

Public Comments for Chapter 70 Local Contribution Study

Response ID:12 Data

1. Public comment response

1. Name:

Frederick M Small

2. City/Town of residence:

Whitman

3. Organizational affiliation (optional):

Whitman Hanson Regional Committee

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:14 Data

1. Public comment response

1. Name:

Tanya Gaylord

2. City/Town of residence:

Clearwater, FL

3. Organizational affiliation (optional):

Pioneer Valley Regional School District

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:15 Data

1. Public comment response

1. Name:

Michele Giarusso

2. City/Town of residence:

Leyden

3. Organizational affiliation (optional):

Verizon Communications

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:16 Data

1. Public comment response

1. Name:

Dianne Salcedo

2. City/Town of residence:

Orange

3. Organizational affiliation (optional):

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

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:17 Data

1. Public comment response

1. Name:

Gerald McCue

2. City/Town of residence:

Somerville

3. Organizational affiliation (optional):

Chelsea Public Schools

5. Comment:

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.
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6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:18 Data

1. Public comment response

1. Name:

Douglas Tanner

2. City/Town of residence:

Wendell

3. Organizational affiliation (optional):

Finance Committee

5. Comment:

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

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:20 Data

1. Public comment response

1. Name:

Alice Wozniak

2. City/Town of residence:

Heath

3. Organizational affiliation (optional):

Finance Committee & Assistant Assessor

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:21 Data

1. Public comment response

1. Name:

DAVID B WELENC

2. City/Town of residence:

ORANGE

3. Organizational affiliation (optional):

FINCOM

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:22 Data

1. Public comment response

1. Name:

Susan Pimental

2. City/Town of residence:

Rehoboth

3. Organizational affiliation (optional):

5. Comment:

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

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:24 Data

1. Public comment response

1. Name:

Terry Wiggin

2. City/Town of residence:

Milford MA

3. Organizational affiliation (optional):

Millis Public Schools

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:26 Data

1. Public comment response

1. Name:

Joseph Tierney

2. City/Town of residence:

Yarmouth Port

3. Organizational affiliation (optional):

Dennis Yarmouth. School Committee

5. Comment:

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

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:27 Data

1. Public comment response

1. Name:

Barbara Malkas

2. City/Town of residence:

Clarksburg

3. Organizational affiliation (optional):

North Adams Public Schools

5. Comment:

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.

6. Links to attachments (optional):

[Berkshire_Public_School_Enrollment_Trends.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:28 Data

1. Public comment response

1. Name:

William Cameron

2. City/Town of residence:

Pittsfield

3. Organizational affiliation (optional):

Pittsfield School Committee

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:29 Data

1. Public comment response

1. Name:

Tom Ziniti

2. City/Town of residence:

ORANGE

3. Organizational affiliation (optional):

Retired Teacher, Warwick

5. Comment:

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!

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:30 Data

1. Public comment response

1. Name:

Todd Soucy

2. City/Town of residence:

Orange

3. Organizational affiliation (optional):

5. Comment:

The funding is biased and against rural communities. It's clear as day. Look at the data. 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

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:32 Data

1. Public comment response

1. Name:

Susan McBride

2. City/Town of residence:

rehoboth

3. Organizational affiliation (optional):

Finance Committee

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:33 Data

1. Public comment response

1. Name:

Michael McBride

2. City/Town of residence:

Rehoboth

3. Organizational affiliation (optional):

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:34 Data

1. Public comment response

1. Name:

Amy White

2. City/Town of residence:

Orange, MA

3. Organizational affiliation (optional):

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:35 Data

1. Public comment response

1. Name:

Joseph Sawyer

2. City/Town of residence:

Shrewsbury

3. Organizational affiliation (optional):

Superintendent, Shrewsbury Public Schools

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:36 Data

1. Public comment response

1. Name:

Russ Kaubris

2. City/Town of residence:

Greenfield MA

3. Organizational affiliation (optional):

Franklin County Technical School District

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:37 Data

1. Public comment response

1. Name:

Jessica Keegan

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:38 Data

1. Public comment response

1. Name:

Marlena Gilbert

2. City/Town of residence:

Groton

3. Organizational affiliation (optional):

GDRSC

5. Comment:

Cutting the funding for Districts that are currently held harmless would devastate 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 ultimately result in devastating 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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:39 Data

1. Public comment response

1. Name:

Felice Ferreer

2. City/Town of residence:

Groton ma

3. Organizational affiliation (optional):

Parent

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:40 Data

1. Public comment response

1. Name:

Wendy Flaherty

2. City/Town of residence:

Groton

3. Organizational affiliation (optional):

5. Comment:

I feel Groton is assumed 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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:41 Data

1. Public comment response

1. Name:

Jean Bjerke

2. City/Town of residence:

Dunstable

3. Organizational affiliation (optional):

Groton-Dunstable schools

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:42 Data

1. Public comment response

1. Name:

Allan Clemons

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

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?

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:43 Data

1. Public comment response

1. Name:

John Kalemkeridis

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:44 Data

1. Public comment response

1. Name:

Christopher Smith

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

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.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:45 Data

1. Public comment response

1. Name:

Scott Carpenter, Superintendent of Schools, Monomoy Regional

2. City/Town of residence:

Hyannis, but work for Monomoy Regional

3. Organizational affiliation (optional):

Monomoy Regional Schools

5. Comment:

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).

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:46 Data

1. Public comment response

1. Name:

Roberta Bartholdson

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

I feel it is unfair for Hanson to have to pay much more than Whitman for the schools when Whitman has many more students. Hanson has erroneously been deemed a more affluent town. This is incorrect and should be rectified.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:47 Data

1. Public comment response

1. Name:

Deborah Boyd

2. City/Town of residence:

Fiskdale

3. Organizational affiliation (optional):

Tantasqua Regional School District

5. Comment:

see attached

6. Links to attachments (optional):

[Funding_review_comments-Tantasqua.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:48 Data

1. Public comment response

1. Name:

Gabriele H Voelker

2. City/Town of residence:

New Salem

3. Organizational affiliation (optional):

Town of Orange

5. Comment:

As towns facing overwhelming issues we need a serious review of how the Commonwealth of Mass funds it's school, especially special education.

The inequitable funding across the state is crippling small towns in the Central/Western part of the state.

6. Links to attachments (optional):

[School_Education_Letter-Gabe.doc](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:49 Data

1. Public comment response

1. Name:

Barbara D'Arthenay

2. City/Town of residence:

Leverett

3. Organizational affiliation (optional):

5. Comment:

The cap on the Combined Effort Yeild should be increased to 100% of the foundation buget. This is not only fair, but is essential for schools in western Massachusetts such as ours in Leverett.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:50 Data

1. Public comment response

1. Name:

Lindi Russell

2. City/Town of residence:

Ashfield

3. Organizational affiliation (optional):

Mohawk

5. Comment:

The Mohawk Trail Regional School district desperately needs more money for our schools. We are a very rural district with a low student population. We are 9 towns. Since we are a very rural area, we do not have business contributing to our tax base. The state needs to step up and fund our rural schools.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:51 Data

1. Public comment response

1. Name:

Ellen E Edge

2. City/Town of residence:

Leverett

3. Organizational affiliation (optional):

5. Comment:

Our property taxes are inordinately high, and this is because we bear the burden of funding public education for our town. The contribution from the state is grossly inadequate.

Please review Chapter 70 funds and how those are distributed across the commonwealth.

We need more support. Thanks.

6. Links to attachments (optional):

[LEF_Chapt70_Study_Letter.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:52 Data

1. Public comment response

1. Name:

Shannon Lovett

2. City/Town of residence:

Charlemont

3. Organizational affiliation (optional):

5. Comment:

My children's elementary school, Hawlemont, has been hit hard by budget cuts and state aid cuts. We need help to get the kids back to school in person.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:53 Data

1. Public comment response

1. Name:

Rebecca Spencer

2. City/Town of residence:

Amherst

3. Organizational affiliation (optional):

5. Comment:

The hold harmless model is both essential and it is equitable. Consider how damaging these changes will be to the Amherst school district!

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:54 Data

1. Public comment response

1. Name:

Hallie Hughes

2. City/Town of residence:

Amherst

3. Organizational affiliation (optional):

5. Comment:

Please continue support for Amherst schools— we have many students with parents that live in student housing— which isn't taxed.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:55 Data

1. Public comment response

1. Name:

Tracey Pinkham

2. City/Town of residence:

Ashfield

3. Organizational affiliation (optional):

5. Comment:

As a rural district with no tax base, we desperately need state funding in order for kids and teachers to be safe, by following DESE guidelines for a return to in person learning.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:56 Data

1. Public comment response

1. Name:

Patrick Davis

2. City/Town of residence:

Orange MA

3. Organizational affiliation (optional):

Mahar Regional School Committee

5. Comment:

For far too long, the CH70 formula has placed rural districts at a fiscal disadvantage and it is HIGH time the Commonwealth does something to level the playing field between those districts inside and outside 495. It is an abhorrent and dissonant disregard of the students and the tax payers of the Commonwealth to not do so. This is chains long term economic consequences, and is hurting our communities. Furthermore. Foster children moving in from the same area, east of 495, has become cottage business in small towns like Orange. The monies don't follow the child. Our community and district are being bankrupted on the backs of providing essential services for which there is no compensation. It's honestly deplorable that the Commonwealth doesn't see this- or at least recognize it. You have a lot of work to do.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:57 Data

1. Public comment response

1. Name:

Rebecca Tew

2. City/Town of residence:

Leverett

3. Organizational affiliation (optional):

5. Comment:

Dear Senator Comerford,
Leverett is a small town in Franklin County of approximately 1,800 residents located in the Pioneer Valley. Leverett Elementary is the heart of our community and a rural school with around one hundred twenty five Pre-K — 6th grade students. Like many small and rural schools, LES offers just one class per grade with a class size of approximately 18 students. With a history of excellence, LES is the primary draw for families with young children to buy homes and move into our town.

Over the past 15 years, Leverett has seen a stable number of students in the school, but these numbers are stagnant and will not increase any time soon, in fact, it's possible these numbers could decrease over time. Population growth is simply not a reality we can count on in rural Massachusetts.

Small rural schools are in deep trouble across the Commonwealth, and nowhere as pronounced as in western Massachusetts. Our town budgets are strained and our tax rates are climbing perilously close to the \$25/\$1,000 Proposition 2 ½ tax cap. Soon, Leverett, like many rural towns, will not be able to fund our town budget.

Proposition 2 ½ puts a hard cap on what revenue we can raise. But, it's the chapter 70 formula and low charter school reimbursement that affects Leverett the most. Leverett currently funds 91% of its elementary school budget from Property Taxes. This is unsustainable and unfair. Our Chapter 70 funds are dramatically low compared to our neighboring towns. We believe this may be due to an uneven distribution of wealth within our Town and the use of income averages in the formulas rather than median income. We urge this to be investigated!

Small rural schools in Massachusetts are disproportionately affected by population changes and unfairly burdened by the significant funding shortfalls that are in response to these population changes.

The Leverett Education Foundation is a non-profit, 501(c)3 organization dedicated to supporting LES programs, staff, and students.

The state has not adequately funded education, and the amount that municipalities must contribute to fund their schools has been rising sharply year after year. Leverett raises property taxes to raise these additional funds, but Leverett has other costs in addition to funding K-12 education, like paying the salaries of municipal officials, repairing roads and providing other municipal services.

State education funding has not kept pace with increases in healthcare costs, transportation costs, special education costs, and more. Some of these areas will see funding increases thanks to the Student Opportunity Act law. However the SOA does not impact regional school transportation or charter school tuition reimbursements, and state reimbursements to municipalities for these services will remain inadequate even with the new law.

Paying for K-12 education has been eating up larger and larger portions of Leverett's budget and simply cannot go on without drastic change.

Chapter 70 funds need an urgent review to recalibrate towards a more equitable distribution. Chapter 70 Aid currently benefits more affluent municipalities which end up paying a fraction of what they could pay. But, less affluent/smaller municipalities (like those in western Massachusetts) pay 100% of their Combined Effort Yield.

Look at a few examples:

If the 82.5% cap were raised to 100%, wealthy towns like Winchendon and Yarmouth would be required to pay almost \$4 million and \$8.5 million more annually, respectively. Meanwhile 263 towns would be required to pay less – in fact this change would mean that 88 of the wealthiest towns in the Commonwealth pay more while all of the other towns would benefit.

The cap on Combined Effort Yield should be raised to 100% of the foundation budget for all municipalities. This would not require an increase in Chapter 70 funding, but would result in lower subsidies for the wealthiest communities and equity in the requirement on municipalities to contribute.

Thank you for your consideration

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:58 Data

1. Public comment response

1. Name:

Megan Shulda

2. City/Town of residence:

Ashfield

3. Organizational affiliation (optional):

5. Comment:

Our rural towns are struggling financially with the cost of education in significant ways. Transportation in particular is a tremendous burden for districts with large geographical area like ours. We need more funding to help defray the cost of transportation for small, rural public schools. Schools are closing or are forced into remote learning even with very poor internet access due to this financial situation.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:60 Data

1. Public comment response

1. Name:

Michael Naughton

2. City/Town of residence:

Montague

3. Organizational affiliation (optional):

Six-Town Regional Planning Board, former member Montague Finance Committee

5. Comment:

I appreciate the opportunity to comment. I was a Montague Finance Committee member for 20 years, and I have spent much of that time learning about public school financing and Chapter 70. Several years ago, several of us became interested in the 82.5% cap. We became convinced that the cap works against the stated goal of equitably distributing responsibility for public school funding. I have attached an analysis (FY21 Data Sheet - Chapter 70 Local Contributions.xlsx) and an explanatory document (Public Comment for Chapter 70 Local Contribution Study.docx) that explains this in more detail. I will be happy to answer any questions you may have. Thank you.

6. Links to attachments (optional):

[Public_Comment_for_Chapter_70_Local_Contribution_Study.docx](#)

[FY21_Data_Sheet_-_Chapter_70_Local_Contributions.xlsx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:62 Data

1. Public comment response

1. Name:

Johanna Bartlett

2. City/Town of residence:

Wendell

3. Organizational affiliation (optional):

Swift River Regional School Committee

5. Comment:

There is something very unfair about the 82.5% cap, which becomes apparent to anyone who has had experience with school districts in both the eastern and western parts of the state. Education in Massachusetts is supposed to be equitable, and for very wealthy towns to pretend that they need that money as badly as, for instance, the towns of Franklin County, is a very costly delusion for many poor towns.

Another costly burden, especially for rural towns, is the ever-increasing charges incurred by the unfunded mandates of the State for special education services. I believe that all of these mandates make sense for the children, but it is unfair for the State to expect small municipalities to come up with the money for these considerable expenses. The State must step in and offer more and equitable support for these services. Increasingly, other worthy programs must be put aside for these services, taking up a large portion of the budget.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:63 Data

1. Public comment response

1. Name:

Theresa Cocio

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

Why does the Town of Hanson pay more than the Town of Whitman? Whitman has a larger population, more children enrolled and a higher number of special education students. It is not an equitable manner of supporting the Whitman Hanson Regional School district. Whitman has more seats on the school committee therefore Whitman officials have the upper hand in the entire situation.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:64 Data

1. Public comment response

1. Name:

Kathleen Anne Ottina

2. City/Town of residence:

Whitman

3. Organizational affiliation (optional):

5. Comment:

The factors used to calculate the Foundation Budget should be revisited. The COVID-19 impact of school closings and hybrid models with remote learning have deprived an entire generation of students of the traditional education that has earned the Commonwealth of Massachusetts the reputation for quality public school education. Additional Chapter 70 funds need to be appropriated, as cities and towns will be faced with the challenges of funding their Minimum Local Contribution until the economy recovers.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:65 Data

1. Public comment response

1. Name:

Jane Burke

2. City/Town of residence:

New Marlborough

3. Organizational affiliation (optional):

--SBRSD School Committee Chair

5. Comment:

It is our feeling that the tools used to determine the formula for rural aid and local contribution is based on a zip code analysis that is inaccurate. We are trying to get this fixed. New Marlborough has zip codes including 01230 for mail driven out from Great Barrington which serves BHRSD as well as 01244, and 01259. Alford has several zip codes that include West Stockbridge and Great Barrington which are in the BHRSD.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:66 Data

1. Public comment response

1. Name:

Dr. J Lynn Griesemer

2. City/Town of residence:

Amherst Ma

3. Organizational affiliation (optional):

Amherst Town Council

5. Comment:

JOINT RESOLUTION: HOLD HARMLESS AID IS ESSENTIAL AND EQUITABLE

TO: Governor Charlie Baker

Secretary of the Massachusetts Treasury, Deborah B. Goldberg

Board of the Massachusetts Department of Elementary and Secondary Education (DESE) Commissioner of Massachusetts Department of Elementary and Secondary Education, Jeffrey C. Riley

Commissioner of the Massachusetts Department of Revenue, Geoffrey E. Snyder

Senior Deputy Commissioner of the Division of Local Services (DLS) Massachusetts Department of Revenue, Sean Cronin

CC: Senate President Karen E. Spilka

Speaker Robert A. DeLeo

Senator Joanne Comerford

Representative Mindy Domb

Representative Natalie Blais

WHEREAS, the legislature passed the Student Opportunity Act to equalize education funding; and
WHEREAS, some Advocacy groups seeking to implement the Act quickly propose to eliminate the "Hold Harmless" provision of the current law that prevents the reduction of Chapter 70 aid to any city, town or regional district from the amount of aid from the previous year; and

WHEREAS, Amherst, Pelham and Amherst-Pelham Regional Schools and the Amherst Select Board originally supported the Student Opportunity Act, but with the elimination of the Hold Harmless provision, we would lose more than \$8M or approximately 14% of our combined budgets, which we cannot support; and

WHEREAS, such a loss would have a negative impact on the equitable access to and quality of education in our communities, resulting in a dramatic reduction to services, including but not limited to:

- A significant reduction of staffing levels, with corresponding class size increases at all grade levels
- Severe cuts to elective programs, specials, and extracurricular activities
- Major reductions to Special Education, English Language Learner, and Title I / Intervention services for our most vulnerable students with the highest needs; and

WHEREAS, this loss would have a devastating ripple effect throughout our communities, as the decrease in public school quality would decrease property values, thereby reducing our ability to fund our schools through property taxes (the rates for which already approach the \$25 per thousand cap in all member towns), which in turn would drive down property values further in an unrecoverable cycle; and

WHEREAS, many public school districts like ours have experienced declining enrollment due to many factors, but still have annual inflation of fixed-costs, and therefore have higher costs per student and less ability to benefit from the economy of

scale that's assumed in the Foundation budget calculations; and

WHEREAS, Amherst is higher than the State average for educating diverse students; economically disadvantaged students; high need students; English language learners, and students with disabilities; all of whose educational opportunity will be affected; and

WHEREAS, smaller and more rural public schools like ours rely heavily on this aid in part because we are disproportionately impacted by the state's repeated failure to fully fund the "subject to appropriation" mandates of Regional School Transportation, Charter Reimbursement, Circuit Breaker, and Homeless Student Transportation; therefore, let it be

RESOLVED that we the undersigned ask DESE and DLS in the strongest possible terms to preserve Hold Harmless aid; and

BE IT FURTHER RESOLVED that the Clerk of the Amherst Town Council shall cause a copy of this resolution to be sent to Massachusetts Governor Charles Baker; Secretary of the Massachusetts Treasury, Deborah B. Goldberg; members of the Board of the Massachusetts Department of Elementary and Secondary Education (DESE); Commissioner of Massachusetts Department of Elementary and Secondary Education, Jeffrey C. Riley; Commissioner of the Massachusetts Department of Revenue, Geoffrey E. Snyder; Senior Deputy Commissioner of the Division of Local Services (DLS), Massachusetts Department of Revenue, Sean Cronin. And to the following members of the Massachusetts General Court: Massachusetts President of the Senate Karen E. Spilka; Massachusetts Speaker of the House of Representatives Robert A. DeLeo; State Senator Joanne N. Comerford; State Representative Mindy Domb; and State Representative Natalie Blais.

Losing Hold Harmless would have a profound negative impact on the quality and equity of our public schools.
HOLD HARMLESS AID IS ESSENTIAL AND EQUITABLE.

Voted this _5th_ day of October 2020. Lynn Griesemer, Town Council President

Voted this _7th_ day of October 2020. Allison McDonald, Amherst School Committee Chair

Voted this _7th_ day of October 2020. Allison McDonald, Amherst-Pelham Regional School Committee Chair

Voted this _7th_ day of October 2020. Sarah Hall, Pelham School Committee Chair

6. Links to attachments (optional):

[Final_JOINT_RESOLUTION_-_as_adopted_by_the_Town_Council_on_10-5-2020_-_signed_by_Griesemer,_McDonald,_Hall.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:67 Data

1. Public comment response

1. Name:

Linda Long-Bellil

2. City/Town of residence:

Holden

3. Organizational affiliation (optional):

Wachusett Regional School District Committee

5. Comment:

The Minimum Local Contribution formula is unsustainable for the towns in our regional district. There should be a Circuit Breaker, similar to the Circuit Breaker for special education costs, which would apply when a district's Minimum Local Contribution exceeds a threshold of 30% of a town's budget.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:68 Data

1. Public comment response

1. Name:

Peter Cross

2. City/Town of residence:

ORANGE

3. Organizational affiliation (optional):

Chair, R.C. Mahar Regional School Committee

5. Comment:

I am glad for the opportunity to comment on this issue. I have been a Mahar school committee member for nearly 36 years (since November 1984), serving as chairperson for the past 7 years. I represent Orange on the committee, and our town has significant financial difficulty with the current Chapter 70 formula. The assumed percentage of special education students in our town is far below the actual percentage of these students in our schools, in part because we have a rather large number of families who have foster children. And the special education services we provide, based on IEP decisions, are much more expensive than the amount of our state reimbursement. We are coming close to the maximum revenue we can raise by Proposition 2 1/2. The most recent override election in August failed by a mere 7 votes, and as a result the town of Orange had to come up with over \$200,000 to balance their budget. And this money was, quite dangerously, taken from new growth, which will only result in greater problems in subsequent years. We have met with Senator Comerford and Rep. Whipps, and they are aware of this issue and are trying their best to address it. Please, please, please support their efforts and modify the formula so that small "mill towns" like Orange will be treated fairly!

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:69 Data

1. Public comment response

1. Name:

Roger Hatch

2. City/Town of residence:

Littleton

3. Organizational affiliation (optional):

retired

5. Comment:

In my former careers as DOR local aid director and then for 20 years, ESE school finance administrator, I heard the Chapter 70 formula described as "so inequitable" many times. But never once did I hear those complaining describe what would be equitable. The Commonwealth has made great strides, with the initiation of the foundation budget in FY94, the FY07 changes to both foundation budgets and required contributions, and now the Student Opportunity Act passed in 2019. We are closer to a point where someone might finally describe the formula with that phrase I long to hear, after all these years, "Chapter 70 is so equitable!"

The SOA defines what an adequate spending level for the pupils in a district would be—the foundation budget. That can be referred to as "pupil equity." But Section 21 is asking for an assessment of how we define a fair split between local and state funding to reach that foundation, a concept commonly referred to as "taxpayer equity."

Until FY07 there was no metric indicating, for any given year, each community's ideal split between local and state.

The "aggregate wealth" methodology first adopted in FY07 does articulate that split—to the dollar. As municipalities' property values, residential income, and demographics change from year to year the "target" split changes as well. The important thing is that we have a target. We have defined what an "ideal" formula should look like.

Almost as important, a state aid formula must be transparent. If it's so complicated that it makes your hair hurt, the general public will not trust it. The aggregate wealth method is readily understood. There are no complicated algorithms as there are in many states. I remember a particular meeting years ago, where a local official announced, "Ok, now I do understand it. But I still don't like it." Well, I thought, that's progress!

