

Southern Vermont Regional
Governance Analysis

Route 100 Corridor

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Executive Summary

This report examines regional school district governance along the Route 100 Corridor in southern Vermont. This region includes two supervisory unions, the Windham Central Supervisory Union (WCSU) located in Townshend, and the Windham Southwest Supervisory Union (WSSU) in Wilmington. School districts in both supervisory unions have engaged in merger activity under Act 46. None of this work has identified the formation of a "preferred governance structure" as a viable option, with all the proposed mergers advocating for the maintenance of "alternative governance structures" or supervisory unions. This report reviews the school district merger work to date in both supervisory unions against the policy requirements for forming alternative governance structures. This report also describes the option of realigning current supervisory union boundaries to form a single supervisory union and to locate that supervisory union on Route 100 near Dover. A boundary study for these supervisory unions was completed in 2012. This report builds on those previous findings to explore how supervisory union boundary realignment might support local decision makers in meeting the policy goals of Act 46. I conclude supervisory union realignment and the creation of a single supervisory union for the region would enable local decision makers to better meet State education policy goals for equity and efficiency and create a more sustainable alternative governance structure as defined by Act 46.

Policy Context

The State of Vermont is ultimately responsible for the education of Vermont students in grades K-12. The State delegates certain aspects of its responsibility for the education of students to local school districts which under Vermont law are political subdivisions of the State not local entities. This delegation of authority is evidenced by the fact that local school board members are required to take the Vermont Oath of Allegiance and swear that, "I will faithfully execute the office of school director for the State of Vermont" as a condition of holding local office.

To further enact its responsibility for the education of its students, the State groups local school districts into regional administrative entities called supervisory unions. Supervisory unions are led by a superintendent who functions as the CEO of each member district and is responsible for the general administration and supervision of all the schools in a supervisory union. Some school districts are large enough to function as their own supervisory unions and have been designated as supervisory districts by the State. Altogether, there are approximately 60 supervisory unions and supervisory districts in Vermont and about 280 school districts. Although there have been some adjustments to supervisory union structures over the years in terms of school district membership, the current configuration has been relatively stable.

After the Brigham Decision in 1997 which re-affirmed the State's responsibility for K-12 education, the General Assembly created a statewide education funding system under Act 60 and its successor legislation Act 68. The statewide funding system caused education spending to increase as districts with relatively smaller grand lists could increase their spending levels without seeing significant increases to their tax rates. At about the same time, however, the number of students in Vermont started to decline following a larger demographic trend witnessed throughout northern New England. This combination of increases in education spending coupled with declines in the number of students

caused significant pressure on the education funding system since the diffused nature of the Vermont's education governance structure was not able to respond to these challenges in a systematic manner. The diffused governance structure also inhibited the ability of the State to ensure all students were achieving at high levels since the complex governance structure did not allow for a consistent approach to data collection and analysis.

During the same period, federal education policy in the form of the No Child Left Behind Act, put new requirements on states to develop school accountability systems. These policies created new challenges for Vermont's governance structure which in many cases was comprised of governance structures too small to yield valid accountability data. The data did identify, however, a persistent equity gap in student achievement between students in poverty and their non-poverty peers.

Faced with challenges in affordability, equity, and accountability, policy makers increasingly began to focus on school district governance reform. Starting with Act 153 of 2010, the General Assembly began to formally explore the incentivization of school district consolidation. Act 153 was largely voluntary, however, resulting in few district mergers. Act 153 did require the centralization of certain school district services at the supervisory union level which forced many school districts to adjust how they provided these services and to seek greater efficiencies by sharing services with neighboring districts. After several statewide conversations about governance reform including the Green Mountain Imperative in 2015 which was co-sponsored by the Vermont Business Roundtable, the Legislature

passed Act 46 in 2015 which called for a less-than-voluntary approach to school district governance reform.

Although Act 46 did not require districts to merge, it did require them to have conversations with neighboring districts about merging, and included the threat of state-led reorganization of districts after 2019. Act 46 also established several policy goals which were designed to address the growing concerns over education costs and equity of opportunity. Act 46 expressed an interest on the part of the State to create, "sustainable models of education governance," and established the supervisory district as the "preferred governance structure" for achieving the policy goals. New incentives were provided for the creation of these larger, centralized school districts, and some disincentives were implemented to penalize those districts that were unable or unwilling to consider merging. These disincentives for districts included the possible elimination of Small Schools Grant funds and limited access to the hold harmless provision in the funding formula for reducing the impact of a decline in number of students on the local tax rate.

Policy Goals of Act 46

"By enacting this legislation, the General Assembly intends to move the State toward sustainable models of education governance.

The legislation is designed to encourage and support local decisions and actions that:

- (1) provide substantial equity in the quality and variety of educational opportunities statewide;
- (2) lead students to achieve or exceed the State's Education Quality Standards, adopted as rules by the State Board of Education at the direction of the General Assembly;
- (3) maximize operational efficiencies through increased flexibility to manage, share, and transfer resources, with a goal of increasing the district-level ratio of students to full-time equivalent staff;
- (4) promote transparency and accountability; and
- (5) are delivered at a cost that parents, voters, and taxpayers value."

Regional Control as the New Local Control

While Act 46 contemplated a more top-down approach to school district consolidation, the law acknowledged the best regional governance solutions would be designed by local decision makers. Many communities moved forward quickly under Act 46 with their regional conversations, but others struggled. Areas of the state with relatively isolated schools and school districts seemed to have greater

A key variable for moving forward under Act 46 seemed to be not so much geography, but the extent to which member districts of a supervisory union had successful experience working together as a single system.

difficulty identifying regional solutions in some situations. In some geographically isolated areas, however, districts found a path forward for merging. These

districts seemed to be in supervisory

unions that had already established a context where the member districts worked closely together and had developed a collective sense of responsibility for all students. A key variable for moving forward under Act 46 seemed to be not so much geography, but the extent to which member districts of a supervisory union had successful experience working together as a single system.

All Vermont school districts are assigned to regional supervisory unions or designated supervisory districts, but supervisory unions can vary greatly in terms of the extent to which they function as a single system of schools. In some cases, supervisory unions are highly centralized organizations that share services and common educational goals, and in other cases supervisory unions are merely loose confederations of independent districts where local interests supersede regional ones. A good indicator of the systems nature of a supervisory union is the degree to which it had success complying with prior policy initiatives that required the centralization of services at the supervisory union level. For example, an initiative implemented in 2004 required teacher collective bargaining among school districts to occur among centralized "bargaining councils". This process was designed to

create a more efficient collective bargaining process. Act 153 of 2010 included incentives for voluntary mergers, but also included involuntary requirements to centralize certain services at the supervisory union level including curriculum and professional development, student transportation, and business, accounting, and data functions. Act 156 of 2012 expanding these requirements to include special education services, requiring all special education teachers to become employees of supervisory unions. Many of the districts that struggled finding a path forward under Act 46 were in supervisory unions that also had difficulty complying with the law in these areas of required centralization.

