

VIRGINIA:

BEFORE THE BOARD OF EDUCATION

IN THE MATTER OF THE JOINT)
PROPOSAL FOR THE CONSOLIDATION OF)
THE ALLEGHANY COUNTY AND)
COVINGTON CITY SCHOOL DIVISIONS)
)

**JOINT PROPOSAL FOR THE CONSOLIDATION OF THE
ALLEGHANY COUNTY AND COVINGTON CITY SCHOOL DIVISIONS**

Submitted October 23, 2020

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Pursuant to § 22.1-25(D) of the Virginia Code, the Alleghany County School Board and the Covington City School Board, by and through their Joint Committee on School Consolidation (collectively, the “Local Boards”), by counsel, hereby submit this Proposal respectfully requesting that the Virginia Board of Education (the “Board”) consolidate their school divisions.

INTRODUCTION AND EXECUTIVE SUMMARY

Consistent with the materials submitted to the Board in connection with this Proposal, and as will be further discussed in meeting with the Board, the Local Boards respectfully submit that the consolidation of their school divisions is in the best interests of their students and of the citizens of Alleghany County, of the City of Covington, and of the Commonwealth at large.

Regarding the statutory criteria for consolidation under § 22.1-25(A)(1) and (C) of the Virginia Code, and the requested information and data under § 22.1-25(D) of the Virginia Code, the Local Boards provide the following executive summary of the material detailed further herein:

- **Consent of the school boards and governing bodies of the affected county and city. Va. Code § 22.1-25(A)(2).** The Alleghany County Board of Supervisors and the Covington City Council (the “Governing Bodies”) and the Local Boards have consented to the consolidation of the school divisions of Alleghany County and Covington. *See infra* at 9.
- **School-age population of the school division proposed to be consolidated. Va. Code § 22.1-25(C)(1), (D)(i).** The school-age population of the consolidated school division is

estimated at 3411, consisting of 2472 school-age residents from Alleghany County and 937 from the City of Covington, if consolidation were effective in 2022. *See infra* at 9-10.

- **Potential of the proposed school division to facilitate the offering of a comprehensive program for kindergarten through twelfth grade at the level of the established standards of quality (“SOQ”).** Va. Code § 22.1-25(C)(2), (D)(i). Educational opportunities for students in Alleghany County and Covington would be improved through enhanced course offerings available through the establishment of a single middle school and a single high school in the consolidated school division, as opposed to two middle schools and two high schools across two school divisions. Students would have access to more elective courses, including career and technical education and foreign languages, as well as educational opportunities potentially through the Dabney S. Lancaster Community College (“DLCC”). *See infra* at 10-13.
- **Potential of the proposed school division to promote efficiency in the use of school facilities and school personnel and economy in operation.** Va. Code § 22.1-25(C)(3), (D)(i). Consolidation of the school divisions is expected to reduce the number of school buildings used, streamline central office administration, and result in more-efficient pupil teacher ratios over time. Eventual reductions in overlap in central office administration, alone, are projected to save over \$900,000 per year. *See infra* at 13-15.
- **Anticipated increase or decrease in the number of children of school age in the proposed school division.** Va. Code § 22.1-25(C)(4), (D)(i). The school-age populations of Alleghany County and Covington are projected to decline over time, with Covington’s already-smaller school-age population expected to decline at a greater rate. While the consolidated school division’s school-age population would reflect the respective localities’ declines, it would have a substantially higher school-age population than either of the school divisions would alone. *See infra* at 15-16.
- **Geographical area and topographical features as they relate to existing or available transportation facilities designed to render reasonable access by pupils to existing or contemplated school facilities.** Va. Code § 22.1-25(C)(5), (D)(i). Consolidation of school divisions would allow for school transportation and routes within the combined school bus capacity of the school divisions. Some travel times will be decreased, while some will have about fifteen minutes added (which would nevertheless remain under sixty minutes). Some reconfiguration of existing bus routes or available bus capacity may be necessary based on changing needs, and it is expected that this should be feasible for the consolidated school division. *See infra* at 16-17.
- **Ability of each existing school division to meet the SOQ with its own resources and facilities or in cooperation with another school division or divisions if arrangements for such cooperation have been made.** Va. Code § 22.1-25(C)(6), (D)(i). Alleghany County and Covington are fiscally stressed, and their school divisions have seen decreases in local funding in recent years. While Alleghany County enjoyed increased State aid following the reversion of Clifton Forge from an independent city to a town within Alleghany County, that assistance has expired, and it is also receiving decreased State aid

based on a decreased average-daily membership (“ADM”) of students. With little other alleviation in sight, the Local Boards submit that a consolidated school division – pooling the resources of Alleghany County and Covington and increasing efficiencies and course offerings – would enhance the educational opportunities available for local students and better facilitate local schools’ satisfaction of the SOQ. *See infra* at 17-19.

