

April 18, 2022

Dear Members of the Legislative Committee on Rules [LCAR],

We are writing to address public comment from Rebecca Holcombe on the Independent School Approval Rules (2200 Series) that makes claims that designated agencies are not transparent and forthcoming in their therapeutic school cost reporting and fee structure. We want to strongly refute these claims.

The therapeutic schools operated by the agencies in the Vermont Care Partners network are an essential resource at the acute end of the spectrum of education options for Vermont students. Our schools provide therapeutic instruction to approximately 300 students whose social, emotional, or behavioral needs exceed what is available in public school settings. A therapeutic school placement can allow a struggling student to stay in the community rather than require much more expensive residential treatment.

Designated Agencies [DAs] and Specialized Services Agencies [SSAs] engage in a rigorous process of financial reporting and accounting with the Department of Mental Health [DMH] for therapeutic schools, providing financials which are thoroughly scrutinized by DMH. The issues raised in the public comment are the result of discrepant reporting structures required by DMH and Agency of Education [AOE], rather than lack of transparency by agencies. Our members have been fully accountable in our reporting and responsive to questions. Members have met multiple times with DMH and AOE to work through the translation issues between the two systems. The decision to postpone the time study, driven by the pandemic, was a collective decision made in a meeting that included DMH and AOE.

Holcombe's letter and previous public comment from 2021, including an internal AOE memo, includes agency-specific concerns. If LCAR deems it necessary, agencies are more than happy to provide line-by-line response to these charges. From our perspective, however, the solution to any ongoing concerns lies with the Agencies of Human Services and Education aligning reporting expectations and cost definitions across departments.

Sincerely,

Mary Moulton and Beth Sightler, Co-Presidents, Vermont Care Partners

VCP is a statewide network of community-based agencies providing mental health, substance use, and intellectual and developmental disability services and supports.
www.vermontcarepartners.org