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|  | Public Comments |
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| Local Contribution Study  Pursuant to Chapter 132, Section 21 of the Acts of 2019 *An act relative to educational opportunity for students*  Comments submitted as of October 8, 2020 |

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# Public Comments

**Frederick M Small** (9/18/2020)

Whitman

Whitman Hanson Regional Committee

We are underfunded, our member Towns have not been able keep up with small budget increases as Chapter 70 increases less than .05% and our budget increases 3-4% annually.

**Tanya Gaylord** (9/21/2020)

Clearwater, FL

Pioneer Valley Regional School District

PVRSD is hold harmless. removing this would increase member town assessments in four rural Massachusetts towns. I think automatically increasing all towns to the 82.5% contribution would drastically affect the smallest of our four towns drastically. Taking away hold harmless for wealthy also takes it away fro areas that are poor and have experienced decrease enrollment over the years, but still have increasing annual costs.

**Michele Giarusso** (9/22/2020)

Leyden

Verizon Communications

With declining enrollments in our school districts the current school district is unsustainable for small towns to support. We formed a school district back in the early 90's because we believed the state legislature when we were told we would receive 100% reimbursement for chapter 70 if we formed a "district". That never happened, instead we are left with mandates to have buses for all school children whether they ride the bus or not. There are buses left empty but have to roll. Busing costs keep increasing but not chapter 70.

Another inequality is the formula used for reimbursement. On paper some of our small towns look rich with a high EQV compared to districts in the eastern part of the state. That is because we have no industry and under 500 households in our town. The formula has got to change. We in western MA are being compared to districts in the eastern part of the state where the per capita income is just not the same. Either the legislature needs to mandate districts merge (model Vermont legislature) or change the formula because leaving it up to towns to merge will just not happen. Our education is suffering as we pay administrators for each small district enormous salaries and leave our children with little or no supplies.

Remote learning has taught us this as western MA children have suffered greatly due to no internet service for remote learning and lack of technology to even connect.

The legislature must act because Dept. of Elementary and Secondary Education (DESE) is not. DESE states they cannot mandate school districts to do anything. Another mandated department with high paying salaries that only "recommend" and do not legislate.

Please have public forums in the western part of the state or invite us to speak to the legislature.

I have attached a report from a community compact grant we received to look at the Pioneer Valley Regional School District. While this was a great experience and some results have come from it more needs to be done but the school committee has stalled on any further action as COVID has taken center stage. Momentum needs to come from our leaders in state legislature and DESE to help us further.

[No report attached]

**Dianne Salcedo** (9/22/2020)

Orange

Orange Elementary School Committee and Ralph C. Mahar Regional School Committee

The Orange Elementary Schools currently have over 30% special education students. This is over double what the Chapter 70 calculation assumes. Orange has much of the rental housing in the area as well as lower average incomes. We also have dedicated foster families. And it has a high tax rate. The state needs to step up and fully fund the special education costs of all children rather than unfairly burdening the town where they reside.

**Gerald McCue** (9/23/2020)

Somerville

Chelsea Public Schools

1. Increase the maximum percent local contribution for very wealthy communities, lower the minimum contribution for very poor communities.

2. Create a wind down methodology for the foundation budget calculation for districts with declining enrollment, maybe similar to the charter tuition reimbursement methodology.

3. Treat mature charters the same as public districts when creating foundation budgets using the prior Oct. 1 enrollment. Create a grant program for start-up/expanding charters, maybe similar to Kindergarten expansion grants.

**Douglas Tanner** (9/23/2020)

Wendell

Finance Committee

I, Douglas Tanner, am the chair of the finance committee in Wendell, Massachusetts. At one time I was an Assessor and I've served on several special school committee projects including the planning and development of the Middle School at Ralph C. Mahar High School, major repair supervision committees and K-12 study committees.