One of the more significant effects of Act 46 is that it has exposed the ineffectiveness of the supervisory union as a viable governance structure.

Although the jury is still out on Act 46 and it will take years to assess its impact, in many ways, one of the more significant effects of Act 46 is that it has exposed the ineffectiveness of the supervisory union as a viable governance structure. The interest in creating more sustainable regional solutions quickly became a focus of Act 46 mergers as communities engaged in the more difficult merger conversations that remained after the first two years of the law enabled the perhaps simpler mergers to occur. These regional conversations seemed to be focused on maintaining supervisory unions, or what Act 46 terms as “alternative governance structures,” since they are less likely to be able to meet the policy goals of the law. These merger conversations frequently did not consider the larger regional context, however, since they were often restricted to current supervisory union boundaries.

The purpose of this report is to examine the regional school governance context along the Route 100 corridor in Windham County relative to meeting the school district merger requirements of Act 46. This report is informed by my 9-years of experience as Superintendent for the Bennington-Rutland Supervisory Union, a large multi-district supervisory union located in the region adjacent to the districts that are the focus of this report. I also bring to this analysis my experience as an organizational

consultant who has worked with a variety of Vermont school districts and supervisory unions around the state. This report is organized around responding to the policy guidelines for forming Act 46 alternative governance structures. Specifically, to what extent:

1. The current governance structure is educationally and fiscally sustainable on an individual district, supervisory union, and regional basis;
2. The districts in a current supervisory union consider themselves to be collectively responsible for the prekindergarten – grade 12 education of all resident students;
3. A current supervisory union and the districts within it operate in a manner that maximizes efficiencies;
4. A current supervisory union has the smallest number of member districts practicable;
5. The current governance structure of a supervisory union – or a different “alternative structure” – is “the best means of meeting the Act 46 goals in a particular region”; and
6. Creation of a unified union school district that is its own supervisory district is or is not “possible” or “the best model” to achieve the Act 46 goals in the region pursuant to Act 46, Secs. 5(c), 8-10.

All data in this report come from public information available on the Vermont Agency of Education website unless otherwise indicated.

Sustainability of the Current Governance Structure

District Configurations

The region examined in this report is organized into two supervisory unions, the Windham Central Supervisory Union (WCSU) to the north and the Windham Southwest Supervisory Union (WSSU) to the south. Both supervisory unions are located along major transportation corridors: Route 30 for WCSU and Route 9 for WSSU. Route 100 bisects the state and connects these two supervisory unions north to south. The table below describes the structure of each organization.



FIGURE 1: BOUNDARY MAP OF WCSU AND WSSU, GOOGLE MAPS

TABLE 1: WCSU CONFIGURATION

District	Type	Operating Configuration	Operating Schools	FY17 School Enrollment
Brookline*	Town School District	Joint Contract PK-6	NewBrook Elementary	149
Dover	Town School District	Grades PK-6	Dover Elementary	102
Jamaica*	Town School District	Grades PK-6	Jamaica Village School	62
Leland and Gray	Union School District	Grades 7-12	Leland & Gray Middle High School	307
Marlboro	Town School District	Grades PK-8	Marlboro Elementary	90
Newfane*	Town School District	Joint Contract PK-6	NewBrook Elementary	149
Stratton	Town School District	Non-Operating	N/A	N/A
Townshend*	Town School District	Grades PK-6	Townshend Village School	79
Wardsboro	Town School District	Grades PK-6	Wardsboro Central School	53
Windham*	Town School District	Grades PK-6	Windham Elementary	19

*indicates member of Union District #34 (Leland and Gray)

WCSU can be described as two distinct geographic school governance regions. To the center, north, and east is a group of districts that are members of Union School District #34 which operates the Leland and Gray Middle High School in Townshend. The WCSU office is also located in Townshend. These districts are largely organized along the major transportation corridor of the area, Route 30, which runs from Brattleboro in the south to Manchester in the northwest. Stratton is located to the north in the Green Mountains and is a non-operating school district that is not a member of Union District #34. Students in Stratton have school choice in grades K-12. Windham, also located to the north of the central office, is a member of Union District #34 and operates the smallest PK-6 school in the region.

The southern part of WCSU contains another distinct group of districts, Dover, Wardsboro, and Marlboro. Dover and Wardsboro operate PK-6 schools along Route 100, and Marlboro to the southeast

The Marlboro school is located closer to the WSSU central office than the WCSU central office by about five miles.

operates a K-8 school. The Marlboro school is located on Route 9 which is the major transportation corridor between Brattleboro and Bennington.

Interestingly, the Marlboro school is located closer to the WSSU central office than the WCSU central office by about five miles.

The central office for WSSU is in Wilmington near the intersection of Route 100 and Route 9. The WSSU office is not geographically centered in its region, with most of its districts being located south of Route 9. Wilmington is one of the major population centers of the area, and Wilmington and Whitingham jointly operate the Twin Valley Elementary School in Wilmington and the Twin Valley Middle High School in Whitingham. Stamford, to the southwest, borders Massachusetts and sends many of its students to Massachusetts to attend high school in that state.

TABLE 2: WSSU CONFIGURATION

District	Type	Operating Configuration	Operating Schools	FY17 School Enrollment
Halifax	Town School District	Grades PK-8	Halifax Elementary	60
Readsboro	Town School District	Grades PK-8	Readsboro Central School	49
Searsburg	Town School District	Non-Operating	N/A	N/A
Stamford	Town School District	Grades PK-8	Stamford Elementary	75
Whitingham	Town School District	Joint Contract K-12	Twin Valley Elementary (K-5) Twin Valley Middle HS (6-12)	213 229
Wilmington	Town School District	Joint Contract K-12	Twin Valley Elementary (K-5) Twin Valley Middle HS (6-12)	213 229

Readsboro, located to the southeast, also sends many of its students to attend high school in Massachusetts. The districts and schools of WSSU are isolated from a geographic perspective, with east-west transportation being limited to the Route 9 corridor in the north of the supervisory union which requires traversing Hogback Mountain, a route both famous for its scenic beauty for challenging driving conditions in winter weather.

Enrollment and Efficiency Comparisons

Both supervisory unions have a lot in common. Both are comprised of small elementary schools that are relatively isolated from each other. The table below summarizes the amount of Small Schools Grants provided to districts within each supervisory union for FY2018. It is clear both supervisory unions contain districts that rely significantly on this source of local revenue, with a total of \$750,448 being sent to both supervisory unions to subsidize the operation of small schools.