- **Evidence of the cost savings to be realized by such consolidation. Va. Code § 22.1-25(D)(ii).** There would be cost savings realized by the consolidation of the school divisions, including an eventual reduction in total teachers employed, assuming an increase in pupil-teacher ratios in the consolidated division over time; the streamlining of central office administration, which could save over \$900,000 per year; savings from the equalization or increase of health benefits more slowly over time; and implementation of an early-retirement incentive program (an “ERIP”). *See infra* at 19-21.
- **Plan for the transfer of title to school board property to the resulting combined school board governing the consolidated division. Va. Code § 22.1-25(D)(iii).** It is expected that these details will become clearer as consolidation nears, should it be approved by the Board. Presently, the localities plan to retain title to all property held by them unless and until the respective Governing Body determines otherwise, use of middle school buildings vacated as a result of consolidation would be determined by the consolidated school board and the Governing Bodies, and existing school debt service of the Local Boards would be transferred to the respective locality for retirement. *See infra* at 21.
- **Procedures and a schedule for the proposed consolidation, including completion of current division superintendent and school board member terms. Va. Code § 22.1-25(D)(iv).** The consolidation would take effect on July 1, 2022, with the merger of the student bodies to occur in advance of the 2023-2024 school year. With the expiration of several Local Board members’ terms in 2022, the respective Governing Bodies would appoint the required number of board members within sixty days before July 1, 2022. Appointment of the consolidated school division’s superintendent and assistant superintendent would follow thereafter, with such positions being filled by the respective school divisions’ current superintendents. Should the Board approve consolidation, the Local Boards and Governing Bodies would thereafter negotiate and enter into an agreement regarding school consolidation matters. The consolidated school board would also adopt a policy manual for the consolidated school division for use beginning in the 2022-2023 school year. *See infra* at 21-23.
- **Plan for proportional school board representation of the localities comprising the new school division, including details regarding the appointment or election processes currently ensuring such representation and other information as may be necessary to evidence compliance with federal and state laws governing voting rights. Va. Code § 22.1-25(D)(v).** Consistent with § 22.1-53(A) of the Virginia Code, the composition of the consolidated school board would be based on “equitable and reasonable criteria” other than proportional representation. The consolidated school board would be composed of seven members, four appointed by the Alleghany County Board of Supervisors and three appointed by the Covington City Council. In addition, a two-thirds vote would be required

on certain matters of significance such as the hiring or termination of superintendents and the construction or closure of facilities. There are no foreseen issues regarding compliance with federal or State laws governing voting rights. *See infra* at 23-25.

- **Evidence of local support for the proposed consolidation. Va. Code § 22.1-25(D)(vi).** In addition to the support of the Local Boards and Governing Bodies, a recent poll reflected that 54% of residents across Alleghany County and Covington are either very supportive or mostly supportive of the consolidation, while only 38% are mostly unsupportive or not supportive at all. Upon learning more about the proposed consolidation, those numbers changed to 59% likely to support and 36% unlikely to support.¹ While public opposition has derailed consolidation efforts in other Virginia localities, that is in contrast to the support across Alleghany County and Covington. *See infra* at 25-27.

BACKGROUND

In September 2020, the Local Boards and Governing Bodies each passed resolutions supporting, and consenting to, the consolidation of the school divisions of Alleghany County and Covington. (**Exhibit A** – Alleghany Cnty. Bd. of Supervisors Res. (Sept. 9, 2020); **Exhibit B** – Alleghany Cnty. Sch. Bd. Res. (Sept. 9, 2020); **Exhibit C** – Covington City Council Res. (Sept. 10, 2020); **Exhibit D** – Covington City Sch. Bd. Res. (Sept. 10, 2020).)

The procedural background resulting in the September resolutions is discussed below. However, underlying these events is a strong desire to set the Alleghany Highlands up for success. This tight-knit community prides itself on its rich heritage, but is also looking forward to a bright future. To ensure both Alleghany County and the City of Covington reach their full potential it is imperative that the area’s youth, and their families, are set up for success – and that educators, administrators, and other school division employees are supported. In voting in favor of this proposal, the governing bodies and school boards of Alleghany County and the City of Covington have made the determination that consolidation is the best way to ensure these goals are met.