Required local contributions

The huge success of the aggregate wealth methodology is that, although it took a decade to achieve it, no city or town is now required to spend more than what the formula defines as its target local contribution. In FY07 232 of our 351 municipalities were required to spend a combined \$497 million above what the formula defined as fair. Having defined a fair target, why did the Commonwealth continue to require expenditures above that amount? Because it meant more Chapter 70 state aid, and there wasn't enough cash—or political will—to pay for it. Finally, beginning in FY19, not a single municipality is required to spend more than its target local share.

For those spending below their targets, the formula is not as robust. Because of Proposition 2 ½, it's just not feasible to bring below-effort communities up to their targets in one year. The best the formula can do is bring them closer annually, and there are many cases where they've achieved that goal. Still, in FY20, 209 fall short, by \$188 million. In the context of \$6.5 billion in total required contributions, if the local share of our school funding system is \$188 million out of whack, that's actually not too bad.

In the preliminary FY21 proposal, which as of this writing may or may not come to fruition, the below-effort numbers rose, and that is a warning. There are 244 communities under their targets, with a total shortfall of \$258 million. The proposal reflects implementation of the increased foundation numbers in the SOA, and this trend may signal the need to change some of the underlying assumptions in the formula.

One option would be to raise the cap on local contributions, from 82.5% of foundation budget, to some higher amount. Just raising it modestly to 85% would have lowered the FY21 number to 196 communities with a shortfall of \$196 million. There is no magic about the 82.5%—it was a reasonable political compromise in 2006 between 85 and 80 percent.

A second option would be to change the formula's overall state share from 59 percent to something lower. Like the 82.5% benchmark, 59 percent seemed like a reasonable amount back in 2006, but it was arbitrary. Just lowering it slightly to 58 percent would reduce the below-effort number to \$172 million.

We're fortunate to have had, and continue to have, leaders at the state level who have a demonstrable commitment to fair school funding. If tweaks are needed, they will find a way.

Roger Hatch, retired
Administrator of School Finance, ESE 1996-2016
Local Aid/Municipal Data Bank Director, DOR, 1987-1996

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:70 Data

1. Public comment response

1. Name:

Robert R. Raymond

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

selectboard

5. Comment:

Every city and town in MA is constrained by Prop 2 and 1/2 and that has held all of us from spending money left and right. If this is changed to 3% Or 3 and 1/2% the money raised will have to be paid by the local taxpayers. In small towns the taxpayers can not be asked to pay this money as they are already strapped paying taxes. Local incomes have not risen like they have in cities or larger towns. Our town employees wages have remained stagnate for many years. We give them what the social security increases are. Our school budget is more than 60% of our total town budget and sometimes 65% . My recommendation is to change the way the state funding for education is arrived at. The state arrives at a minimum contribution figure for each town. This money figure takes into consideration the average income of each citizen and the value of the property they own. In a town of 2100 people we have over 700 residents that are over 60 years of age. Many of them do not even file income taxes because of their low income or retirement. So how are they figured into the formula. It is true we may have 4 or 5 families that are super rich and that probably skews the figures. The legislature has tried to come up with a fairer formula but they can not agree on what to do. There are several towns and cities that could do with less state chapter 70 money! These richer communities do not want to lose any of their state educational money and their representatives would be voted out of office if they let it happen. I think the number of cities and towns that could afford to get less state money is around a 100 or so! This money could be reallocated to the other 250 less wealthy cities and towns in the Commonwealth. But you already know this! The state knows that many school districts(like ours) have a decreased school population over the past decade and you have NOT decreased our chapter 70 funds. You have increased chapter 70 by \$25/student or some other small amount to try and help; however, this money has not kept up with inflation of all school costs. Medical insurance for our school district is over \$3 million of our \$15 million budget! You have also given a small rural transportation aide package to our rural district. I have lived in Bernardston for most of my life and I firmly believe that education in rural MA is not equal in poorer towns vs. wealthy towns. Classes like calculus or physiology are the first to be canceled when the budget is tight. My community feels education is really important for all of our youth. They also feel police, fire and plowing roads are important! I could go on with other educational ideas to help solve the problems but you have probably stopped reading my letter. Thanks for the opportunity to write this bob raymond

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:71 Data

1. Public comment response

1. Name:

Linda M. Raymond

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

N/A

5. Comment:

At the present time I have five grandchildren in local schools. My daughter is a special needs teacher at Bernardston Elementary School. She loves her job, but it is quite difficult and frustrating to work with students and not have all the materials needed to support their special needs. The fear of the Covid 19 virus makes teaching difficult for both teachers and students. I also have a special needs son. He struggled with education, but was lucky in the 1980's and 1990's to have a one on one aide. At BES we have many students who need one on one aides. I can't imagine the cost of educating these special young people, but they WANT and NEED and DESERVE the best education we can give them.

On the other hand our property taxes on a modest home are approaching \$5000 per year, and we are both retired. We cannot afford large increases! I think that the state needs to step up with increases to Chapter 70, special needs reimbursements, and transportation costs. I have heard many town leaders comment that these transportation need to be reimbursed at a higher level.

Thank you for this opportunity to comment.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:72 Data

1. Public comment response

1. Name:

David B. Hopson

2. City/Town of residence:

Blandford

3. Organizational affiliation (optional):

Gateway Regional School District

5. Comment:

The recommendations of the Mass Business Alliance for Education and the Boston Chamber of Commerce, if enacted, would end Gateway's hold harmless status and create a significant reduction in state funding that would be as harmful to the district as the reduction in state aid was in 2003-2004 (loss of 38 full time staff, reduction in hours of other staff, and a significant reduction in educational services beyond staffing). In this district, the 2003-2004 reduction essentially flipped the percentages paid for education from the state to town (prior, the state paid roughly 60%, towns paid 40%, after the reduction, the state paid 40% and towns paid 60%). Enacting these 'new' recommendations would likely make one of two things happen - the towns would pay significantly more for the same education as we have today or the education our children would receive would be significantly reduced, potentially even forcing the district to disappear. Unfortunately, Gateway's six towns have little leeway in raising taxes and many are close to their levy limits meaning that any significant increase in school funding would substantially, and negatively, impact other town departments. With a rural district like ours, the only two significant expenditures are for education and highway - our six towns only have 1 fulltime police officer, all have volunteer fire departments, and almost all of town government is essentially run by volunteers. I find it interesting that only Boston would be exempted from the hold harmless loss, if that's not the adage of see no evil, hear no evil, and speak no evil then it must simply be total ignorance of how much quality education across the state depends (for 200+ school districts) on hold harmless funding. If you wish to further the inequities between small districts and large municipal districts and set the stage for additional lawsuits on the ability to access education, this would be the way to do that.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:73 Data

1. Public comment response

1. Name:

Darius Modestow

2. City/Town of residence:

S. Deerfield

3. Organizational affiliation (optional):

Frontier Regional School & Union #38

5. Comment:

Declining enrollment has not resulted in an opportunity to decrease staffing or other expenditures. overhead expenses (utilities, insurance, administrative costs, etc) do not change with an enrollment reduction.

Special education costs continue to increase year after year and DESE holds districts to spending at least what they spent in the prior year on SPED expenses in order to continue to receive grant funding (meeting Maintenance of Effort year to year) - when MOE cannot be met you must provide DESE with explanations such as a loss of student with significant needs - you can't simply say you reduced staffing.

small rural towns cannot afford to lose hundreds of thousands of dollars of State aid without tax overrides, which taxpayers cannot necessarily afford

Programming would suffer significantly as dramatic cuts in staffing would be necessary

a decrease of regional school chapter 70 funding further strains small rural town budgets as assessments will significantly increase. These cuts of programs then create an equity issue of Eastern Mass Schools (in general better funded schools) having more opportunities for students, more access to the variety of educational programming not found in schools with tight budgets, course such as computer science, expanded arts, variety of AP and other electives.

Now is especially not the time for the state to consider eliminating hold harmless, as school districts are facing further declining enrollment given the pandemic (increases in numbers of students being homeschooled and school choice options if another district's educational model better meets the needs of a family). Additionally expenses are significantly increasing given state mandates that have not been fully funded relative to COVID-19.

If the hold harmless clause were to be eliminated then the state would need supplemental funding for districts who are in hold harmless state, as towns couldn't take on the increase in local funding in such large numbers.

FYI - this is what our decreases would be if they remove the hold harmless clause for my district(s) schools.

Conway Grammar Shool loss of \$469,910 (24% of FY21 total general fund budget)

Deerfield Elementary loss of \$477,912 (10% of FY21 total general fund budget)

Frontier Regional loss of \$1,627,524 (14% of FY21 total general fund budget)

Sunderland Elementary loss of \$500,808 (17% of FY21 total general fund budget)

Whately Elementary loss of \$100,548 (6% of FY21 total general fund budget)

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:74 Data

1. Public comment response

1. Name:

Tracy O'Connell Novick

2. City/Town of residence:

Worcester

3. Organizational affiliation (optional):

Worcester School Committee

5. Comment:

Please see attached.

6. Links to attachments (optional):

[local_contribution_letter.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:75 Data

1. Public comment response

1. Name:

Brian E. Allen

2. City/Town of residence:

Holden

3. Organizational affiliation (optional):

Worcester Public Schools

5. Comment:

The passage of the Student Opportunity Act (SOA) in November 2019 marked an extraordinary achievement after more than seven years of statewide concerted advocacy to adopt meaningful changes to a reliable yet outdated funding formula. The more difficult challenge is to phase in the new, higher goal rates over the next seven years; a timeframe already stalled due to a worldwide pandemic and resulting economic collapse.

The SOA also requires an examination of the local contribution component of the Chapter 70 program, specifically on "the equity, predictability and accuracy of the method of determining each municipality's ability to contribute toward education funding and the calculation of each municipality's required local contribution".

The 2007 correction to the local contribution calculation using income and property wealth (or "aggregate wealth") as a means of determining a community's ability to pay for education addressed the previous method of using property values only. This adjustment also placed an arbitrary minimum of 17.5% of a community's foundation budget to be funded by Chapter 70 state aid, regardless of wealth or ability to pay more than this amount. As a result, in FY21, just under 10% of the state's \$5.4 billion Chapter 70 state aid, or \$500 million, goes to the wealthiest 20% of school districts in Massachusetts.

According to the recent report of the Massachusetts Business Alliance for Education (MBAE) and the Greater Boston Chamber of Commerce, "Missing the Mark: How Chapter 70 Education Aid Distribution Benefits Wealthier School Districts and Widens Equity Gaps", this \$500 million in what is referred to as "needs-blind aid" is state money that could otherwise be used to accelerate increases in funding to higher needs districts that do not have the capacity to fully fund their schools.

The report recommends increasing the maximum required local contribution toward school district budgets that wealthy municipalities are expected to make. For FY 2021, the state calculates that 104 of Massachusetts' 351 municipalities can afford to fund their schools entirely from local resources, and these districts often spend well more than the foundation budget through local resources. The net effect of raising the maximum required local contribution from 82.5% to 100% of a municipality's foundation budget is a Chapter 70 aid increase of \$221 million statewide, with the lowest resourced school districts gaining \$82 million in aid and the wealthiest school districts seeing an aid reduction of \$4 million.

The recent downturn in the state's economy stripped away the first-year phase-in of SOA funding in the interim state budget, resulting in a \$15.5 million reduction for the Worcester Public Schools from the earlier H-2 estimates. It is in times like we are currently in when the inequity of funding of school districts is glaringly evident – communities like Worcester continue to barely spend at the foundation budget level and struggle to meet the basic education needs of our students for class size, instructional materials and technology, staff development, and building maintenance while wealthier communities continue to spend well in excess of the foundation budget, funded partially through an arbitrary level of Chapter 70 state aid.

The recommendation of the MBAE and Greater Boston Chamber of Commerce report makes practical, political, and economic sense. Only when the Commonwealth fully enacts the goal rates of the Student Opportunity Act, funded in part through a

change in the maximum required local contribution, do we actually accomplish the much needed updated funding formula and a far more equitable distribution of state education dollars.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:76 Data

1. Public comment response

1. Name:

Brian Keir

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

Selectboard

5. Comment:

My name is Brian Keir. Thank you for the opportunity to comment. I am a member of the Bernardston Selectboard. During my tenure I have attended most PVRSD School Committee meetings and have been appalled at their approach to finances and to the lack of sufficient financial support from the state.

Why should there be a maximum of 82.5% of foundation for a town's required local contribution? This approach simply punishes less affluent districts and towns and their students while benefiting those districts and towns that can readily afford the amounts they are forgiven. Adjusting this maximum upward to 95% would seem to be more equitable-showing we believe in educating ALL children equally regardless of school district.

Special Education costs are another prime concern. The formula for these reimbursements are extremely insufficient.

Recognition must be given to the fact that this expensive population is growing and thus putting a drain on district resources-since these services are mandated (an unfounded mandate). I believe we should do our very best to educate all children but not at the expense of others. For this reason the state should pay 100% of Special Education costs including transportation. At the very least Circuit Breaker reimbursements could be significantly increased.

There are many other areas I could talk about, but if we could work on these it would greatly help PVRSD, FCTSD and member towns like us.

Thank You

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:77 Data

1. Public comment response

1. Name:

Joan Arnold

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

I am all for getting rid of Whitman /Hanson school district and going back to Hanson.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:78 Data

1. Public comment response

1. Name:

Jane Dutcher

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

Bernardston Finance Committee, Chairman

5. Comment:

I was appointed to the Bernardston Finance Committee in 2004 and became the Chairman in 2009. I also serve as a member of several other working committees in our Town. The biggest challenges for the Finance Committee are planning and proposing a budget for the Town which stays within the 2 ½ limit and keeping our tax rate as reasonable as possible! Planning for capital expenditures is also a challenge, made especially difficult when schools take such a large bite of our budget and appear to believe that they should be financed as they request regardless of any other responsibilities a Town faces and that they are entitled to every additional dollar we are able to find.

During my tenure on the Finance Committee I have attended most PVRSD Budget and School Committee meetings. We have all watched the PVRSD budget continually increase as the student population continues to decrease. Some areas of the budget increase faster than others and, when an effort is made to decrease spending, the cuts, in my opinion, always directly affect the students. I have watched the percentage of our Town budget allocated to education go from 50% in FY10 to 62% in FY20. During that same period our new growth ranged from a low of \$18,530 to a high of \$135,795 for an average of \$61,300. Our total budget for FY10 was approximately \$3,000,000 and in FY 20 it was approximately \$4,400,000.

With careful and diligent work by the Finance Committee in cooperation with the Assessors and the Selectmen, we have succeeded in avoiding a 2 ½ override vote - - which we know would be defeated by the voters - - not because we do not believe in and want to support education, but because we are a rural and aging community. Our population numbers just over 2,000 of which Seven Hundred and Seventy-six (776) are over 60 years of age. Many of our residents are caring for and helping to support elderly parents. In normal times, this sandwich generation is often in the position of also helping their children and grandchildren and now in the age of a pandemic even more help is being provided by the sandwich generation. I do not have the figure for those in our community who live below the poverty level and even if I did, I would know that it was underreported because our people are proud and want to take care of themselves.

Being "careful and diligent" means that our Town employees seldom see an increase in their pay above what Social Security "awards" it's recipients. Our Departments have been advised to level fund their budgets for at least the last six years and have done so. Replacement of major equipment often is deferred until the replacement is an emergency.

So, with this background, it will be no surprise that I believe the formulas used in the various parts of school funding need a drastic overhaul.

Why should there be a maximum of 82.5% of foundation for a town's required local contribution? This approach simply punishes less affluent districts and towns and their students while benefiting those districts and towns that can readily afford the amounts they are forgiven. Adjusting this maximum upward to 100% would seem to be more equitable – that is if we believe in educating ALL children equally regardless of background and/or geography.

Why is not the transportation costs covered at 100% when that was the carrot held out to get towns to regionalize? This

reimbursement needs to be 100% for qualified student transportation. Rural districts are paying the highest per pupil transportation costs because of the miles needed to travel in transporting our students.

Special Education costs are another prime concern. The formula for these reimbursements are antiquated at best. Recognition must be given to the fact that this expensive population is growing and thus putting a drain on district resources – since these services are mandated. I believe we should do our very best to educate all children - - and not some at the expense of others. For this reason the State should pay 100% of Special Education costs including transportation.

School Choice funding also needs to be addressed. When the program was established the rate was set at \$5,000 per student - - an equitable amount AT THAT TIME. A good look should be taken at the current per pupil costs and a new level of funding for this program should be established. At the same time there could be an escalation/deescalation clause established so the rate does not get so out of balance. The FY19 average per pupil cost statewide is just over \$17,000; however, Pioneer's per pupil is over \$19,000 according to DESE per pupil expenditure report which was updated in June 2020. So, for every Choice student we are underfunded by \$14,000.

In this county we have a town without a high school. They have a tuition agreement with one district, but students from that Town are educated in our district High School at the \$5,000 School Choice level. How is that allowed?

Funding for Charter Schools is also a detriment to local rural school districts because the charges are disproportionate. This whole financing structure needs to be evaluated.

Declining enrollment. This Trogon Horse is perhaps the most difficult. Enrollment declines, number of teachers, teaching assistants, and administrative employees remains stagnate. Then, as the number of teachers does decline, there is still have an inordinate number of employees at the administrative level. It appears that for this last group there has been creativity by adding responsibilities to keep positions instead of combining duties and taking advantage of retirements and resignations. In other words, schools need to think more like a for-profit entity. Student enrollment in our district during the previous 10 years declined by 288 students in grades K-12. Our student:teacher ratio in the 19-20 school year was 11.7:1 while the state average was 12.6:1. I believe that Franklin County towns would be well served by combining the various school districts into one county-wide district, or two, plus the Technical School.

Unfunded Mandates should all be reviewed and then removed or funded by the state.

MCAS testing should be reviewed. Far too much time is spent on these tests when that ssroom time could be better utilized.

Proposition 2 ½ – Increasing this percentage will increase the levy limit and the Levy Ceiling. IT will NOT help our taxpayers who are already heavily burdened at the current tax rate.

If I can expand on any of the above or anser any questions, please contact me.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:79 Data

1. Public comment response

1. Name:

Kate Martineau

2. City/Town of residence:

Millers Falls

3. Organizational affiliation (optional):

LES PTO

5. Comment:

October 13, 2020

Senator Jo Comerford
24 Beacon Street
Boston, MA 02133

Dear Senator Comerford,

Leverett is a small town in Franklin County of approximately 1,800 residents located in the Pioneer Valley. Leverett Elementary is the heart of our community and a rural school with around one hundred twenty five Pre-K — 6th grade students. Like many small and rural schools, LES offers just one class per grade with a class size of approximately 18 students. With a history of excellence, LES is the primary draw for families with young children to buy homes and move into our town.

Over the past 15 years, Leverett has seen a stable number of students in the school, but these numbers are stagnant and will not increase any time soon, in fact, it's possible these numbers could decrease over time. Population growth is simply not a reality we can count on in rural Massachusetts.

Small rural schools are in deep trouble across the Commonwealth, and nowhere as pronounced as in western Massachusetts. Our town budgets are strained and our tax rates are climbing perilously close to the \$25/\$1,000 Proposition 2 ½ tax cap. Soon, Leverett, like many rural towns, will not be able to fund our town budget.

Proposition 2 ½ puts a hard cap on what revenue we can raise. But, it's the chapter 70 formula and low charter school reimbursement that affects Leverett the most. Leverett currently funds 91% of its elementary school budget from Property Taxes. This is unsustainable and unfair.

Our Chapter 70 funds are dramatically low compared to our neighboring towns. We believe this may be due to an uneven distribution of wealth within our Town and the use of income averages in the formulas rather than median income. We urge this to be investigated!

Small rural schools in Massachusetts are disproportionately affected by population changes and unfairly burdened by the significant funding shortfalls that are in response to these population changes.

The state has not adequately funded education, and the amount that municipalities must contribute to fund their schools has been rising sharply year after year. Leverett raises property taxes to raise these additional funds, but Leverett has other costs in addition to funding K-12 education, like paying the salaries of municipal officials, repairing roads and providing other

municipal services.

State education funding has not kept pace with increases in healthcare costs, transportation costs, special education costs, and more. Some of these areas will see funding increases thanks to the Student Opportunity Act law. However the SOA does not impact regional school transportation or charter school tuition reimbursements, and state reimbursements to municipalities for these services will remain inadequate even with the new law.

Paying for K-12 education has been eating up larger and larger portions of Leverett's budget and simply cannot go on without drastic change.

Chapter 70 funds need an urgent review to recalibrate towards a more equitable distribution. Chapter 70 Aid currently benefits more affluent municipalities which end up paying a fraction of what they could pay. But, less affluent/smaller municipalities (like those in western Massachusetts) pay 100% of their Combined Effort Yield.

Look at a few examples:

If the 82.5% cap were raised to 100%, wealthy towns like Winchendon and Yarmouth would be required to pay almost \$4 million and \$8.5 million more annually, respectively. Meanwhile 263 towns would be required to pay less – in fact this change would mean that 88 of the wealthiest towns in the Commonwealth pay more while all of the other towns would benefit.

The cap on Combined Effort Yield should be raised to 100% of the foundation budget for all municipalities. This would not require an increase in Chapter 70 funding, but would result in lower subsidies for the wealthiest communities and equity in the requirement on municipalities to contribute.

As the Parent Teacher Organization we work hard to make sure our students get the best possible education. Often this means fundraising to pay for things like field trips, library databases, and social justice training for teachers. We will continue to do our part to keep our little school afloat but we could really use your help!

Thank you for your consideration.

Respectfully,

The Leverett Elementary School PTO

6. Links to attachments (optional):

[LEF_Chapt70_Study_10072020.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:80 Data

1. Public comment response

1. Name:

Laura Kirshenbaum

2. City/Town of residence:

Holden

3. Organizational affiliation (optional):

5. Comment:

This year due to the pandemic, our school district is experiencing unprecedented number of students opting for homeschooling or private school. I anticipate that this will negatively impact our budget, programming and staffing and further restrict an already underfunded regional school district. I would propose that our funding not be determined by October 1, 2020 enrollment numbers but instead by using prepandemic enrollment numbers (for example February, 1 2020).

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:81 Data

1. Public comment response

1. Name:

Alison Manugian

2. City/Town of residence:

Groton

3. Organizational affiliation (optional):

Select Board

5. Comment:

It is imperative that educational opportunities be offered to all students in the Commonwealth. When circumstances outside of school make that impossible additional supports must be provided. In the interest of funding education these supports should be provided outside of Chapter 70.

Students who have medical needs that require aides or outside placements for education should have their needs met. Currently the schools, and hence educational funding, is providing for medical services that should be funded outside of Chapter 70.

Chapter 70 funding accounts, to some degree, for the wealth of a community or regional district. Many districts throughout the Commonwealth have dropping or stagnant enrollments. (And the impacts of COVID on enrollment data remain to be seen.). Groton Dunstable is one such district. Unfortunately Chapter 70 does nothing (and likely can't) to account for the willingness of a community to approve an override of Prop 2 1/2. In Groton we see a growing gap between longer term residents who tend to have less ability to pay and new residents who have greater ability and willingness to pay for education.

Removal of the held harmless provision must be done thoughtfully and gradually if it must be done. A sudden increase to local taxpayers would be painful if mandated via some mechanism allowing override without community approval. If the increase is dependent on a vote to override Prop 2 1/2 it will not happen. This will instantly decimate our schools and likely municipal governments.

