

Memorandum

To: Chairperson Kate Webb, House Education Committee
Members of the House Education Committee

From: Sue Ceglowski, Executive Director, Vermont School Boards Association
Jeffrey Francis, Executive Director, Vermont Superintendents Association
Nathan Lavery, President-Elect, Vermont Association of School Business Officials

Date: June 10, 2020

Re: Updated - Follow-up CRF Allocation - House Education Committee, draft 1.2

Dear House Education Committee,

Thank you for the opportunity to discuss the proposed legislation on the allocation of Coronavirus Relief Funds for education. In this memorandum, we are providing clarifying information consistent with our comments yesterday. In addition, we have now conferred with the Vermont Association of School Business Officials regarding the draft, and have included them as signers on this memorandum.

- 1) Context - Our Associations are generally supportive of the approach outlined in the draft legislation, but must be clear that we have not had time to adequately collect feedback from the field either with respect to the construct of the draft legislation or the amounts of funding for proposed allocation.

That stated, we offer the following specific recommendations:

- 2) Under (a) (1) language should be added which directs the Agency of Education to provide reimbursement funds to school districts equitably and in a manner that is not based on a first-come, first served basis (assuming that reimbursement funds are a finite resource).
- 3) In order to assure maximum flexibility for eligible uses for funds within the requirements of federal law, in sections (a)(1) and (a)(2) language should be added to explicitly state that the Agency of Education shall not impose eligibility restrictions for COVID related reimbursements or grants to school districts that exceed eligibility requirements set forth under the federal CARES Act.
- 4) The bill should include a requirement for a published timeline for the distribution of funds indicated in (a)(1) and (a)(2). Additionally, the bill should make explicit reference to the Agency of Education's responsibility to issue clear and timely guidance on the use of the funds.

- 5) In order to ensure that under the grant program referenced in section (a)(2) maximum flexibility is provided to school districts, the phrase “the costs of reopening schools” should be replaced with the phrase “coronavirus costs incurred by school districts.”

- 6) In section (a)(3), it is our understanding that the \$45,000,000 is part of a potential ‘Tier 2’ distribution. It should be made clear (in the legislation and in subsequent guidance to the field) that the \$45,000,000 is not guaranteed funding and is subject to a different timeline. It may be worthwhile to consider removing the reference to Tier 2 funds from the bill because of the uncertainty about whether the funds will become available.

In closing, our Associations want to emphasize that timely distribution of funds to school districts, clarity of guidance, flexibility and equitable opportunity to access the funding are our core priorities.

Thank you again for your consideration.