¹ Seventy-two percent are more likely to support consolidation after hearing about additional educational opportunities; 68% more after hearing that it means financial savings; 63% more after hearing that it means additional opportunities to utilize Jackson River Technical Center; 51% more after hearing that it means no changes in elementary education; and 38% more after hearing that it means both high school buildings are still used.

While this Proposal necessarily focuses on the statutory factors and many of the practical benefits to consolidation, those who have led the consolidation effort have not viewed this as a mechanical process. Instead, at all turns, they have sought to take into account the very real present and future needs of their constituents and have determined that consolidation is the best way to ensure continued educational success in their community.

Without overlooking the considerable amount of study and effort over the last several years that has resulted in this Proposal, it also bears emphasis that this is part of a longer trend toward increased cooperation among localities in the area. Allegheny County and Covington have had separate school divisions since 1958 (**Exhibit E** – Excerpts, *from* Supt. Wilkerson Letter to Att’y Gen. Miller (Nov. 23, 1970)), and as soon as the late 1960s the Local Boards were discussing consolidation, Mary Litts Burton, THE CONSOLIDATION OF ALLEGHANY COUNTY AND CLIFTON FORGE CITY SCHOOLS: A CASE STUDY 26 (1989) [hereafter Burton, CONSOLIDATION CASE STUDY], available at <https://tinyurl.com/yxagj15y>. Discussion and study continued through the 1970s and into the 1980s, with Clifton Forge’s school division also being included. See Burton, CONSOLIDATION CASE STUDY, *supra*, at 26-34. Those discussions resulted in the Board’s 1981 approval of the consolidation of the Allegheny County and Clifton Forge school divisions. 52 MINUTES OF THE STATE BOARD OF EDUCATION 178-79 (meeting of Dec. 11, 1981); see also Burton, CONSOLIDATION CASE STUDY, *supra*, at 37-38. Although the Covington City School Board had “expressed its approval of the consolidation concept,” noting that “it would give [Covington’s] children an opportunity to have a great school system,” consolidation did not win the necessary support from the City Council at the time. Burton, CONSOLIDATION CASE STUDY, *supra*, at 33.

Still, Covington, Clifton Forge, and Alleghany County continued to explore greater cooperation over the ensuing decades, with results including Clifton Forge's 2001 reversion from an independent city to a town within Alleghany County. *See* Comm'n on Local Gov't, REPORT ON THE CITY OF COVINGTON – COUNTY OF ALLEGHANY CONSOLIDATION ACTION 6 (2011), available at <https://tinyurl.com/y4kpvmfj>. More recently, the closure of two Alleghany County elementary schools in the mid-2010s renewed discussion of a consolidation of Alleghany County's and Covington's school divisions, though a plan did not materialize at the time. *See* ALLEGHANY CNTY. BD. OF SUPERVISORS REG. MTG MINUTES 6 (Jan. 2, 2019) (reprinted letter referencing those talks), available at <https://tinyurl.com/yxm63lqq>.

This Proposal represents the furthest that Covington and Alleghany County have come in planning and proposing a consolidated school division, since talks began in the late 1960s. This most recent effort had its genesis in 2018 with a school board member's "hearing from the community that they want cooperation between the school divisions." ALLEGHANY CNTY. SCH. BD. MINUTES (Oct. 15, 2018), available at <https://tinyurl.com/yy7up8na>. Responsive to the community's interest in such cooperation, Jacob Wright of the Alleghany County School Board related the following in a letter to the Governing Bodies and Local Boards:

The youth are our future and whether they go to your schools or our schools, they are a part of this community. We are all on the same team. We work together, we pray together, and we play together. Our successes are your successes and your successes are our successes. We are very lucky to have a supportive city council and board of supervisors that fund us at a higher percentage above the state requirements than almost every other community in the Commonwealth. The combining of our school systems would not be a huge savings to taxpayers from the onset, but rather a more efficient use of their money. We feel that we could combine our resources and offer more opportunities, a better use of taxpayer money, and solidify the educational future for our next generation. The plan for a merged system must be diplomatic, well thought out, and be centered around what is best for the future of our community, the students. A unified Alleghany Highlands will solidify our future, increase the quality of life and most importantly, offer the future generations the best opportunities as they pursue additional

educational opportunities or chose to enter the workforce with skills they have gained through our programs. We look forward to continuing our current allegiance and working towards unifying our wonderful community.