Currently our municipal spending aligns with our regional district. Approximately 80% of our spending is on wages and salaries. Only in education do annual steps and lanes get added to cost of living or negotiated pay increases. Recent COLAs have been around 2% without three steps and lanes. An additional 15% of district and municipal spending is on benefits. These have routinely grown by more than 10% in recent years. The remainder is spent on supplies and other expenses. These have been forced to be at near zero increases for many years. The district and municipal grown annually is more than 2 1/2 percent. The minimal increases in Chapter 70 funding mean that each year more the growth is dependent on local taxpayers. Currently about 60% of local spending is on education. Without voter support for routine overrides the schools and municipal needs must compete for funding that simply can't be sustained.

An overlooked constraint on educational funding is created by Proposition 2 1/2. In addition to ongoing review of Chapter 70 spending a discussion around overrides, permissions and an update of the arbitrary 2 1/2% limit is needed.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:82 Data

1. Public comment response

1. Name:

Karen Cruise

2. City/Town of residence:

Princeton

3. Organizational affiliation (optional):

Chair, Selectboard

5. Comment:

We are pleased to have the opportunity to comment on the equity, predictability and accuracy of the method of determining each town's ability to contribute toward education funding and the calculation of our required local contribution. Section 21 of the Student Opportunity Act requires DESE and DLS to submit a report to the General Court on these calculations.

Princeton is part of a large 5-town regional district and has struggled with several aspects of the funding formula which negatively impact us.

- The formula for districts has the negative consequence of pitting towns within the district against one another. Princeton attempted to negotiate with the other four towns in our district so that we too would benefit from the district-wide hold harmless provision, but there was no incentive for the other towns to give anything up.

We commend our elected officials for filing House Amendment 95 for H.3800 to formally review regional school district fair chapter 70 allocations.

Though not part of Chapter 70, the lack of fully funded transportation places a huge burden on our large, sparsely populated Town.

Though the Student Opportunity Act made some incremental progress in funding SPED, this portion of our district's budget is growing quickly and the formula is not keeping up.

Another issue that is hitting Princeton and our neighbors quite hard is the requirement to fully fund placements in out-of-district vocational programs if in-district programs don't have the course of study sought by the student. This year, Princeton is paying \$60k to send a single student 60 miles to Northampton each day. For \$60k, Princeton could provide full time EMT service to the town instead of relying on the slower on-call option 265 days a year. This is reflective of the types of decisions that a small town must make.

School funding is over 50% of our budget and that share increases every year. Our citizens' ability to pay isn't increasing and therefore services and our infrastructure are suffering. Princeton has met its extreme need for austerity in as constructive a manner as is possible. The state formula assumes we are well off because it is based on median incomes and valuations. However, we have a higher percentage of senior citizens and low-income residents than surrounding towns. The town has learned to do without. No significant investment in town buildings took place in the decade before FY20. We rent space for our senior center. Our public safety structure is considered to be the worst in the state. We must beg neighboring towns for jail cells for difficult situations since we don't have any in our building. The DPW routinely rebuilds the large trucks necessary to plow our roads. The roofs on two municipal buildings had to make do with stopgap leak repairs for years because the money was unavailable to fix them properly. Lack of funds for restoration and maintenance resulted in one historically significant town owned building being put up for sale.. The town faces possible shutdown of several municipal facilities due to its inability to meet municipal building codes.

Our Selectboard sent a letter to Senator Chang-Diaz and Representative Peisch in the fall of 2017 in support of S. 217, A Resolve establishing a commission on regional school district foundation budgets. Contact selectmen@town.princeton.ma.us to receive a copy of that letter.

Princeton's Selectboard thanks our representatives for continuing to fight for adequate and fair resource allocation to all towns.

6. Links to attachments (optional):

[section_21_comments_-_final.docx](#)

[Foundation_Budget_Testimony_v3.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:83 Data

1. Public comment response

1. Name:

Allen Tupper Brown

2. City/Town of residence:

Gill

3. Organizational affiliation (optional):

Finance Committee

5. Comment:

Please see attached document.

6. Links to attachments (optional):

[013a_Public_comment_to_DESE_and_DLS.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:84 Data

1. Public comment response

1. Name:

Robert R. Raymond

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

selectboard

5. Comment:

I would like to respond to your inquiry about school funding and how it can be improved for rural towns. We have about 25 students from our district attending charter schools. For some students charter schools are an excellent choice and these students are very successful in their educational endeavors. The problem is the cost to public education. The last money figure I heard at a school committee meeting was \$19,000 per student! The state does reimburse some of the money to the local schools; however that amount of money does not begin to cover our losses! Your reimbursement for each local student choosing a charter school needs to be increased for rural districts as we can not continue to lose this amount of money.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:85 Data

1. Public comment response

1. Name:

Stephen H Nestanpower

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

Finance Committee, Bernardston

5. Comment:

My concerns as they apply to local education can be found in the attached file.

Thank You..

6. Links to attachments (optional):

[DOR_DESE_10-14-20.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:86 Data

1. Public comment response

1. Name:

Geoffrey Epstein

2. City/Town of residence:

Framingham

3. Organizational affiliation (optional):

School Committee

5. Comment:

I am a current member of the Framingham School Committee, where I have served since January 1st 2018, the day Framingham became a city. I also served for 6 years on the Newton School Committee, from 2008-2013. The opinion presented here is purely my own and I am not speaking for the Framingham School Committee. The arguments are also independent of the COVID-19 crisis effects.

BOTTOM LINE:

Whereas the Chapter 70 contribution is formulaic and connected to demographics, the local contribution is not and is now being depressed in Framingham by a city council driven zero tax levy increase approach, which puts low taxes first and education second. Furthermore, the foundation budget is pretty much meaningless and in fact is a political liability as the city CFO has used the fact that the local contribution is well above foundation to argue that the school district is abundantly funded. The new city council in 2018 was temporarily impressed by that until School Committee members pointed out that the foundation formula was broken and a bogus standard.

The trend of taxing below the 2.5% levy increase limit began in FY13 at the level of order 1.25% but, since the city transition, has gone to 0%. Increased Chapter 70 funding in 2013 triggered a wave of tax breaks to property owners, and it is getting worse, with the local contribution now very clearly underfunded.

DETAILS:

Of major concern to the Framingham Public Schools is the trend in the local contribution, which has plummeted since Framingham became a city. For the last 5 years Framingham was a town the average annual increase in the local contribution was \$3.3 million, but the FY19 increase was just \$0.43 million, and the FY20 increase was \$2.1 million. This underfunding trend has forced the school district to use part of the circuit breaker carry forward reserve to balance the carry forward year budget. The 'pre-spent amount' was \$0.5 million for FY20 and pre-COVID was \$1.5 million for FY21. Things are in bad shape and will get worse in FY22.

The underlying reason for the schools growing fiscal problem is that Framingham has adopted financial practices in the last 6 years which are a serious threat to the schools and are connected to Chapter 70 funding.

In FY13, Chapter 70 funding jumped for Framingham, as past inequities in the funding formula were fixed. That year the Chapter 70 increase was about \$6 million and the town local contribution to the school district budget actually dropped by \$800,000. FY13 was also the year the town decided for the first time since Proposition 2 ½ was adopted by the state, to tax below the maximum 2.5% annual levy increase limit. The accumulated tax breaks for property owners have now reached \$80 million in the last 6 years, the same period that assessed residential property values increased by around \$2 billion. As a town, the local contribution was maintained at a reasonable level through FY18, largely because, despite the tax breaks,

health insurance was moved to the GIC and investment in building infrastructure was cut. Beginning with FY19, and zero tax levy increases, things have gotten much worse.

We actually have two rising problems: the underfunding of the operating budget due to underfunding the local contribution, and a huge deferred maintenance problem which is about to hit with \$20 million in roof replacements alone due in 2023 and an annual capital budget which is annually underfunded by \$4-8 million.

So in summary, there is a huge Framingham school district financial crisis approaching in both the operating and capital budgets, whose origin can be traced to deserved Chapter 70 funding increases providing budget relief which was converted into huge tax breaks for property owners who are riding a huge wave of rapid property value appreciation. This win-win for the tax payers is a total lose-lose for the schools.

It may be that Framingham is a unique situation, but it also may be an example of a more wide-spread problem. I shall leave that analysis to you.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:87 Data

1. Public comment response

1. Name:

Walter Nutter

2. City/Town of residence:

Oakham

3. Organizational affiliation (optional):

Quabbin RSD

5. Comment:

Kindly note that while I am a member of the Quabbin Regional School District School Committee, my comments are my own, and may not represent those of the Committee as a whole or the QRSD Administration.

I would like to specifically address the Hold Harmless provision of Ch. 70. Some would like you to consider elimination of Hold Harmless, saying that it provides an unnecessary "generous cushion" to our towns. That may be true in other, more wealthy communities, but here in Central Mass, that "cushion" has never been generous. Instead, this provision is a critical lifeline in our existence at Quabbin, totaling about 14% of our entire budget. I'm sure many other districts closely mimic our experience. Every year we struggle to pare down our budget that it might be accepted by our five member towns. Despite cutting staff, and holding budget increases to below 3% most years, our seven schools still require minimum staffing levels in administration, nursing and support services. Every year we ask more of our towns, some of which see nearly 70% of their total revenue dollars going to schools. Municipal workers see meager wage increases, if any at all, while town services continue to suffer from lack of available resources. Since 2008, Ch. 70 aid to our district has fallen by 1.5%, while required local contributions have risen by an outstanding 53.1%. It's no wonder us vs. them scenarios play out year after year at town meeting. The only Ch. 70 increase we see is minimum aid, which amounts to less than \$58,000 towards our \$35 million annual budget. That money is well used, but hardly sufficient to take the pressure off our towns, or to allow us to offset the relentless onslaught of increasing fixed costs.

I do not pretend to have the answer to how best to fairly fund districts with declining enrollment, such as ours. While Hold Harmless is clearly an imperfect tool, without it the children of Quabbin, and most of the other 182 districts throughout the Commonwealth that receive Hold Harmless aid, would suffer a tremendous loss of educational opportunities. Please do not let that happen. .

Thank you for providing me a forum to convey my thoughts, and for your consideration of them.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:88 Data

1. Public comment response

1. Name:

Louis Bordeaux

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

Town of Bernardston

5. Comment:

My name is Louis Bordeaux. I am honored to serve as Bernardston's Town Coordinator. Prior to that, I served on the town's Selectboard.

I would like to draw your attention to the declining enrollment problem in our PVRS District.

This Trojan Horse is difficult to address in just a few words. Enrollment declines, number of teachers, teaching assistants, and administrative employees remain stagnant. Additionally, there remains an inordinate number of employees at the administrative level. It appears that for this last group there has been a degree of creativity by adding responsibilities to keep positions instead of combining duties and taking advantage of retirements and resignations. In other words, schools need to act like a for-profit business. Beyond that, all schools within the Commonwealth should have their collective feet held to the fire regarding procurement. The amount of uncontrolled spending of our tax dollars needs desperately to be reined in. Student enrollment in our district during the previous 10 years declined by 288 students in grades K-12. Our student: teacher ratio in the 19-20 school year was 11.7:1 while the state average was 12.6:1. For a rural town such as Bernardston, the current formula is a ticking time bomb. Annually, our aging population is being asked to do more for a district with fewer and fewer students.

Unfunded Mandates should all be reviewed and then removed or funded by the state.

MCAS testing needs to be reviewed. Far too much time is spent on teaching to testing level when the classroom time could better be utilized in real teaching!

Proposition 2 ½ – Increasing this percentage will increase the levy limit and the Levy Ceiling. IT will NOT help our taxpayers who are already heavily burdened with the current tax rate. To repeat, a small, rural town such as ours, where over 60% of our residents are age 60 and above, simply cannot shoulder the burden that is being required of them.

Thank you for exploring better ways to go about this important matter and thank you very much for the opportunity to comment.

6. Links to attachments (optional):

[DESE-DOR_Response--LB.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:89 Data

1. Public comment response

1. Name:

Michael F. Fitzpatrick

2. City/Town of residence:

Monson

3. Organizational affiliation (optional):

Superintendent-Director, Blackstone Valley Vocational Regional School District

5. Comment:

At this juncture, any plan to reconfigure Chapter 70 calculations must consider the Commonwealth's serious revenue shortfalls that were predicted in the October 7th economic summit at the State House. As state policymakers craft a new plan to protect or enhance Chapter 70, it is paramount that such a plan identify new revenue sources to fund it. There is no doubt that the current financial situation requires difficult conversations regarding possible new revenue streams, including the stop-gap use of future federal stimulus funds or accessing the Commonwealth's rainy day funds. Any plan to create a down payment for the SOA, justifiably targeted to the most needy students and disadvantaged populations, would be less disruptive with the benefit of clearly identified revenue sources.

In their recent report, the Massachusetts Business Alliance for Education and the Greater Boston Chamber of Commerce present a compelling argument against maintaining current levels of needs-blind formula factors within Chapter 70 calculations. Rather than identify new revenue streams, however, they suggest simply reallocating existing funding by eliminating some of the factors which result in a consistent level of funding to wealthier communities, arguing that these communities should be able to afford supporting their schools without state aid.

As president of the Massachusetts Association of Regional Schools, I can attest to a level of justified fear that the blanket removal of the hold harmless provision would cause massive disruption among many school districts experiencing a decline in enrollments. In those districts where this trend has been long-term, the negative economic impact would be even more significant. The current COVID-19 situation has certainly exacerbated the flight from local schools to private or home-school learning environments, putting more lower-resourced school districts at even greater risk of enrollment declines than has been experienced generally across the Commonwealth.

As a school administrator with 28 years of field-based experience in a thirteen-town regional school district, I recognize that in the quest for relationships and revenue, cooperation should outweigh competition. I therefore advocate for a middle-ground approach which analyzes the impact of removing the hold harmless provision in the FY22 Chapter 70 base calculation in tandem with an in-depth analysis of the ability of each of the 351 cities and towns to pay. Just as public health officials determined that it was necessary to expand the color-coded indicators of COVID-19 status in order to more accurately gauge a community's readiness to reopen, state reviewers should expand the wealth indicators that comprise the calculation of a community's ability to pay. A municipality's wealth factor should be based on more detailed economic indicators, with any adjustments to the hold harmless factor made solely in relationship to these expanded wealth considerations. This may well result in an adjustment to the base funding to those communities which can afford it, but would maintain the current level of hold harmless funding or some reasonable percentage of it for less wealthy communities.

Proceeding in this fashion will increase the likelihood of garnering support from a wider array of constituencies.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:90 Data

1. Public comment response

1. Name:

Greg Snedeker

2. City/Town of residence:

Gill

3. Organizational affiliation (optional):

Gill Selectboard, Six Town Regionalization Planning Board

5. Comment:

Greg Snedeker

Gill, MA

current member, Gill Selectboard

current member, (Secretary/Treasurer) Six Town Regionalization Planning Board

current member, (Vice Chair, Executive Committee) FRCOG

The choice to set the 82.5% local contribution cap was established through political negotiations in 2006/2007 and, from my understanding, was based less on equitable distribution of aid and more on a political goal to make sure "everyone received something," and therefore all would advocate for more education state aid. Although the negotiations may have satisfied the political goal, the result stands in contradiction to the goals of means-tested financial aid. Raising the local contribution cap would help correct these conflicting goals and allow for a more progressive allocation of resources within the Chapter 70 formula. According to the recent Missing the Mark report published by the Mass Business Alliance for Education (MBAE) and the Greater Boston Chamber of Commerce (GBCC), the change in aid distribution by raising the local contribution cap from 82.5% to 100%, holding would shift approximately \$221 million of state aid away from the wealthiest towns and toward less affluent towns (under the LC cap). Mike Naughton's (Montague) analysis shows that the impact of raising the local contribution cap to 100% on the aggregate Target Local Contribution is \$538 million. This impact on the aggregate TLC more fully reflects the shift of funds away from poorer towns to wealthier towns because it ignores the other factors used to determine Ch. 70 aid.

The 82.5% cap is regressive in that it is needs-blind for those towns above the cap. In essence, the wealthier the town, the lower the town's foundation budget is as a percentage of its ability to pay. Therefore, raising the 82.5% cap to 100% would require the wealthier towns, whose CEY/Foundation are above 100%, to fund more of their budgets through local property taxes. It is true that not all residents in these affluent towns have high incomes in relation to their real property, but most of these towns have Combined Effort Yields (CEYs) that are substantially higher than their foundation budgets and are in fact already funding their school budgets at much higher levels than what is required by the state. Towns under the cap are required to pay 100% of their ability to pay set by the Ch. 70 formula. This can be difficult for towns that are already facing inadequate tax bases and declining population (and declining enrollment). Levy limits are often reached in an attempt to balance budgets in which the school budget is by far the largest line item. To alleviate some of the burden of rising local property taxes (and prop 2 ½ overrides), the state might consider shifting the Ch. 70 local – state contribution percentages from 59% (local)/41% (state) to 50%/50% (as proposed by the MMA), and establish a marginal income tax rate like the proposed millionaire's income tax to backfill the state budget shortfall the shift would create.

Because of this on-going pandemic, we will be facing difficult times in the coming years and the negative effects of this crisis will fall most heavily on those who can least afford it. These changes would help address some of the inequities in the Ch. 70 formula and reset the local-state contributions to a more progressive and equitable policy mix.

Thank you for your consideration and all your work!

6. Links to attachments (optional):

[Snedeker_Comment_to_Legislature_re_Ch_70.pdf](#)

[FY21_Data_Sheet_-_Chapter_70_Local_Contributions_50-50.xlsx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:91 Data

1. Public comment response

1. Name:

Paul Bockelman

2. City/Town of residence:

Amherst

3. Organizational affiliation (optional):

Town of Amherst

5. Comment:

The Town of Amherst has a preK-6 Town elementary school district and is the only city that is a member of a regional school district.

The Town works with its partner communities – Leverett, Pelham, and Shutesbury – to provide high quality education and provide the funding for this education. And to ensure the funding is distributed fairly among the contributing communities.

1. The impact of enrollment demographics, including in districts with flat or declining enrollment.

– Amherst foundation enrollment has decreased by 23.6% since 2007. Without the "hold harmless" provision, State aid would have declined significantly over that span of time.

– While the school system has been able to make enrollment driven reductions, there are many fixed costs that are difficult to adjust for such as special education costs, utilities, health insurance, pension/retirement, transportation etc.

– Enrollment changes between the elementary schools and the regional schools have caused large fluctuations in member town assessments. The magnitude of these changes is quite large and is difficult to prepare for as multiple independent municipalities and school districts are involved. This has contributed to the disagreement among member towns in regards to the assessment method.

2. An analysis of the impact of Proposition 2½ on the ability of municipalities to make their required local contributions and recommendations to mitigate the constraints of Proposition 2½.

– Many western Massachusetts communities are struggling with this issue as they do not have the population or industry to support the same level of economic activity as eastern Massachusetts communities.

– The result is a much heavier reliance on property tax revenues and higher property tax rates.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:92 Data

1. Public comment response

1. Name:

Adam Tarquini

2. City/Town of residence:

Springfield

3. Organizational affiliation (optional):

Dir. of Finance - Granby

5. Comment:

More consideration needs to be given to the small, rural districts that do not have the ELL or Special Education population that contributes to more state funding.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:95 Data

1. Public comment response

1. Name:

Jeff Singleton

2. City/Town of residence:

Montague MA

3. Organizational affiliation (optional):

Former Fin Com, School Committee

5. Comment:

As someone who has served on a variety of local committees – including the Montague Finance Committee for six years, the Gill-Montague regional school committee and a "technical panel" that devised a long term plan to stabilize local school funding and end state "fiscal control" of the regional school district a decade ago, I have spent a good deal of my life over the past fifteen years thinking about, writing about and debating the Chapter 70 formula.

There are two myths that pervade discussions of the formula in our region: one is that Chapter 70 is unfair to rural districts, which have higher costs for things like transportation. The author is that the "cap" on the minimum contribution that benefits wealthy districts is unfair and amounts to a "tax" on poorer districts. The real flaw in the formula is a minimum or local contribution that is barely influenced by enrollment subtracted from a foundation budget with an exaggerated enrollment impact. This flaw, shared by rural districts in our region and urban districts like Boston and Somerville, exerts excessive downward pressure on state aid.

The attached articles, both of which have appeared in local newspapers, develop these arguments.

Jeff Singleton

Montague MA town meeting member and former Fin Com and School Committee member

6. Links to attachments (optional):

[Ch70_and_the_Local_Contribution.doc](#)

[Ch_70_and_Rural_Ed_Recorder_4-4-16.doc](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:96 Data

1. Public comment response

1. Name:

Sean Mangano

2. City/Town of residence:

Belchertown

3. Organizational affiliation (optional):

5. Comment:

3. Equity, predictability and accuracy of how the state determines the required local contribution.

– Amherst has long been concerned with wealth factors used in the Chapter 70 formula and the impact on perceived equity. The Chapter 70 formula uses EQV (taxable property) and income to measure wealth.

– The logic behind the use of the two major wealth variables, taxable property and income, should be reexamined to see if it is still valid. For example, a municipality's ability to fund education is not directly tied to the income of its residents but it is directly tied to taxable property. A Chapter 70 formula based entirely on taxable property would allocate State aid very differently.

– The formula does not consider costs borne by a municipality that may affect its perceived wealth. In the case of Amherst, the Town provides services to thousands of students who live in tax exempt housing.

4. The impact of the 82.5% maximum local contribution of foundation on the equity of required local contributions and the distribution of Chapter 70 school aid.

– The local contribution percentage helps determine how much aid a community receives. Communities with low percentages receive a greater share of funding from the State.

– Amherst's local contribution share, as calculated by the Chapter 70 formula, is 77.10% which is up almost 3% from FY19. Amherst has almost reached the maximum local contribution.

– Many communities have already reached the 82.5% maximum.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:97 Data

1. Public comment response

1. Name:

Jo Comerford

2. City/Town of residence:

Northampton

3. Organizational affiliation (optional):

MA State Senate

5. Comment:

Comment submitted jointly with Senators Adam Hinds, Eric Lesser, Anne Gobi

6. Links to attachments (optional):

[20201015_-_Senators_Comerford_Hinds_Gobi_Lesser_Comment_on_municipal_education_funding_formula.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:98 Data

1. Public comment response

1. Name:

Cheryl Duval

2. City/Town of residence:

Petersham

3. Organizational affiliation (optional):

Quabbin Regional School District

5. Comment:

Attached is a presentation that indicates the extent of personnel cuts that would result in the loss of hold harmless aid to our district.

6. Links to attachments (optional):

[for_Public_Comment_on_SOA_10.15.20.pptx.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:99 Data

1. Public comment response

1. Name:

Andrew Baker

2. City/Town of residence:

Shelburne

3. Organizational affiliation (optional):

Town of Shelburne

5. Comment:

Please see attached letter submitted on behalf of the Shelburne Selectboard

6. Links to attachments (optional):

[DESE_letter_on_Minimum_Contribution_and_Hold_Harmless_10-13-20.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:100 Data

1. Public comment response

1. Name:

David Conlon

2. City/Town of residence:

Colrain, MA

3. Organizational affiliation (optional):

Mohawk Trail Regional School District

5. Comment:

In rural districts such as Mohawk Trail, we are currently facing declining enrollments. You can't expect rural towns to foot larger and larger bills for the school district, because they don't have the money to fund us either. Wealthier districts out east don't need as much (or any in some cases) aid, and we could really use that. It's upsetting that Beacon Hill thinks that the state ends at Worcester, and there is nothing west of it. Many towns out here still don't have broadband and instead rely on terrible DSL and satellite internet. You need to properly fund ALL school districts, not just the ones that you view as important. We matter too.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:101 Data

1. Public comment response

1. Name:

Ellen James

2. City/Town of residence:

Northampton

3. Organizational affiliation (optional):

5. Comment:

I urge you to prioritize support for western Mass and other underfunded school districts. The 82.5 % cap, for example, protects residents of wealthy districts leaving less for districts with property values or populations in decline. Massachusetts needs to reverse this trend.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:102 Data

1. Public comment response

1. Name:

Patricia Brown

2. City/Town of residence:

Sudbury

3. Organizational affiliation (optional):

5. Comment:

My detailed comments, with supporting considerations, are in the attached file. In summary:

- 1) Use EQV only, not wealth defined by income, as the basis for the Target Local Contribution. Residents' incomes are taxed at the state level and should be used at the state level to provide education funding or social service.
- 2) Apportion towns' ability to pay for regional districts using EQV, rather than Foundation Budget enrollment. This should be required by law of all districts, and phased in to avoid economic shocks.
- 3) Distinguish between education and social services provided through the schools. Education is a local responsibility; social services are available to all residents, including children, and should be funded by the Commonwealth.
- 4) Support Economically Disadvantaged, English Language Learner, and Special Needs children through the Commonwealth. Non-educational expenses should be borne by the Commonwealth and not made the responsibility of local school districts.
- 5) Support legislation specifically providing special education services to low incidence high needs populations at the state level.
- 6) Preserve the "Hold Harmless" provision. Education costs have not decreased as enrollment has declined.
- 7) Maintain the 82.5% cap on local contribution to avoid creating a two-tier education system.

