



# VERMONT ASSOCIATION OF SCHOOL BUSINESS OFFICIALS

SERVING EDUCATION THROUGH SOUND BUSINESS PRACTICE

[www.vasbo.net](http://www.vasbo.net)

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**April 10, 2019**

**Dear Senator Baruth and Senate Education Committees:**

**Re: Delay/extension to implementation of Act 173**

Thank you for inviting me to testify on this important legislation. As the VASBO president last year I testified in support of these ground breaking changes. I continue to believe Act 173 expands and improves services to our students by reducing service providers' administrative burden, allowing more direct services to special education students and struggling students.

The VASBO membership appointed me to represent them on the Act 173 Committee that began meeting last fall and continues to meet. The committee's goal is to advise the AOE on necessary rule changes in the implementing Act 173. As you know, the committee met on April 1, 2019 and with the exception of Secretary French, voted unanimously to seek a delay. Unfortunately I could not attend this meeting but I read and reviewed the rules and provided the chair with my thoughts and concerns. I fully support the decision to seek a delay. In fact I was relieved. This work and these students are too important to get it wrong.

In my opinion the draft rules were insufficient in detail, they referenced financial manuals that have not been finalized or are out dated, and seem to require the same or similar administrative recordkeeping burdens without identifying any indicators of success. The agency needs more time to dedicate qualified staff to writing rules that provide enough guidance on the block grant utilization that meet our goals, outcomes, and a recording system that can substantiate their federal maintenance of effort.

The AOE and the field are in the process of implementing a statewide accounting system. This process includes defining and writing business rules necessary for uniform reporting AND to accommodate the evidence/outcomes of Act 173. These business rules, while referenced in the new draft rules, are not completed and in fact, as of the last release of the uniform chart of accounts they did not have a mechanism to account for the simplest request envisioned in the Uniform Chart – how much do schools spend on mental health services? The business rules would first define mental health services then the uniform chart of account would accommodate recording.

In closing, I believe more time would provide clear special education rules that would progress through the rule making process smoothly and would allow for adequate and essential training to successfully accomplish the services and efficiencies envisioned in Act 173.

Thank you for your consideration.

Sincerely,

***Brenda Fleming***

Brenda Fleming, CPA, SFO  
VASBO Past President  
VASBO Act 173 Committee Representative

Cc: VASBO membership  
Act 173 Committee

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