1. Prop 2 ½ cap limit: From my seat I can say this about the Proposition 2 ½ cap limit. It restricts our rights as citizens to decide for ourselves how much we want to tax ourselves to pay for basic services. With school budgets increasing, primarily but not exclusively due to the cost of special education, and our EQV being static for 10 years or more we are in a situation where we may be forced to cut libraries, public safety and highway maintenance because the state law says we can't pay for it even if we want to. So essentially, the state says your property isn't worth much and you are not allowed to pay for the services that could make it worth more. THIS IS OPPRESSIVE AND INSANE!. It may be helpful to realize that while our real estate assessment values have remained static, the incomes of our families here have risen in line with all of the other towns around us. Perhaps it is an anomaly – but whatever it is, it should be eliminated. We have voted consistently to support education and our elementary school is one of the best in the state. Why should we have to cut other essential services because of this arcane law, the unintended consequences of which should be addressed. I have no objection the prop 2 ½ limit because it can be over-ridden with a ballot vote. However, something that speaks to the efficiency and quality of fiscal management in Wendell is that we have not needed an over-ride vote in over 20 years, and yet, here we are, less than $1 from the cap. Our "limit" has exceeded the "cap" for the last 3 years and our auditors tell us we are one of the fiscally managed small towns in the state. The Cap is a travesty.

2. Special Education funding: As your own commissioned review of Special Education funding: "Review of Special Education in the Commonwealth of Massachusetts Thomas Hehir and Associates, 2012" concluded, disproportionate burden of special education costs are falling on districts that in many case are the least able to support them. And while the 2012 study acknowledged that Massachusetts "demonstrates a higher rate of students with disabilities than most of the rest of the country" it is also true the rate and method the state uses to reimburse special education costs is among the worst, i.e., least effective and most burdensome on local resources as any state in the country. The problem with this is obvious. The Wendell/New Salem district for example, spends 25% of its total budget serving the 25% of its students with identified needs but at the present time has no students with needs that qualify for reimbursement. Chapter 70 funding for 2020 covered our special education costs and only 2% of the mainstream budget. In 2021, were it a normal year, chapter 90 wouldn't even cover special education. Just a few years ago chapter 70 funding covered special education and about 16% of mainstream education expenses. The trend is clear. The mandate to serve is for many reasons necessary and in the long run works for students and is cost effective. But the disproportionate burden on local districts (and taxpayers) has not been adjusted to accommodate reality.   
  
At least 27 other states have more substantial, reality based reimbursement systems and another 10 have systems that are based on the actual number student who require services. Other states use a variety of methods to distribute the burden more fairly, ranging from reimbursing costs based on categories of special needs to paying directly for special education services. Massachusetts and only two other states (WV and NJ) do nothing but reimburse local schools for individual students with extreme needs with no other local factors considered. This is called "high cost reimbursement.

Douglas Tanner

Chair, Wendell Finance Committee

**Alice Wozniak** (9/23/2020)

Heath

Finance Committee & Assistant Assessor

I'm from a town of less than 700 people who send their kids to a regional school district with declining enrollment. The formula is clear on several things; I understand where the values of the homes come from but I don't understand one bit how the wealth factor for a community is calculated. If it is based upon our tax returns; that is a huge problem! My town has 5 zip codes for 700 people. When we file our income tax forms, we use our mailing address so no one would know I live in Heath because my mail goes through Colrain. Only 4 roads get mail delivery and the post office boxes which carry the Heath zip code. The mailbox residents are our top 5% of wealth including the 4 roads that get delivery. This makes me believe that our wealth factor is skewed by our zip code users. If my income is going to another town like many others; this doesn't work for balancing my town's income. I would hope that this is seriously considered to ensure that (All) residents income get defined to their correct school district town's assessment or I think that there needs to be a revised formula to ensure accuracy. To have 60% of your income being absorbed by neighboring towns and probably benefitting their assessment is a hard pill to swallow when you have already closed your elementary school to save money.

