24	Net Loss N = 27	<b>Neutral</b> N = 5
Totals	27,020			22,421	391	391	188	-188	
Mill River USD #52	446	35.87%	7-12	320	8	20	12		
Milton High School	481	31.60%	9-12	480	3	1		-2	
Missisquoi Valley UHS #7	814	47.42%	7-12	543	17	0		-17	
Montpelier High School	308	19.81%	9-12	308	2	10	8		
Mt Abraham UHS #28	643	30.79%	7-12	442	14	4		-10	
Mt Anthony Sr UHS #14	907	59.43%	9-12	907	8	2		-6	
Mt Mansfield USD #17	810	12.59%	9-12	810	10	9		-1	
North Country UHS #22A	715	52.17%	9-12	715	21	1		-20	
Northfield Middle/High School	312	33.01%	6-12	174	7	3		-4	
Otter Valley USD #53	533	39.96%	7-12	360	13	2		-11	
Oxbow UHS #30	337	54.01%	7-12	234	3	8	5		
Peoples Academy	265	30.57%	9-12	265	6	1		-5	
Poultney High School	188	38.83%	7-12	120	9	2		-7	
Proctor Jr/Sr High School	121	33.88%	7-12	82	8	7		-1	
Randolph UHS #2	397	34.01%	7-12	274	3	3			0
Richford Jr/Sr High School	232	53.02%	7-12	144	1	1			0
Rutland High School	849	36.04%	9-12	843	21	34	13		
South Burlington High School	924	16.88%	9-12	924	4	6	2		
South Royalton Elem/High School	381	40.16%	PK-12	114	1	3	2		
Spaulding UHS #41	675	44.44%	9-12	670	16	5		-11	
Springfield High School	431	49.19%	9-12	431	3	4	1		
Stowe Middle/High School	446	11.21%	6-12	257	0	7	7		
Twin Valley Middle/High School	229	47.16%	6-12	146	13	0		-13	
Twinfield USD #33	367	34.06%	PK-12	123	2	9	7		
U32 UHS #32	751	24.10%	7-12	509	10	8		-2	
Vergennes UHS #5	457	37.86%	7-12	302	9	9			0
West Rutland School	343	42.57%	PK-12	90	8	6		-2	
Whitcomb Jr/Sr High School	118	46.61%	7-12	78	1	1			0
Williamstown Middle/High School	290	42.07%	6-12	190	2	5	3		
Windsor School	608	40.13%	PK-12	233	3	0		-3	
Winooski High School	222	56.31%	9-12	211	11	4		-7	
Woodstock Sr. UHS #4	325	20.92%	9-12	325	2	5	3		

More schools showed an overall net loss of students (the number sent versus the number received) than showed a net gain of students – 27 schools had a net loss and 24 had a net gain. While that difference in schools is not large, the average size of the net loss schools is smaller than the net gain schools, having an average student population



of 441 for the net loss schools versus 537 for the net gain schools. Those figures encompass the entire student population at these schools, regardless of the grade configuration offered.

Looking at just the 9-12 student cohort in each school, the same trend is evident – net loss schools have an average 9-12 grade size of 345 versus 471 for the net gain schools. While the net gain group's average enrollment is skewed by the inclusion of two of the three largest high schools in the state (the third large high school was neutral in terms of loss and gain), the same pattern holds true if those two large high schools are excluded from the average enrollment calculation. If the enrollment of those two large schools is excluded in the average enrollment calculation, the net gain schools still have an average 9-12 enrollment of 401 versus 345 for the net loss schools. This means that, in very general terms, students partaking in public high school choice tend to choose larger schools.

The net sending schools are listed in Table 3. They are listed by percentage 9-12 enrollment net lost (sent minus received) through public high school choice participation. Four out of the five high schools with a grade 9-12 enrollment under 100 had a net loss of students.