ALLEGHANY CNTY. BD. OF SUPERVISORS REG. MTG MINUTES, *supra*, at 6 (Jan. 2, 2019) (reprinting the text of the letter).

In that same spirit, the Local Boards and Governing Bodies appointed members to a Joint Committee on School Consolidation (the “JCSC”), *see infra* App. I (members of the JCSC), which engaged in substantial study and effort, involving outside consultants and members of the community, *see infra* App. II (timeline of notable steps toward school consolidation, 2018-2020), before reaching a recommendation that the school divisions consolidate, JCSC, REPORT & RECOMMENDATION: PROPOSED SCHOOL CONSOLIDATION OF THE CITY OF COVINGTON AND ALLEGHANY COUNTY (2020) [hereafter REPORT & RECOMMENDATION], *available at* <https://tinyurl.com/y2trh5db>. The General Assembly acknowledged the efforts of the JCSC and committed funding to its study of a potential consolidation,² and the JCSC’s study has included a feasibility report, James J. Regimbal, Jr., & Richard G. Salmon, A STUDY REGARDING THE FEASIBILITY FOR CONSOLIDATION OF COVINGTON CITY AND ALLEGHANY COUNTY SCHOOL DIVISIONS (Dec. 2019) [hereafter Regimbal & Salmon, FEASIBILITY STUDY], study into specific

² In material part, the General Assembly’s Appropriation Act read as follows: “In the case of and in recognition of the current deliberations and on-going joint efforts of the Alleghany County School Board, Alleghany County Board of Supervisors, Covington City School Board and the Covington City Council toward investigating and determining benefits of operating a joint school division, that each respective entity has approved two members to serve on the established Committee to facilitate such activities. Out of this appropriation, \$400,000 the second year from the general fund is included in this item’s appropriation and is provided to Alleghany County Public School Division for the express purpose of using such funds as incentive funding to support costs incurred by such joint efforts of Alleghany County School Board, Alleghany County Board of Supervisors, Covington City School Board and the City of Covington City Council toward investigating and determining benefits of operating a joint school division.” 2019 Va. Acts, ch. 854. In the explanation to the budget amendment, it was observed that “[a] joint school system in the Alleghany Highlands would offer area students more diverse opportunities and would be a more efficient use of tax payer funds at both the local and state level.” Explanation, *to Budget Amendments – HB1700 (Committee Approved), Item 136 #1h* (2019 session), VA. LEGIS. INFO. SYS., *available at* <https://tinyurl.com/yycdjcd2>.

subject matters by subcommittees of the JCSC,³ a transportation study (**Exhibit F** – AECOM, ANALYSIS OF ALLEGHANY COUNTY AND COVINGTON CITY SCHOOL BUS ROUTES (Oct. 21, 2020) [hereafter AECOM, TRANSPORTATION STUDY]), and a poll of public support for the consolidation of school divisions (**Exhibit G** – 20-20 Insight, LLC, POLL OF VA CONSOLIDATION (Oct. 10-13, 2020) [hereafter 20-20 Insight, CONSOLIDATION POLL]).

Consistent with the results of these studies and the resolutions of the Governing Bodies and Local Boards, the Local Boards respectfully submit this Proposal and request that the Board consolidate the school divisions of Alleghany County and Covington.

LEGAL STANDARD

Article VIII, § 5(a) of the Virginia Constitution provides that “the Board shall divide the Commonwealth into school divisions of such geographical area and school-age population as will promote the realization of the prescribed standards of quality, and shall periodically review the adequacy of existing school divisions for this purpose.” Consistent with the Board’s constitutional authority, “local school boards may submit proposals for the consolidation of school divisions to the Board of Education,” Va. Code § 22.1-25(D). In determining whether to consolidate school divisions, the Board considers the following statutory criteria:

- (1) the proposed school division’s school-age population;
- (2) its potential to facilitate the offering of a comprehensive program for kindergarten through the twelfth grade at the level of the established SOQ;
- (3) its potential to promote efficiency in the use of school facilities and school personnel and economy in operation;
- (4) its anticipated increase or decrease in school-age population;

³ For a list of the subcommittees and members, see REPORT & RECOMMENDATION, *supra*, at 6. Memoranda from the subcommittees were incorporated into the JCSC’s Report & Recommendation. Mem. from Fin. Subcomm. to JCSC, *in* REPORT & RECOMMENDATION, *supra*, available at <https://tinyurl.com/y6pjwu9f>; Mem. from Governance Subcomm. to JCSC, *in* REPORT & RECOMMENDATION, *supra*, available at <https://tinyurl.com/yybmd2k3>; Mem. from Facilities Subcomm. to JCSC, *in* REPORT & RECOMMENDATION, *supra*, available at <https://tinyurl.com/y5urwau2>; Mem. from Transp. Subcomm. to JCSC, *in* REPORT & RECOMMENDATION, *supra*, available at <https://tinyurl.com/y4f8ox9c>; Mem. from Curriculum Subcomm. to JCSC, *in* REPORT & RECOMMENDATION, *supra*, available at <https://tinyurl.com/yxhcdh67>.

