

Written Testimony to the House Commerce Committee  
Subject: 26-0768 – CTE Educational Service Agency Proposal  
Submitted by: Jody Emerson, CVCC Director/CVCCSD Superintendent/Director

Good morning Chair and Members of the Committee,

My name is Jody Emerson. I serve as Superintendent and Director of the Central Vermont Career Center School District in Barre and am a past President of VACTED. Thank you for the opportunity to testify on the proposed CTE Educational Service Agency.

The core issue in Central Vermont is access. Nearly half of the students who want to enroll in CTE cannot, due to capacity limits. Those who do enroll often lose instructional time because of transportation and split schedules. These are not governance problems at their core. They are capacity, alignment, and funding problems. My request is straightforward: ensure equitable access to high-quality CTE statewide, supported by funding that reflects the real cost of delivery.

CTE operates in regulated, high-risk environments that require strict staffing ratios, specialized equipment and facilities, compliance with OSHA and federal regulations, and alignment with Perkins V and our Comprehensive Local Needs Assessment. We cannot simply add seats without addressing these realities.

If the goal is to expand access without destabilizing existing programs, I urge a sequenced approach:

First, update State Board Rule Series 2370 before restructuring governance. Rule modernization can:

- Clarify the enforcement of CTE-earned academic credit and transcript recognition, establish a defined intervention and escalation pathway,
- Modernize definitions to reflect embedded academics, satellite programs, and varied delivery models,
- Align rules with current safety and Perkins V requirements.

These changes strengthen accountability without immediate structural disruption.

Second, codify credit recognition and graduation protections in statute, including clear inclusion of CTE within Act 73 graduation requirements. CTE-earned credits must be consistently honored statewide.

Third, align CTE funding within a predictable, formula-based model that reflects true cost drivers: facilities, equipment cycles, transportation, increasing programming capacity (facilities and staffing), and the supports required for all students to access credential-based programming. Without stable funding, waitlists will persist regardless of governance structure.

Then, and only then, should governance restructuring be evaluated. Structural change should follow demonstrated readiness, not precede it.

Thank you for your consideration and for your commitment to strengthening CTE in Vermont.