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Table 3: Net sending schools	, or sumber by percent	1 5 12 5inneni 00n	

Schools offering grades 9 - 12 Count = 61	Enroll- ment N = 27	% FRL for School	Grade Config- uration	Grades 9-12 Enroll- ment	<b>Sent</b> N = 27	Received N = 22	Net Loss N = 27	% of 9-12 students sent
Totals	11,907			9,312	274	86	-188	
Twin Valley Middle/High School	229	47.16%	6-12	146	13	0	-13	8.90%
Bellows Falls UHS #27	332	45.18%	9-12	332	27	2	-25	7.53%
Poultney High School	188	38.83%	7-12	120	9	2	-7	5.83%
Cabot School	184	47.83%	PK-12	52	3	0	-3	5.77%
Bellows Free Academy HS (Fairfax)	284	22.18%	9-12	284	14	3	-11	3.87%
Blue Mountain USD #21	410	56.83%	PK-12	108	7	3	-4	3.70%
Chelsea Public School	194	56.19%	PK-12	55	2	0	-2	3.64%
Winooski High School	222	56.31%	9-12	211	11	4	-7	3.32%
Missisquoi Valley UHS #7	814	47.42%	7-12	543	17	0	-17	3.13%
Otter Valley USD #53	533	39.96%	7-12	360	13	2	-11	3.06%
North Country UHS #22A	715	52.17%	9-12	715	21	1	-20	2.80%
Hazen UHS #26	337	62.31%	7-12	231	7	1	-6	2.60%
Northfield Middle/High School	312	33.01%	6-12	174	7	3	-4	2.30%
Mt Abraham UHS #28	643	30.79%	7-12	442	14	4	-10	2.26%
West Rutland School	343	42.57%	PK-12	90	8	6	-2	2.22%
Fair Haven UHS #16	407	48.16%	9-12	407	19	10	-9	2.21%
Peoples Academy	265	30.57%	9-12	265	6	1	-5	1.89%
Spaulding UHS #41	675	44.44%	9-12	670	16	5	-11	1.64%
Windsor School	608	40.13%	PK-12	233	3	0	-3	1.29%
Proctor Jr/Sr High School	121	33.88%	7-12	82	8	7	-1	1.22%
Black River UHS #39	153	41.18%	7-12	109	6	5	-1	0.92%
Lamoille UHS #18	483	52.38%	9-12	481	7	3	-4	0.83%
Mt Anthony Sr UHS #14	907	59.43%	9-12	907	8	2	-6	0.66%
Milton High School	481	31.60%	9-12	480	3	1	-2	0.42%
U32 UHS #32	751	24.10%	7-12	509	10	8	-2	0.39%
Harwood UHS #19	506	21.15%	9-12	496	5	4	-1	0.20%
Mt Mansfield USD #17	810	12.59%	9-12	810	10	9	-1	0.12%
Avg enrollment	441.0		Avg 9-12	344.9				

Four schools had a net loss of students greater than 5%: Twin Valley Middle/High School, Bellows Falls Union High School, Poultney High School, and Cabot High School. Of those four schools, two had no students choosing to come in.

The net receiving schools are listed in Table 4. They are listed by percentage 9-12 enrollment net gained (received minus lost) through public high school choice participation. Of the 24 net gain schools, only one has a 9-12 enrollment under 100.



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		of 9-12 student body net sent/received

Schools offering grades 9 - 12 Count = 24	Enroll- ment N = 24	% FRL for School	Grade Config- uration	Grades 9-12 Enroll- ment	<b>Sent</b> N = 21	<b>Received</b> N = 24	Net Gain N = 24	% of 9-12 students received
Totals	12,897			11,300	94	282	188	
Twinfield USD #33	367	34.06%	PK-12	123	2	9	7	5.69%
Lake Region UHS #24	394	48.73%	9-12	394	1	20	19	4.82%
Arlington Memorial High School	208	42.31%	6-12	129	2	8	6	4.65%
Craftsbury Schools	196	51.02%	PK-12	70	2	5	3	4.29%
Mill River USD #52	446	35.87%	7-12	320	8	20	12	3.75%
Leland And Gray UHS #34	314	40.76%	7-12	216	3	11	8	3.70%
Green Mountain UHS #35	320	42.19%	7-12	215	8	14	6	2.79%
Stowe Middle/High School	446	11.21%	6-12	257	0	7	7	2.72%
Brattleboro UHS #6	757	34.21%	9-12	752	0	20	20	2.66%
Montpelier High School	308	19.81%	9-12	308	2	10	8	2.60%
Oxbow UHS #30	337	54.01%	7-12	234	3	8	5	2.14%
South Royalton Elem/High School	381	40.16%	PK-12	114	1	3	2	1.75%
Bellows Free Academy UHS #48	906	27.81%	9-12	901	0	15	15	1.66%
Williamstown Middle/High School	290	42.07%	6-12	190	2	5	3	1.58%
Rutland High School	849	36.04%	9-12	843	21	34	13	1.54%
Champlain Valley UHS #15	1,257	10.74%	9-12	1,257	10	29	19	1.51%
Middlebury Union High School	615	25.20%	9-12	605	5	13	8	1.32%
Enosburg Middle-High School	439	54.90%	6-12	328	1	5	4	1.22%
Essex High School	1,222	22.75%	9-12	1,216	6	18	12	0.99%
Woodstock Sr. UHS #4	325	20.92%	9-12	325	2	5	3	0.92%
Colchester High School	676	20.27%	9-12	669	6	10	4	0.60%
Springfield High School	431	49.19%	9-12	431	3	4	1	0.23%
South Burlington High School	924	16.88%	9-12	924	4	6	2	0.22%
Hartford High School	489	25.36%	9-12	479	2	3	1	0.21%
Avg enrollment	537.4		Avg 9-12	470.8				