- (5) its geographical area and topographical features as they relate to existing or available transportation facilities designed to render reasonable access by pupils to existing or contemplated school facilities; and
- (6) the ability of each existing school division to meet the SOQ with its own resources and facilities or in cooperation with another school division or divisions if arrangements for such cooperation have been made.

Id. § 22.1-25(C). A consolidation of school divisions also requires the consent of the respective divisions’ local school boards and the governing bodies of the localities affected. *Id.* § 22.1-25(A).

SUPPORTING INFORMATION AND DATA

The Local Boards and Governing Bodies having consented to the consolidation of the school divisions, Va. Code § 22.1-25(A)(2); **Exhibits A-D**, the Local Boards submit the following information and data responsive to items (i) through (vi) of § 22.1-25(D) of the Virginia Code and respectfully request that the Board grant their Proposal to consolidate the school divisions.

I. INFORMATION AND DATA RESPONSIVE TO THE CONSOLIDATION CRITERIA LISTED IN § 22.1-25(C) OF THE VIRGINIA CODE.

Pursuant to § 22.1-25(D)(i) of the Virginia Code, the Local Boards submit the following information and data addressing “the criteria set forth in subsection C” of that statute.

1. School-age population of the proposed school division.

Table 1 below shows “[t]he school-age population of the school division proposed to be . . . consolidated.” *Id.* § 22.1-25(C)(1). If the school divisions were consolidated in 2022 as desired, the school-age population of the consolidated school division would be estimated at 3411, consisting of 2472 school-age residents from Allegheny County and 937 from the City of Covington.

Table 1: School-Age Population Data

Year	Allegheny County	Covington	Consolidated
2013	2836	1168	4004
2014	2783	1150	3933
2015	2668	1107	3775

2016	2727	1065	3792
2017	2709	1040	3749
2018	2615	1055	3670
2019	2470	966	3436
2020	2535	957	3492
2021	2505	947	3452
2022	2474	937	3411
2023	2444	928	3372
2024	2414	918	3332
2025	2384	908	3292
2030	2232	809	3041

Notes:

The University of Virginia Weldon Cooper Center for Public Service (“Weldon Cooper”) does not have school age population data for years after 2018, only age cohort population data. The estimates of school-age residents for 2019-2030 above are derived from age-cohort data from the U.S. Census Bureau (as reported by Weldon Cooper).

Special education counts are included in Weldon Cooper’s School Age Population Estimates. Because these estimates are not available for 2019-2030, this data was not a factor in determining the School-Age Population for those years as reflected in this Table.

Sources:

The 2013 and 2014 estimates were received by email from Hamilton Lombard of Weldon Cooper on April 30, 2020; the 2015 and 2016 estimates were received by email from Hamilton Lombard of Weldon Cooper on February 11, 2020; and the 2017 and 2018 estimates are available at <https://tinyurl.com/r79tzzz>.

The 2013-2018 age cohorts from U.S. Census Bureau are available at <https://tinyurl.com/vlc8mxx>; the 2019 age cohorts were calculated using Weldon Cooper’s 2018 and 2020 population projections, available at <https://tinyurl.com/stcxbnn>; the 2020 age cohorts are available at <https://tinyurl.com/yx3d5hsr>; and the 2021-2030 age cohorts were calculated using Weldon Cooper’s 2020 and 2030 population projections, available at <https://tinyurl.com/sej8v6k>.

2. Potential to facilitate the offering of a comprehensive kindergarten through the twelfth grade program at the level of the established SOQ.

