



To: House Commerce and Economic Development Committee
From: Sue Ceglowski, Executive Director and General Counsel, VSBA
Re: CTE - Draft Bill 25-0915 (Draft 2.1)
Date: March 18, 2025

INTRODUCTION

Thank you for the opportunity to join the Committee today to discuss the draft CTE bill 25-0915.

My name is Sue Ceglowski – I’m the Executive Director and General Counsel for the VSBA.

The VSBA and its over 850 elected school board members are deeply grateful for the work you do every day on behalf of Vermont. This is a unique and critical moment for us as a state. The circumstances we face are complex, but they also offer an opportunity to come together to craft innovative, solution-oriented approaches. We all have a shared responsibility to ensure the well-being of our students, communities, and future generations. VSBA takes this responsibility seriously and it is reflected in our priorities which I will cover after telling you a bit about who we are.

WHO WE ARE

The VSBA is a non-profit member association that supports school boards in their work. All of the school boards in the state are members (encompassing more than 850 individual board members).

VSBA is committed to a strong public education system. We believe public education is a fundamental right, the foundation for democracy, the core of strong communities and a driver of economic development. The VSBA’s vision, mission and beliefs are listed on the “Who We Are” document provided to the Committee.

The roles and responsibilities of school board members are sometimes misunderstood. School board members are the bridge between the community and the schools. They do not run schools; they ensure that schools are well run. School boards core responsibilities are listed in the Who We Are document and include:

- (1) hiring and evaluating the superintendent,
- (2) developing a vision,
- (3) developing and overseeing the budget,
- (4) adopting policies, and
- (5) monitoring finances, progress and performance.

Everything school boards do includes the opportunity for community involvement - school board members are the bridge between the community and the schools.

VSBA PRIORITIES

The VSBA's priorities are listed on the "Legislative Platform" document provided to the Committee and developed through resolutions proposed by and voted on by the Association's members. The priorities are divided into three groups: Education Funding Priorities, Education Cost Drivers Priorities, and Core Priorities.

Education Funding Priorities

VSBA understands the education funding challenges Vermont is facing and we want to be a constructive partner in addressing those challenges. We're committed to finding solutions with you. When talking about education funding, the conversation often moves quickly to numbers. As the people who build school district budgets, we understand that numbers are important and that they cannot be considered in isolation. When looking at possible changes to education funding, we have six priorities:

1. Focus on students by providing sufficient funds to support equitable, sustainable high-quality education in Vermont's school systems.
2. Ensure predictability in the school district budget process.
3. Give enough time for school districts to adjust to any changes.
4. Provide data and modeling to show the impact on districts over time.
5. Strengthen accountability for the use of public dollars.
6. Include measures to address the cost drivers.

Education Cost Drivers Priorities

Addressing the cost drivers behind the increasing cost of education is a critical piece of the complex puzzle you will be trying to solve this legislative session. VSBA's priorities around cost drivers are included in the Legislative Platform document. I won't be covering them in depth today. They include the cost of public school employees' health benefits, school facilities, mental health supports, the Legislature's utilization of the Education Fund, and existing laws and regulations that were put into place without attention to how much pressure they would put on local school budgets and without adequate support from the AOE on implementation.

Core Priorities

In addition to the education funding and education cost drivers priorities I just discussed, VSBA's Legislative Platform includes these core priorities:

1. Improve the capacity of the Agency of Education to meet its statutory responsibilities.
2. Require the Agency of Education to expand and maintain a comprehensive data dashboard.
3. Restructure the State Board of Education.
4. Require public tuition to private schools to comply with the Vermont Constitution's Compelled Support Clause.
5. Ensure accountability for public dollars by requiring private schools and Pre-K programs receiving public tuition to comply with requirements for quality, equity, efficiency, and transparency.

A VSBA Task Force of school board members from across Vermont developed the first three core priorities in response to long-standing challenges within the education leadership structure of the state. These challenges have impacted districts' ability to realize their educational goals. We submitted the Task Force Report to the Governor, the Secretary of the Agency of Education, the State Board of Education and all legislators in September of 2024. We included it with our testimony today as well.

The House Education Committee received detailed testimony from Clare Wool (Burlington School Board Chair and Chair of the Task Force) and VSBA President Flor Diaz Smith about the Task Force Report. I know that Clare and Flor would be willing to provide testimony to this committee as well if you would like to learn more about the work and the conclusions of the Task Force which are important considerations for any education related work this Committee will undertake during this legislative session.