TABLE 3: FY2018 SMALL SCHOOLS GRANTS

WCSU	\$482,398		WSSU	\$268,050
Dover	\$72,680		Halifax	\$82,419
Jamaica	\$91,971		Readsboro	\$76,872
Marlboro	\$109,468		Stamford	\$108,759
Townshend	\$86,757			
Wardsboro	\$81,022			
Windham	\$40,500			

The two supervisory unions are also of a similar scale, although WCSU is about 30% larger in terms of student enrollment. Both districts have experienced a similar decline in enrollment that has been part of the larger demographic trend in Vermont, with WCSU seeing a 15% decrease and WSSU seeing a 24% decrease. The table below summarizes changes in enrollment over the last ten years.

TABLE 4: 10-YEAR ENROLLMENT CHANGES

	2006-2007	2016-2017	# Change	% Change
WCSU	1018	861	-157	-15%
Dover Elementary	85	102	17	20%
Jamaica Village	90	62	-28	-31%
Leland and Gray	381	307	-74	-19%
Marlboro Elementary	87	90	3	3%
NewBrook Elementary	171	149	-22	-13%
Townshend Village School	91	79	-12	-13%
Wardsboro Central	84	53	-31	-37%
Windham Elementary	29	19	-10	-34%
WSSU	829	626	-203	-24%
Halifax Elementary	58	60	2	3%
Readsboro Central School	65	49	-16	-25%
Stamford Elementary	72	75	3	4%
Twin Valley Elementary	172	213	-76*	-44%*
Twin Valley High School	239			
Twin Valley Middle	106			
Twin Valley Middle-High School		229	-116	-33%*
Whitingham School	117			

*calculated based on school reconfigurations

This trend in declining enrollment correlates to an increase in the cost of education as measured by education spending and the homestead education property tax rates over a 5-year period. The non-operating districts are not included in this analysis since their costs are not directly connected to the operation of a school or schools.

TABLE 5: 5-YEAR TRENDS IN EDUCATION SPENDING AND HOMESTEAD TAX RATES

	FY12 Ed Spending per Eq Pupils	FY17 Ed Spending per Eq Pupils	% Change	FY12 Homestead Tax Rate	FY17 Homestead Tax Rate	% Change
Brookline	\$10,854	\$14,524	34%	\$1.1052	\$1.4972	35%
Dover	\$13,594	\$15,257	12%	\$1.3842	\$1.5727	14%
Jamaica	\$12,000	\$15,407	28%	\$1.2219	\$1.6121	32%
Leland and Gray	\$13,515	\$16,646	23%	\$1.3761	\$1.7159	25%
Marlboro	\$12,253	\$16,676	36%	\$1.2477	\$1.7312	39%
Newfane	\$11,523	\$14,525	26%	\$1.1734	\$1.4972	28%
Townshend	\$11,667	\$16,441	41%	\$1.1880	\$1.6948	43%
Wardsboro	\$13,164	\$15,357	17%	\$1.3404	\$1.5931	19%
Windham	\$12,673	\$14,523	15%	\$1.2904	\$1.4971	16%
Halifax	\$12,069	\$13,413	11%	\$1.2289	\$1.3826	13%
Readsboro	\$8,544	\$11,469	34%	\$0.8700	\$1.1823	36%
Stamford	\$10,357	\$11,286	9%	\$1.0546	\$1.1634	10%
Wilmington	\$14,340	\$17,092	19%	\$1.4602	\$1.7619	21%
Whitingham	\$14,469	\$17,867	23%	\$1.4734	\$1.8417	25%

These trends of decline in enrollments and increases in education spending and tax rates perhaps indicate the current governance structure might be unsustainable from a financial perspective.

These trends of decline in enrollments and increases in education spending and tax rates perhaps indicate the current governance structure might be unsustainable from a financial perspective.

Since financial efficiency in Vermont's education funding system is measured by education per equalized pupil, the main strategies to create greater efficiency are:

- 1) reduce education spending, 2) increase equalized pupils, or 3) both. Reducing overall education spending in a supervisory union can be challenging since it requires member districts to work together to share services and staff. Increasing the number of equalized pupils is challenging within the larger

demographic change of declining numbers of children, but from a district perspective this can be addressed by consolidating school districts: district consolidation aggregates students in the denominator of the ratio. Decreasing education spending while simultaneously increasing equalized pupils is also achievable through governance consolidation since such consolidation, unlike the voluntary association of districts under the supervisory union relationship, enforces the sharing of services and staff which can have a significant impact in reducing education spending.

I conclude these districts should explore governance consolidation as a strategy to improve the fiscal sustainability of their overall governance structures. Governance consolidation will likely lead to reductions in education spending and lower and more stable tax rates with the aggregation of larger numbers of students in larger governance structures.

Collectively Responsible for Prekindergarten – Grade 12 Education

Both supervisory unions have had similar and successful experience coordinating the work among their member districts. The 2017 annual reports for districts in both supervisory unions document their many accomplishments and successes in working together in areas such as curriculum, technology, and governance. The governance structure of both supervisory unions would seem to limit the opportunity to establish system-wide approaches to monitoring student outcomes, however, since in most situations the governance structures in both supervisory do not oversee the full scope of K-12 education. In WCSU for example, Dover and Wardsboro have school choice in grades 7-12, Marlboro has school choice in grades 9-12, and Stratton has school choice K-12. WSSU has a similar setup with only Wilmington and Whitingham sharing a common structure PK-12, and that structure is a more informal joint contract structure not a union district.

In these types of governance structures, the supervisory union becomes the over-arching structure through which collective responsibility for student outcomes is developed. A review of the policies of each supervisory union and its member districts indicates both organizations have developed a nominal disposition towards developing a collective responsibility for student outcomes at the supervisory union level.

WCSU has a policy on curriculum development and coordination that pertains to all member districts. WSSU, on the other hand, seemed to have delegated curriculum development to its member districts even though Act 153

required curriculum development at the supervisory union level. For example, the Halifax School Board in its policy on curriculum development, delegated authority to

The [WCSU] supervisory union board shall be responsible for establishing a supervisory union-wide curriculum by either developing the curriculum or assisting member school districts to develop it jointly. The supervisory union curriculum shall be coordinated to allow students to meet or exceed standards established by the Vermont State Board of Education. Curriculum plans shall be coordinated between sending and receiving schools within the supervisory union and will be periodically reviewed to determine compatibility with schools outside the school district that are attended by students residing within the school district.

curriculum development to

the building principal, although the principal was required to ensure local curriculum was consistent

The school [Halifax] board delegates the direct responsibility for developing and evaluating the curriculum to the principal as the educational leader of the school. The principal shall insure that the curriculum is consistent with the written goals and objectives of the instructional program as approved by the board consistent with state frameworks and Windham Southwest Supervisory Union curricula guidelines.

with WSSU curriculum guidelines. The

Readsboro School Board had adopted

the same policy whereas neither the

Twin Valley Board or the Stamford Board

had such policies. No supervisory union

policies for WSSU were available on the

supervisory union's website to evaluate.