Thank you.

6. Links to attachments (optional):

[Comments_on_Chapter_70_Submitted.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:103 Data

1. Public comment response

1. Name:

Helen Miller

2. City/Town of residence:

Northampton MA

3. Organizational affiliation (optional):

Ralph C. Mahar Regional School

5. Comment:

To Whom it May Concern,

The current way that the state of Massachusetts expects municipalities to fund education is inequitable and unstatanible. I am a teacher at the Ralph C. Mahar Regional School in Orange Massachusetts and this past year I was involved in an effort to pass an override to fund the school. The Town of Orange has been struggling financially for years due to a lack of new revenue streams and the crushing burden of supporting special education in the town. An attempt was made at an override vote to raise taxes and generate some more revenu. The override lost by only 7 votes and the reason that people voted against the override wasn't that they didn't support the town or the school, but because they honestly couldn't afford to pay another \$100 a year, on average, in property taxes. They have neighbors and friends who couldn't afford to pay more in taxes. People had to choose between funding education and town services and keeping their homes. The tax rate in Orange is already \$20.33 per \$1000.

Towns across the state have wildly different tax rates which leads to inequity in what they can offer their children for education. Some towns are able to keep their tax rates low due to location, number of businesses in town, etc. while other towns, especially rural towns have to carry all municipal expenses on the weight of the property taxes of homeowners alone. Chapter 70 was supposed to address this issue and balance the scales but it has failed to do so. Orange has failed to be reimbursed the amount promised by the state for special education and transportation costs for years.

For the fiscal year 2021, the Town of Orange had a shortfall of over \$300,000 to fund the school to the level it needed to be funded to be operational. This \$300,000 shortfall was after the school had already cut teachers and staff, the entire staff forwent promised cost of living raises to help close the gap and everything that could be cut, was cut. The high school lost 3 teachers and 2 staff and the elementary school lost over 15 teachers and staff. Orange is in no better position to fund the schools next year, and due to the pandemic, most likely in even more dire circumstances as people continue to be unemployed. The town, just like the school, has reached the point where there are no more services which are not absolutely essential to be cut. The schools, library, police department and fire departments are all in danger of cuts next year if something is not done to balance the cost of education.

At the Ralph C. Mahar Regional School we had been piloting programs to serve low income and at risk students. We were thinking creatively to develop new programs which would support all learners including a project-based learning track for students who struggled with the traditional school structure. Due to the staff cuts we are not able to run these innovative programs any longer because we simply don't have the resources or staff to continue. We had more AP classes than any other school in our area but our advanced placement class offerings have been reduced due to staffing issues.

The way that Special Education is funded in Massachusetts is also inequitable and can lay a heavy burden on a town. Schools can be on the hook for the cost of medical care for students who are outplaced. Sometimes health insurance reimburses schools for cost and sometimes it doesn't. One high needs student can cost a school district over \$200,000 in

special education costs including transportation, one on one services and other needs. High needs students should absolutely receive every single one of these benefits that they require but the state should reimburse the schools so that the other students in the school are not penalized for being enrolled in the same district as high needs students.

The system to fund education in Massachusetts needs to be reformed. A child's education and opportunities should not be limited by the zip code in which they live. My students deserve to have the same access to education and opportunities as students in towns with more affluent tax bases. We need lasting and effective change in the way that schools are funded, not stop gap measures like rural aid bills which distribute a one-time grant.

If you have any questions please do not hesitate to contact me.

Helen Miller
Art and Music Department Coordinator
Middle and High School Art Teacher, Advanced Placement Art Teacher
Ralph C. Mahar Regional School
Orange, MA

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:104 Data

1. Public comment response

1. Name:

Eileen Claveloux

2. City/Town of residence:

Sunderland

3. Organizational affiliation (optional):

EEA

5. Comment:

I would like to advocate for a shift in the structure of educational funding in Massachusetts. With Proposition 2 ½ our lower income municipalities have an unmanageable struggle every year to try to fund the basics; only the necessities are possible. I teach in Easthampton and live in Sunderland, with grandchildren in Leverett. I see the terrible struggles every year these schools face just trying to get by. Every time a child leaves Leverett Elementary School, it is a near crisis, because of the loss of funds that child represents. Every year I am begged, as a Sunderland resident, to fund another override – and an override that will ONLY fund the bare minimum, since all of the extras such as language and other 'Specials' have already been stripped out of the curriculum. As an Easthampton teacher I see teachers cut almost every year, with a loss of diverse and vital programs that go with those teachers.

The 82.5% CEY is harming our lower income and rural communities in terrible ways. The structure benefits wealthier and larger communities. If the cap was raised to 100%, wealthier communities would pay more of their fair share while 263 communities would pay less, making our educational funding much more equitable. This change in the cap percentage will not result in an increase in Chapter 70 funding, but will result in lower subsidies for wealthier communities and more equity in municipal contributions.

Please consider carefully the repercussions involved for our lower income and rural towns and cities. Public education has suffered enormously and towns struggle with horrendously rising costs every year, while still having to pay for everything else that makes a community run. Charter school costs coming out of local public school funding is another incredible financial drain. Another structure to fund Charter schools must be found!

Our schools are failing because they lack the money it takes to succeed. Please restructure funding so that our Massachusetts schools, of which we have always been so justifiably proud, can again make us proud with adequate resources that allow ALL our children to thrive.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:105 Data

1. Public comment response

1. Name:

Nerissa Wallen

2. City/Town of residence:

Rowley, MA

3. Organizational affiliation (optional):

Triton Regional

5. Comment:

Thank you for accepting public comment on these items. I am a parent of third and sixth graders, current chair of Triton Regional's School Committee, and co-founder of the 1800-person strong Support MA Regional Schools grassroots advocacy group. I've attached a more extended comment the leadership team at Support MA Regional Schools wrote because it expresses my views, and I will keep this brief.

Our district, Triton Regional, is not what one would consider a wealthy district, though it is portrayed that way as both a hold harmless and 82.5% district. Our towns are characterized as "aging in place", bedroom, and vacation communities, and the most common adjectives used to describe them are "sleepy" and "quaint". As aging in place communities, there are a significant number of properties owned by elderly residents on fixed incomes and fewer young families. Business rises and falls with the seasons.

I believe Triton is affected in two major ways: one, the foundation budget underestimates the cost to educate our students as a declining enrollment district, and two, the local contribution calculation overestimates how much communities can afford to pay through the set local/state split and by not appropriately considering the sole factor that most of their revenues are based on: the assessed value of properties.

The concerns implicated in the items I'm commenting on could mean a loss of millions of dollars of state aid to Triton, depending on the changes made as a result. Our hold harmless debt alone is \$4.2M, about one-tenth of our annual budget. Our towns are putting most, sometimes all, of the levy allowed under Proposition 2 ½ plus their new growth toward their district assessments, straining our residents, and that is still often resulting in cuts, including 5% of the district staff three years ago. As much as they would want to, our communities could not even begin to help soften a catastrophic blow like that.

I believe the generalizations and perceptions around some of these education finance terms have clouded some of these issues occurring within Chapter 70. I appreciate your careful consideration of all the individual views and the district stories that will be represented in these comments.

6. Links to attachments (optional):

[SMRS_MLC_Public_Comment.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:106 Data

1. Public comment response

1. Name:

Margaret D Miller

2. City/Town of residence:

Florence

3. Organizational affiliation (optional):

5. Comment:

I am very worried about how the Prop 21/2 mandate hurts schools in Northampton.

We have had to campaign for an override 3 times since my kids started school in 2000.

State education funding has not kept pace with increases in healthcare costs, transportation costs, special education costs, and more. Some of these areas will see funding increases thanks to the Student Opportunity Act law. However the SOA does not impact regional school transportation or charter school tuition reimbursements, and state reimbursements to Northampton for these services will remain inadequate even with the new law.

Paying for K-12 education has been eating up larger and larger portions of the city budget and Northampton is bumping up against the Prop 2.5 ceiling: the cost of funding K-12 education is the reason why.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:107 Data

1. Public comment response

1. Name:

Emma Stamas

2. City/Town of residence:

Colrain

3. Organizational affiliation (optional):

5. Comment:

The problem in the Town of Colrain is that there are only a few businesses in our entire township so the property tax burden fall almost solely onto residents. Our housing is stock is primarily over 40 years old and and our few newer homes are small with just a few homes and farms in the whole town worth more that \$350, 000? Our small farms and small home based businesses were barely making any profit even before Covid hit. Basically we have no tax base. We have very long schoolbus transportation routes, lots of land under chapter 61 agreements, and we have lots of snow and ice in winter. My relatives in Wellfleet, MA pay less than half the proerty taxes we pay for residences assesed at the same amount Why can't the state look at the TOTAL tax revenues that each Town or municipality collects each year and use this figure to judge how much help they need from the state to run their school district and upkeep their roads and essential services?

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:108 Data

1. Public comment response

1. Name:

Elaine Sanfilippo

2. City/Town of residence:

Stow

3. Organizational affiliation (optional):

5. Comment:

Thank you for the opportunity to provide public comment on this important topic.

I echo much of what was written in the testimony provided by Support Massachusetts Regional Schools. I would like to add some additional details specific to my community and regional school district.

Last year, the Student Opportunity Act (SOA) was hailed as the solution to a much-needed restructuring of the foundation budget (FB), the first step in the Massachusetts state funding formula for pre-K-12 schools. It should be implemented, and for the record not with COVID funds. With questions like those in this public comment request however, even the Student Opportunity Act acknowledges that the overall work on Chapter 70 is unfinished.

The SOA made strides in adjusting the FB to better reflect the realities of true education costs. However, 57% of the districts in the state (post-SOA adjustments in the original Gov's budget from January 2020 that admittedly is not a full implementation) STILL would operate outside the FB, due largely to declining enrollments pushing them into Minimum Aid status. I would argue that changing or cutting Minimum Aid is not the issue that needs to be solved (at least not yet). Continuing work on the FB is.

Clearly the FB calculations are broken. Districts that fund their schools at or near FB rightfully advocate that their schools are chronically underfunded, and their students are not getting an adequate education. At the same time, school districts that fund above their FB are told they are doing "extra". This is all regarding what an adequate education should cost, not about who pays for it, but without continued work on FB it compounds the complexity and equity issues around who can afford what.

Local Ability to Pay

The local ability to fund services is almost entirely based on property taxes. In determining a municipality's capacity to fund its schools, the formula does not look directly at this factor at all. Instead, it considers the free and fair cash value of taxable properties (EQV), a different measure from the assessed values that taxes are based on; municipal growth; and total income. While the figures used now are known values, relatively predictable, and do tend to trend with tax assessments, they do not provide an accurate reflection of the municipality's ability to fund local services OR even what amounts are realistically able to be raised via taxation.

In my district of Nashoba, local revenue is almost entirely based on residential property taxes: Bolton: 93.5%, Lancaster: 85.0%, Stow: 92.7% in FY20. Tax rates (per \$1000) are already in the top 30 in the state: Bolton: \$20.39, Lancaster: \$19.85, Stow: \$20.61. Our average single family tax bill as a % of per capita income is high as well: Bolton: 15.0%, Lancaster: 20.3%, Stow: 16.3% Additionally each town has a higher than average concentration of tax-exempt land for things like farms, historical landmarks, churches, and federal-owned land. There's no argument that we should pay our fair share for education, or even that we are a relatively affluent set of communities. But what IS a problem, especially for regional school districts that need multiple towns to approve a single school budget, is that our ability to raise additional revenue is constrained by factors

not included in any FB calculation. Swings or large changes in assessments, that often happen in regional school districts, leave us with few choices on an annual basis.

Our Regional Agreement states we must have a School Committee-approved budget by March 15th. Our regional school district attempts to begin the budget process in the fall. School departments are asked to create three plans: level funded, level service and "urgent additions" (things like compliance with state mandates, NOT a wish list). However, this is not what drives our actual budget. The process is actually driven by our member towns defining an "acceptable" (usually 3%) increase in assessment for the member town with the highest assessment increase after MLCs are initially released in the Governor's budget at the end of January. Then we back into what services need to be cut to meet that number. No one really likes this process, but the Town Administrators feel that the volatility that comes with MLC for such a large-ticket item in their budgets is too great. Knowing the assessment will be capped at 3% provides them stability. None of our three towns has even attempted an override in 15 years.

In general, regional districts and their member towns are left in a very reactive state between local contribution and enrollment changes, sometimes with wild swings in the assessments that double or triple a member town's increase over the previous year.

This dynamic unfortunately has consequences on the overall perception of public education in many towns as well, as any additional education spending is seen as "competing" with other local services for limited funds. This creates a vicious cycle as support for funding education actually decreases as residents feel their other public service needs are not being met. "Us vs them" dynamics are incredibly common across communities and are particularly acute in regional school districts that have to balance the different needs of multiple towns. Even amongst member towns there is "competition" due to towns' differing MLCs and ability to pay. While technically only $\frac{2}{3}$ of our member towns have to approve operating budgets, dragging the third along erodes trust and breeds long-term discord. With each passing year, it becomes harder and harder to pass regional school budgets.

I would like to include one last point about the additional complexity of funding a regional school district. Within regional districts, assessments are based on MLC by towns' ability to pay, but additional assessment is pegged to enrollment. Our FB, however, is at the regional-level. Enrollment increases in our least wealthy town are negated by enrollment losses in our wealthiest. Overall the district is left in Hold Harmless/Minimum Aid and the town that really needs that additional help does not get it. I don't know if this is common across other regional districts, but the larger point is that there is a lot of complexity within regional school districts that is simply not captured with the current MLC/FB system.

It would be an oversight if a change to the local/state split was not also included in this conversation. The current 59/41 split keeps the state's share of education funding artificially low, and as the SOA changes are phased in over the coming years, local contributions will rise in response. I encourage legislators to look specifically at the impact on regional school districts given the budgeting process and volatility I detailed above. One recent bill recommended a shift to 54/46 over 4 years, and further consideration of this and similar proposals is important.

We regionalized to take advantage of economies of scale, fully admitting that our small towns (population approximately 19K combined) cannot handle the financial cost of facilities, robust special ed programming and administrative overhead on their own. But yet that is exactly how we fund our schools as a state. How is that efficient or effective? Until we break the stranglehold of town-based, property tax-driven funding of public education I fear we will have the same arguments over and over. Since basically everything in our lives has been turned upside down in 2020, maybe it's time to think bigger on this topic too.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:109 Data

1. Public comment response

1. Name:

Mary Jane Else

2. City/Town of residence:

South Hadley

3. Organizational affiliation (optional):

5. Comment:

The Student Opportunity Act mandates public comment on municipalities' ability to contribute to the education of its students. As an educator, I can see the impact of inadequate funding on students. Students from communities with low median incomes, a weak tax base, and rural communities struggle to cover school costs or do so inadequately. This is an unfair disadvantage for young people from these communities and forces municipalities to make awful choices about which critical need to fund. I favor removing the 82.5% cap. This cap benefits only the wealthiest communities, while others struggle. The Prop 2.5 cap is a second reason why our communities struggle to fund schools. An educated state will be a prosperous state for years to come. It is therefore to the benefit of all in the Commonwealth for the state to adequately fund education through the mechanism of progressive taxation.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:110 Data

1. Public comment response

1. Name:

Zoë Crabtree

2. City/Town of residence:

Amherst

3. Organizational affiliation (optional):

5. Comment:

Massachusetts has not adequately funded education, and the amount that municipalities must contribute to fund their schools has been rising sharply year after year. Municipalities raise property taxes to raise these additional funds, but municipalities have other costs in addition to funding K-12 education, like paying the salaries of municipal officials, repairing roads and providing other municipal services.

State education funding has not kept pace with increases in healthcare costs, transportation costs, special education costs, and more. Some of these areas will see funding increases thanks to the Student Opportunity Act law. However the SOA does not impact regional school transportation or charter school tuition reimbursements, and state reimbursements to municipalities for these services will remain inadequate even with the new law.

Paying for K-12 education has been eating up larger and larger portions of municipalities budgets, and Prop 2.5 has been an issue.

Also, the "82.5% cap" is inherently unfair and only benefits wealthy/larger communities.

The cap on Combined Effort Yield should be raised to 100% of foundation budget. This would not require an increase in Chapter 70 funding, but would result in lower subsidies for the wealthiest communities and equity in the requirement on municipalities to contribute.

And we cannot get rid of hold harmless aid and minimum per pupil aid because that would make operating schools in rural areas in Western MA impossible.

DESE recently produced a report detailing the absolutely brutal fiscal conditions of rural school districts, it's important that you look to that report when making decisions that will affect rural school funding.

6. Links to attachments (optional):

[01rural-schools.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:111 Data

1. Public comment response

1. Name:

Ray Purington

2. City/Town of residence:

Gill

3. Organizational affiliation (optional):

Town of Gill

5. Comment:

October 14, 2020

To: The Department of Elementary and Secondary Education (DESE) and the Division of Local Services (DLS) at the Department of Revenue
From: The Town of Gill
Re: Chapter 70 Local Contribution Public Comment

The Town of Gill would like to express its gratitude and appreciation to DESE and DLS for giving us the opportunity to comment on the state's Chapter 70 local contribution.

The Town of Gill is a member of the Gill-Montague Regional School District (GMRSD). Our school district, as well as many districts in Western Massachusetts and throughout the state, has been plagued by declining and low enrollment over the past two decades. This has had severely negative impacts on our educational programs and school budgets. Further exacerbating the situation is the fact that Franklin County falls into the lower end of the economic spectrum of income and wealth (ranked 11 out of 13 in per capita income), making rising education costs difficult to absorb and fund at the local level, often leaving towns no alternative but to cut educational programs and municipal services. This lack of adequate support has caused much harm to the academic programs and the overall quality of education in our district and throughout the region. In addition, the decline in the quality of our schools has made it more difficult for Gill and its surrounding towns to attract families to the area. The Student Opportunity Act (SOA) was a good first step in bringing more equitable funding, resources, and quality of education to disadvantaged students, but there is still more that can be done. For example, the SOA brought districts like GMRSD more support in state aid because of the demographics of its students, but unfortunately, didn't bring other financially struggling school districts like Pioneer Valley Regional School District (PVRSD) any extra help, leaving them in hold-harmless. Therefore, although the SOA increased aid to many disadvantaged students, it didn't correct some of the underlying structural inequities built into the Chapter 70 formula.

In this respect, the Town of Gill emphatically supports raising the 82.5% local contribution cap to 100%. We are dismayed and disappointed by the fact that the local contribution cap is severely regressive in two respects. First, it permits many towns, and mostly the wealthier towns, to provide financial support for public education at lower rates of their financial capacity than less fortunate towns. This results in an actual and substantial subsidy by less wealthy towns of the budgets of mostly more wealthy towns. Second, the consequence of that inequity is the further inequity of shifting much needed state educational funding away from school districts whose cities and towns lie below the cap to school districts whose wealthier municipalities lie above the cap. We support the written public comments of Michael Naughton (Montague), Allen Tupper Brown (Gill), and Greg Snedeker (Gill). Each comment presents a different perspective and provides context and information regarding the inequitable financial impact of the local contribution cap. We ask that you read these three comments carefully and consider the merits of each but also hear them as one unified voice in support of raising the local contribution cap.

The Town of Gill appreciates the progress that has been made through the SOA, but also believes we can and must do better to support our disadvantaged students, many of whom are disadvantaged for no other reason than because of the location of where they live. Additionally, we must at least partially relieve our taxpayers from the regressive inequity imposed by the current system. We ask that DESE and DOR develop recommendations to the legislature that address these inequities as soon as possible.

Thank you for your time and consideration in this very important matter.

This Public Comment by the Town of Gill is authorized by unanimous action of the Gill Selectboard taken on October 13, 2020.

Town of Gill
Selectboard
Randy Crochier, Chair
Greg Snedeker, Clerk
John Ward

Cc: Senator Jo Comerford

6. Links to attachments (optional):

[2020-1014_Gill_SB_to_DESE_and_DLS_on_Ch70_inequity.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:112 Data

1. Public comment response

1. Name:

Maura E Keene

2. City/Town of residence:

Amherst

3. Organizational affiliation (optional):

5. Comment:

Please raise the CEY to 100 per cent. The lower level of funding is hurting our small rural schools with lower property tax revenue. Our students deserve the best education the state can supply too.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:113 Data

1. Public comment response

1. Name:

Kevin Regan

2. City/Town of residence:

Hanson

3. Organizational affiliation (optional):

5. Comment:

Eliminate the statutory method of assessments

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:114 Data

1. Public comment response

1. Name:

Kimberly L Russo

2. City/Town of residence:

HANSON

3. Organizational affiliation (optional):

5. Comment:

I do not find it fair that Hanson pays over 1.5 million more when Whitman has more children in the w.h school system. We are not a "richer" town. We are hard working middle class that should not be forced into footing the bill for others. Whitman needs to pay for there students.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:115 Data

1. Public comment response

1. Name:

Robin Bousquet

2. City/Town of residence:

Hanson, Ma.

3. Organizational affiliation (optional):

5. Comment:

the current formula that the state uses is flawed and unfair to the town of Hanson. 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. Nor is it fair a town much smaller with much of it's citizens elderly/ on a fixed income & with only 40% of students in the schools system compared to Whitman's 60% students be forced to pay much more than the larger town. Forcing those on limited income to chose between paying their taxes(which includes coverage of the schools) or losing their homes. There needs to be another fair option for both sides.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:116 Data

1. Public comment response

1. Name:

Claire Chang

2. City/Town of residence:

Gill

3. Organizational affiliation (optional):

Gill Finance Committee Chair

5. Comment:

Since 2007 the 82.5% cap has caused our GMRSD to actually lose funding. The least that can be done is to increase the cap to 100% so that poorer towns are not penalized and wealthy towns are fully contributing towards their own foundation budgets. There are a number of other issues with Chapter 70 funding formulas which I don't have the bandwidth to discuss, but which other members of Gill and Montague have. I fully support comments submitted by Allen Tupper Brown, Greg Snedeker and Mike Naughton. It is more than time to finalize your report and make substantial corrections for the good of all. I hope that DESE will be able to follow through with changes which allow all our students to have equal access to a good education. Thank you

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:117 Data

1. Public comment response

1. Name:

Darryll McCall

2. City/Town of residence:

Rutland

3. Organizational affiliation (optional):

Superintendent of Wachusett Regional School District

5. Comment:

I'd like to thank both DESE and the Division of Local Services (DLS) of the Department of Revenue for the opportunity to make this public comment. Wachusett Regional School District is the largest comprehensive regional school district in the Commonwealth with an enrollment of 7,000 plus students (October 2019 figures). Like many districts, particularly regional districts, we have our fair share of financial challenges: regional transportation reimbursement; circuit breaker reimbursement and Chapter 70 aid. I am grateful to the legislature for its work to hold districts harmless by not reducing Chapter 70 aid, especially during these difficult financial times. Unfortunately, that cannot be said on the local level given the current formula configuration. Looking at this year's October 1 SIMS count, Wachusett will lose 400 students which will significantly impact our FY22 budget. I am hopeful that state revenues will be sufficient to implement the critical funding provided by the Student Opportunity Act (SOA) in FY22 to mitigate our expected loss of funding. While a decline in enrollment of 400 students does prompt the need to examine our staffing levels and budget, this pandemic is requiring unanticipated services for many of our students, the level of which is unprecedented.

