

Proposed letter to the General Assembly to accompany SBE’s metrics for SSG eligibility
(to be adopted by SBE by 30 June per Act 46 (2015), Section 21) (JC draft 2.0, 27 June 2018)

<< SBE letterhead >>

30 June 2018

Re: Determining eligibility for Small School Grants

to Members of the General Assembly:

Act 46 (2015), Section 21, directs the State Board of Education, on or before 1 July 2018, to *“adopt and publish metrics by which it will make determinations whether to award small school support grants pursuant to 16 VSA § 4015 on and after 1 July 2019...”*.

The purpose of this report to the General Assembly is to present metrics that the State Board of Education has developed in response to the General Assembly’s directive. These metrics are described in Attachment A.

Although we’ve done our best to comply in good faith with the General Assembly’s directive in this matter, we are not especially satisfied with the results. Accordingly, the second purpose of this report is to convey to the General Assembly the concerns that have arisen during our deliberations and to ask that the General Assembly, upon reconvening in 2019, consider revisiting the entire question of Small School Grants and how best, if at all, to determine eligibility.

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For many years prior to the adoption of Act 46, and even to the present day, the General Assembly has provided that “Small School Grants” be awarded to schools purely on the basis of being “small”. No other conditions, requirements, or objectives have had to be met. If the school was small – no matter whether it was isolated or proximate, rich or poor, accomplished or struggling, efficient or expensive -- it was entitled to a Small School Grant (SSG).

With the adoption Section 21 of Act 46, the General Assembly appears to have determined that it will no longer be enough for a school just to be “small” to qualify for an SSG. Instead, Act 46 stipulates that, starting a year from now, entirely new conditions will have to be met before a small school is eligible for a Small School Grant. Besides being “small”, the school must also:

- >> be geographically isolated from “the nearest school with excess capacity”, or
- >> demonstrate “academic excellence and operational efficiency”.

The State Board of Education has studied these new conditions and the directive of the General Assembly in several of its monthly meetings since late 2017. As might well be expected, some members of the Board have expressed reservations about the wisdom of the Legislature’s new conditions for SSG eligibility, while others have expressed enthusiasm. Nonetheless, the Board has determined to respond in good faith to the letter of the General Assembly’s directive. Accordingly, the Board has applied its best collective wisdom to devising “*metrics by which it will make determinations whether to award small school support grants.*”

We wish to note that applying metrics to characterize real-life conditions is more difficult than might first appear. By definition, *metrics* are objective, comparable, and measurable. By contrast, the Legislature’s new *conditions* for Small School Grants -- “driving times”, “inhospitable travel routes”, “academic excellence”, “operational efficiency” -- are largely qualitative – or at the very least, subject to a wide variety of interpretations.

- Take, for a simple example, “driving times”. Is this to be measured in summer or in winter? In a car or in a school bus? And how long is too long for third-graders? For sophomores in high school?
- And how and by whom is “excess capacity” at the nearest school to be determined?
- Still harder to characterize and compare is “academic excellence”. Consider what’s to be done when students at two different small schools achieve virtually the same scores on their SBAC examinations -- yet one school serves students mostly from economically-deprived backgrounds, while the other serves a mostly middle-income population. The schools’ academic scores are equal: are these schools equally entitled to be rewarded with a Small School Grant?

Despite these challenges, we believe that the metrics the Board has adopted (presented here as Appendix A) align with the General Assembly’s directive to the Board in Act 46, Section 21, as adopted by the Legislature in 2015.

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Going forward, we suggest that the General Assembly consider these metrics only as a work-in-progress. A lot has changed in Vermont’s educational landscape since Act 46 was adopted three years ago, and more changes are yet to come. In November of this year, the State Board will publish its State Plan, which will surely impact some of the remaining small schools not currently merged. Moreover, in early 2019, the Legislature will have on-hand the results of the new equalization study.

Taken together, these developments may warrant the General Assembly's further attention to Small School Grants. We ask that the General Assembly, upon reconvening in 2019, consider revisiting the entire question of Small School Grants and how best, if at all, to determine eligibility. The State Board will be pleased to provide whatever assistance the Legislature may require.

Yours sincerely,

Krista Huling
Chair, Vermont State Board of Education

Attachment A: **"Metrics for Determination of Eligibility for Small School Support Grants
-- Pursuant to 16 VSA § 4015, as of 1 July 2019"**