Another indication of the extent to which there is collective responsibility for student outcomes can be found through examining how the organizations prioritize system interventions for students in poverty, the Vermont demographic subgroup where disparities in student outcomes is frequently observed. There is the same demographic variability among these districts that exists statewide in Vermont around the issue of socio-economic status of students as measured by the proxy indicator of poverty, eligibility for the Free and Reduced School Lunch Program. This variability in student socio-economic status did not seem to be strongly related to student-teacher ratios which is perhaps an indication of schools working more in isolation and a lack of a system-wide prioritization of instructional services. These data are summarized below.

TABLE 6: FRL RATES VS STUDENT TEACHER RATIOS, 2006-2007 VS 2016-2017

	06-07 FRL	16-17 FRL	06-07 Student-Teacher Ratio	16-17 Student-Teacher Ratio
Dover Elementary	25%	30%	9.14	11.72
Jamaica Village	39%	60%	13.43	10.16
Leland and Gray	0%	41%	9.85	10.06
Marlboro Elementary	0%	48%	8.37	9.89
NewBrook Elementary	**	48%	**	13.55
Townshend Village School	30%	44%	11.38	10.53
Wardsboro Central	23%	40%	13.55	8.55
Windham Elementary	0%	**	10.51	8.84
Halifax Elementary	31%	53%	8.8	11.32
Readsboro Central School	60%	53%	9.03	7.78
Stamford Elementary	**	17%	12.2	11.72
Twin Valley Elementary	38%	59%	10.12	10.87
Twin Valley Middle High School	**	47%	**	9.27

For example, among WCSU districts such as Jamaica and Townshend where FRL rates increased significantly over the last ten years, both districts saw a decrease in student-teacher ratios. During the same ten-year period, however, a more affluent community such as Dover saw a nominal increase in the FRL rate but an increase in the student-teacher ratio. It is difficult to identify any trend in the WSSU data due to changes to school configuration for Twin Valley and missing data for Stamford.

The relationship between FRL rates and student-teacher ratios could be a poor indicator of collective responsibility if the supervisory unions employed other strategies such as supervisory union employees deployed in a targeted manner as interventionists. Such strategies might not be captured in the student-teacher ratio data. My experience tells me these data represent a system where the schools have experienced these issues in relative isolation from one another. Supervisory unions that become more systematic with interventionists tend to shift the employment of these staff from the school district to the supervisory union, and that trend is not apparent in these data.

Another indicator of collective responsibility is Allowable Tuition rates. Allowable Tuition is a reliable representation of the prioritization of educational investment per pupil since it is an amount verified by the State after districts submit their annual statistical reports. It is important to note that Allowable Tuition excludes both special education and transportation costs since these costs are variable and are offset, to a certain extent, by governmental reimbursements. This also makes Allowable Tuition a good indicator of investment in the core academic program of each school since it controls for these other variable costs.

Schools within both supervisory unions have Allowable Tuition rates that vary from the composite State allowable tuition rates. The State composite rates are calculated by aggregated all applicable costs and dividing by the number of pupils in the state.

TABLE 7: FY2016 ALLOWABLE TUITION RATES

	FY16 K-6	% Difference to Vermont	FY16 7-12	% Difference to Vermont
Vermont Composite Rates	\$12,178		\$15,138	
Dover Elementary	\$14,582	19.7%		
Jamaica Village	\$13,813	13.4%		
Leland and Gray			\$16,447	8.6%
Marlboro Elementary	\$12,106	-0.6%	\$15,178	0.3%
NewBrook Elementary	\$12,742	4.6%		
Townshend Village School	\$12,852	5.5%		
Wardsboro Central	\$13,137	7.9%		
Windham Elementary	\$15,040	23.5%		
Halifax Elementary	\$12,848	5.5%	\$12,848	-15.1%
Readsboro Central School	\$15,880	30.4%	\$15,880	4.9%
Stamford Elementary	\$7,203	-40.9%	\$7,203	-52.4%
Twin Valley Elementary	\$13,952	14.6%		
Twin Valley Middle-High School			\$19,205	26.9%

These data seem to indicate some spending equity issues which probably translate into program differences among the schools. For example, Dover's tuition rate for a K-6 school is almost double that of Stamford's tuition rate for a K-8 school. This variance also shows up in a comparison between the districts in terms of instructional expenditures where Dover spends approximately \$1,000 more on instruction per equalized pupil than Stamford. See the table below. These variations in amounts of instructional expenditures extend to other districts as well. For example, Halifax, a district that operates a K-8 and is in the WSSU with Stamford, spent about \$1,600 more on instruction per equalized pupil than Stamford.

TABLE 8: FY2016 INSTRUCTIONAL EXPENDITURES PER EQUALIZED PUPIL, DOVER, HALIFAX, AND STAMFORD

	Instructional Expenditures (Does not include tuition payments)	FY16 Equalized Pupils	Instructional Expenditures per Equalized Pupil
Dover	\$865,824	169.06	\$5,121
Halifax	\$474,632	83.15	\$5,708
Stamford	\$468,722	113.11	\$4,144

These variations in costs seem to indicate a lack of collective responsibility, and that perhaps the supervisory union governance structures have inhibited the ability of these organizations to develop an equitable approach to making financial investments in their educational programs among groups of similar schools.

I conclude both supervisory unions have developed ways to share resources and to work together within the limitations of their organizational structures. Governance consolidation, however, would seem to eliminate some barriers to developing a collective responsibility for the success of all students, and would allow for a more effective and equitable targeting of resources.

Current Supervisory Unions and Districts Operate in a Manner that Maximizes Efficiencies

According to staff census data submitted to the State, both supervisory unions operate lean central offices. This could be interpreted to mean both central offices are very efficient or perhaps understaffed. The table below summarizes these data.

TABLE 9: CENTRAL OFFICE STAFFING, FY2013-FY2017

	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Windham Central Supervisory Union					
505-Bookkeeper	0.0	3.0	0.0	0.0	0.0
601-Business Managers	1.0	0.0	1.0	1.0	2.0
602-Human Resource Personnel	0.0	0.0	0.5	0.5	0.5
701-Admin Assists Clerical and Secretarial Support	5.0	2.8	0.0	1.0	0.0
702-In-service Training Staff (for non-instructional personnel)	0.0	0.0	0.0	0.0	0.0
703-Planning/Research/Development	0.0	1.0	1.8	3.5	2.3
704-Statistical Data Processing/IT	0.0	0.0	1.0	2.0	0.0
Total	6.0	6.8	4.3	8.0	4.8
Windham Southwest Supervisory Union					
505-Bookkeeper	0.0	1.0	0.0	0.0	0.0
601-Business Managers	1.0	1.0	1.0	1.0	1.0
602-Human Resource Personnel	0.0	0.0	0.0	0.0	0.0
701-Admin Assists Clerical and Secretarial Support	3.0	4.0	4.0	4.0	4.0
702-In-service Training Staff (for non-instructional personnel)	0.0	0.0	0.0	0.0	0.0
703-Planning/Research/Development	0.0	0.0	0.0	0.0	0.0
704-Statistical Data Processing/IT	0.0	0.0	1.4	1.4	1.4
Total	4.0	6.0	6.4	6.4	6.4

Based on my experience reviewing the operations of supervisory union offices around the state, I believe both central offices have typical staffing patterns for organizations of their size. Supervisory unions that have more advanced degrees of centralization tend to have dedicated staff associated with managing buildings and facility maintenance, technology, and school food service programs.