To illustrate my concern, I've attached the following scenario assuming there are no adjustments with staffing, programs or related services:

- Final October 1 SIMS count reflects a loss of 400 students – 6,610 as of October 7, 2020.
- The FY21 Foundation Budget per pupil cost (as it stands today) is \$10,523. Please see the DESE Summary Page of WRSD, Chapter 70 for FY21.
- The loss of 400 students is a loss of \$4,209,200 to WRSD's total Foundation Budget using FY21 rates – 400 students x \$10,523 per pupil cost = \$4,209,200.
- 40% of that number -- \$1,683,680 – represents Chapter 70 aid, as the district as a whole is a 60/40 district. Please see the DESE Summary Page of WRSD, Chapter 70 for FY21.
- In FY22, Wachusett will see a reduction to their foundation budget, with resulting reduction in foundation aid due to the reduction in enrollment.
- It is expected Wachusett will be held harmless for that reduction in foundation aid, and will receive the same Chapter 70 aid we received in FY21, along with any minimum per pupil aid that is funded (SOA providing for \$30 per pupil).
- Wachusett's more significant problem is the value associated with MLC, which represents 60% of our foundation budget. Our MLC reduction is therefore expected to be approximately \$2,525,520.
- Therefore, Wachusett's primary concern is not Chapter 70 aid, as it is not expected the legislature will be phasing out hold harmless aid in the FY22 budget. Rather, Wachusett's concern is loss of funding from its member towns due to their MLC reduction. This will negatively impact Wachusett's revenue projections for FY22, especially if the implementation of SOA is further delayed.
- With this anticipated revenue loss driven by the reduction in enrollment, Wachusett has the Herculean task of advocating for more funding from its member towns given the anticipated reduction in revenue.

I ask that the phasing out of hold harmless and minimum per pupil aid as recommended by the MA Business Alliance for Education/Greater Boston Chamber of Commerce not be considered in your review, as doing so will have catastrophic effects to our district by way of severe budget cuts.

I ask that you consider changing the state and local split of 59/41% to increase the level of the state's contribution toward Chapter 70 aid to provide much needed relief to our municipalities, so they are in a position to support their education appropriation. In that regard, I also request you maintain the 82.5% cap on MLC as a percentage of foundation budget, as one of our member towns (Princeton) has been unfairly categorized as a wealthy town due to their low student enrollment. Their mandated local contribution has therefore come at the detriment of their other town services and is untenable. I ask further you consider student enrollment when calculating a municipality's combined effort yield or capacity to pay.

As I expect our student enrollment decline to be temporary, with students expecting to return in the 2021-22 school year when the pandemic is lifted and full in-person instruction has resumed, it is critical that is considered when formulating the FY22 budget recommendation. I therefore ask that the allowance of additional student enrollment counts be submitted throughout the 2020-21 school year, and prior to the FY22 budget being finalized.

Again, thank you to both DESE and DLS for this opportunity. These are very difficult times, compounded with challenges unlike any in recent history.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:118 Data

1. Public comment response

1. Name:

Alexandre A. Schwanz

2. City/Town of residence:

Orange

3. Organizational affiliation (optional):

Board of Selectman

5. Comment:

Please see letter attached.

6. Links to attachments (optional):

[Letter_to_DESE_&_DOR_Study_Committee_\(PDF\).pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:119 Data

1. Public comment response

1. Name:

Dawn Byers

2. City/Town of residence:

Whitman

3. Organizational affiliation (optional):

Whitman-Hanson Regional School District

5. Comment:

The following comments are being submitted as my own personal views and not that of the Whitman Hanson Regional School District or School Committee, for which I am a member of.

Whitman-Hanson is a 2 member K-12 Regional School District located in Plymouth County, roughly halfway between Boston and Cape Cod, and squarely between Route 3 and Route 24.

In FY20, WHRSD received \$24,776,700 in Chapter 70 state aid, of which \$4,430,551 is "Hold Harmless Aid".

A potential decision by DESE and DOR to phase out and eliminate the Hold Harmless aid, without re-evaluating the Foundation Budget, would be detrimental to the WHRSD.

Five years ago, WHRSD was not in Hold Harmless, and five years ago the Foundation Budget Review Commission came out with their findings and recommendations to increase funding to the Foundation Budget. Had those recommendations been 100% implemented, WHRSD would not be in the Hold Harmless situation it is today.

Yes, enrollment has declined over the past decade, but if the state wide formula for the Foundation Budget had been updated to recognize the exponential increases in health insurance costs, the rising Special Education Costs and associated transportation costs, increased Mental Health costs and increased costs associated with English Language Learners, then the financial impact of declining enrollment would have been lessened. Because there were no changes made in the past 5 years, WHRSD is now potentially going to be penalized with the threat of eliminating the \$4.4 million Hold Harmless Aid.

Every year of inaction is another year lost for closing the achievement gap in a child's education.

Being in "Hold Harmless" also means WHRSD is one of the 183 districts that would receive only Minimum Aid increases of \$30 per student, according to Gov Baker's preliminary budget released in Jan 2020 that took the requirements of the SOA into consideration. The Per Pupil Minimum Aid increase across the board is not equitable as some districts have the capacity to contribute above the 82.5% maximum local contribution, and others are in dire need of additional state aid.

For WHRSD, we are neither. When looking at the CH 70 Economically Disadvantaged Deciles, we are smack dab in the middle: Decile 5. As a District, we are not the wealthiest, and we are not the poorest of the poor. If the Hold Harmless aid is repurposed to other needy districts, WHRSD will not see any benefit- only a loss of aid. Then, we will turn to our member towns...

When it comes to the impact of Proposition 2 ½ on the ability of municipalities to make their required local contributions, Whitman and Hanson have more than \$11 million each in override capacity. However, having override capacity doesn't guarantee there is a will of the people to vote yes and increase the tax levy.

In 2016, an override of \$1,241,141 in Hanson and \$1,762,588 in Whitman to fund a \$3mil increase in the FY17 WHRSD operating budget failed at the ballot box.

If we are being asked to examine the equity, predictability and accuracy of how the state determines the required local contribution, we must also consider how the Local Contribution correlates to CH 70 state aid and the Foundation Budget. To do otherwise would only address 1/3 of the root problem. I would suggest we look at the FBRC and Regional School District studies from the past 5 years and find the common thread(s) among the recommendations to improve, and increase, state aid education funding- and act quickly upon them. Our students can't wait another year.

October 30, 2015, The Foundation Budget Review Commission

<https://www.mbae.org/foundation-budget-review-commission-issues-final-report/>

"a high-quality education to every student within the Commonwealth regardless of wealth, income, educational background, or zip code is not only a matter of constitutional obligation but of generational responsibility".

Two years following that, Oct 18, 2017, Suzanne Bump, Auditor of the Commonwealth presented a Local Financial Impact Review of Regional School Districts

"Supporting Student and Community Success: Updating the Structure and Finance of Massachusetts Regional School Districts":

https://www.mass.gov/files/documents/2017/10/18/RegionalSchoolDistrictsMunicipalImpactStudy_1.pdf

"The study points to demographic changes, long standing structural challenges, and funding shortfalls as key factors that de-incentivize communities from moving forward with new or enhanced school regionalization. During the decade ending with the 2015-16 school year, RSD enrollment declined by 10.5 percent, while statewide public school enrollment declined by just 1.62 percent. Overhead costs, however continue to rise, and state funding is inadequate for many of these districts.

The study notes RSDs face significant challenges related to education funding and reimbursements. For example, Massachusetts law entitles RSDs to a 100 percent reimbursement for school transportation expenses, but state funding has consistently fallen short of this benchmark. In fiscal year 2016, the reimbursement rate from the state was just 73 percent. Additionally, RSDs face high and growing costs for out-of-district placement for students with special needs. These districts also lose state aid to charter schools for transferring students, without seeing a corresponding reduction in costs. The state is also not fully funding statutory reimbursements intended to cushion school districts in the early years of a student transfer to a charter school."

And two more years following that, Nov 16, 2019, Gov Baker signs Ch 132 of the Acts of 2019, "Student Opportunity Act"

<https://www.mass.gov/news/governor-baker-signs-education-funding-bill-providing-investments-in-public-schools-across-the>

DESE Cmsr Jeffrey C. Riley states:

"Low-income district have been waiting a long time for additional money to help them offer all of the academics, support services and enrichment opportunities that prepare students for life after high school. This legislation addresses those needs, acknowledges the value of accountability, and dedicates a trust fund to close achievement gaps, an important goal that requires resources as well as our best thinking."

It's time to close the achievement gaps and you can't do that by taking away state aid from Districts who are not funding 82.5% of their budget with local tax revenue.

Thank you for the opportunity to provide public comment.

Ms. Dawn Byers

Links:

https://www.mass.gov/files/documents/2017/10/18/RegionalSchoolDistrictsMunicipalImpactStudy_1.pdf

<https://www.mass.gov/news/bump-calls-for-modernization-of-massachusetts-regional-school-structure>

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:120 Data

1. Public comment response

1. Name:

James E. Rooney

2. City/Town of residence:

Boston

3. Organizational affiliation (optional):

Greater Boston Chamber of Commerce

5. Comment:

October 15, 2020

Commissioner Jeffrey C. Riley
Department of Elementary and Secondary Education
75 Pleasant Street
Malden, MA 02148

Dear Commissioner Riley,

On behalf of the Greater Boston Chamber of Commerce, I am writing to provide comments on the Chapter 70 Local Contribution Study required by Section 21 of the Student Opportunity Act. The Chamber is committed to closing achievement gaps and pushing equity to the forefront of state education funding policy. With the impact of COVID-19 reducing the state's revenue and imperiling the implementation of the Student Opportunity Act, the state must use its limited resources, like Chapter 70 education aid, to the maximum benefit and effect. To this end, it is important for the state to equitably, predictably, and accurately determine each municipality's ability to contribute toward education funding.

Many municipalities have the capacity to fund their school districts entirely through local resources, while less wealthy cities and towns struggle to provide adequate education funding. In FY 2019, the wealthiest 20 percent of districts spent an average of \$4,642 more per student than the least wealthy 20 percent of districts. These inequities across municipalities exacerbate achievement gaps, disproportionately impacting Black, Latinx, low-income, and high-needs students.

Addressing education inequities requires aligning state aid to community need. But right now, Massachusetts distributes more aid to wealthier school districts than their formula-determined need, which limits the amount of critical funding sent to low-income communities. As we find in *Missing the Mark*, a report the Chamber co-authored with the Massachusetts Business Alliance for Education, 14 percent or \$778 million of the Chapter 70 aid in the original FY 2021 budget proposal (H.2 submitted in January 2020) is needs-blind because it goes to districts regardless of their ability to fund their K-12 education on their own. Almost \$500 million, or 64 percent, of that total goes to the wealthiest 20 percent of districts. These districts serve municipalities that have the capacity to fully fund their schools from local resources alone.

Continuing to use these needs-blind formula factors – the hold-harmless provision, minimum aid, the 175 percent threshold for below-effort aid, and the cap on maximum local contribution share of the foundation budget – hinders the state's ability to close achievement gaps. The report recommends four changes to the Chapter 70 state aid funding formula to increase progressivity and equity:

- Incrementally phase out the hold harmless provision, which guarantees every school district level Chapter 70 aid each year. If a phased withdrawal of the hold harmless provision would be too detrimental to school districts, an alternative step is to

switch to a per-student hold-harmless calculation, guaranteeing level funding each year on a per-pupil basis.

- Phase out minimum aid, which guarantees every district a flat per-pupil aid increase each year. The Legislature determines the minimum aid increase amount each budget cycle and then distributes it only to those districts for which all other foundation budget and Chapter 70 formula factors do not generate an aid increase equal to what the district would receive with minimum aid alone. Minimum aid is regressive because the wealthiest school districts receive more than five times as much in total minimum aid compared to the lowest resourced districts.
- Eliminate below-effort aid to municipalities that have the capacity to fund at least 125 percent of their foundation budget from local resources, lowered from the current threshold of 175 percent. Below-effort aid is meant to help cities and towns afford a large year-over-year increase in their required contributions by shifting some of the responsibility for paying for the increased contribution from the municipality to the state. The Commonwealth's least wealthy communities benefit the most from below-effort aid and such aid should be reserved for those municipalities rather than assisting municipalities with a high level of local capacity for funding.
- Increase the maximum required local contribution share of the foundation budget from 82.5 percent to 85 percent so that wealthier communities are responsible for funding a larger share of their districts' budget. In FY 2021, the state calculates that 104 of the 351 municipalities can afford to fund their school districts entirely from local resources.

Taken together, these recommendations reduce the topline investment by \$25 million, money that can be reinvested into districts based on student need. These recommendations increase the equity of Chapter 70 state aid in H.2 by boosting aid in the lowest-wealth districts by \$2.5 million and reducing unnecessary aid in the highest-wealth districts by \$13.2 million.

The Chamber recognizes the intricacies and complexities of the Chapter 70 formula and appreciates that developing a formula that works for every municipality in the Commonwealth is a daunting undertaking. However, we also believe that growing inequality and economic uncertainty necessitates a statewide approach steeped in equity. Removing or thoughtfully revising some of the needs-blind factors in the Chapter 70 aid formula is a necessary step toward ensuring equity in educational opportunity.

Sincerely,
James E. Rooney
President and CEO
Greater Boston Chamber of Commerce

6. Links to attachments (optional):

[10-14-20_DESE_Local_Contribution_Study_Comment_Letter_final.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:121 Data

1. Public comment response

1. Name:

Craig Cohen

2. City/Town of residence:

Leverett

3. Organizational affiliation (optional):

Leverett School Committee

5. Comment:

To whom it may concern,

Leverett is a small town in Franklin County of approximately 1,800 residents located in the Pioneer Valley. Leverett Elementary is the heart of our community and a rural school with around 125 Pre-K — 6th grade students. Like many small and rural schools, LES offers just one class per grade with a class size of around 18 students. With a history of excellence, LES is the primary draw for families with young children to buy homes and move into our town.

Over the past 20 years, Leverett saw a decline in student population. The last 10 years the decline slowed and we now have a stable number of students in the school. However, these numbers are stagnant and will not increase any time soon, in fact, it's possible these numbers could decrease over time. Population growth is simply not a reality we can count on in rural Massachusetts.

Small rural schools are in deep trouble across the Commonwealth, and nowhere as pronounced as in western Massachusetts. Our town budgets are strained and our tax rates are climbing perilously close to the \$25/\$1,000 Proposition 2 ½ tax cap. We have a limited capacity for growth in our town - there are very few new houses built each year and we have no infrastructure to support businesses. Soon, Leverett, like many rural towns, will not be able to fund our town budget.

Proposition 2 ½ puts a hard cap on what revenue we can raise. But, it's the chapter 70 formula and low charter school reimbursement that affects Leverett the most. After grants, Leverett currently funds 91% of its elementary school budget from Property Taxes. This is unsustainable and unfair.

Some Chapter 70 numbers for Leverett:

FY 20 - Chapter 70: \$295,511

FY 20 - Charter School Charges: \$128,548

What is left from state aid for the ~130 students physically in the building: \$163,963

The budget submitted to the Town after grants and School Choice: \$1,839,358

That means that in FY 20 Chapter 70 covered just 9% of our budget. The rest comes from property taxes which are above \$20/\$1,000. We can't keep raising property taxes and if our properties decline in value, we will hit the levy ceiling even more quickly.

Our Chapter 70 funds are dramatically low compared to our neighboring towns. We believe this may be due to an uneven distribution of wealth within our Town and the use of income averages in the formulas rather than median income. We urge this to be investigated!

Small rural schools in Massachusetts are disproportionately affected by population changes and unfairly burdened by the significant funding shortfalls that are in response to these population changes.

The state has not adequately funded education, and the amount that municipalities must contribute to fund their schools has been rising sharply year after year. Leverett raises property taxes to raise these additional funds, but Leverett has other costs in addition to funding K-12 education, like paying the salaries of municipal officials, repairing roads and providing other municipal services, like police and fire.

State education funding has not kept pace with increases in healthcare costs, transportation costs, special education costs, and more. Some of these areas will see funding increases thanks to the Student Opportunity Act law. However the SOA does not impact regional school transportation or charter school tuition reimbursements, and state reimbursements to municipalities for these services will remain inadequate even with the new law.

Chapter 70 funds need an urgent review to recalibrate towards a more equitable distribution. Chapter 70 Aid currently benefits more affluent municipalities which end up paying a fraction of what they could pay. But, less affluent/smaller municipalities (like those in western Massachusetts) pay 100% of their Combined Effort Yield.

Look at a few examples:

If the 82.5% cap were raised to 100%, wealthy towns like Winchendon and Yarmouth would be required to pay almost \$4 million and \$8.5 million more annually, respectively. Meanwhile 263 towns would be required to pay less – in fact this change would mean that 88 of the wealthiest towns in the Commonwealth pay more while all of the other towns would benefit.

The cap on Combined Effort Yield should be raised to 100% of foundation budget. This would not require an increase in Chapter 70 funding, but would result in lower subsidies for the wealthiest communities and equity in the requirement on municipalities to contribute.

Thank you for your consideration.

Respectfully,

Craig Cohen, Chair & Bethany Seeger, Vice Chair on behalf of the Leverett School Committee

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:122 Data

1. Public comment response

1. Name:

John Robertson

2. City/Town of residence:

Boston

3. Organizational affiliation (optional):

Massachusetts Municipal Association

5. Comment:

Please see attachment below.

6. Links to attachments (optional):

[Final_Draft_MMA_Comments_to_DLS-DESE_10-16-20.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:123 Data

1. Public comment response

1. Name:

SUSAN BOGOSIAN

2. City/Town of residence:

REHOBOTH

3. Organizational affiliation (optional):

5. Comment:

The continuation of the restructuring of the Foundation budget as provisions of the Student Opportunity Act began is essential. A town's wealth is currently based on the property and personal taxes of its' residents; this formula is flawed and unfair. This needs to be changed. Revise the minimum contribution formula to include EQV as the main factor. Support for hold harmless aid should continue (to declining enrollment) or provide aid for declining enrollment outside the chapter 70 funding formula if chapter 70 funding calculation is on an accurate per student basis. Special education expenses should receive state wide support and these state funds should follow the child. This is a more equitable method of funding special education. Currently, the number of special education students and the chapter 70 calculation does not align. Also, the cost of busing must be addressed. Further, unfunded mandates should not exist. A method of determining each municipalities ability to contribute must be accurate and equitable, without causing angst among municipalities. Thank you for your efforts!

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:124 Data

1. Public comment response

1. Name:

Dr. Elizabeth Zielinski

2. City/Town of residence:

Ludlow

3. Organizational affiliation (optional):

R. C. Mahar Regional and School Union 73 Districts

5. Comment:

Dear Legislature,

I write to you today, as the new Superintendent of Schools for the R.C. Mahar and School Union 73 Districts. I began my administrative career at the beginning of the Massachusetts Education Reform Bill in 1993. I currently serve the students in the towns of Orange, New Salem, Wendell, and Petersham. I entered the position with expertise in other regional and municipal education systems. The intention of the Education Reform Bill was supposed to create a level playing field for students to succeed. And by most accounts, since that time, Massachusetts has become a leader in education nationally.

Two generations later, we have seen much success for so many students. Most of that success comes from students who are fortunate enough to live in districts whose town or city management can afford the cost of high-quality education. However, the Bill has unintentionally marginalized students who live in areas haunted by poverty, in communities where there is a high percentage of second language learners, and our children's racial demographics are mostly brown or black.

The Legislature, hearing the cries for educational equality, took up the charge to look at the funding formula of Chapter 70. What is unique about this formula is that all districts receive this funding source, no matter the town or cities ability to fund their schools through property tax. In towns and cities, where property taxes are at a premium, wealthy communities have been able to levy their capped property tax, even at 2.5%, and meet most of their towns/city's education needs.

However, in poor communities where the tax base is low and property taxes are so repressed, a 2.5% levy increase each year cannot provide the bare necessities a Town needs to manage, including education. For instance, towns like Orange, where businesses rolled up and left because the Town could not afford to keep the infrastructure healthy or maintain those systems, have created financial pressures. Without a vital infrastructure, which includes public

schools, the Town cannot attract new businesses. It is a vicious cycle, which causes the deeper downward spiral into poverty for the entire community.

Yes, Towns can seek a 2.5% override, as Orange has now done twice. Unfortunately, the town electorate has not approved an override for Orange. One reason for this unfortunate loss of potential revenue is because, like many poor communities, there is an aging population and a decreasing number of school-age children. Our responsibilities to serve these students and educate them come with increased costs and expectations, especially in Special Education services.

The Legislature took up education funding reform through the Student Opportunity Act (SOA), school districts across the Commonwealth anticipated changes that would improve the outcome for so many students: Students living in poverty, students who faced the challenges associated with learning English as a second language, and the hope, that students who are brown and black would be able to achieve as well as their white, wealthier peers. Why, because to provide an education that meets student's needs, it requires adequate funding. In an average year, given all things equal, education funding for a

town needs to increase by at least 3 to 4% to meet contractual obligations, Special Education requirements, transportation costs, not including complying with unfunded mandates.

Orange, Massachusetts is a town that has suffered financial burden under an old Chapter 70 formula; now, with the promise of SOA, we still have not received adequate funding to meet our district's basic needs. Our increase is \$30 per child, the same amount received by much wealthier districts, and far lower than poor urban schools.

Orange has an underperforming school, Dexter Park. The staff is working hard to improve outcomes for students. While we have received some additional funding through grants, we still struggle because our school's primary infrastructure, the teaching staff, has been decimated through constant reductions. These reductions are due to the Town's inability to provide adequate funding.

Proposition 2½ has handcuffed Orange and other poor municipalities' ability to meet students' educational needs because local tax contributions are not adequate. Orange has bent and splintered, and it is now at the breaking point.

You have been asked to determine if the revised funding of Chapter 70 provides equity, predictability, and accuracy in determining each municipality's ability to contribute toward education funding. From my vantage point, with many years' experience in education, I attest that the current formula does not meet this standard. I suggest that you please consider releasing municipalities and regional districts from the restrictions of Proposition 2 1/2 .

Allow education funding to be a stand-alone and the Town to increase taxes at 4% each year to fund its education portion. At the same time, the Legislature considers how to effectively provide Chapter 70 to meet the needs of poverty, language learners, and our brown and black students.

Sincerely,

Elizabeth Zielinski,
Superintendent of Schools

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:125 Data

1. Public comment response

1. Name:

Leverett Selectboard

2. City/Town of residence:

Leverett

3. Organizational affiliation (optional):

Town of Leverett

5. Comment:

We ask that your joint study mandated by Section 21 of the Student Opportunity Act specifically address the inequitable effect of the cap, along with all other aspects of the funding formula, and propose a new formula that would produce equal funding for public education without distortions in local aid such as those demonstrated by the Naughton chart.