**DAVID B WELENC** (9/24/2020)

ORANGE

FINCOM

THE WAY IN WHICH SPED STUDENTS ARE TRACKED IS NOT ACCURATE. WE HAVE NOT BEEN REIMBURSED PROPERLY FOR THESE STUDENTS WE HAVE AND IT HAS GONE ON FROM 2004 TO PRESENT.

**Susan Pimental** (9/24/2020)

Rehoboth

funding for schools should NOT take into account income level since someone's ability to pay more doesn't affect the towns contribution unless their is a prop 2 1/2 override. Districts should be funded and it should be mandated that the money "follow" the child. When one town is considered "wealthier" than the other town int he district, the weathier town subsidizes the other town. It causes such unnecessary conflict within the member towns

**Terry Wiggin** (9/24/2020)

Milford MA

Millis Public Schools

I think my general comment would be that while effort continues to be made to help districts with high levels of poverty and other demographics, it tends to forget, and even take from districts that are smaller and who have worked hard to perform well. Its fine when all the ships rise, but when some rise while others begin to sink you do the state no favors. The formula still does not address in my opinion all of the operational aspects of running a school, heightened during the current pandemic.

**Joseph Tierney** (9/30/2020)

Yarmouth Port

Dennis Yarmouth School Committee

Chapter 70 funding is severely Mis-aligned. A better job has to be done to properly find school districts. More money needs to go to schools on Cape Cod

**Barbara Malkas** (9/30/2020)

Clarksburg

North Adams Public Schools

The Chapter 70 formula is enrollment based and while that is beneficial to districts with stable or growing populations, there are many other regions of the state that have declining populations and therefore declining enrollments. One would think that would indicate a lower need for services, but those left behind in these communities are representative of vulnerable urban populations with increased needs due to poverty, substance use, high levels of trauma and associated behavioral issues, and lack of infrastructure to address community needs.

**William Cameron** (9/30/2020)

Pittsfield

Pittsfield School Committee

Chapter 70 aid should be provided according to an objective standard. That standard should take account of three factors: (a) the actual annual taxing capacity of the community or communities served; (b) the qualifying costs attributable to municipalities that fund municipal school districts, and that therefore draw funds away from instruction of and services to students; and (c) the needs of the school district if it is to provide equitable and effective instruction to especially needy populations, including students are ELLs, or with IEPs, or are economically disadvantaged, or some combination thereof.

The formulaic provision of Chapter 70 funds to districts that have the capacity to fund their communities' school far more amply than is now expected of them is unjust. More practically, it assures that many needy students will never benefit from their K-12 educations as they should, with all the dark social & economic consequences to the Commonwealth that can be readily foreseen.

**Tom Ziniti** (10/2/2020)

ORANGE

Retired Teacher, Warwick

Rural towns are in desperate need of an increase in Chapter 70 funds. This is evident because schools in these towns are being closed with increasing frequency. Warwick Community School from which I retired is an example of such a school. Please help! Thank you!

**Todd Soucy** (10/4/2020)

Orange

The funding is biased and against rural communities. It's clear as day. [...] Also, special education although necessary is driving us to impossible budget targets. Common sense would be helpful. Don't let the tail wag the dog

**Susan McBride** (10/5/2020)

Rehoboth

Finance Committee

When considering the ability of a town to fund its schools, EQV is a valid component. Any town is able to collect property taxes based on assessment values. Basing part of the state's minimum contribution formula on per capita income however, makes no sense. Income tax goes directly to the state. The towns are not able to use that tax revenue, but must depend on Chapter 70 money and state aid, grants, etc. to recoup some of their income tax contributions.

If there are some millionaires living among regular folk in a town, the minimum contribution is skewed. These millionaires do not necessarily add to a town's EQV. They may have a modest home in one town and homes elsewhere, like in Florida or an ocean-front home on the Cape and may not contribute to a town's local property taxes in the way one might expect.

Therefore, the expected minimum contribution formula should be revised to include EQV as its primary component, as taxation based on EQV gives the best approximation of what a town is able to pay to support its schools.

