

Thank you for the opportunity to provide comments in support of the Foundation Aid Formula study.

I am a member of the New York State Board of Regents, representing the 4<sup>th</sup> Judicial District -- a large and mostly rural area extending from Montgomery, Schenectady, Saratoga, and Washington counties on the southern edge of the district to St. Lawrence, Franklin, and Clinton counties on the northern edge of the district. I represent school districts ranging from high poverty urban districts like Schenectady and Amsterdam to exceptionally small districts like Long Lake (65 students K-12) and Wells (128 students K-12). Rural poverty is widespread, with 60% of the students in Franklin county considered Economically Disadvantaged (ED). The Foundation Aid Formula must consider the needs of all these districts -- and many more. It's no small challenge!

My own recommendations are separated into two main approaches. First, modernize the formula for all districts. Second, consider the particular needs of small and rural schools.

**1- Modernize the Formula.** I support ideas for modernizing the formula for all schools that have gained prior support from the Educational Conference Board, the NY State Department of Education, and the Board of Regents. These include:

- Update the census poverty counts by replacing the decades-old poverty figures presently being used with a three-year moving average of small area income poverty estimates (SAIPE).
- Replace free and reduced-price lunch (FRPL) counts with counts of economically disadvantaged (ED) students.
- Eliminate the income wealth index minimum of 0.65.
- Update and smooth the high need designation triennially and extend consideration to average need districts.

These relatively straightforward fixes will build upon the strengths of the Foundation Aid Formula by ensuring that support for schools and students is based on current data, pivotal information that will continue to change annually as circumstances change.

**2- Consider the Particular Needs of Small and Rural School Districts.** The issues of small and rural schools are less widely known and sometimes misunderstood. I will briefly outline some of these issues and provide a few recommendations. Rural school districts are a part of the fabric of upstate New York. These are areas of great beauty, vast distances, extreme weather, and supportive local communities. School experiences in rural New York can be different from urban and suburban school experiences. Children ride school buses for an hour or more each way. Most rural students will graduate from high school, but few will have the opportunities to take advanced courses like Advanced Placement (AP) or International Baccalaureate (IB) or to specialize beyond basic coursework in art, music, computing, or engineering. Teachers in these districts work hard, wear many hats, are personally committed to their school communities, and earn modest salaries (For example, the 2022-23 median teacher salary in Washington County was \$64,021). Support staff (who work in the cafeteria, drive busses, and clean classrooms) are predominantly local residents who once attended the school where they are employed and now rely on the moderate hourly wages and good benefits to support their families. The buildings and grounds are well-used spaces utilized year-round for athletic, civic, and other community events and purposes. In my own district we once hosted an alumni wedding in our high school foyer. More recently school spaces and resources are used to

support struggling families with meals, clothing, mental health and other support services - services not available anywhere else.

Per-pupil expenses are often higher than average in small rural schools due to low enrollment and the cost of maintaining basic academic and support services. For example, with Long Lake CSD's 7 second graders, Keene CSD's 10 second graders, and Johnsburg CSD's 15 second graders, each district must hire one second grade teacher. The per-pupil costs differ widely in each of the above examples, and all are higher than second grade per-pupil costs in a school of 100 or 200 second graders. Some may see this as inefficient, but economies of scale are less reachable in small schools. Attempts to consolidate districts often fall flat due to immense distances between districts and/or the fear of losing community identity. Districts must also meet every legal or regulatory mandate, regardless of size, with far less capacity to do than in larger districts. Statewide mandates apply equally to small districts regardless of the associated costs -- these districts still must develop and maintain safety plans, develop a workplace violence prevention program, administer the federal McKinney Vento (homeless student) law, report all required data, etc. Every new rule and regulation required of all school districts falls heaviest on the smallest districts. Regardless of size, districts must provide special education services, English language learner support, counseling services, psychological services, speech services, information technology (IT) support, and business services. It may seem inefficient to hire a bilingual educator or a 6:1+1 special education teacher and teaching assistant for serving only 1 or 2 students, but that is what is needed and required by state and federal law. When it comes to sharing services across districts, BOCES can be a big help -- but there is no guarantee those services will be available, accessible, or less costly. Running a modern school district in rural America can be challenging -- and expensive.

The Foundation Aid Formula relies heavily on the Sparsity Factor to address all of these complexities. I recommend that this factor be re-evaluated to account for the real costs associated with running a small district, taking into account that -- regardless of size -- each district must be able to provide a high-quality education that meets the standards of access and equity for all districts statewide. The Sparsity Factor should also reflect the increased needs of our post-pandemic society in which schools are now called upon to support students beyond their academic needs -- including their social, emotional, nutritional, physical, and mental health needs. Again, these needs fall heaviest upon small schools and communities where no other services are available. While income measures likely reflect the economic struggles faced by families in rural districts, vacation property can artificially inflate property valuations, skewing the Combined Wealth Ratio and masking the needs families face. These property-rich income-poor rural districts rely heavily on property taxes but are limited in their ability to tap into that revenue source due to the property tax cap. These districts are stuck between a rock and a hard place.

Much has been said about declining enrollment and hold harmless funding, with speculations about overly generous foundation aid amounts being distributed to small and rural districts like many that I represent. These characterizations are incorrect, and a visit to any small rural district will confirm that point. I encourage researchers to visit Clifton-Fine CSD (238 students, 71% ED), Boquet Valley CSD (368 students, 58% ED), or any North Country district and see for themselves. Our schools struggle to do what is right for students every day. Student and community needs are greater than ever before. Expectations are higher than ever before. Our formulas should reflect our present reality, and not hold us to a past that no longer exists.