Food service centralization is a good bellwether of the degree to which districts share resources within a supervisory union because three years ago the State designated supervisory unions as the Food Service Authority for their member districts. This change precipitated many districts to consolidate these

services even though they previously were not required to do so under Act 153. Many supervisory unions responded to this new responsibility by hiring food service directors to supervise school staff and to coordinate purchasing. Although neither of these supervisory unions has apparently hired a food service director, it appears WCSU has made a greater investment in centralizing these services than WSSU. In FY 2016, WCSU spent \$44,943 on food service operations and WSSU spent \$5,383. The table below indicates the bulk of WSSU's food service expenditures remain at the school level which indicates the supervisory union has not yet realized all possible efficiencies through centralizing these services.

TABLE 10: FY2016 FOOD SERVICE EXPENDITURES

	FY 16 Food Service Expenditures
Windham Central Supervisory Union	\$44,943
Newbrook	\$51,660
Dover	\$29,091
Jamaica	\$60,007
Marlboro	\$77,292
Townshend	\$74,192
Wardsboro	\$39,313
Windham	\$212
Leland and Gray	\$140,793
SU Total	\$517,503
Windham Southwest SU	\$5,383
Twin Valley	\$314,184
Halifax	\$32,769
Readsboro	\$45,509
Stamford	\$31,786
SU Total	\$429,631

Neither supervisory union has completely centralized student transportation. This is not surprising since both organizations serve a wide geographic region and neither supervisory union operates a central middle school or high school that serves all districts. No district in either supervisory union was eligible for Extraordinary Transportation Reimbursement for FY2018. These funds are provided to districts who have high transportation costs relative to their overall budgets. None of these funds were earmarked for these districts in FY2018 which supports the conclusion that these districts largely run local student transportation routes to and from their small schools.

Both districts have achieved comparable efficiencies in special education. Neither is considered a “high spender” in special education as defined by statute. The table below describes these data.

TABLE 11: FY2016 SPECIAL EDUCATION COSTS PER PUPIL

	FY2016 Actual K-12 Special Education Cost	Dec. 1, 2015 Child Count	FY2016 K-12 ADM	% of K-12 Special Education	FY2016 K-12 Special Education Cost per Pupil
Windham Central	\$3,540,514	158	940.17	16.8%	\$3,560
Windham Southwest	\$2,655,085	92	644.40	14.3%	\$3,852

In conclusion, I believe both supervisory unions have achieved some efficiencies based on the limitations of their organizational structures and regional geography. Neither organization has an especially robust central office which is an indicator of both efficiency and capacity. Consolidation of districts might reduce costs, but it will increase capacity since it would likely allow central office staff to spend more time on instructional leadership activities and less time on duplicate administrative functions.

Current Supervisory Unions have the Smallest Number of Member Districts Practicable – Act 46 Work to Date

Both supervisory unions have embarked on merger activity as a response to Act 46. Act 46 designates the supervisory district as the preferred governance structure for meeting the policy goals of the law. The law anticipates supervisory districts might not be the best solution for all regions, however, so “alternative governance structures” or supervisory unions are still permitted with the understanding that even within a supervisory union, districts with the same operating structure will merge to create the smallest number of districts practicable. Since neither WCSU or WSSU contain many groups of districts with the same operating structures, forming supervisory districts would be very challenging. Many districts would be required to change their operating structures to do so. To their credit, however, districts in both supervisory unions have embarked on merger activity under Act 46.

Windham Central Supervisory Union

Merger work in WCSU has been organized in two areas: an initiative to merge the all the member districts of Union District #34 (Leland and Gray), and a merger for Dover, Marlboro, and Wardsboro in the southern part of the supervisory union. Stratton, the non-operating district to the north, has appealed to the State Board of Education for reassignment to the Bennington-Rutland Supervisory Union where it intends to work with other non-operating districts on examining its governance options.

To date, all members of the Leland and Gray merger have approved merging except for Windham. This means Brookline, Jamaica, Newfane, and Townshend and Union District #34 will merge into a Modified Unified Union School District called the West River Unified School District. Dover and Wardsboro have tentatively approved their merger into the River Valleys Unified School District, but

Marlboro, listed as an advisable district to the merger, voted against it. The table below describes the current configuration of WCSU and its new configuration after all proposed mergers have been finalized.

TABLE 7: WCSU COMPOSITION AFTER MERGERS

	Current WCSU Districts	New WCSU Districts
Brookline Town School District	X	
Dover Town School District	X	
Jamaica Town School District	X	
Marlboro Town School District	X	X
Newfane Town School District	X	
River Valleys Unified School District		X
Stratton Town School District	X	
Union District #34 (Leland and Gray)	X	
Wardsboro Town School District	X	
West River Unified School District		X
Windham Town School District	X	X
TOTAL	9	4

After these mergers, WCSU will have almost merged down to the smallest number of districts practicable, and will have greatly simplified its governance structure by the reducing the number of districts from nine to four. The new supervisory union will include:

- Marlboro Town School District – operating the Marlboro Elementary School in grades PK-8 and providing tuition for students in grades 9-12;
- River Valleys Unified School District – operating the Dover Elementary School and the Wardsboro Central School in grades PK-6, and providing tuition for students in grades 7-12;
- West River Unified Union School District – operating the Jamaica Village School, the NewBrook Elementary School, and Townshend Village School in grades PK-6, and operating Leland and Gray Middle High School in grades 7-12; and

- Windham Town School District – operating the Windham Elementary School in grades PK-6, and the Leland and Gray Middle High School in grades 7-12.

The new configuration does, however, leave the two relatively small districts of Windham and Marlboro in geographic isolation operating one small school each, but the new supervisory union meets the minimum requirement of 900 pupils for an alternative structure.

