



To: Vermont House Education Committee
From: VCSEA
Date: February 18, 2026
Subject: Development of Cooperative Education Service Agencies

For over 44 years, the Vermont Council of Special Education Administrators (VCSEA) has been a cornerstone of educational leadership in Vermont. We are dedicated to supporting all Special Education Administrators and other special education leaders, working in close collaboration with Superintendents, Principals, the Vermont Agency of Education, family support organizations, and numerous other state organizations. At the core of our mission, the VCSEA strives to provide leadership, support, collegiality, and mentorship to all who teach and lead in education and special education across Vermont. We are honored to contribute to a state that deeply invests in the future of all its children.

We appreciate the invitation to come and speak with you today about Cooperative Education Service Agencies. We have previously provided a copy of our VCSEA legislative priorities and a fact sheet regarding federal Maintenance of Effort (MOE). Today's testimony focuses specifically on our support of the development of Cooperative Education Service Agencies and the benefits that could come from thoughtful design and implementation of Cooperative Education Service Agencies with guardrails to ensure access, effectiveness and quality leadership.

Cooperative Education Service Agencies, or CESAs, may offer Vermont an opportunity to address staffing shortages, improve services and support for students with low-incidence disabilities, provide professional development and resources to local school districts and schools, strengthen regional collaboration in special education, and increase the capacity of regions to serve students. VCSEA supports voluntary participation in CESAs when they improve access to services, increase efficiency, and enhance student outcomes based on the unique needs of a region or group of school districts.

CESAs Need Guardrails

CESAs must be developed with clear safeguards. Without guardrails, they risk increasing segregation and weakening local accountability. First and foremost, districts must retain full responsibility for providing a Free Appropriate Public Education (FAPE). CESAs cannot serve as decision-makers for eligibility, placement, or IEP determinations—those legal responsibilities must

remain with local education agencies. Federal laws and regulations require this, and LEA responsibilities must remain with the local school district.

Vermont's districts vary widely in size, capacity, and student need, so CESAs must remain flexible and responsive to regional realities. Their success should be measured by stronger inclusion and improved services within local schools—not by creating new regional placement systems that separate students with disabilities.

It is also essential that CESAs do not undermine the internal capacity districts have already built. Districts should not be forced to dismantle effective programs or staff structures in favor of a regional model. Just as our classrooms must be differentiated to meet the needs of various learners, CESAs must be flexible and tailored to the regions they support. Our schools and districts are in different places with regard to programming and resources, so CESAs must not be cookie-cutter but tailored to meet the needs of the regions and the districts they support. Additionally, CESAs must operate with transparency and strong accountability under IDEA, ensuring districts are not placed at risk of noncompliance.

The state must also recognize that the design of entirely new systems of service delivery will require investment. While the CESA design has been developed in the environment of Act 73 implementation—a law centered on saving taxpayers money—this initiative will require careful investment to build an appropriate model for each region or group of districts that chooses to develop a CESA.

The governance structure must ensure that participating districts are the decision-makers. Governance is the cornerstone of this initiative. CESAs must supplement, not supersede, district-level special education responsibilities. Given the chronic turnover and resulting instability at the Agency of Education, it is vital that oversight is embedded directly within district leadership structures to ensure professional continuity and local accountability. Instability and policy churn create significant challenges for school districts, making long-term planning nearly impossible. CESAs must be governed by local school district membership representatives. The Agency of Education does not have the staffing, expertise, or capacity at this time.

Vermont has already created the framework for CESAs, and one has been developed. We urge the Legislature to learn from this existing work and move carefully to ensure CESAs become a successful tool for strengthening inclusive services—not a system that unintentionally increases segregation or reduces accountability.