6. Links to attachments (optional):

[DESE_letter_oct_2020.pdf](#)

[DESE_FY_21_DATA_cap_at_100%.xlsx](#)

[DESE__FY21_DATA_no__cap.xlsx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:126 Data

1. Public comment response

1. Name:

Ginny Hamilton

2. City/Town of residence:

Amherst

3. Organizational affiliation (optional):

none

5. Comment:

I write as a homeowner and public elementary school parent to express my concern about ending the "hold harmless" provisions of state school funding. We are a Commonwealth, and thus should maintain our commitment to shared resources, particularly providing additional support for communities with higher levels of poverty and greater needs.

The 82.5% cap is inherently unfair, unwise, and inequitable. Removing "hold harmless" provisions would indeed cause harm, particularly in low income districts, urban districts and rural districts already struggling to provide quality public education under existing conditions. As the pandemic increases costs and ravages local economies, the Commonwealth needs to provide more support in harder hit areas, not less.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:127 Data

1. Public comment response

1. Name:

Martha Thurber

2. City/Town of residence:

Buckland

3. Organizational affiliation (optional):

Mohawk Trail Regional School Committee

5. Comment:

Please see attached

6. Links to attachments (optional):

[Comments_from_Mohawk_Trail.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:128 Data

1. Public comment response

1. Name:

Kimberly Ferguson

2. City/Town of residence:

Holden

3. Organizational affiliation (optional):

State Rep

5. Comment:

I have attached my comments

6. Links to attachments (optional):

[CH70.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:129 Data

1. Public comment response

1. Name:

Megan K Weeks

2. City/Town of residence:

Princeton

3. Organizational affiliation (optional):

WRSD

5. Comment:

I'd like to thank both DESE and the Division of Local Services (DLS) of the Department of Revenue for the opportunity to make this public comment. Wachusett Regional School District is the largest comprehensive regional school district in the Commonwealth with an enrollment of 7,000 plus students (October 2019 figures). Like many districts, particularly regional districts, we have our fair share of financial challenges: regional transportation reimbursement; circuit breaker reimbursement and Chapter 70 aid. I am grateful to the legislature for its work to hold districts harmless by not reducing Chapter 70 aid, especially during these difficult financial times. Unfortunately, that cannot be said on the local level given the current formula configuration. Looking at this year's October 1 SIMS count, Wachusett will lose 400 students which will significantly impact our FY22 budget. I am hopeful that state revenues will be sufficient to implement the critical funding provided by the Student Opportunity Act (SOA) in FY22 to mitigate our expected loss of funding. While a decline in enrollment of 400 students does prompt the need to examine our staffing levels and budget, this pandemic is requiring unanticipated services for many of our students, the level of which is unprecedented.

To illustrate my concern, I've attached the following scenario assuming there are no adjustments with staffing, programs or related services:

Final October 1 SIMS count reflects a loss of 400 students – 6,610 as of October 7, 2020.

The FY21 Foundation Budget per pupil cost (as it stands today) is \$10,523. Please see the DESE Summary Page of WRSD, Chapter 70 for FY21.

The loss of 400 students is a loss of \$4,209,200 to WRSD's total Foundation Budget using FY21 rates – 400 students x \$10,523 per pupil cost = \$4,209,200.

40% of that number -- \$1,683,680 – represents Chapter 70 aid, as the district as a whole is a 60/40 district. Please see the DESE Summary Page of WRSD, Chapter 70 for FY21.

In FY22, Wachusett will see a reduction to their foundation budget, with resulting reduction in foundation aid due to the reduction in enrollment.

It is expected Wachusett will be held harmless for that reduction in foundation aid, and will receive the same Chapter 70 aid we received in FY21, along with any minimum per pupil aid that is funded (SOA providing for \$30 per pupil).

Wachusett's more significant problem is the value associated with MLC, which represents 60% of our foundation budget. Our MLC reduction is therefore expected to be approximately \$2,525,520.

Therefore, Wachusett's primary concern is not Chapter 70 aid, as it is not expected the legislature will be phasing out hold harmless aid in the FY22 budget. Rather, Wachusett's concern is loss of funding from its member towns due to their MLC reduction. This will negatively impact Wachusett's revenue projections for FY22, especially if the implementation of SOA is further delayed.

With this anticipated revenue loss driven by the reduction in enrollment, Wachusett has the Herculean task of advocating for more funding from its member towns given the anticipated reduction in revenue.

I ask that the phasing out of hold harmless and minimum per pupil aid as recommended by the MA Business Alliance for Education/Greater Boston Chamber of Commerce not be considered in your review, as doing so will have catastrophic effects to our district by way of severe budget cuts.

I ask that you consider changing the state and local split of 59/41% to increase the level of the state's contribution toward Chapter 70 aid to provide much needed relief to our municipalities, so they are in a position to support their education appropriation. In that regard, I also request you maintain the 82.5% cap on MLC as a percentage of foundation budget, as one of our member towns (Princeton) has been unfairly categorized as a wealthy town due to their low student enrollment. Their mandated local contribution has therefore come at the detriment of their other town services and is untenable. I ask further you consider student enrollment when calculating a municipality's combined effort yield or capacity to pay.

As I expect our student enrollment decline to be temporary, with students expecting to return in the 2021-22 school year when the pandemic is lifted and full in-person instruction has resumed, it is critical that is considered when formulating the FY22 budget recommendation. I therefore ask that the allowance of additional student enrollment counts be submitted throughout the 2020-21 school year, and prior to the FY22 budget being finalized.

Again, thank you to both DESE and DLS for this opportunity. These are very difficult times, compounded with challenges unlike any in recent history.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:130 Data

1. Public comment response

1. Name:

Paul Goldner

2. City/Town of residence:

Byfield

3. Organizational affiliation (optional):

5. Comment:

Ability to fund schools being tied to property value unfortunately hurts communities with a wide spread between the median property value and the average property value. Communities with some very high value properties, but majority lower value properties, have significant wealth they cannot access to fund schools, as costs of funding schools typically go up faster than the 2.5% increase that is allowed without an override. Where communities have higher low income population and lower value properties, passing an override is difficult. Meanwhile, the property values of the high income properties typically rise much faster than low value properties. As such, ability to fund schools is seen from afar as higher than it is in reality.

FOR more comprehensive information, See the attached document on impact on regional school districts.

6. Links to attachments (optional):

[SMRS_MLC_Public_Comment.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:131 Data

1. Public comment response

1. Name:

Maria Tucker

2. City/Town of residence:

North Brookfield

3. Organizational affiliation (optional):

NB School Committee

5. Comment:

In 2019, the NB School Committee spent considerable time and effort advocating for an update to the Chapter 70 formula. We appreciated the difficulties facing smaller urban districts (Gateway Cities) in the state and we were thrilled when the Student Opportunity Act was passed and promised to provide a much needed infusion of funding for them.

However, the Student Opportunity Act as passed in 2019 did nothing to change the situation that faces rural school districts such as North Brookfield, and our neighboring districts, both stand alone and regional. We are 57 miles west of Boston and we are a part of the Commonwealth of Mass and our students deserve the education mandated in the state constitution. Rural schools and towns in the commonwealth are unable to financially keep up with the many mandates, requirements, and ever-changing needs of the students. Significant areas of impact in our district and town budgets include in the area of special education and increases in health insurance costs. The education offered in towns where budget overrides do not happen versus towns where they do, is significantly different. Small rural towns are unable to fill the 'gap' created in the funding formula. More funds are diverted to federal and state mandates requiring cuts and cut-backs in almost all other areas, namely facilities and grounds maintenance, curriculum development, 'special' subjects, technology, regular education teaching and support staff, and extracurriculars.

Rural school districts are required to maintain a level of high quality education all the while tax money is diverted from our town to charter schools over which we have no governance, authority, or input. We are required to pay tuition and transportation costs associated with out-of-district education needs as well as ever increasing vocational education costs. There is so much that pulls from our budget, and yet year after year we are allotted \$20 per student a year. This does not cover increases in electricity or fuel year-to-year, and does not come close to touching those areas where greater increases in costs are experienced.

Over the past 20 years or more rural schools have instituted cuts in the arts/music, sports, extracurriculars, social/emotional support personnel and school counselors. Rural schools have tried to share or co-op personnel. Schools have tried to increase enrollment through outreach, social media and events. Schools have petitioned their towns for an override or additional funding.. Schools have joined collaborations and used our collective purchasing power to get the lowest possible price on supplies. We have started our own 'in-house' special education programs so that we are not paying the tuition and transportation bills to send students out of district. Schools have accessed grant funding. Schools have hired first year teachers with little to no experience. Schools have held political and community awareness events.

In a nutshell, rural schools have tried everything to slow the financial bleed. All we have accomplished is to simply mitigate the effects of the financial crisis in our schools. We have shifted the burden. There is nothing left to shift. Nothing left to cut. We have gotten to a point where the budget deficit and its effects are not able to be anything short of devastating.

Our rural schools provide a multitude of services to our communities. They have loving teachers, counselors, administrators and staff to nurture our students, they are places of safe personal growth and development for all students, they are community centers, food banks, and emergency shelters. Our rural schools are important and integral to our rural towns. But

still, there is NO recognition of the challenges we face in rural districts, nor is there any recognition of how hard administrators, staff and school committees have worked to try and continue to provide the best education to our students

It is time for the state to close the gap between affluent and middle/lower income districts while also recognizing that economic hardship and need extends beyond the gateway districts. Only by addressing the unique financial challenges facing rural communities can the state begin to fulfill its constitutional to provide education for ALL its residents across the Commonwealth.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:132 Data

1. Public comment response

1. Name:

Leiha Maldonado

2. City/Town of residence:

Shelburne

3. Organizational affiliation (optional):

MTRSD School Committee

5. Comment:

Thank you for the opportunity to raise concerns about the inequalities of the current Chapter 70 calculations.

I have served on the Mohawk Trail Regional District school committee since July 2020. My understanding of the complexities of the multiple calculations of Chapter 70 is cursory. The following is what I do understand about the reality of educating students in a historical underfunded, rural district.

Property taxes are entirely too high. Towns cannot afford an increase in assessments without cutting essential services to residents. More than 50% of the town budget is allocated to education. Massachusetts is an aging state, and that is even truer for Western Massachusetts. Elders on fixed incomes cannot afford increases in property taxes. Long time residents are being priced out of their homes, paving the way for gentrification. We need the 82.5% cap raised to 100% so our elders can age in place without fear of losing their homes due to increased property taxes.

The Chapter 70 calculation does not consider regional transportation or charter reimbursements. In 1949, the Commonwealth incentivized regional districts with the promise of a fully funded transportation reimbursement. Transportation reimbursements have not been at 100% since fiscal year 2001. Geographically the MTRSD is the largest district in the Commonwealth, and transportation costs are 5% of the annual budget. Our community also struggles with a lack of competition for bus companies. We are under a monopoly, and currently, it costs the district anywhere from \$36,000-\$21,000 for buses that are not running. Our situation is not unusual. Many communities only have one bus company respond to bids, and we have no choice but to pay whatever costs the bus company proposes. We need Chapter 71 fully funded.

Since the all-time high of 1,791 students (K-12) in 1997, enrollment has dropped to 755 as of October 1, 2020. Based on Chapter 70 enrollment for FY20, that is a drop of 175 students. Public school enrollment is down across the nation due to the pandemic, but the rural district trend is clear and consistent. There is a steady decline year after year. Every student that leaves our district increases the per-pupil cost. As a result, the charter tuition payment increases. Without fully funded transitional aid in all three tiers, charters compete with our district dollar for dollar. That creates a system of winners and losers in our public schools, with charter students receiving more money per student. We need fully funded transitional aid.

Under the SOA, the hold harmless is a buffer. Before our district can take advantage of the SOA, we need to eat through the hold harmless money. That is one of the reasons why we have a meager \$35 increase per student. Hold harmless may not be necessary if the SOA will make up the difference. But will the SOA be fully funded year after year? Without hold harmless, the education we can afford to provide will be a shell of its former self.

Thank you for reading.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:133 Data

1. Public comment response

1. Name:

Stanley Garland

2. City/Town of residence:

Bernardston

3. Organizational affiliation (optional):

Selectboard

5. Comment:

My name is Stanley Garland.

I am a Selectboard member, currently serving as the Chairman. I was first elected in 2006.

With careful and diligent cooperation among the Selectboard, the Finance Committee and the Assessors, we have succeeded in avoiding a 2 ½ override vote - - which we know would be defeated by the voters. This is not because Bernardston does not believe in and want to support education, but because we are a rural and aging community. Our population numbers just over 2,100 of which Seven Hundred and Seventy-six (776) are over 60 years of age. Many of our residents are caring for and helping to support elderly parents. In normal times, this sandwich generation is often in the position of also helping their children and grandchildren and now in the age of a pandemic even more help is being provided by the sandwich generation. I do not have the figure for those in our community who live below the poverty level and even if I did, I would know that it was underreported because our people are proud and want to take care of themselves.

Being "careful and diligent" means that our Town employees seldom see an increase in their pay above what Social Security "awards" its recipients. Our Departments have been advised to level fund their budgets for at least the last six years and have done so. Replacement of major equipment often is deferred until the replacement is an emergency. Major investment in infrastructure is almost impossible.

So, with this background, it will be no surprise that I believe the formulas used in the various parts of school funding need a drastic overhaul.

I believe there has to be more Chapter 70 money awarded to our school districts because with the school taking between 62 and 65 percent of our budget, we are handicapped to support the rest of our community's needs. For example, our Highway garage and Fire Station both are in need of updating and modernization to protect our employees and improve service by these department to our town.

In my opinion it is counter-productive to increase Proposition 2 ½ since it would only fall onto the taxpayers who are already heavily burdened with the current tax rate.

Thank you for this opportunity to comment.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:134 Data

1. Public comment response

1. Name:

Petersham Selectboard

2. City/Town of residence:

Petersham, MA

3. Organizational affiliation (optional):

Selectboard

5. Comment:

Dear Commissioner Cronin and Commissioner Riley,

The Town of Petersham Selectboard writes to relay our strong support for the efforts and analysis of our regional legislators who doggedly persist in their tenacious review of the current state of Chapter 70 education funding.

In Central and Western Massachusetts our legislators know their towns well -- very well -- with regular outreach and personal participation in public meetings, local events, and community programs; with consistent communications; and on personal one-on-one basis. Given their deep understanding of our communities, we ask that you take their analysis and input seriously (including their recent summary correspondence) as you review the critical, long-standing need for improvement of the education funding formula and methods.

As you know, for many School Districts the current funding methods are unsustainable -- in our area, the budget impact on one town has a ripple effect across many towns' local economies -- effecting citizens, school communities, and businesses.

The domino effect is real and profound and puts the entire Commonwealth at risk.

We know you work diligently at continuing to ensure Massachusetts is a national leader in education and we join in all who look forward to implementing much-needed improvements in and modernization of the funding formula and your focus on realistic solutions for this issue. We look forward to you, your staff, the Legislature, and the Governor's Office working together to apply good old fashioned Massachusetts creative energy to finally solve this now seemingly ancient conundrum for the students and families of the Commonwealth.

We are grateful for your time and work particularly at this period when so much is occurring at many levels of need requiring your attention.

Thank you -- respectfully submitted,

~ Petersham Selectboard ~

- Nancy Allen

- Henry Woolsey

- Fredrik Marsh

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:135 Data

1. Public comment response

1. Name:

Karl Ottmar

2. City/Town of residence:

Paxton

3. Organizational affiliation (optional):

5. Comment:

I ask that the phasing out of hold harmless and minimum per pupil aid as recommended by the MA Business Alliance for Education/Greater Boston Chamber of Commerce not be considered in your review, as doing so will have catastrophic effects to our district by way of severe budget cuts.

I ask that you consider changing the state and local split of 59/41% to increase the level of the state's contribution toward Chapter 70 aid to provide much needed relief to our municipalities, so they are in a position to support their education appropriation. In that regard, I also request you maintain the 82.5% cap on MLC as a percentage of foundation budget, as one of our member towns (Princeton) has been unfairly categorized as a wealthy town due to their low student enrollment. Their mandated local contribution has therefore come at the detriment of their other town services and is untenable. I ask further you consider student enrollment when calculating a municipality's combined effort yield or capacity to pay.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:136 Data

1. Public comment response

1. Name:

Emily Slater

2. City/Town of residence:

Groton

3. Organizational affiliation (optional):

Groton Dunstable School District

5. Comment:

We really need the state to step up and participate in funding our schools. I have lived in town for 10 years and our already very high taxes are continually increasing. We still have issues approving a budget every year and our schools have been suffering. We have had to cut programs from the schools over the years. We don't have much business in town and funds come primarily from homeowners' property taxes. Families just can't continue to pay increasing taxes and actually afford to live here. Our students need to state to help!

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:137 Data

1. Public comment response

1. Name:

Linda Dunlavy

2. City/Town of residence:

Deerfield

3. Organizational affiliation (optional):

Rural Policy Advisory Commission

5. Comment:

Advocating for the rural municipalities across MA (defined as municipalities with population densities of less than 500 people per square mile), the Rural Policy Advisory Commission (RPAC) offers the following comments. The RPAC was created by the legislature in 2015 and is governed under M.G.L. Chapter 23A: Section 66. One of the designated roles of the RPAC is to advise the general court and the executive branch of the impact of existing and proposed state laws, policies and regulations on rural communities.

It is our understanding that elimination of the hold harmless provision of Chapter 70 is being considered by DESE. It appears that the consideration of eliminating the hold harmless provision is targeted at a few wealthy communities that receive more than their "fair share" of Chapter 70 aid. If this is the issue, we urge you to resolve the conflict in another way.

In rural districts, per pupil costs are high because it is difficult for small districts to create economies of scale. Many small districts have decreasing enrollment due to demographic changes and competition from private schools, homeschooling, cross-district school choice, charter schools and career-vocational-technical (CVTE) high schools. Declining enrollments do not lead to proportional decreased expenses because of transportation, employee benefits, special education, higher per pupil costs for Charter and CVTE students (that are the responsibility of the sending district), and other costs that cannot be eliminated. The Chapter 70 school funding formula does not adequately account for the higher per-pupil cost of rural schools, which can be exacerbated in poorer rural communities with limited ability to raise property taxes and are near their levy limit, and results in a disparity in the quality of education from district to district and in competition for limited financial resources between the schools and town government. Elimination of the hold harmless provision, without a predictable, dependable funding substitution to address the conditions in rural schools will only increase existing inequities.

The RPAC would be happy and willing to provide relevant data, analysis and statistics but, for now, offer brief examples to illustrate our points.

1. Rural school districts are already, by and large, regional. There is little additional regionalization or restructuring that can be done to realize significant savings until DESE or the legislature provides enough foundational funding to truly study, plan, support and incentivize more significant structural changes.

2. The cost of transporting children across large geographic districts is high, especially when the promised reimbursement of these costs is never fully realized.

3. Closing elementary schools with small enrollment is happening but the decision is difficult and often contentious; the savings are ultimately not very significant; and we may be forcing rural communities out of the public education system altogether.

a. After the Gateway Regional School District closed the Worthington Elementary School, the town of Worthington, through a legislative Home Rule Petition, left the regional district altogether. The move was challenged in court, pitted municipalities against each other, and leaves the district with less secure financial footing.

b. Heath closed its elementary school but, because of the existing 1952 Regional School Agreement that does not include Heath, Heath now pays tuition to the Hawlemont School, has no seat on the School Committee, and is not paying based on a fair and equitable formula. DESE requires a new agreement but the Town has not had the resources to hire the legal expertise needed to negotiate a new, fairer agreement.

c. With pressure from its regional school district, Warwick agreed to close its elementary school that had very few students.

Because of the costs to transport Warwick's children to Northfield, the costs to maintain the school infrastructure, the loss of students to home schooling, among other costs, the estimated savings to the District is less than \$35,000. And the residents of Warwick are now considering opening a private school for their children.

None of these outcomes are good, in the long term, for our children, our municipalities or the Commonwealth.

The RPAC invites the members of the Local Contribution Study to review the Massachusetts Rural Plan, <https://frcog.org/wp-content/uploads/2019/10/RPP-Final-Draft-10.10.19.pdf> to better understand the conditions facing rural communities. We welcome members of the study team to a future RPAC meeting and we would be happy attend one of your meetings whenever convenient.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:138 Data

1. Public comment response

1. Name:

Sara stanley

2. City/Town of residence:

Rowley

3. Organizational affiliation (optional):

5. Comment:

Please do not eliminate the hold harmless provisions.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:139 Data

1. Public comment response

1. Name:

Geraldine herlihy

2. City/Town of residence:

Holden

3. Organizational affiliation (optional):

Holden Board of Selectmen

5. Comment:

Please do not do away with hold harmless status this year

Ch 70 calculations do not work for regional school districts

The aggregate wealth formula needs updating and again, special attention should be given to regional school districts

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:140 Data

1. Public comment response

1. Name:

Patricia A Smith

2. City/Town of residence:

Orange

3. Organizational affiliation (optional):

Vice Chair, Ralph C Mahar Regional School District School Committee

5. Comment:

See my letter attached below. I appreciate this survey, but am not clear how results will be compiled. With only open ended questions, it will not be possible to quantify the responses in way that can inform meaningful reforms. I would like to think that this is a sincere effort to get useful feedback, and not just a PR effort being undertaken to meet the requirements of Section 21 of the SOA.

6. Links to attachments (optional):

[Funding_survey_response_Smith_Mahar_10-16-20.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:141 Data

1. Public comment response

1. Name:

Christine Bennett

2. City/Town of residence:

Phillipston

3. Organizational affiliation (optional):

5. Comment:

I am writing to beg you to increase funding for our regional district, Narragansett RSD. We have lost so much in the last few years, this year adding our own local elementary school to the list of casualties. Our partner town has a new elementary school and they refused to fund a full budget which includes our building any longer. Their building can supposedly house our students as well, but we still don't really know that because of COVID. Many students are remote only or fully withdrew to homeschool, and those that remain are only attending half days in two separate cohorts. So we have no idea how full the classes would be. But because of the cuts, teachers were let go at every elementary grade level and many offerings at middle and high school were cut. This is not fair to all our students, and especially to our Phillipston students who can no longer attend the closer homier school we chose for them. I can't even imagine what any further cuts would do to our district. We need a full fair assessment of all education costs and the full 100% transportation reimbursement we were promised. Thank you.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:142 Data

1. Public comment response

1. Name:

Michael Naughton

2. City/Town of residence:

Millers Falls

3. Organizational affiliation (optional):

Six-Town Regional Planning Board, former member Montague Finance Committee

5. Comment:

I have attached "Public Comment on Low and Declining Enrollment.docx", which contains my comments on the impact of low and/or declining enrollment on smaller school districts. I will be happy to answer any questions that you may have. Thank you for this opportunity.

Mike Naughton

6. Links to attachments (optional):

[Public_Comment_on_Low_and_Declining_Enrollment.docx](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:143 Data

1. Public comment response

1. Name:

Linda Dunlavy

2. City/Town of residence:

Deerfield

3. Organizational affiliation (optional):

Franklin Regional Council of Governments

5. Comment:

FRCOG, representing the 26 rural municipalities of Franklin County, offers the following comments.

The Chapter 70 school funding formula does not adequately account for the higher per-pupil cost of rural schools, which can be exacerbated in poorer rural communities with limited ability to raise property taxes and are near their levy limit, and results in a disparity in the quality of education from district to district and in competition for limited financial resources between the schools and town government. In rural districts, per pupil costs are high because it is difficult for small districts to create economies of scale. Many small districts have decreasing enrollment due to demographic changes and competition from private schools, homeschooling, cross-district school choice, charter schools and career-vocational-technical (CVTE) high schools. Declining enrollments do not lead to proportional decreased expenses because of transportation, employee benefits, special education, higher per pupil costs for Charter and CVTE students (that are the responsibility of the sending district), and other costs that cannot be eliminated.