TABLE 8: WCSU 2016-2017 AGGREGATE ADM BY DISTRICT AFTER MERGERS

District	2016-2017 AGGREGATE ADM
Marlboro Town School District	123.45
River Valleys Unified School District	273.18
West River Unified School District	496.04
Windham Town School District	26.00
TOTAL	918.67

Windham Southwest Supervisory Union

There have been several mergers proposed in WSSU. One merger focused on unifying Wilmington and Whitingham into a single unified union school district. Currently, the two districts operate Twin Valley Elementary and Twin Valley Middle High School under a joint contract. Another merger among the three K-8 operating districts of Halifax, Readsboro, and Stamford was proposed as part of a side-by-side merger with Twin Valley. To date, the Twin Valley merger has been approved by voters in both communities. Halifax and Readsboro approved their merger and will move forward with the creation of the Southern Valley Unified Union School District. Stamford voters overwhelmingly rejected the propose merger with a vote of 6 in favor and 173 opposed. Stamford leaders have expressed an interest in forming an interstate district with communities in Massachusetts even though this process is very complex and involves action by the legislatures in both states and requires federal

approval. It is anticipated the remaining WSSU district of Searsburg would remain a standalone non-operating district within the supervisory union.

TABLE 9: WSSU COMPOSITION AFTER MERGERS

	Current WSSU Districts	New WCSU Districts
Halifax	X	
Readsboro Town School District	X	
Searsburg Town School District	X	X
Southern Valley Unified Union School District		X
Stamford Town School District	X	X
Twin Valley Unified Union School District		X
Whitingham Town School District	X	
Wilmington Town School District	X	
TOTAL	6	4

After these mergers, WSSU will have not merged down to the smallest number of districts practicable since Stamford could still merge into the Southern Valley district. The supervisory union's structure will, however, have been simplified by reducing the number of school districts from six to four. The new supervisory union will include:

- Searsburg Town School District – a non-operating district providing tuition for students in grades K-12;
- Southern Valley Unified Union School District – operating the Halifax Elementary School and the Readsboro Central School in grades PK-8, and providing tuition in grades 9-12;
- Stamford Town School District – operating the Stamford Elementary School in grades PK-8 and providing tuition in grades 9-12; and
- Twin Valley Unified Union School District – operating Twin Valley Elementary School in grades PK-5 and Twin Valley Middle High School in grades 6-12.

In addition to not merging down to the smallest number of districts practicable, the WSSU will not have the requisite 900 students to qualify as an alternative governance structure.

TABLE 10: WSSU 2016-2017 AGGREGATE ADM BY DISTRICT AFTER MERGERS

District	2016-2017 ADM
Searsburg Town School District	19.00
Southern Valley Unified Union School District	154.08
Stamford Town School District	100.00
Twin Valley Unified Union School District	392.17
TOTAL	665.25

In conclusion, both supervisory unions have embarked upon significant merger work under Act 46. This work, however, has not resulted in merging down to the smallest number of districts practicable in either supervisory union. In WCSU, Windham and Marlboro remain geographically isolated because of the merger activity. WSSU has a similar situation with Stamford. WSSU also does not have the requisite 900 students to qualify as an alternative governance structure.

Current Governance Structure of a Supervisory Union is the Best Means of Meeting the Act 46 Goals in a Particular Region

This analysis has exposed some deficiencies with the supervisory union model in terms of its ability to support the achievement of the Act 46 policy goals of equity and efficiency which is perhaps why the supervisory union is designated as an alternative structure to the supervisory district under Act 46. To evaluate whether the supervisory union is the "best" governance structure for a region, several variables need to be considered including the size of the schools, the spatial organization of schools and districts in the region, and to what extent the member schools feed into centralized middle schools and high schools.

As described previously, both supervisory unions contain groups of small schools. Having lived in arguably some of the most remote areas of the Northeast Kingdom for 15 years, I would have to say the

The Windham Region is predominantly rural and undeveloped. Almost 85 percent of the total land area is forested and only 6 percent is open. Urban and built up areas such as residential commercial, industrial, public and semi-public uses constitute less than 5 percent of the region. The remaining 3 percent is covered by water and wetlands.

-Windham Regional Plan, 2014

schools in the WCSU and WSSU are more isolated from each other than many in the Kingdom due to the mountainous terrain, a significant variable when considering any changes to the governance structure. The table below uses data from Google Maps to describe the distances of the schools

from their respective offices, as well as the "best" drive time.

TABLE 11: DISTANCE FROM SCHOOLS TO CENTRAL OFFICES AND DRIVE TIME

	Distance to Central Office (miles)	Drive Time to Central Office (minutes)
Dover Elementary	16.1	25
Jamaica Village	10.2	16
Leland and Gray	0.8	1
Marlboro Elementary	18.6	31
NewBrook Elementary	5.9	9
Townshend Village School	1.0	2
Wardsboro Central	10.7	14
Windham Elementary	11.3	16
Average	9.3	14.3
Halifax Elementary	9.8	20
Readsboro Central School	16.2	22
Stamford Elementary	17.8	23
Twin Valley Elementary	2.7	6
Twin Valley Middle-High School	8.5	14
Average	11.0	17.0

Both supervisory unions are similar in terms of spatial organization. What these data do not describe is how long it takes for students to get to their local schools, a variable that no doubt justifies the continued existence of the schools in their communities despite their small size.

In very few situations, elementary schools feed into centralized middle schools and high schools in these supervisory unions. WCSU has a group of districts that feed into Leland and Gray located in Townshend, but to the north Stratton has school choice as do Dover, Wardsboro, and Marlboro to the south. WSSU has a similar situation with Wilmington and Whitingham jointly operating the Twin Valley schools in the center of the supervisory union, but the other districts mostly tuition their students out of the supervisory union.

I conclude the supervisory union as an alternative governance structure is probably the best solution for this region. A variety of factors in both supervisory unions make the formation of supervisory districts impractical and probably not desirable. These factors include the diverse operating configurations of the districts and the dispersed nature of the school locations which I believe is reasonable considering the mountainous terrain.

Creation of a Unified Union School District that is its Own Supervisory District is or is not "Possible" or "the Best Model"

Although the supervisory union is probably the best governance solution for this region, it is important to describe the barriers to forming supervisory districts in this region more specifically. These barriers can be characterized as being political and educational.

It is important to note that in both supervisory unions, the supervisory district was not identified as a good solution by local political leaders working through the merger requirements of Act 46. The work in both supervisory unions surfaced REDs and side-by-side mergers as the best solutions to meet the requirements of the law. None of these mergers was completely successful from a political perspective. In WCSU, Windham and Marlboro voted against their mergers, and in WSSU, voters in Stamford voted against its merger in an overwhelming manner. It can be assumed from these votes that forming single supervisory districts would be even more challenging, especially considering each supervisory union contains one non-operating district (Stratton in WCSU and Searsburg in WSSU), both of which would be required to give up school choice altogether as part of forming a supervisory district.

The lack of political enthusiasm for merging into single districts is probably related to the lack of a compelling educational rationale to do so. Forming supervisory districts would disrupt historic enrollment patterns for many of these communities at middle schools, high schools, and regional

technical centers. Many of these districts tuition students out of their supervisory unions due to geographic convenience. Stamford

and Readsboro tuition many students to schools in Massachusetts, and Marlboro tends to send its high

Forming supervisory districts would disrupt these well-established enrollment patterns and would increase student transportation costs significantly.

school students to Brattleboro. Forming supervisory districts would disrupt these well-established enrollment patterns and would increase student transportation costs significantly.

