



To: Vermont Senate Education Committee
From: Vermont Council of Special Education Administrators
Date: May 5, 2026
Subject: Defining the Scope of CESA Authority: Implementing
Essential Protective Guardrails

For over four decades, 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.

Given the chronic turnover and resulting instability at the Agency of Education, oversight of Cooperative Education Service Agencies (CESAs) must be 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.

Cooperative Education Service Agencies may offer Vermont an opportunity to address staffing shortages and strengthen regional collaboration in special education. VCSEA supports voluntary participation in CESAs when they improve access to services, increase efficiency, and enhance student outcomes. CESAs are partners to local school districts to deliver services rather than independent governance bodies overseeing school districts. The Agency of Education does not have the staffing, expertise, or capacity at this time.

However, CESAs must be developed with clear statutory boundaries. Without this regulatory framework, they risk increasing segregation and weakening local accountability. Districts must retain full legal 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.

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. The partnership with CESAs must supplement, not supersede, district-level special education responsibilities. LEAs must remain the governance entity for special education across the state of Vermont; they are its cornerstone.

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. Additionally, CESAs must operate with transparency and strong accountability to the IDEA, ensuring districts are not placed at risk of noncompliance.

By establishing clear guidelines, the legislature can empower CESAs to prioritize inclusive service delivery while maintaining the high standards of transparency and accountability our educational system deserves, and ensure their appropriate role within the state.