Regarding “[t]he potential of the proposed school division to facilitate the offering of a comprehensive program for kindergarten through grade 12 at the level of the established standards of quality,” Va. Code § 22.1-25(C)(2), the consolidated school division is expected to provide the opportunity for enhanced course offerings, allowing the consolidated school division to better meet the SOQ than the existing school divisions could separately.⁴

⁴ See generally Va. Code § 22.1-253.13:1 (SOQ 1: instructional programs supporting the Standards of Learning and other educational objectives); *id.* § 22.1-253.13:3 (SOQ 3: accreditation, other standards, assessments); *id.* § 22.1-

From school years 2015-2016 through 2018-2019, the Covington City School Division has been fully compliant with the SOQ, while the Alleghany County School Division has fallen short of compliance with SOQ 3 (i.e., all schools fully accredited by the Board, Va. Code § 22.1-253.13:3(A)). Va. Bd. of Educ., 2019 ANNUAL REPORT ON THE CONDITION AND NEEDS OF PUBLIC SCHOOLS IN VIRGINIA apps. H & I, at 109 & 119 (Dec. 1, 2019), *available at* <https://tinyurl.com/y3kk5t4n>. For the 2018-2019 school year, all of Alleghany County’s elementary schools were accredited, while its middle school and high school were “accredited with conditions” being near the State standard. *Alleghany Cnty. Pub. Schs.*, VA. DEP’T OF EDUC. SCH. QUALITY PROFILES (archived webpage Oct. 10, 2019), *available at* <https://tinyurl.com/y2t2zurs>; *Division Summary*, in ALLEGHANY CNTY. SCH. BD. MTG. AGENDA (Oct. 21, 2019), *available at* <https://tinyurl.com/yxshflcb>.⁵

In terms of the SOQ, the relative weak spots in the school divisions are in the accreditation of the middle school and high school of Alleghany County, and the proposed consolidation should address those areas and result in full accreditation and full SOQ compliance. The consolidation contemplates the merger of the school divisions’ existing middle schools and high schools into a single middle school and a single high school. REPORT & RECOMMENDATION, *supra*, at 32. It is expected that the accreditation results would be more in line with those currently in Covington’s school division and that full SOQ compliance would similarly result.

253.13:4 (SOQ 4: student achievement and graduation); *id.* § 22.1-253.13:5 (SOQ 5: quality of classroom instruction and educational leadership).

⁵ Alleghany High School fell short in categories regarding “Math” (Level Three); “English Achievement Gaps” (Level Two); “Math Achievement Gaps” (Level Three); and “Chronic Absenteeism” (Level Two). *Alleghany High School*, in ALLEGHANY CNTY. SCH. BD. MTG. AGENDA (Oct. 21, 2019), *available at* <https://tinyurl.com/y29kjowu>. Clifton Middle School fell short in categories regarding “English Achievement Gaps” (Level Three); “Math Achievement Gaps” (Level Two); and “Chronic Absenteeism” (Level Two). *Clifton Middle School*, in ALLEGHANY CNTY. SCH. BD. MTG. AGENDA (Oct. 21, 2019), *available at* <https://tinyurl.com/y5v6pfou>.

Further, consolidation is expected to enhance the ability of the schools to meet accreditation and the SOQ through increased educational opportunities available to local students. The JCSC has recommended that the consolidation feature “[a]n expansion of course curricula to the extent possible and continued expansion of [career and technical education (‘CTE’)] and elective offerings at the middle and high school levels, and exploration of potential partnerships with [DLCC] to further benefit students.” REPORT & RECOMMENDATION, *supra*, at 7. While further details regarding the nature and extent of expanded course offerings could only be determined once a final decision on consolidation is made, the Curriculum Subcommittee sees this as worthy of further exploration so that such expanded course offerings would benefit the students of a consolidated school system as appropriate. Mem. from Curriculum Subcomm. to JCSC, at 2-3, *in* REPORT & RECOMMENDATION, *supra*.

Among other things, the expanded course offerings would be facilitated by combining resources in one middle school and one high school in the consolidated school division, *see id.* at 32, as opposed to having resources divided across two middle schools and two high schools across two school divisions. The Curriculum Subcommittee “agreed that having all students and teachers in one place would lend itself to a greater selection of courses and the expansion of elective courses such as CTE and foreign language(s).” *Id.* at 38. As discussed by the Curriculum Subcommittee, “potential opportunities for technical education options” could include “drone technology, robotics, and career certifications in different technology pathways.” Mem. from Curriculum Subcomm. to JCSC at 2-3, *in* REPORT & RECOMMENDATION, *supra*. Partnerships with DLCC might provide students additional opportunities in “fine arts education and [CTE] offerings such as virtual welding for middle school students who cannot work in a traditional welding lab due to state policy, and [licensed practical nurse] training at the high school level.” *Id.* at 2.