I conclude the supervisory union is the best governance structure for this region despite the identified deficiencies of this structure in meeting the Act 46 policy goals of equity and efficiency. Local merger efforts to date, however, have failed to create governance structures that fully meet State guidelines for alternative governance structures. WCSU has failed to merge to down to the smallest number of districts practicable with the exclusion of Windham. WSSU has failed to include Stamford in a merger, and with approximately 600 students does not have the requisite minimum number (900) of students. An option that should be explored further is the realignment of these districts to form a single supervisory union. Such an approach might allow local decision makers to arrive at an alternative structure that can better meet the policy goals of Act 46. In the next section of this report, I consider how a realignment of supervisory unions boundaries would impact local governance options under Act 46.

Realignment of Supervisory Union Boundaries

Supervisory Union Composition

The creation of a single supervisory union in the region (realignment of supervisory union boundaries) would create the largest supervisory union in the state in terms of square miles.

Realignment would also create new merger opportunities under Act 46. The table below summarizes the merging of districts down to the “smallest number of districts practicable.”

TABLE 12: SUPERVISORY UNION COMPOSITION AFTER REALIGNMENT

	Operating Configuration	Current Districts After Local Act 46 Mergers	New Districts After Supervisory Union Realignment
Marlboro School District	PK-8, Choice 9-12	X	
River Valleys Unified Union District	PK-6, Choice 7-12	X	
Stratton Town School District	Non-operating K-12	X	
West River Unified Union District	PK-12	X	
Windham Town School District	PK-6, Union 9-12	X	
Twin Valley Unified Union District	PK-12	X	
Searsburg Town School District	Non-operating K-12	X	
Southern Valleys Unified Union District	PK-8, Choice 9-12	X	
Stamford Town School District	PK-8, Choice 9-12	X	
PK-6, Choice 7-12 District			X
PK-8, Choice 9-12 District			X
PK-12 District			X
Non-Operating District			X
TOTAL		9	4

This model could be adopted by the State Board of Education as part of its statewide plan for governance in 2019 or local decision makers could take the necessary action on their own. Here is a summary of the new supervisory union’s composition.

- PK-6, Choice 7-12 District – This district would be composed of the Dover-Wardsboro merged district. Marlboro was advisable to this merger.
- PK-8, Choice 9-12 District – This district would be comprised of the Halifax-Readsboro merged district. Stamford was advisable to this merger.
- PK-12 District – This district would merge the Twin Valley Unified Union District and the West River Unified Union District into a single PK-12 district. Windham was advisable to this merger.
- Non-Operating District – This district would include the Searsburg Town School District and the Stratton Town School District assuming both would remain assigned to the region.

Marlboro and Stamford would have a couple of options: 1) they could change their operating structures to PK-6 and join Dover and Readsboro, or 2) they could maintain their current structures and merge with Halifax and Readsboro. Windham would most likely have to merge into the PK-12 operating district since it is already a member of Union District #34 (Leland and Gray) for students in grades 7-12.

Educational and Operational Impact of Supervisory Union Realignment

The potential educational and operational impact of supervisory union realignment was studied at some length through a supervisory union boundary study commissioned by the State Board of Education for the WSSU in 2012. This study was required as a condition for WSSU to maintain its own superintendent. The study, authored by VSBA consultants and former superintendents Wayne Gerson and John Everitt, involved conducting interviews with board members, central office and school staff, and superintendents of neighboring districts. These consultants recommended the two supervisory unions be realigned into a single supervisory union, and predicted the realignment would achieve the following positive outcomes:

- Facilitation the sharing of professional staff among K-8 schools making it possible to efficiently provide specialists. (e.g. art, music, PE, and related service providers at all grades levels; mathematics, science, foreign language teachers at middle grade levels);
- Sharing support services among all schools in the region (e.g. personnel management, business, transportation, technology support services, facilities and operations);
- A single administrator, whose primary focus would be implementing a K-8 curriculum that prepares students for a wide range of secondary schools, would oversee boards in choice communities;
- The Superintendent's primary focus would be on K-12 education in the two high schools in the region; and
- Potential six-figure savings in administrative overhead due to the consolidation of the central office staffs.

My review of district operations based on the data provided in this report indicates these predicted outcomes would likely be achievable under supervisory union realignment, and would assist the districts

I believe greater equity of educational opportunities would be achieved under a consolidated governance structure with fewer boards and with greater oversight over a larger number of schools, and efficiency would be improved significantly by reducing the education spending associated with the elimination of a supervisory union central office.

with meeting the policy goals of Act 46. I believe greater equity of educational opportunities would be achieved under a consolidated governance structure with fewer boards and with greater oversight over a larger number of schools, and

efficiency would be improved significantly by reducing the education spending associated with the elimination of a supervisory union central office.

I also think a more robust central office could be created through realignment. Both supervisory union central offices have limited capacity in the areas of human resources support and curriculum

coordination. A consolidated central office would provide greater capacity in these areas and support the expanded coordination and centralization of facilities and maintenance, transportation, and food service programs. Consolidation of central offices could also be used as an opportunity to implement integrated data systems to provide board members greater oversight of organizational outcomes and instructional leaders with greater capability with program evaluation.

Focusing Regional Development Through Supervisory Union Realignment

Windham County has engaged in significant planning to support economic development in the region. In the Regional Development Plan adopted by the Windham Regional Commission in 2014, a long-range future vision for the region was articulated and regional goals were established including:

- To broaden access to education and training for all citizens; and
- To plan for, finance, and provide an efficient system of public facilities and services (such as schools, water and wastewater facilities, highways and bridges) to meet future local, regional, and state needs;

These ambitious goals acknowledge the importance of considering education policy in concert with the social and economic development of a region. Realignment of supervisory boundaries provides an opportunity to ensure the school governance structure is aligned to the broader goals of regional development.

In its *Regional Profile* developed in 2014 as part of the Windham Regional Plan, the Windham Regional Commission examined trends in population and economic development in the region. Major employment centers of the region were identified along the Connecticut River Valley including the towns of Brattleboro and Rockingham. In the center of the region, Dover, Townshend, and Wilmington

were identified as major employment centers. Transportation patterns to and from major employment centers indicate Dover to be an important economic center of the region, and possibly a good location for a realigned supervisory union.