Some specific issues with the Chapter 70 formula that should be considered by the Committee include:

The current special education formula assumes that 4% of a district's population needs SPED services but the percentage of special education students in rural districts is often much higher, often because of issues of poverty and other socioeconomic factors, but also because the denominator of total school enrollment is very small. In the Orange Elementary School 26% of students have special education needs.

The SPED circuit breaker formula is broken. According to Jeff Wulfson, the circuit breaker "threshold for eligibility is tied to four times the state average foundation budget per pupil as calculated under the chapter 70 program, with the state paying 75 percent of the costs above that threshold. In FY08, the state average foundation budget per pupil was \$8852, so if a special education student cost a district \$50,000, the district's eligible reimbursement for that student would be $(\$50,000 - (4 * \$8852)) * .75 = \$10,944$." If a District has four students needing \$50,000 of special services, the District is paying \$200,000 and receives only \$44,000 from the state.

The current formula relies heavily on personal income/wealth making the often incorrect assumption that wealth is reflected in property tax paid. For Franklin County municipalities with nonprofit private schools that provide faculty housing, no revenue is derived by some of our highest paid residents.

The formula needs to be less complicated, more transparent and must shield against the all too common swings that municipalities in regional districts face from year to year. Currently a 2% increase in a district budget can result in an 18% increase for one town but a 3% reduction for another. It is now lore that only two people in the state understand how the formula really works.

If, as reported, there is a consideration of eliminating the hold harmless provision there must be a fair, predictable, dependable funding substitution to address the conditions in rural schools. Otherwise, inequities between rural districts and other districts in the state will compound and will be devastating not just to the rural areas of the Commonwealth but to the Commonwealth as a whole.

Rural school districts are already, by and large, regional. There is little additional regionalization or restructuring that can be done to realize significant savings until DESE or the legislature provides enough foundational funding to truly study, plan, support and incentivize more significant structural changes.

The cost of transporting children across large geographic districts is high, especially when the promised reimbursement of

regional transportation costs is never fully realized. Additionally, because there are limited special services in rural areas, the transportation costs of out of district SPED placemats are another burden on rural communities.

Thank you so much for the opportunity to comment. We know that your task is difficult and complicated and hope you are able to find a way to fairly and equitably meet the needs of all municipalities and students.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:144 Data

1. Public comment response

1. Name:

Lisha Cabral

2. City/Town of residence:

East Freetown

3. Organizational affiliation (optional):

Easton Public Schools Superintendent

5. Comment:

Thank you for seeking information regarding the SOA. There was obviously a great deal of effort that went into the creation and ultimate acceptance of SOA, and we thank you once again for your dedication to the process. We are encouraged that many students in the Commonwealth will benefit from the infusion of funds into those school systems. Unfortunately, as a minimum aid district, Easton would not realize a net gain in funding. In fact, when accounting for the increase in assessments, Easton would have less funding available than in FY20. Please consider the following feedback in reference to the SOA.

1. Raise the minimum aid from \$30 to \$100 per student.

2. Wage adjustment factor: Reassign Easton to the Boston Labor Market. Our neighbors are either already in this labor market or are foundation districts. There can be no reasonable expectation that we would offer our faculty and staff any less than our area districts. Therefore, to offer wages competitive to our neighbors, we need to divert funds from critical programs and student services. We recommend an analysis of the Schedule 18 data on educator salaries be used as a more reliable metric for wage determination.

3. Fully fund charter school reimbursements. Easton was assessed \$438,000 in FY20. This was reduced by only \$8,000 to \$430,000 in FY21.

4. Currently, Circuit Breaker begins after the minimum payment (which is 4 times Foundation). We believe that Special Education Collaboratives (vs private institutions) should be set at 3 times Foundation.

5. Low income rate (for entitlement grants, etc.): According to the FY21 Foundation Budget, Easton's "Low income" percentage is 16.98% (which accurately reflects our free/reduced lunch rate). The "Low income foundation budget as % of total foundation budget" is 6.1%. Yet the poverty rate of Easton has been indicated at 4.1% for purposes of federal grants. We will lose at least \$131,000 next year in Title I funds because we are not at 5% in Easton. We have not yet found anyone who can explain the different percentages used for different purposes in calculating the low income rate in Easton. This would be extremely helpful in projecting which numbers will be used as we work on future budgets.

6. Entitlement grants: Foundation does not take into account entitlement grants. Many districts such as ours receive minimal compensation for the significant needs of these learners. This is compounded when the numbers are not high enough to be eligible for additional funds, yet still requiring significant needs. We feel as though these learners fall through the "financial" cracks as some districts receive low income assistance, in essence, twice.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:145 Data

1. Public comment response

1. Name:

Thomas Matuszko

2. City/Town of residence:

Berkshire County

3. Organizational affiliation (optional):

Berkshire Regional Planning Commission

5. Comment:

The Berkshire Regional Planning Commission serves the 30 town and 2 cities in Berkshire County. These comments are provided from a community perspective to set the context for consideration in the Chapter 70 funding formula evaluation. Except for the two cities, the communities in Berkshire are rural (defined as municipalities with population densities of less than 500 people per square mile) and have small populations. The 2018 median population of Berkshire County communities is 1,503. Twelve of the 32 municipalities have populations of less than 1,000, with 25 communities having populations of less than 5,000. Furthermore, the population of Berkshire County has been declining since the 1970s, and projections show this trend will be continuing for the coming decades. The County's population has declined by an estimated 4,500 people since 2010, amounting to 3.6% of the population.

The Berkshire County population is older than the rest of Massachusetts and the population continues to get older. The median age of Berkshire County population increased from 43.8 to 46.7 between 2010 and 2018 compared to Massachusetts, which had a median age of 39.4 in 2018. Many of those in the older populations are retirees on fixed incomes. This has contributed to difficulties getting 2.5% override votes passed to increase municipal budgets.

There is a noticeable missing age cohort of young adults (roughly 20 to 40 years old) in Berkshire County. This has implications for the Berkshire economy but has also contributed to a precipitous decline in school enrollment across the County. Total enrollment in Public Schools in Berkshire County has declined from 15,911 students in 2015 to 14,748 in 2020, a drop of 7.3%. By 2030, public school enrollments in Berkshire County are projected to be 11,650, a further 21% decline. Fiscally, several of the larger municipalities in Berkshire County, as well as some smaller ones, are closing in on their levy ceiling, with Pittsfield having effectively reached its ceiling. This limits the amount of revenue a municipality can raise through property taxes. Berkshire County median household income of \$56,674 is 73% of the state median household income (\$77,378). With limited tax capacity and lower household incomes, increasing taxes is harder for municipalities to achieve and for citizens to manage.

Berkshire County is geographically large and, except for the two cities, dispersed. At over 900 sq. miles, it is second only to Worcester County in size in Massachusetts. Berkshire County has about 12% of the state's land area but only about 2% of the population. Travel times between communities are long and challenging with many communities facing hilly conditions on limited highway infrastructure. Berkshire County's school districts are a mix of municipal and regional districts. While schools in municipal districts tend to be in close proximity to each other (less than 5 miles apart and a relatively short travel time of 10 minutes), most of the regional districts have multiple schools more than 10 miles apart with travel times of 20 – 30 minutes between schools not uncommon. These distances contribute to high transportation costs, which districts have little control over.

The conditions cited previously are structural and systemic and will not easily nor readily change. The current Chapter 70 funding structure is based heavily on property value, personal income, and student enrollment. The communities in Berkshire County are at a significant disadvantage against those measures. The Local Contribution Study must incorporate the existing conditions found in Berkshire County in its findings and recommendations.

The recently released report, "Missing the Mark, How Chapter 70 Education Aid Distribution Benefits Wealthier School Districts and Widens Equity Gaps" by the Massachusetts Business Alliance for Education and Greater Boston Chamber of Commerce contains recommendations to make the Chapter 70 aid formula more equitable, essentially suggesting that state

aid to communities should not necessarily be "needs blind." That report also suggests eliminating the hold harmless provision. Hold harmless funding is an extremely important funding source for many of the school districts in Berkshire County. Eliminating the hold harmless provision without predicable, reliable substitute funding would have devastating impact to many of the school districts in Berkshire County, especially the more rural districts. It would also have a devastating impact to our small communities as well. For many of the small communities in the Berkshires the school is a center of community activity. Without the hold harmless funding, or substitute, many more schools would likely close thereby eliminating an important gathering point for communities.

Please consider the factors mentioned above, small communities, declining populations, declining enrollments, limited tax base expansion capacity, low incomes and large geographic distances as a basis for a substitute funding source if the hold harmless provision is eliminated.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:146 Data

1. Public comment response

1. Name:

Natasha Ushomirsky

2. City/Town of residence:

Boston

3. Organizational affiliation (optional):

The Education Trust (Massachusetts team)

5. Comment:

As an organization committed to educational equity that works closely with community advocates in Massachusetts' highest need school districts, we believe that the Commonwealth must fully fund the promise made in the Student Opportunity Act (SOA) to students of color, economically disadvantaged students, English learners and students with disabilities.

We recognize that COVID-19 and the resulting economic slowdown has made it more difficult for the state to meet its SOA obligations this year. We also know, however, that the levels of challenge in our highest need districts have increased dramatically since the SOA was signed into law. The combination of COVID-19's disproportionate impact on communities that have long been underfunded in our state and significant budgetary constraints makes it paramount that all available dollars be spent based on student need. We encourage the Department of Elementary and Secondary Education (DESE) and the Division of Local Services (DLS) at the Department of Revenue to consider the findings of the Massachusetts Business Alliance for Education's recent study, *Missing the Mark: How Chapter 70 Education Aid Distribution Benefits Wealthier School Districts and Widens Equity Gaps*, which raises significant questions regarding allocation of nearly \$780 million dollars that are currently distributed in ways that do not take community wealth and income into account -- including dollars spent because of the 82.5% local contribution cap.

We look forward to working with DLS and DESE to figure out how to ensure that students who have been underserved in Massachusetts for too long receive the resources they need and deserve.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:147 Data

1. Public comment response

1. Name:

Kate-Marie Roycroft

2. City/Town of residence:

Malden

3. Organizational affiliation (optional):

Alliance of Massachusetts YMCAs

5. Comment:

The Alliance of Massachusetts YMCAs, the member organization of the 28 YMCA Associations in Massachusetts, their 86 branches and 700+ locations is pleased to offer comments on the issue of Chapter 70 funding. The YMCAs are the largest provider of Out of School Time Services in the Commonwealth, this includes new remote learning programs (operating 140 of them). We believe that the Chapter 70 formula should include acknowledgement of Out of School Time organizations within school districts that are running services, especially the remote learning programs at this time. The cost of these programs is substantial and there has been little to no public assistance to offset them. These costs include, staffing, IT upgrades and supplies, meals, furniture, and transportation.

Thank you

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:148 Data

1. Public comment response

1. Name:

Massachusetts Business Alliance for Education

2. City/Town of residence:

Boston

3. Organizational affiliation (optional):

Massachusetts Business Alliance for Education

5. Comment:

The Massachusetts Business Alliance for Education (MBAE) and the employers we represent believe that an excellent public education system is the foundation of a sound and equitable economy. We promote and support continuous improvement in our schools to ensure that EVERY student receives a high quality education that prepares them for success in college, career and citizenship.

MBAE played a leading role in the Education Reform Act of 1993, including development of the formula to fund our state's public schools based on the actual costs of providing students with the high quality education needed to meet a consistent, high standard of academic achievement. In addition, MBAE Board Member Joseph Esposito served as a voting member of the Foundation Budget Review Commission (FBRC).

MBAE believes that the Student Opportunity Act (SOA) Section 21 rightly gives 'equity' primacy of place in its instructions for further study of how municipal contributions are calculated. It is not enough to have a formula that is accurate in its assessment of available local resources for education or predictable in its determinations of local contributions if these features do not serve to direct resources to municipalities in a manner that gives every school district the ability to marshal the resources necessary to meet students' educational needs. Because of this focus on equity, this study would be incomplete without consideration of how the calculation of required municipal contributions affects the amount and distribution of Chapter 70 aid, the state's primary tool for achieving equity in local education funding. Furthermore, the equity of the method of determining municipal contributions should be assessed against its impact on both communities (does it require greater effort from communities with greater resources?) and students (does it serve to enable greater expenditure on students with needs that require greater levels of resources to address?).

The impact on equity of the current municipal contribution calculation

The method for determining municipal contributions involves several statutorily-determined factors that influence required local contributions. Many of these factors are 'needs-blind' in the sense that they influence municipal contributions but do not take into account underlying municipality and student need. Needs-blind factors include below-target local contributions, the maximum local contribution share of foundation, the hold harmless provision, and minimum aid. Other statutorily-determined factors that influence required local contributions include the method for calculating Combined Effort Yield (CEY) and the municipal revenue growth factor (MRGF).

MBAE and the Greater Boston Chamber of Commerce published a paper in September 2020 investigating the impact of the needs-blind factors listed above on the FY 2021 H.2 budget proposal. The paper is called Missing the Mark: How Chapter 70 Education Aid Distribution Benefits Wealthier School Districts and Widens Equity Gaps and has been submitted separately for consideration (available at: https://www.mbae.org/wp-content/uploads/2020/09/Missing_The_Mark_Chapter70_Report_MBAE_GBCC_Final.pdf). The comments below are meant to serve as a supplement to the analysis described in Missing the Mark.

We encourage the Chapter 70 Local Contribution Study to explicitly study and report on the extent to which continued SOA phase-in could affect needs-blind aid and suggest strategies for limiting SOA-driven needs-blind aid increases to wealthy communities. As part of the analysis behind Missing the Mark, we examined the impact of needs-blind factors in FY 2019, the year before the FY 2020 data we present in the paper. In FY 2019, needs-blind factors were responsible for approximately \$700 million of the state's Chapter 70 aid outlay, of which two-thirds went to the wealthiest 20% of school districts in the state. FY 2020 needs-blind aid is about \$80 million more than in FY 2019. This suggests that implementation of the SOA could increase total needs-blind aid without significantly altering its regressive distribution. Examining how these formula factors may behave during SOA phase-in could allow both a more equitable distribution of resources and a more rapid SOA phase-in.

In light of our findings, we offer testimony that we hope will allow for your consideration of the following points, which we believe will enhance the equity of required local contributions and Chapter 70 aid:

- Incrementally increase the maximum required local contribution as a share of municipalities' foundation budgets;
- Examine whether the pace at which communities are expected to make progress toward their target local contribution share of foundation budget is appropriate;
- Slow and reverse the reliance on the hold harmless provision and minimum aid through an incremental approach that balances the fact that these formula factors allocate significant Chapter 70 aid without regard to underlying student and district need with their importance for short-term continuity of operations in many school districts;
- Assure that any reductions in Chapter 70 aid generated by changes to formula factors recommended by the study are redistributed to school districts in their entirety through a progressive mechanism that provides a greater share of this money to relatively less wealthy school districts;
- Examine whether or not the effect on CEY of altering formula factors enhances or hinders efforts to increase the equity of required local contributions; and
- Publicly release a concrete set of actions that commit the Commonwealth to evaluate and enact the report's recommendations.

Incrementally increase the maximum required local contribution as a share of municipalities' foundation budgets

A cap on the maximum required local contribution share at 82.5% of foundation budget (the cap) is difficult to justify at a moment when we know from FBRC findings that we are not meeting the needs of many higher needs students, many of whom live in municipalities that do not benefit from the cap. We believe that the Chapter 70 Local Contribution Study should make recommendations for gradually raising the cap. The effect of raising the cap should be studied in tandem with factors, described in more detail below, that affect how quickly municipalities with below-target local contributions are expected to make progress to target. Should the cap be raised, a transition period may be advisable to allow municipalities whose Chapter 70 aid would be reduced by this change to develop the levy space to replace state dollars with municipal dollars.

The cap on required local contributions is regressive by design. Under the FY 2021 H.2 budget proposal, the 157 municipalities with the greatest wealth relative to their foundation budget (as measured by CEY as a percentage of foundation budget) benefit from the cap on required local contributions (45% of the 351 cities and towns in Massachusetts).

The regressive impact of the cap is stark when examining its impact on target local contributions. The cap reduces target local contributions in wealthy communities and increases it in less wealthy communities. Under the H.2 budget proposal, municipalities that benefit from the cap have target local contributions that are \$476 million lower than they would be if the cap on required local contributions was set to 100% of foundation budget. Conversely, less wealthy municipalities that do not benefit from the cap face collective target local contributions that are \$476 million greater than they would be under a 100% cap.

The impact of the cap on required local contributions is also regressive, though is not quite as significant as the impact on target local contributions; a result of the formula's use of the MRGF to constrain large increases in required local contributions. Nonetheless, the dynamic is the same: the cap serves to reduce required local contributions in wealthy communities by shifting spending obligations to less wealthy ones. Under H.2, we find that the cap reduces by \$126 million required local contributions among municipalities served by the wealthiest 20% of school districts in the state. Required local contributions

among the remaining municipalities are \$349 million greater than they would be if the cap was set to 100%. This also impacts aid, as we point out in *Missing the Mark*. If the cap were eliminated (and assuming no other changes to the formula), Chapter 70 aid to the lowest wealth 80% of school districts would be \$225 million greater than it is under H.2.

Because, on average, wealthy communities contribute greater local resources to their schools than required, increased required local contributions driven by a change in the cap would not require increased local spending in wealthy communities. In the wealthiest 20% of school districts, actual net school spending is an average of 153% of required net school spending. For all 63 of the wealthiest 20% of school districts, raising the cap to 100% of foundation results in an increase in the collective required local contributions from the municipalities that the district that is less than the amount by which FY 2020 budgeted net school spending exceeds required net school spending. Raising the cap, therefore, is likely to convert existing discretionary education spending into required spending; it is not likely to require significant additional spending.

A gradual increase in the cap on required municipal contribution, as we recommend in *Missing the Mark*, will allow municipalities time to adjust. Wealthier communities that want to replace reductions in state aid (which we calculate in our report to be approximately \$3.8 million across the wealthiest 20% of communities, assuming no other changes to the formula) with increased local contributions could run into constraints posed by proposition 2 ½ levy limits. These constraints should be considered in setting a phase-in schedule for increasing the cap.

Examine whether the pace at which communities are expected to make progress toward their target local contribution share of their foundation budget is appropriate

The formula allows municipalities to make required contributions that are below target, often for many years in a row. The goal of this provision is to guard against increases in required contributions that exceed annual growth in municipal revenue-raising capacity. Below-target contributions and the additional aid they generate are justifiable on these grounds. However, if they reduce contributions in municipalities with the capacity to absorb the increase, they no longer serve to make municipal contributions affordable and run the risk of exacerbating inequity.

Recognizing that the two measures of municipal capacity to contribute local resources to education used in the formula — a target local contribution derived from CEY as a percentage of foundation and a preliminary local contribution derived from the prior year's required contribution increased by the MRGF — can diverge, the state formula includes several mechanisms to bring preliminary and target local contributions closer together over time. However, it's possible that the current balance struck by the formula is not optimal from the perspective of equity. This study should examine whether some municipalities have the capacity to make quicker progress toward target than currently required, and whether this would improve the equity of required municipal contributions and Chapter 70 aid.

A greater number of lower-wealth municipalities make below target contributions than more wealthy municipalities. In general, lower-wealth municipalities' contributions to their school districts are very close to their required minimum (in FY 2019, actual net school spending was only 104% of required net school spending among the lowest wealth quintile of school districts). Many of the municipalities served by these school districts are also making contributions that are significantly below target. This pattern provides some suggestive evidence that, for these communities, the interplay between preliminary and target local contributions is functioning as intended, with the preliminary local contribution setting a floor that maintains minimum contribution levels and the target local contribution setting a goal for incrementally aligning the local contribution share to a level that's affordable based on municipal wealth (assuming the aggregate wealth method generates an accurate measure). If this is true, sustained below-target contributions can likely be justified, especially as the phase-in of SOA rates and increments increases foundation budgets and, accordingly, the dollar value of target local contributions in many less wealthy municipalities.

The justifiability of sustained below-target local contributions for wealthier municipalities, particularly those making significant discretionary contributions to their schools, is less clear cut. For example, among the subset of the wealthiest 20% of municipalities served primarily by a non-regional school district (which makes a rough comparison of municipal required contributions and net school district spending above required levels possible), spending beyond required levels exceeds the difference between target and required local contributions in every below-target contribution municipality. The same trend

holds in the second wealthiest 20% of municipalities served by a non-regional district. Given that many wealthier below-target municipalities are making discretionary contributions beyond their target levels, even while required contributions are being held below target, raises questions about whether below target contributions are necessary to make required municipal contributions affordable. Beyond a certain level of CEY, below-target contributions no longer play a significant role in assuring the sustainability of municipal education contributions. The formula requires municipalities with a CEY equal to 175% or more of foundation budget to make full progress to target each year. A threshold lower than 175% could be warranted. The effect of a lower threshold would be progressive. Setting a cutoff at 110% of foundation results in a net increase in required local contributions of \$28.2 million, of which \$19.6 million comes from municipalities served by the wealthiest 20% of school districts and \$8.6 comes from municipalities served by the second wealthiest 20% of school districts. Aggregate aid to these school districts is reduced by \$4.6 million.

The impact on required local contributions and aid of the other two mechanisms for adjusting preliminary local contributions toward target local contributions — the 1% and 2% increment toward target adjustments and effort reduction — should also be included in this study. In particular, the impact on equity and feasibility of conditioning effort reduction on CEY should be examined. Under H.2, wealthier municipalities are more likely to benefit from effort reduction. Over half of the wealthiest 20% of municipalities benefit from excess effort reduction. The number of beneficiary municipalities decreases steadily in wealth, and among the least wealthy 20% of municipalities only two benefit. The use of state aid to reduce effort among these wealthy communities may not be the optimal use of limited aid dollars. One reason is that these communities are making above target contributions is that their MRGFs suggest a growth in local revenue capacity that would allow it. Another reason is that wealthy municipalities' required local contributions are already constrained by the cap on maximum local contributions. It's possible that this aid would be better used to meet the needs of less wealthy communities, perhaps by allowing above target wealthy communities' local contributions to exceed the current 82.5% maximum local contribution share.

As with any changes to the maximum local contribution share, to the extent that changes to how quickly communities are expected to make progress toward their target contribution level reduces aid, a gradual approach that allows sufficient space under proposition 2 ½ limits to backfill lost aid with additional municipal contributions is desirable.

Slow and reverse the reliance on the hold harmless provision and minimum aid

Hold harmless and minimum aid serve to move the Chapter 70 formula away from the 1993 Education Reform Act's commitment to match resources to student and municipality need. For school districts that rely on the hold harmless provision, state aid depends on the amount of aid they received in previous years, an altogether different and less equitable approach to public budgeting. This fact notwithstanding, the hold harmless provision is tremendously important to the financial stability of about half of school districts, and its rapid removal would likely be too disruptive to contemplate. This should not stand in the way of incremental progress in rolling back the state's increasing reliance on hold harmless aid. Pursuit of these measure should be accompanied by an effort to directly address challenges faced by rural school districts with declining enrollment, among others, for which hold harmless has become a stopgap response.

Hold harmless and minimum aid are widely valued by school districts because they offer budget stability and predictability. Their value is particularly salient at the current moment, when disruptions related to COVID-19 have caused significant flux in student enrollment, which potentially will impact districts' future foundation budgets if steps to directly deal with the impact of enrollment flux are not taken by budget writers. Other reasons cited in support of hold harmless and minimum aid include helping districts deal with fixed costs that cannot easily be reduced when enrollment declines, addressing costs related to diseconomies of scale in rural districts that are not accounted for in the foundation formula, and augmenting annual foundation budget rate inflation adjustments.