If consolidation were approved, there appears to be no reason why the high school and middle school in the consolidated school division would not receive full accreditation, and it would be expected that the consolidated school division would be better situated to meet the SOQ, together, than the separate school divisions are today, on their own. An enhanced educational program would be facilitated through the more-efficient sharing of resources, and educational opportunities would be expanded from those available to local students today.

3. Potential to promote efficiency in the use of school facilities and school personnel and economy in operation.

Regarding “[t]he potential of the proposed school division to promote efficiency in the use of school facilities and school personnel and economy in operation,” Va. Code § 22.1-25(C)(3), the consolidated school system would be expected to reduce the number of schools buildings used, streamline central office administration, and result in more-efficient pupil teacher ratios over time.

Efficiencies in the use of school facilities would be most conspicuous in the transition from two middle schools and two high schools across the two school divisions to one middle school (in the current Covington High School building) and one high school (in the current Alleghany High School building) in the consolidated school division. The Facilities Subcommittee agreed “that it would be in the best interests of our students to have one high school and one middle school.” Mem. from Facilities Subcomm. to JCSC at 1, *in* REPORT & RECOMMENDATION, *supra*. It would allow “for more class options for all students” than if the schools remained separate as they are now. *Id.* Given the Alleghany High School building’s closer proximity to the Jackson River Technical Center (“JRTC”), JRTC classes would also be more accessible to students with the Alleghany High School building housing the consolidated school division’s single high school. *Id.* at 3. In addition, consolidating the middle and high schools could be expected to reduce

maintenance, upkeep, and operational costs or allow the respective localities to divert the former school buildings to more efficient uses not currently available.⁶

A consolidated school division would also promote efficiencies in central office administration. As recognized by the Regimbal-Salmon Report, “[a] consolidated school division would . . . no longer need to have duplicative central office administration[,]” and “[e]ventually eliminating duplicative positions could save over \$900,000 per year.” Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 2; *see also id.* at 40 & tbl. 22. The Regimbal-Salmon Report “provided the basis for [the Governance Subcommittee’s] conversations about administrative structure,” which “supposed a structure very similar to [the Allegheny County Public Schools’] current structure would be utilized.” Mem. from Facilities Governance Subcomm. to JCSC at 2, *in* REPORT & RECOMMENDATION, *supra*. The Governance Subcommittee recommended such a structure, *id.* at 3, and it was “recognized that a merger of central offices could create situations where duties could be combined,” REPORT & RECOMMENDATION, *supra*, at 17.

With respect to personnel outside of central office administration, it is expected that consolidation could also result in efficiencies in the eventual reduction in the overall number of teachers and in increased pupil-teacher ratios. In the FY2017-2018 school year,

- Allegheny County’s pupil-student ratio was “significantly below” the statewide ratios for kindergarten through seventh grade and eighth through twelfth grade; and
- Covington’s pupil-student ratio was “slightly above” the statewide ratio for kindergarten through seventh grade but “below” the statewide ratio for eighth through twelfth grade.

Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 17-18 & tbl. 5. Using an ERIP program for those who are VRS-retirement eligible, consolidation presents an opportunity to “right-size school

⁶ After consolidation, the former school buildings would be vacated, and their uses would be determined by the consolidated school board and Governing Body. REPORT & RECOMMENDATION, *supra*, at 32 n.13.

division pupil-teacher ratios with the least amount of disruption.” *Id.* at 2; *see also id.* at 41-42 & tbl. 23; Mem. from Fin. Subcomm. to JCSC at 2, *in* REPORT & RECOMMENDATION, *supra*. Accordingly, the Finance Subcommittee recommended “that an ERIP program . . . be implemented by the consolidated division as one of its first actions,” “ensur[ing] a smoother transition and provid[ing] a catalyst to achieving ideal staffing levels.” Mem. from Fin. Subcomm. to JCSC at 3, *in* REPORT & RECOMMENDATION, *supra*.

Thus, consolidation presents real opportunities to enhance the efficiencies of the local schools and to do so in a manner that improves course offerings to students and student-pupil ratios.

4. Anticipated change in the school-age population of the proposed school division.

The “[a]nticipated increase or decrease in the number of children of school age in the proposed school division,” *id.* § 22.1-25(C)(4), is shown in Table 1 above (school-age populations) and Table 2 below (percentage change in school-age population from 2022 to 2030).