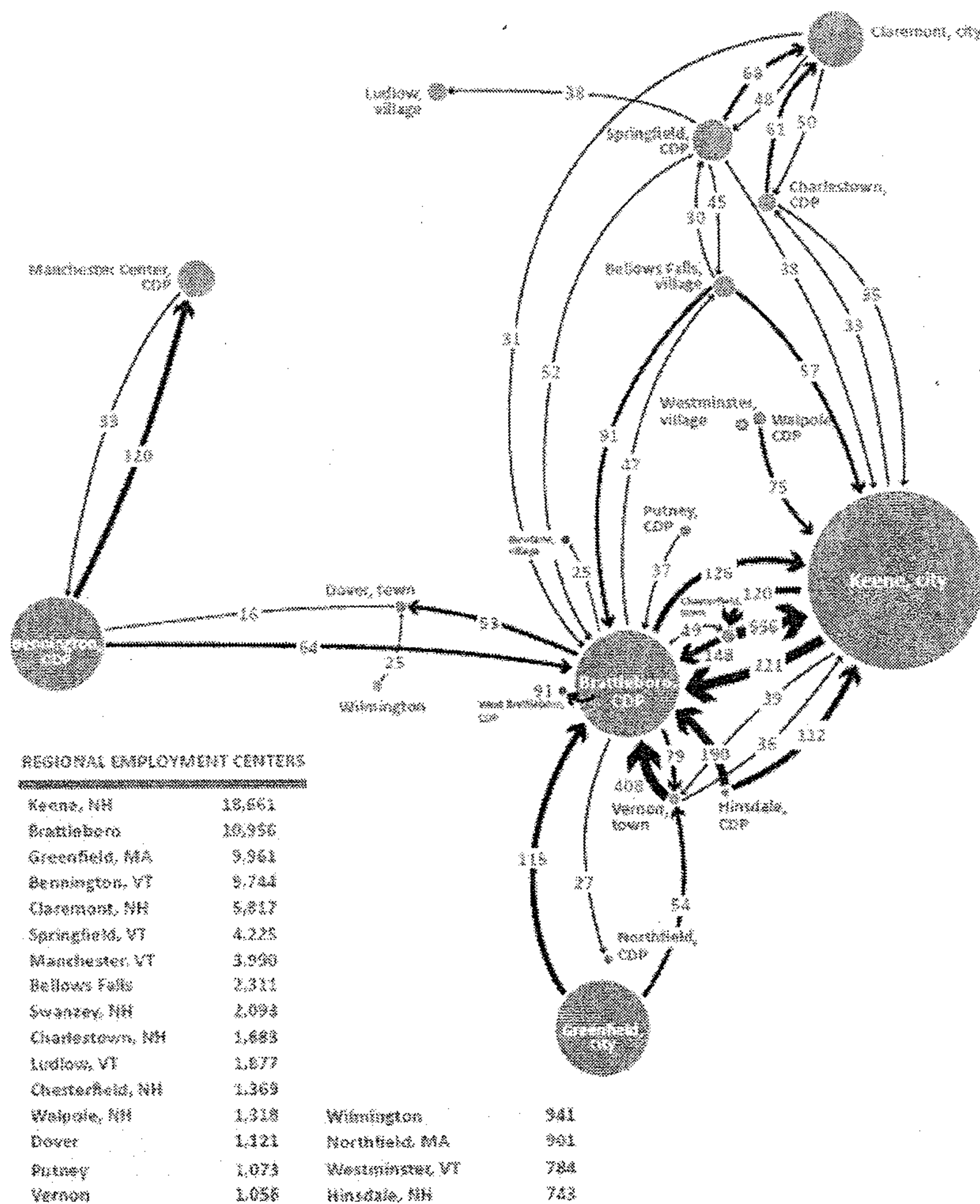


FIGURE 2: TRANSPORTATION PATTERNS FROM REGIONAL EMPLOYMENT CENTERS, REGIONAL PROFILE, WINDHAM REGIONAL PLAN, 2014

The table below indicates the relative distances and travel times from the schools to a central office in Dover in a realigned supervisory union.

TABLE 13: DISTANCES FROM SCHOOLS TO CENTRAL OFFICE LOCATED IN DOVER AND DRIVE TIMES

	Miles to Central Office	Drive Time to Dover Central Office
Dover Elementary	5.8	10.0
Jamaica Village	17.9	26.0
Leland and Gray	22.5	36.0
Marlboro Elementary	14.6	24.0
NewBrook Elementary	16.0	27.0
Townshend Village School	20.4	28.0
Wardsboro Central	10.6	15.0
Windham Elementary	21.8	31.0
Average	16.2	24.6
Halifax Elementary	16.0	31.0
Readsboro Central School	23.3	35.0
Stamford Elementary	25.0	36.0
Twin Valley Elementary	6.2	10.0
Twin Valley Middle-High School	14.7	25.0
Average	17.0	27.4

These distances show that a central office located in Dover would be mutually convenient (or inconvenient) to both supervisory unions. Since the realignment would only affect districts and not schools, student transportation would not be impacted. However, if the new supervisory union chose to operate its own buses at some point, the Dover location might prove to be convenient for a centrally located bus maintenance location. Both supervisory unions operate on the same fiber network. Moving the central office would allow districts operations to continue without disruption and might provide greater savings in terms of E-Rate reimbursement.

Supervisory Union Realignment – Towards a More Sustainable Regional Governance Structure

Act 46 established five policy goals for Vermont's education system:

1. Provide substantial equity in the quality and variety of educational opportunities statewide;
2. Lead students to achieve or exceed the State's Education Quality Standards, adopted as rules by the State Board of Education at the direction of the General Assembly;
3. Maximize operational efficiencies through increased flexibility to manage, share, and transfer resources, with a goal of increasing the district-level ratio of students to full-time equivalent staff;
4. Promote transparency and accountability; and
5. Are delivered at a cost that parents, voters, and taxpayers value.

The law also created an overarching purpose and described the General Assembly's intention to, "move the State toward sustainable models of education governance" to encourage and support local decision on behalf of achieving the law's goals. Act 46 does not specifically define what is meant by a sustainable governance structure, but it is reasonable to conclude supervisory unions are considered less sustainable than supervisory districts since they are comprised of more than one school district.

Based on my experience as a superintendent for a large multi-district supervisory union, I believe sustainability in supervisory unions pertains to reducing the number of school boards and districts involved in governing a school system. Sustainability indicators I have observed in my experience include:

- The turnover rate among leaders such as superintendents and principals;
- The inability of many school boards to fill vacancies;

- The difficulty many school boards have in meeting quorum requirements for their meetings, particularly large supervisory union boards; and
- The large number of school board vacancies that are filled through uncontested elections.

In areas where alternative governance structures are determined to be the best governance structure for the region, I believe there should be significant progress towards reducing the number of boards and districts to make real progress towards achieving sustainability. Supervisory union realignment in the WCSU-WSSU region would go a long way towards improving the sustainability of the school governance structures. Realignment would reduce the current system, currently comprised of two supervisory unions and nine districts (after Act 46 locally-initiated mergers), down to one supervisory union with four districts. I believe such a structure, although encompassing a large geographic region, would enable local decision makers to better meet State education policy goals for equity and efficiency. Such a structure could also bring greater alignment with the social and economic development goals for the region, and create the possibility or more a sustainable school governance structure over time.