

Syosset Central School District

Dr. Thomas L. Rogers
Superintendent of Schools

Board of Education
P.O. Box 9029
Syosset, NY 11791-9029
516-364-5600

Carol C. Cheng, President
Brian J. Grieco, Vice President
Lynn Abramson
Lisa A. Coscia
Susan Falkove
Anna Levitan
Jack Ostrick
Shany Park
Thomas A. Rotolo

November 7, 2024

Dear Chancellor Young and Commissioner Rosa,

The Syosset Central School District appreciates the opportunity to take advantage of the comment period on the Regents' Regionalization planning process. Ambiguity in the language adopted by the Regents created concerns about the potential for the erosion of local control or redistribution of resources, both of which we would oppose vigorously. Public statements by the Department¹ clarify that neither is the case. As the Department is now "reviewing the regulation's language and considering modifications"², we offer the following recommendations which are consistent with the Department's clarifications:

1. **Amend the language in the definition of a Regionalization Plan in §124-2.2(c):**

(c) Regionalization plan means a strategic plan ... designed to improve student opportunities and operational efficiencies through ~~shared resources~~ voluntary cooperative initiatives.

The term "shared resources" creates confusion because it implies that monetary or other resources raised by one community might be shared involuntarily. As fiduciaries, school board trustees are required to act in their Districts' best interests and an involuntary use of resources would be antithetical to that responsibility. The term "voluntary cooperative initiatives" aligns the Department's stated goals and school trustees' obligations.

2. **Clarify the criteria for plans and approvals under §124-2.4(b):**

Since the Department has indicated that individual school districts need only avail themselves of as much or as little of a plan as they deem beneficial, it is unclear what criteria the Department would use to evaluate a plan for approval or why the Department's approval would be relevant. School districts can already enter into shared arrangements through Intermunicipal Agreements and BOCES cooperative services without an additional layer of Departmental approval. If the Department is not creating a novel avenue for collaboration, it is unclear why a new approval process for plans would be necessary.

3. **Remove the word "compel" from §124-2.5(d):**

As the Department has stated: "school districts are only required to implement activities they

¹ "... Upon completing the regional plan, school districts are only required to implement activities they have agreed or consented to for their local context in the final plan..." [link](#)

² "... While we are currently in the 60-day public comment period on the proposed regulation, at Regent Tilles' request, we are reviewing the regulation's language and considering modifications based on how it is being interpreted in the field..." [link](#)

have agreed or consented to”. So, the need to establish a compulsory function or highly iterative approval process (§124-2.4[b]) appears at odds with the Department’s stated intent.

4. **Further clarify that Districts may opt-out of any part of the Regional Plan in §124-2.6(c)(3) by amending it as follows:**

(3) Implement those elements of the approved regionalization plans they have agreed or consented to for their local context, identify any necessary amendments to the plan, and engage in continual improvement.

5. **Change the language in §124-2.6(d) as follows:**

(d) The Department, district superintendents, and component school districts shall undertake any other responsibilities needed to develop or implement those elements of the regionalization plans they have agreed or consented to for their local context ~~or as otherwise directed by the Commissioner.~~

The clause after the conjunction “or” suggests that the open-ended authority afforded the Commissioner in this paragraph is juxtaposed against — and therefore outside the scope of — the Regionalization planning process. If there is another process where the Commissioner’s authority needs elaboration, it should be presented as a separate regulation, not appended to this one.

We appreciate the Department’s efforts to affirmatively state that the Regionalization Planning process does not usurp local control or result in resource reallocation and we believe that aligning the language in the regulation could reduce confusion and thus improve transparency. Moreover, by explicitly clarifying that not all schools would be obligated to implement every element of a regional plan, more ambitious and innovative ideas might result – a plan that requires universal consensus among a wide range of partners would inevitably result in something incremental and modest.

We are proud of the excellent educational system our community has built, and we are protective stewards of the public’s resources. We have effectively used partnerships and collaborations to expand services to our students and identify efficiencies for our public. We remain ready to explore any innovation we deem might serve the best interests of our students, our taxpayers, and our community.

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