Five schools had equal numbers of students leaving the school and choosing to come to the school. Table 5 lists those schools.

Schools offering grades 9 - 12 Count = 5	Enroll- ment N = 5	% FRL for School	Grade Config- uration	Grades 9- 12 Enrollment	<b>Sent</b> N = 5	<b>Received</b> N = 5	<b>Neutral</b> N = 5
Totals	2,216			1,809	23	23	
Burlington Senior High School	1,012	45.06%	9-12	1,011	9	9	0
Randolph UHS #2	397	34.01%	7-12	274	3	3	0
Richford Jr/Sr High School	232	53.02%	7-12	144	1	1	0
Vergennes UHS #5	457	37.86%	7-12	302	9	9	0
Whitcomb Jr/Sr High School	118	46.61%	7-12	78	1	1	0

Table 5: Schools with equal sending and receiving in public high school choice in SY2017

# B. Participation by Gender and Eligibility for Free and Reduced Price Lunch (FRL)

Table 6 shows that students participating in public high school choice are slightly less often FRL eligible than what it observed in the statewide 9-12 population. They are also more often female than male, with FRL eligible males making up a smaller proportion of the public high school choice population than they do in the general 9-12 statewide population.

Table 6: Participation in Public High School Choice and Statewide Enrollment by FRL and Gender

Gender	Total Public School Choice Students	Public School Choice Students FRL - No	Public School Choice Students % FRL - No	Public School Choice Students FRL - Yes	Public School Choice Students % FRL - Yes	VT Statewide 9-12 Enrollment FRL - No	VT Statewide 9-12 Enrollment % FRL - No	VT Statewide 9-12 Enrollment FRL - Yes	VT Statewide 9-12 Enrollment % FRL – Yes
Female	192	130	68%	62	32%	8,107	66%	4,140	34%
Male	199	147	74%	52	26%	8,615	65%	4,648	35%
Total	391	277	71%	114	29%	16,722	66%	8,788	35%

# C. Grade Level

This year, as in SY2016, the distribution of students across the grades remained progressive:

 Table 7: Participation in public school choice by grade level

Grade	SY16 count	% of Total	SY17 count	% of Total						
9	86	22.0%	75	19.2%						
10	82	21.0%	112	28.6%						
11	101	25.8%	99	25.3%						
12	111	28.4%	105	26.9%						
Total	380		391							

While overall high school grade enrollments have gradually declined over time, in most cases statewide, participation in public high school choice by grade has varied. As an example, the 86 students in 9<sup>th</sup> grade in SY2016 grew to 112 10<sup>th</sup> grade students in



SY2017, an increase of 26 students in that grade cohort choosing public high school choice for this current year versus last year.

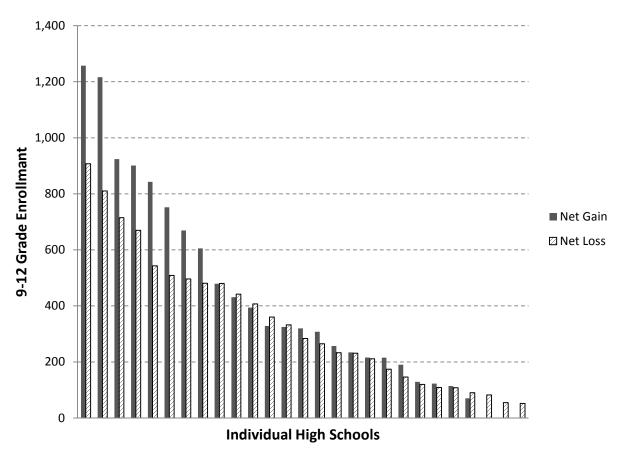
# **D. School Participation in Public High School Choice**

Of the four schools that neither received nor sent public high school choice students (Table 1), one had an extremely small 9-12 cohort (Rochester High School, 33 students grades 9-12) while another district was an interstate district and exempt from 16 V.S.A. § 822a (Rivendell Academy).