Summary of Recommendations from the VSBA Task Force:

Priorities: *Vermont needs:*

- 1) *timely and consistent access to valid data*
- 2) *an Agency of Education and a State Board of Education that can uphold the statutory roles and responsibility to public education in a non-partisan, student centered manner*

Recommendations	Entity Responsible
Expand and Maintain a Comprehensive & Accurate Data Dashboard by providing a publicly available, accurate and accessible data dashboard as a mechanism to ensure equity for all students and by utilizing data as the single	AOE

most important way to effectively monitor the state’s ability to meet its education policy needs.	
Improve the Capacity of the Agency of Education to Meet Statutory Responsibilities by conducting a comprehensive organizational analysis in order to understand why the AOE has been unable to meet its statutory responsibilities to oversee public education in VT. This analysis, inclusive of feedback from the field and an evaluation of the culture of the organization, should result in a redesign to support better Agency function.	AOE
Utilize the District Quality Standards to Conduct a Review of the Function of the State Board of Education The SBE should adhere to the governance standards outlined in Section 113 of the DQS and should be required to conduct an annual self-assessment on its own adherence to these standards.	General Assembly, SBE
Depoliticize the State Board of Education by restructuring to ensure that it can act in a non-political capacity. The appointment structure should be expanded so that the Governor does not have sole authority for appointing members. The SBE makeup should more proportionately represent local school board members from districts that operate a public school. SBE should have adequate resources to conduct its work, either through the budget allocation process or by leveraging AOE resources.	General Assembly
Prioritize Existing Legislation Attempts to implement new legislation without the underlying data and structures to support it will continue to put students and public education in jeopardy.	General Assembly, AOE
Acknowledge the work of the Commission on the Future of Public Education Recommendations to the General Assembly re: public education funding, delivery and governance will be addressed in the Commission’s work. This work needs to be completed in order for substantive improvements to be made.	General Assembly, AOE

ANALYSIS OF DRAFT BILL 25-0915 UNDER VSBA PRIORITIES

We noted that there is not a “Findings” section in this draft bill so we are unclear what the purpose of this bill is, and what it is attempting to achieve. Without fully understanding the purpose of the bill and considering the scope of the changes it is proposing, we feel a clear “findings” section would help us in collaborating effectively with this Committee to achieve shared goals for the administration of publicly funded career technical education.

The draft bill’s transfer of rulemaking to the Agency of Education poses significant concerns to the VSBA. As we stated above, we recommend restructuring and adequately resourcing the State Board of Education so that it can meet its statutory responsibilities, including rulemaking. Additionally, the capacity of the Agency of Education to meet its statutory responsibilities must be improved. The VSBA firmly

believes that first and foremost the AOE must meet its legislatively defined responsibilities before taking on new responsibilities or engaging in an extensive, multi-year consolidation effort.

We also have several technical concerns with the bill though we will limit our observations to two that are quite large:

A. § 1573. CTE SCHOOL BOARD MEMBERSHIP

- a. Currently, bill language reads: *(a) Members. The board of the statewide CTE school district shall be composed of 15 voting members concurrently serving as members of the member supervisory union boards, appointed by the superintendents of each service region. The superintendent of the statewide school district shall be a nonvoting member of the board. The board may, at its discretion, appoint other nonvoting members to the board, including students.*
- b. From a good governance perspective, it is unusual for a superintendent to be a member of the board. Presumably, the board would hire the superintendent and evaluate the superintendent. As the CEO of the district, the superintendent's roles and responsibilities are different from the board. So we have questions about why the superintendent is included as a non-voting board member.
- c. We also have questions about the method for choosing the board members. The VSBA notes that each service region has multiple superintendents (with the exception of Cold Hollow), some with as many as nine superintendents, multiple SUs and many towns. We have significant concerns with the departure of any school district from following the democratic process of electing school board members, especially when that electorate will be responsible for paying for the district to operate. Additionally, due consideration should be given to whether (1) what is described in this bill is closer to the Regional Advisory Board structure and how the Statewide CTE Board would interact with the Regional Advisory Boards; (2) how the Superintendent of this Statewide CTE District would interact with the multiple regional Regional Advisory Boards and member district boards; and (3) how a Statewide CTE school district board would interact with the standalone private CTE regional service area of the district outlined in this bill. This raises significant questions for VSBA as it pertains to one of our core priorities:
 - i. Ensure accountability for public dollars by requiring private schools and Pre-K programs receiving public tuition to comply with requirements for quality, equity, efficiency, and transparency.

B. Sec. 13. CONTINGENT EFFECTIVE DATE

- a. Consistent with VSBA's priority to give enough time for school districts to adjust to any changes, we have significant concerns with the proposed

timeline and the absence of any funding to support what will be a difficult and technically complex process of consolidation that would impact every single SU/SD and board in the state.

- b. This timeline is aggressive, ultimately providing only two fiscal years to engage in this endeavor if you were to maintain the current July 2028 deadline. Additionally, based on what is included in the bill and the complexities that would involve every single supervisory union/district in some or all of the issues related to the governance, funding and quality of CTE in order to meet this deadline, this work would need to start immediately upon passage of the bill. If, then, H.454 were to be passed and go into effect – or some other proposal which involves consolidation and governance – this runs the risk of SU/SDs having to engage in another consolidation effort, duplicate efforts, and/or lose time and resources to an effort that is subsequently abandoned. None of this is good for learning environments and students. The VSBA recommends that this Committee hear from representatives of the Vermont Association of School Business Officials (VASBO) who can provide significant insights into the complexities involved in consolidations and what the personnel and financial costs can be. See this [VASBO written testimony to the House Education Committee](#) for a summary of the business management considerations when consolidating school districts.

CONCLUSION

VSBA appreciates the past and current work of the House Committee on Commerce and Economic Development to strengthen the quality and accessibility of career and technical education. Today, I've provided a two high level concerns with the committee bill based on VSBA's legislative priorities. If the Committee moves forward with the bill, I would be happy to testify again with more feedback on the draft bill.