Also, since special education is a huge expense for small towns to absorb, It should be an expense best handled state-wide. No one town should be shouldering the burden of special ed costs, while other towns happen to have few or no students needing special services. When a student moves from one town to another, it could have drastic consequences financially for the new town. Having the state as a whole fund these special students would be a more equitable way of handling these expenses.

**Michael McBride** (10/5/20)

Rehoboth

Currently, a municipality's total personal taxable income factors into the formula which assigns a dollar value to the amount that the municipality can theoretically afford to contribute to its Required Minimum Local Contribution. This part of the so-called "wealth formula" illogically concludes (since a municipality cannot collect revenue based on personal income) that if your total personal income is X (a figure easily skewed by a few high earners) then your community can therefore contribute Y to its school costs. This approach can disregard a community's unique economic circumstances.

I am willing to help the DESE/DLS improve the formula for determining each municipality's public school operating cost contribution.

**Amy White** (10/5/20)

Orange

I urge you to reconsider the funding formulations for public schools, especially within rural districts. Rural districts bear an inequitable burden in educational costs. Our transportation needs are significantly higher. The unfunded mandates of special education hit the Town of Orange particular hard, and it is as the expense of the general student body. The Town of Orange, as many other towns in Western Massachusetts, cannot sustain the the costs of education the entire body of the student population with the funding formulations established by the State and does not have the local tax revenue to off set it. There is a lack of equity within the current Chapter 70 funding together with unfunded mandates that must be fixed.

**Joseph Sawyer** (10/6/20)

Shrewsbury

Superintendent, Shrewsbury Public Schools

Ostensibly it seems that using the Aggregate Wealth Calculation [measuring both EQV and income] is a fair way to measure a community's ability to pay.

However, it seems arbitrary that communities with significantly different wealth factors are equalized by creating the Required Local Contribution cap at 82.5% of their Foundation Budget.

Of interest is that NCES data [2015-2016 state ranking] shows that the share [Chapter 70 funding] that the State of MA is contributing versus local or federal resources is fairly low and one could argue that it should be higher given our state's resources and emphasis on the importance of public education.

**Russ Kaubris** (10/7/20)

Greenfield

Franklin County Technical School District

I believe DESE and DOR have worked hard to create formulas that try to calculate contribution amounts from both state and local government that is equitable. The formulas are not perfect, but I have yet to see an alternative that is more equitable. I believe the State has been skewing the formula since the beginning of the use of "hold harmless". As a school district we took advantage of the hold harmless funding for a few years, but used the opportunity to right-size our school finances. We used the extra time the hold harmless funds afforded us to refocus our school's mission and priorities. We came out the other side and are now growing our enrollment. I strongly urge the legislature remove "hold harmless" from the CH 70 formula. The formula is a per pupil based formula and hold harmless skews the aid provided. On a per pupil basis, many schools are getting much more aid now than they did 5 or 10 years ago ! That extra aid is papered over by the angst of declining enrollment and the false perception that State aid has plateaued. It has not, it has increased per student attending. Hold harmless should be removed from the CH 70 calculation and should be given to schools through the Foundation Reserve or some other source. Preferably a source that requires schools receiving hold harmless aid be accountable for that extra aid. In order to receive hold harmless aid schools should provide a plan to achieve financial independence without the need for hold harmless X number of years in the future. Keep CH 70 funds on a true per pupil basis and make aid for declining enrollment situations outside that formula. Thank you for the opportunity to comment.

**Jessica Keegan** (10/7/20)

Hanson

Hanson's current school financing situation where Hanson is obligated to pay $1,904,166 more than Whitman and yet Whitman has 730 more students than Hanson.

Because of the recent Town vote to adopt the Statutory method of assessment under the WH Regional School Agreement, this will make Hanson's school financing situation worse in the years to come.