Challenges like those above can be significant for certain districts. However, hold harmless aid and minimum aid do not address the roots of these challenges, and the use of hold harmless aid and minimum aid to address them results in substantial resource leakage. The amount of state aid attributable to the hold harmless provision and minimum aid is large. Our simulation of the effect of removing the hold harmless provision from the Chapter 70 formula finds that Chapter 70 aid attributable to hold harmless is \$319 million under the FY 2021 H.2 budget proposal (these factors do not affect required local contributions).

The impact on the distribution of aid resulting from the hold harmless provision and minimum aid is not equitable. The number of districts in the least wealthy quintile that benefit from hold harmless aid is lower than in any other quintile. On a per-student basis, the amount of hold harmless aid that goes to the least wealthy quintile of districts is also lower than in other quintiles.

If long-term trends in declining statewide student enrollment continue, it is possible that an increasing number of school districts will rely on hold harmless and minimum aid to generate increased revenue rather than foundation aid. Between FY 2010 and FY 2020, foundation enrollment fell in 207, or 66%, of 314 school districts for which enrollment data are available and that were included in our study. The lowest wealth quintile of districts had the fewest experiencing declining enrollment. This dynamic, if it continues, could make hold harmless an increasingly significant contributor to a less than equitable distribution of Chapter 70 aid moving forward.

If more and more districts depend on base and minimum aid, the impact of future progressive funding reforms that rely on increasing foundation aid, like those contained in the SOA, is potentially blunted. The increases in foundation rates and increments contained in the SOA failed to generate foundation aid increases in 174 school districts under H.2, because these districts' foundation aid, even with the SOA-generated increases, remained smaller than base aid, on which hold harmless is based. Large differences between base aid and foundation aid are prevalent. Foundation aid is less than 80% of base aid in 81 school districts. It's less than half of base aid in 10 districts. For these districts, the fundamental principle of matching resources to student need through a progressive foundation formula has ceased to be operative; state aid is simply based on the value of receipts from the year before.

Making changes to hold harmless aid and minimum aid may prove to be politically difficult. It would not be wise to withdraw hold harmless aid quickly, particularly in the absence of strategies for addressing the challenges that hold harmless currently helps ameliorate. But these challenges need not impede incremental progress in the service of a more equitable distribution of state resources. The state should explore several approaches to addressing hold harmless aid:

- Incremental reductions in hold harmless aid;
- Switching hold harmless to a per-student calculation, such that districts receive a guaranteed amount per student;
- Conditioning hold harmless aid and minimum aid on school district wealth.

Separately from the Chapter 70 Local Contribution Study, the state must seek to alleviate challenges that hold harmless aid is currently being used to address. The SOA requires formation of a special commission to study and make recommendations concerning the long-term fiscal health of rural school districts that are facing or may face declining student enrollment. This commission's work should include proposing solutions that encourage new ways of delivering content cost effectively in districts facing these challenges, including regionalization and other measures.

Assure that any reductions in Chapter 70 aid generated by changes to formula factors studied are redistributed to school districts based on need

Changes to the formula factors described above should not reduce overall Chapter 70 aid. Adjustments to the hold harmless provision, minimum aid and below-effort aid that increase the progressivity of Chapter 70 distribution also, in general, reduce statewide Chapter 70 aid from the level it would have been if the change had not been introduced. Unless and until the Commonwealth meets its commitments to equitably funding education for underrepresented students, particularly those in lower-wealth municipalities, adjustments to improve the equity of required municipal contributions should not be used to slow the growth of Chapter 70 aid.

Any reductions to Chapter 70 aid resulting from formula changes designed to increase the equity, accuracy and predictability of required local contributions should be redistributed to school districts in their entirety through a progressive mechanism that provides a greater share of this money to relatively less wealthy communities. In practice, this will require that the state calculate what required local contributions and Chapter 70 aid would have been in any year that adjustments are made to formula factors.

Because of the possibility the Chapter 70 Local Contribution Study recommendations could reduce Chapter 70 aid, it is important the study also consider mechanisms for redistributing reductions in aid based on need. Possible approaches include:

- Accelerating the phase-in of SOA rates and increments;
- Reducing the total state target local contribution from 59% of foundation to a lower share;
- Creating a separate mechanism outside of the Chapter 70 formula to distribute an amount equal to the value of any reductions in Chapter 70 aid attributable to formula factor adjustments back to school districts, with a greater share of the money going to less wealthy communities on a per-student basis.

Examine whether or not the effect on CEY of altering formula factors enhances or hinders efforts to increase the equity of required local contributions

An accurate and equitable required local contribution calculation depends on CEY being an accurate measure of local capacity to spend on schools. We agree with the legislature that it should be included in this study and support a robust examination of its accuracy. While an examination of the accuracy of the CEY was beyond the scope of our study, we would, however, like to offer one observation on CEY made clear through our work.

CEY is endogenous to the Chapter 70 formula. It is calculated by multiplying each municipality's equalized property value (EQV) and municipal income by rates that achieve an equal weighting of EQV and income in setting a total state target local contribution equal to 59% (or less) of the total state foundation budget. This means that, holding EQV and income constant, changes to the statewide foundation budget, the total state target local contribution, or the maximum local contribution share of foundation result in changes to CEY. Changes that lower the statewide foundation budget, lower the total state target local contribution, or increase the maximum local contribution all reduce CEY by allowing total state EQV and income to be tapped at lower rates to achieve the required statewide local contribution.

Some changes to formula factors designed to increase the equity of required local contributions will alter CEY. Specifically, an increase in the cap on the maximum local contribution share will lower CEY, all else equal. For example, in our analysis, increasing the maximum local contribution share to 100% of foundation reduces the statewide CEY by \$1.3 billion and the statewide CEY as a percentage of foundation by 11 percentage points. Similarly, reducing the total state target local contribution as a means to increase Chapter 70 aid will lower CEY. For example, reducing the total state target local contribution share from 59% to 58% changes CEY by \$329 million and the statewide CEY as a percentage of foundation by 3 percentage points.

The interaction between these formula factors and CEY could either serve to amplify or diminish the impact of changes designed to increase equity. The Chapter 70 Local Contribution Study should examine the implications of the endogenous determination of CEY on its recommendations design to increase equity. For example, increasing the maximum local contribution share, on average, lowers municipalities' CEYs, making them appear less wealthy relative to foundation than when the maximum local contributions share was lower. While increasing the maximum local contribution share increases the amount that wealthier municipalities must contribute, it also reduces, for example, the number of municipalities subject to the 175% threshold at which full progress to target contributions is required. When we simulated the effect of increasing the maximum local contribution share to 100%, the number of municipalities with a CEY greater than 175% of their foundation budget fell from 34 to 29.

If possible, this study should seek to define metrics that allow a simple and practical test of whether changes to formula factors that alter CEY affect its accuracy as an assessment of community capacity to fund schools. The aggregate wealth method's sensitivity to formula factor changes could raise questions about whether CEY is a more accurate measure of community effort capacity s before or after the formula factor was changed. A change to a formula factor that increases equity in required local contributions and aid overall could still be unfair to specific municipalities if their required local contributions become less aligned to actual capacity to pay as a result of the change. A method for evaluating such claims would be valuable.

Publicly release a concrete set of actions that commit the Commonwealth to evaluate and enact the report's recommendations

The findings of this study will have significant implications for both the fairness of municipal contributions and the Commonwealth's ability to support lower-wealth communities to adequately fund their schools. Completion and public release of this study should be the beginning of a sustained effort to carry the principles embodied in the SOA through to the steps in the Chapter 70 formula it did not significantly, those focused on calculating required local contributions and aid.

To promote its utility after publication, the Chapter 70 Local Contribution Study report should:

- Include practical steps that the legislature, executive offices, state departments and agencies, and other relevant stakeholders can take to evaluate and implement report recommendations;
- Be released publicly.

The scope of this study is ambitious. That is appropriate for the moment in which we find ourselves. Through SOA, the state has made a significant commitment to better match state resources to student need. Because of the COVID-19 induced recession, state revenue available to meet this commitment is more constrained than when SOA passed. The Chapter 70 Local Contribution Study presents a significant opportunity to define the next priorities on the agenda for continuous improvement of our Chapter 70 funding system. At a moment of challenge, it allows Massachusetts to think deeply and creatively about how we can both keep SOA commitments and increase the equity of how required local contributions and Chapter 70 aid to school districts is determined. We stand ready to support this important work and assure that its findings help us continue toward an even fairer, more equitably funded, and effective public education system.

Submitted by: Ryan Flynn, Director of Policy, MBAE

6. Links to attachments (optional):

[mbae_chapter-70-local-contribution-study-testimony_2020-10-16.pdf](#)

[Missing_The_Mark_Chapter70_Report_MBAE_GBCC_Final_compressed.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:149 Data

1. Public comment response

1. Name:

Rebecca Torres

2. City/Town of residence:

Shutesbury

3. Organizational affiliation (optional):

town administrator

5. Comment:

Hello-

I am writing today about the c.70 formula. I have lived in Shutesbury for 32 years and been the town administrator for 12 years. I was on the finance committee here in the early 1990s when ed reform came in. Shutesbury's child population had just increase from 140 students to 250 students. The early years of the statutory formula added funding to the elementary school, an independent district. Shutesbury belongs to the Amherst region. Moving from a per pupil formula to the new income and property based formula lead to dramatic changes in Shutesbury's assessments. There was a 3 year period where our assessment increased over 20% every year. The town had \$12,000 in cash reserves and was almost forced into bankruptcy, facing a \$70,000 increase in our assessment. We were saved by an emergency grant from DOE.

We understand about the erratic nature of the formula. But we have as a community have worked hard to understand how it works and appreciate the great effort to compare towns by their wealth by tracking income and valuation of property. We formed a committee and spent a summer learning how the formula works and how different communities benefit from it. Our regional agreement is per pupil with a 5 year rolling average. In this formula the poorest of towns in the region pay the same as the wealthiest. With the statutory formula the poorer towns pay less and the wealthier towns pay more. But without a 5-year rolling average the year to year changes in regional assessment can be dramatic and unpredictable.

The amount of state funding is too low. During the Deval Patrick era his goal as governor was to make the state aid/property tax split 50/50. What we have settled for is the current local share target of 59.97% and the current aid share target of 41.1%. State taxes have gone down, and property taxes go up and up. The state needs to raise tax revenue to meet this obligation of a true partnership splitting the cost of education 50/50 with all communities. Ability to pay matters and the base cost of education needs a full commitment from the state.

And what always happens in any conversation about c. 70 state aid funding and formula is how does it effect my town. The scariest element of the new proposal is to eliminate the hold harmless clause that is now baked into the education funding cake. I remember a DESE official explaining to us in one of my first ed reform tutorial that the state has settled on the hold harmless concept to keep the whole thing politically viable. As a member town of the Amherst Region eliminating the hold harmless clause will have a devastating impact on the other member towns in our district, especially Amherst. Our region will loose millions in education aid if the hold harmless is eliminated. Amherst is already under duress as a result of COVID, UMass's declining revenues, resulting lay-offs and store and restaurant closings.

So as you ponder shifting money around by changing formulas, eliminating policies like "hold harmless" please understand the whole picture requires billions of dollars in funding to do the right thing. And yes I understand no one has the stomach for raising taxes, especially now. I just ask if you are going to open this can of worms be ready to solve the funding issue.

Thank you-Becky Torres, Shutesbury (town of 1800, half woods, nestled by the Quabbin)Town Administrator

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:150 Data

1. Public comment response

1. Name:

Suzanne Crawford

2. City/Town of residence:

Hawley

3. Organizational affiliation (optional):

School Committee member and small business owner

5. Comment:

Dear Sirs and Madams at DESE and DOR,

I am writing as a small business owner, a resident of Hawley, and as a member of the Mohawk Trail RSD School Committee.

Our schools have been challenged by declining enrollment for 20 years, largely due to a lack of economic opportunities for young families. Our area has lost many jobs during this time, partly due to small manufacturing disappearing and partly due to a lack of high speed internet capabilities that would allow small businesses to thrive and people to work remotely.

Clearly, in this challenging year of Covid-19, the effects of lack of internet access and cell phone coverage has had a tremendous negative impact on our students being able to work remotely and on their families being able to do the same. People working in their cars at WiFi hotspots is a common sight in our area. This digital divide, which was already problematic, has only grown with Covid-19 and remote education.

We cannot afford to lose the "hold harmless" funding that at least keeps our Chapter 70 education funding from decreasing. Small rural districts do not benefit from an economy of scale. We still need to keep classrooms staffed with teachers whether there are 22 students in a class or 15. Already, education costs account for 60% of our town budgets. Our small towns cannot afford to cover an even higher minimum contribution. In the town of Hawley, the majority of our 320 residents are retired and on fixed incomes. Half of the land in Hawley is in the Dubuque State Forest and is not on the tax rolls. Given that property taxes are the major way to fund our towns and education, that means that we cannot tax half of our land. The other half of the formula for the local minimum contribution is based on income, which the town has no option to tax. A large increase in a single person's income in one year can have a negative impact on the town. It would make sense to use the median income or a rolling average to smooth out these jumps so that towns can plan better.

In a time when the inequities of the digital divide in public education are so stark, please let's work to have fair funding for historically underfunded rural schools - not to remove the hold harmless money and exacerbate the inequities. We cannot afford to let students' educational experience be based on their zip code.

Sincerely,
Suzanne Crawford

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:151 Data

1. Public comment response

1. Name:

Jen Audley

2. City/Town of residence:

Montague

3. Organizational affiliation (optional):

Finance Committee

5. Comment:

I know that several of my comrades and neighbors from Franklin County towns, including Michael Naughton, Allen "Tupper" Brown, and Greg Snedeker, have prepared thoughtful comments regarding the inherent inequity of the 82.5% cap, so for the purpose of this record I'd like to say that I agree with their analysis and concerns about that matter.

If we believe that all students in the Commonwealth have a right to a free public education that prepares them equally well for adulthood, the formulas the Commonwealth currently uses to fund public schools should attempt to level the playing field by recognizing and alleviating disadvantages students face as a consequence of where they happen to live. Instead, the current system seems designed to reinforce the advantages of living in a more affluent community, and to shift the blame for inequity onto special education, ELL, transportation, and families who choose other options in a competitive "marketplace" where there are more seats available than there are students. It doesn't have to be this way.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:152 Data

1. Public comment response

1. Name:

JAY CRANDALL

2. City/Town of residence:

Rehoboth

3. Organizational affiliation (optional):

5. Comment:

Regionalization was promoted to save costs. It has evolved into just the opposite if you are not the wealthiest town involved. As a result, what town in their right mind would commit to losing control of their costs via the wealth formula mandated by DESE, by joining a regional district. If you are not the least wealthiest town, you have absolutely no say or control! This happens. This happened in Rehoboth because DESE controls a regional district. Also in 2019, Rehoboth voted not once but at three town meetings to disapprove the school's budget proposal. Under a regional district agreement, the school committee can and did negate those three votes. The great majority of voters, at one meeting 800 to 200, voted no, and 8 out of 10 school committee members said, not because they had to, sorry, your votes didn't count. This is what a district allows! We thought we lived in America!!! Why do you think there are so many towns that want nothing to do with regionalization. In a stand-alone school, one school, one town, you have control.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:153 Data

1. Public comment response

1. Name:

Mary Dunne

2. City/Town of residence:

Holden

3. Organizational affiliation (optional):

Parent

5. Comment:

Teacher salaries must be increased to support retention in high need areas.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:154 Data

1. Public comment response

1. Name:

Peter Demling

2. City/Town of residence:

Amherst

3. Organizational affiliation (optional):

Amherst and Amherst-Pelham Regional School Committees

5. Comment:

Please see attached pdf comments. Thank you.

6. Links to attachments (optional):

[Peter_Demling_-_Amherst_SC_-_MLC_public_comment.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:155 Data

1. Public comment response

1. Name:

Linda Long-Bellil

2. City/Town of residence:

Holden

3. Organizational affiliation (optional):

Wachusett Regional School District Committee

5. Comment:

Our district is scheduled to lose 400 students for the current school year. Please do NOT phase out the hold harmless and minimum per pupil aid as recommended by the MA Business Alliance for Education/Greater Boston Chamber of Commerce. Phasing out these provisions would be a disaster for our district. This year is difficult enough for our school district and others without the added financial burden that these proposed changes would impose.

I want to note that this comment and my prior comment are made on my own behalf as an individual member of the School Committee, but that I fully support all of the comments of our Superintendent, Darryll McCall submitted previously. Thank you for your consideration.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:156 Data

1. Public comment response

1. Name:

wayne m. adams

2. City/Town of residence:

princeton

3. Organizational affiliation (optional):

advisory committee (chair)

5. Comment:

Our town's budget continues to increase for the school budgets faster than other town services and expenses. Over the years, the town has consciously has had to make hard choices with in-town infrastructure and services to meet the school budget mandates. Our town is appreciative to have a pathway to communicate our needs and our requests through this survey. The key requests we have are:

1) hold each town harmless within a regional district while at the same time the regional district is also held harmless. In 2017, our town provided a multi-year report showing how our town has spent over \$3M because we were not being held harmless, while we looked to the east and saw many wealthier towns being held harmless. The report we compiled was in support of Senate Bill S.217. And this same report would equally apply to the support of House Bill Amendment 95 for H.3800. Both dealing with fairness and review of Chapter 70 funding for regional districts.

2) increased support for out of district vocational students. When footing the full expense of \$60K for one student, community observers remark they could send one student to a private college-track school for much less.

3) because of regional district has to pay transportation costs, it shortchanges its budget to address effective teaching rations, current tools and curriculum, and teaching/learning support including librarians and counselors. At the time the regional district was formed, state commitments were made for 100% transportation funding. Our district benchmarks itself across the state, and ranks in the bottom quartile of funding per student but ranks in the top quartile for MCAS scores, college plans, and graduation rates. We always ponder what our students would accomplish with more equitable funding.

4) As SPED costs continue to rise faster than other educational related costs, it would also be ideal to increase state funding at the same growth rate.

6. Links to attachments (optional):

[Foundation_Budget_Testimony_v3.pdf](#)

Public Comments for Chapter 70 Local Contribution Study

Response ID:157 Data

1. Public comment response

1. Name:

Roberto A Jimenez-Rivera

2. City/Town of residence:

Chelsea

3. Organizational affiliation (optional):

Chelsea School Committee

5. Comment:

I will begin by noting that these comments and opinions are made as an individual member of the Chelsea School Committee, and not as a representative of that body nor of my employer, the Boston Teachers Union.

Given the wealth that Massachusetts holds, the amount of funding that we allocate to education is disappointingly low. Further, when we look at how equitable our education spending is, we see that over the past two decades, it has become increasingly inequitable. While the Student Opportunity Act certainly was a fantastic next step in fixing this inequity, we have seen how at the first sight of financial trouble the Governor and Legislature have all but given up on providing the resources that were promised to the students in our most underfunded districts. Attempting to disguise federal COVID-19 relief funds as SOA funding, they attempt to trick people into believing that this promise is being funded, even though the allocation is inequitable because it is provided to both districts that are fully funded and districts that are not. It is inequitable, but it allows legislators to present themselves in a better light to their constituents in an election year. Meanwhile, children in Gateway Cities and other low-income communities continue to suffer the consequences.

Having a flat 17.5% state-funded allocation means that wealthy communities that are barely educating any low-income students, students of color, or English learners get a free discount on their school spending. Meanwhile, class sizes in Chelsea continue to grow, we have insufficient wraparound and mental health supports for our students, and we are unable to pay our educators the salary they deserve (which affects our retention and ultimately our students' education).

At a minimum, we should have a sliding scale so that wealthy communities that can afford to pay for the adequate education of all their students don't continue to take advantage of the system to get even further ahead. In an ideal scenario, we should take a page from Vermont, which attempts to level out local communities that continue to tap local resources for their own districts by means of pooling some of those resources. I believe we should have a system where, if you spend above foundation to educate an overwhelmingly privileged student population, you should have to contribute to a statewide resource pool that is then distributed to communities that don't possess that wealth. If wealthy districts want to use their community's wealth to further improve their schools, they are welcome to do so, but they should also counteract that form of resource hoarding by helping ensure that all districts can have adequate baseline resources for their students.

There is also the issue of hold harmless and minimum aid increases, which make up over \$300M in state aid. I believe these mechanisms perpetuate inequitable education funding. While I am not an education finance expert, there are experts who are ready to provide recommendations to ensure that we stop upholding inequitable practices in education finance while at the same time not eliminating some of these measures overnight and destabilizing many school districts.

Ultimately, this comes down to priorities. If our priority is to provide an equal flat rate to all, then our system will continue to be inequitable. We need to change our order of operations to make sure that each successive dollar we spend on education has the biggest return on investment. That means not providing state resources to districts that are self-sufficient until every district that does not have that wealth has the baseline resources to provide an adequate education to their students.

6. Links to attachments (optional):

Public Comments for Chapter 70 Local Contribution Study

Response ID:158 Data

1. Public comment response

1. Name:

Maleah Gustafson

2. City/Town of residence:

Jefferson, MA

3. Organizational affiliation (optional):

5. Comment:

Hello. I am writing as an individual member of the community, parent, and member of the Wachusett Regional School Committee, though the views expressed here are my own and do not represent the committee as a whole.

Our district is the largest regional district in the state, with over 7000 students distributed across 13 schools and 5 towns. Each of those town has unique needs and budgetary situations, and I hope their representatives will have also written about those.

The logistical challenges of a larger geographic footprint and diverse student body across so many schools requires the district to navigate many complex and logistical challenges in a typical year – challenges which are only magnified during the current situation.

A few areas I wish to highlight relevant to this request and the equity, predictability, and accuracy of Chapter 70 funding are below.

- **Hold Harmless:** Given the uncertainty of our economic and educational landscape, now is not the time to end Hold Harmless. Many districts in the state are experiencing decreased enrollment right now. At a time when budgets are already stretched thin and districts have already had to make cuts due to reduced state revenues, to lose this now would create further unpredictability and instability. As of October 1, initial enrollment data shows that our district has lost an estimated 400 students compared to FY20. Using the current per pupil Foundation Cost estimates (FY21), this will translate to approximately \$4.2 Million in our budget.

- **Examine the Proportional Split:** Please consider making adjustments to the proportion of Foundation Budget contributed by the state & municipalities (currently 59/41); increasing the state share even slightly will help increase equity across a state where many towns have already been struggling to meet funding obligations (often at the expense of other essential town services).

--Currently, our district operates with 60% of our overall Foundation Budget coming from MLC and 40% from Chapter 70 aid. Under this, of the \$4.2 Million we may lose due to decreased enrollment alone, approximately \$1.7 Million would be Chapter 70 aid and approximately \$2.5 Million would be from the MLC of our towns. As CH 70 state aid decreases, an increasing burden will fall to our five member towns to make up the difference in our budget. This is simply unsustainable. In recent years, my town has seen almost all of its increased revenue go to education with substantial increases in MLC.

- **Maintain SOA Funding:** The changes made through the Student Opportunity Act will have significant impacts across the state. The need for these funds was demonstrated and agreed upon prior to the pandemic, and the inequities they were intended to correct have only been exacerbated by the pandemic. Students with disabilities, low-income, and ELL students have been particularly impacted by the disruptions to their education during this time, and districts will require more resources – not fewer – to meet their needs in the coming years. Whether CH 70 adjustments or other elements of the SOA such as contributions towards special education transportation, the need for these funds is great and I urge you to not abandon their original intent or the needs of the students they were intended to benefit.

Thank you for your time and attention to this important matter.

6. Links to attachments (optional):