Of the remaining two high schools, the Canaan Schools are geographically isolated from other Vermont high schools, with the closest high school being approximately one hour away. Danville School, the fourth high school with no students participating in public high school choice, has three other high schools within 30 minutes, but all of those schools had a net loss of students.

#### III. Patterns A. Size of Schools

As noted earlier and as seen in Tables 3 and 4, and as seen in Graph 1 below, on average, public high school choice students tend to choose larger schools than their home high school.



Graph 1: Grade 9-12 enrollments for schools with students in public high school choice



Table 8 lists the schools serving grades 9-12. The table is sorted by the grade 9-12 enrollment for each participating school, from low to high.

Schools offering	Enroll-	% FRL	Grade	Grades 9-12	Sent	Received	Net	Net	Neutral
grades 9 - 12 Count = 56	<b>ment</b> N = 56	for School	Config- uration	Enroll- ment	N = 53	N = 51	<b>Gain</b> N = 24	<b>Loss</b> N = 27	N = 5
Totals	27,020			22,421	391	391	188	-188	
Cabot School	184	47.83%	PK-12	52	3	0		-3	
Chelsea Public School	194	56.19%	PK-12	55	2	0		-2	
Craftsbury Schools	196	51.02%	PK-12	70	2	5	3		
Whitcomb Jr/Sr High School	118	46.61%	7-12	78	1	1			0
Proctor Jr/Sr High School	121	33.88%	7-12	82	8	7		-1	
West Rutland School	343	42.57%	PK-12	90	8	6		-2	
Blue Mountain USD #21	410	56.83%	PK-12	108	7	3		-4	
Black River UHS #39	153	41.18%	7-12	109	6	5		-1	
South Royalton Elem/High School	381	40.16%	PK-12	114	1	3	2		
Poultney High School	188	38.83%	7-12	120	9	2		-7	
Twinfield USD #33	367	34.06%	PK-12	123	2	9	7		
Arlington Memorial High School	208	42.31%	6-12	129	2	8	6		
Richford Jr/Sr High School	232	53.02%	7-12	144	1	1			0
Twin Valley Middle/High School	229	47.16%	6-12	146	13	0		-13	
Northfield Middle/High School	312	33.01%	6-12	174	7	3		-4	
Williamstown Middle/High School	290	42.07%	6-12	190	2	5	3		
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Green Mountain UHS #35	320	42.19%	7-12	215	8	14	6		
Leland And Gray UHS #34	314	40.76%	7-12	216	3	11	8		
Hazen UHS #26	337	62.31%	7-12	231	7	1		-6	
Windsor School	608	40.13%	PK-12	233	3	0		-3	
Oxbow UHS #30	337	54.01%	7-12	234	3	8	5		
Stowe Middle/High School	446	11.21%	6-12	257	0	7	7		
Peoples Academy	265	30.57%	9-12	265	6	1		-5	
Randolph UHS #2	397	34.01%	7-12	274	3	3			0
Bellows Free Academy HS (Fairfax)	284	22.18%	9-12	284	14	3		-11	
Vergennes UHS #5	457	37.86%	7-12	302	9	9			0
Montpelier High School	308	19.81%	9-12	308	2	10	8		
Mill River USD #52	446	35.87%	7-12	320	8	20	12		
Woodstock Sr. UHS #4	325	20.92%	9-12	325	2	5	3		
Enosburg Middle-High School	439	54.90%	6-12	328	1	5	4		
Bellows Falls UHS #27	332	45.18%	9-12	332	27	2		-25	

Table 8: Participation in public high school choice SY2017, by grades 9-12 enrollment