Section 21 of the Student Opportunity Act (https://malegislature.gov/Laws/SessionLaws/Acts/2019/Chapter132) speaks to how the state currently funds all the MA school districts and how towns must contribute to their schools. The current formula that the state uses is flawed and unfair (a town's wealth is based on property taxes and personal income taxes of its residents. Whitman has $30 million more in Commercial and Industrial real estate value than Hanson which should have more weight in the overall calculation of a town's wealth than personal income taxes. Towns collect property taxes but not personal income taxes so we are dependent on the state to reimburse us to fund our schools). Just because a town's personal income total is higher than another town doesn't mean those residents can afford to pay significantly more for their schools.

Please review the geography of Hanson compared to Whitman. Please review and compare the commercial property tax revenue of both towns.

**Marlena Gilbert** (10/7/20)

Groton

GDRSC

Cutting the funding for Districts that are currently held harmless would devestate many tax payers in our school community. With more than 95% of our taxes derived from property taxes, not being held harmless would create a tax burden that would ultimatey result in devetating academic cuts in our district. As a regional district we are still awaiting the full reimbursement for Chapter 71. we urge you not to cut our Chapter 70 funding as well.

**Felice Ferreer** (10/7/20)

Groton

Parent

The current tax rate is Groton is pretty high in comparison to surrounding towns. I moved to Groton in 2011. Each year the taxes have increased the homeowners are asked to contribute more money! However it seems that we are always just getting by or touching the issue. We have school buildings that need repairs. We cut programs from the schools each year! Asking for more money from taxpayers is insane. The town needs the funding. Especially in these times with unemployment rate being so high and the economy being so volatile. Taking away resources or funding is not acceptable.

**Wendy Flaherty** (10/8/20)

Groton

I feel Groton is assumes to be a wealthy town and we consistently get less and less government and each year. Our special ed service requirements continually go up, property taxes up, school always loses. Please re-examine the funding formula. I'm a working class resident as many of us are. We aren't wealthy by a long shot.

**Jean Bjerke** (10/8/20)

Dunstable

Groton-Dunstable schools

I am highly concerned with the states participation in funding our Groton-Dunstable Regional School system. I am from Dunstable an my taxes are already over $14,000 for my home. This is outlandish. The state needs to help families continue to afford to live in MA by providing more funding to our school system.

**Allan Clemons** (10/8/20)

Hanson

Formula to calculate Hanson's share of Regional School expense fails to address the considerable quantity of commercial property in Whitman, compared to Hanson. Why is this not part of the calculation?

**John Kalemkeridis** (10/8/20)

Hanson

The current formula that the state uses is flawed and unfair. a town's wealth is based on property taxes and personal income taxes of its residents. Whitman has $30 million more in Commercial and Industrial real estate value than Hanson which should have more weight in the overall calculation of a town's wealth than personal income taxes.

**Christopher Smith** (10/8/20)

Hanson

The calculation doesn't not evenly take into account the commercial and non residential properties. Income Tax is paid to State not town so determining wealth doesn't allow adequately for towns to have access to income funds.

The lack of clarity around a clear formula presents calculation issues that result in property tax hikes until the formula is corrected however the property tax hike is incurred and usually doesn't get repealed as a result of the lack of transparency surrounding the formula.

**Scott Carpenter** (10/8/20)

Hyannis

Superintendent of Schools, Monomoy Regional Schools

I'm not sure if the legislation adequately addresses a concern I see with many of the state's regional school districts in how the minimum required contribution is calculated. The minimum required contribution is often too tied to foundation enrollment, rather than each town's capacity to fund education. One of Monomoy's two towns has significant property wealth, far greater than the other, but the minimum required contribution as specified by the state/DESE has the wealthier town paying far less, because it has fewer children attending the district. In reality, the value of every home in both towns is tied to how strong their schools are, and in my opinion, capacity of a town's ability to pay is a far more important factor in determining EQUITY than enrollment. This creates inequities for Harwich (relative to Chatham), for Yarmouth (relative to Dennis), and for Sudbury (relative to Lincoln, where I previously worked).