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Schools offering grades 9 - 12 Count = 56	Enroll- ment N = 56	% FRL for School	Grade Config- uration	Grades 9-12 Enroll- ment	<b>Sent</b> N = 53	<b>Received</b> N = 51	Net Gain N = 24	Net Loss N = 27	Neutral N = 5
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Lake Region UHS #24	394	48.73%	9-12	394	1	20	19		
Fair Haven UHS #16	407	48.16%	9-12	407	19	10		-9	
Springfield High School	431	49.19%	9-12	431	3	4	1		
Mt Abraham UHS #28	643	30.79%	7-12	442	14	4		-10	
Hartford High School	489	25.36%	9-12	479	2	3	1		
Milton High School	481	31.60%	9-12	480	3	1		-2	
Lamoille UHS #18	483	52.38%	9-12	481	7	3		-4	
Harwood UHS #19	506	21.15%	9-12	496	5	4		-1	
U32 UHS #32	751	24.10%	7-12	509	10	8		-2	
Missisquoi Valley UHS #7	814	47.42%	7-12	543	17	0		-17	
Middlebury Union High School	615	25.20%	9-12	605	5	13	8		
Colchester High School	676	20.27%	9-12	669	6	10	4		
Spaulding UHS #41	675	44.44%	9-12	670	16	5		-11	
North Country UHS #22A	715	52.17%	9-12	715	21	1		-20	
Brattleboro UHS #6	757	34.21%	9-12	752	0	20	20		
Mt Mansfield USD #17	810	12.59%	9-12	810	10	9		-1	
Rutland High School	849	36.04%	9-12	843	21	34	13		
Bellows Free Academy UHS #48	906	27.81%	9-12	901	0	15	15		
Mt Anthony Sr UHS #14	907	59.43%	9-12	907	8	2		-6	
South Burlington High School	924	16.88%	9-12	924	4	6	2		
Burlington Senior High School	1,012	45.06%	9-12	1,011	9	9			0
Essex High School	1,222	22.75%	9-12	1,216	6	18	12		
Champlain Valley UHS #15	1,257	10.74%	9-12	1,257	10	29	19		

# IV. Agency of Education's Responsibilities for Administration and Oversight of School Choice, SY2017

# A. Fielding Inquiries

Agency staff respond as requested to administrative and legal questions relating to public high school choice from administrators, guidance staff, and families.

# B. Common Dates for Application Process, January 2017

In response to questions and suggestions from administrators and staff in the field, the Agency continues to develop and distribute information regarding public high school choice. The Agency communicates with the field regarding two important parts of the application process:



- Common dates for schools to follow in the application process, based on statutory requirements (e. g., applications are due on March 1 and students' acceptances are due April 15) and reasonable steps in between, for the lottery process; and
- Combined statutory requirement (February 1 for school boards to determine capacity to receive students each year) and a reasonable interpretation (also February 1) of when boards shall make their discretionary determinations on the number of students allowed to transfer from their school.

These and other communications are included in the Agency's Weekly Field Memos, which are emailed to all principals and superintendents, and posted on the Agency's <u>Public High School Choice</u> web page.

# C. Data Collection: Numbers of Students Transferring to and from Other Schools

AOE needs to collect data on student's first, second, and third choices along with any waiting lists sending schools may have.

Related to the preceding paragraph, the Agency, pursuant to 16 V.S.A. §242 (4)(A), will send a request for information to Business Managers, after April 15, for School Year 2017-2018 covering:

#### Sending schools

- What was the limit set by the school board on transfers to other schools?
- How many students applied to attend another school?
- Was there a waiting list and, if so, how many could not go?

#### Receiving schools

- What was the capacity the high school board set for accepting public high school choice students for the coming school year?
- How many applications were there?
- How many did the high school accept and enroll?

The data received from the collection will be related to the data reported in the fall census. As previously noted, those data include only the number of students transferring to and from which schools, their gender, FRL eligibility status, and grade.

# D. Public High School Choice Web Page

This winter, Agency staff have reviewed, reorganized, and revised all documents on the Public High School Choice web page.



# V. Agency Recommendations

#### A. Reporting Requirement

This report is the fifth report following passage of Act 129 of 2012. It is the Agency's request that the sunset provision on this reporting requirement, in 2 V.S.A. § 20(d), be applied to this reporting requirement. At this time, the Agency has filed five annual reports on Act 129 and the value of additional reports is not clear. The information will likely be redundant and of limited value, and the Agency has limited capacity to meet reporting requirements such as this report.