From 2022 to 2030, Alleghany County’s school-age population is expected to decline 9.78% percent (from 2474 to 2232), and Covington’s is expected to decline 13.66% (from 937 to 809). A consolidated school division’s school-age population would decrease 10.85% (from 3411 to 3041) over the same period; however, it would have a substantially higher school-age population than either of the school divisions would alone. During the 2022-2030 period, the school-age population of the consolidated school division would substantially exceed that of Alleghany County’s or Covington’s, alone, in any year going back at least to 2013.⁷

⁷ During the 2013-2030 period, Alleghany County’s highest school-age population was 2836 (2013) and Covington’s was 1168 (2013). Over the 2022-2030 period, the consolidated school division would be expected to have a school-age population ranging from 3411 (2022) to 3041 (2030).

Table 2: Percentage Change in School-Age Population, 2022-2030

Year	PERCENTAGE SCHOOL-AGE POPULATION		
	Allegheny County	Covington	Consolidated
2022-23	-1.21%	-0.96%	-1.14%
2023-24	-1.23%	-1.08%	-1.19%
2024-25	-1.24%	-1.09%	-1.20%
2025-30	-6.38%	-10.90%	-7.62%
2022-30	-9.78%	-13.66%	-10.85%

Source:

Derived from information in Table 1, *supra*.

5. Geographical and topographical features related to transportation facilities for pupils’ access to school facilities.

Regarding “[g]eographical area and topographical features as they relate to existing or available transportation facilities designed to render reasonable access by pupils to existing or contemplated school facilities,” Va. Code § 22.1-25(C)(5), the Transportation Subcommittee recommended “that a transportation study be conducted” to provide “an in-depth study of what the most cost effective routes for running buses throughout a consolidated school division would be,” Mem. from Transp. Subcomm. to JCSC, at 2, *in* REPORT & RECOMMENDATION, *supra*.⁸

This study was provided by AECOM, which “believes that the combined school bus capacity of the Covington City and Allegheny County school divisions should be adequate to serve the needs of the consolidated system based on one high school and one middle school.” AECOM, TRANSPORTATION STUDY, *supra*, at 5. Among AECOM’s conclusions were that:

- current routes can continue to serve the elementary schools;

⁸ For interactive geographic information system (“GIS”) maps, see *GIS Data*, ALLEGHANY CNTY., VA., available at <https://tinyurl.com/y5wo5sdt> (last accessed Oct. 20, 2020); *GIS Maps*, CITY OF COVINGTON, available at <https://tinyurl.com/y4arh5y8> (last accessed Oct. 20, 2020). For topographical maps, see U.S. Geological Survey, ALLEGHANY QUADRANGLE VIRGINIA (2019), available at <https://tinyurl.com/y585a6gm>; U.S. Geological Survey, CLIFTON FORGE QUADRANGLE VIRGINIA (2019), available at <https://tinyurl.com/y6mr95gj>; U.S. Geological Survey, COVINGTON QUADRANGLE VIRGINIA (2019), available at <https://tinyurl.com/yxgq6chr>.

- a few adjustments to routes can improve travel times for a majority of current Clifton Middle School students and potentially some Allegheny High School students;
- current Covington High School students would have about fifteen minutes added to their bus routes, and the bus rides would remain under sixty minutes; and
- there will be a need for “[a]dditional capacity on one or more bus routes connecting Clifton Middle School, Allegheny High School, and Covington High School;” however, AECOM believes “that the existing bus routes and the available bus capacity can be reconfigured to best serve this need.”

Id. at 3, 5.⁹

AECOM’s conclusions are consistent with the Transportation Subcommittee’s belief that “there will not be a significant impact to bus routes or to the commuting time for students” “[b]ecause the proposed consolidation does not change any of the elementary schools, and because of the close proximity between Allegheny High School and the City of Covington High School[.]” REPORT & RECOMMENDATION, *supra*, at 36.

6. Ability of existing school divisions to meet the SOQ with their own resources and facilities or in cooperation with others if such arrangements have been made.

Regarding “[t]he ability of each existing school division to meet the standards of quality with its own resources and facilities or in cooperation with another school division or divisions if arrangements for such cooperation have been made,” Va. Code § 22.1-25(C)(6), the Local Boards respectfully submit that, absent cooperation through a consolidated school division, it will become more and more difficult to meet the SOQ, as separate school divisions with divided resources, while their student body sizes decrease and their communities remain fiscally stressed.

As discussed above, from school years 2015-2016 through 2018-2019, the Covington City School Division has been fully compliant with the SOQ, while the Allegheny County School Division has fallen short of compliance with SOQ 3 on the issue of accreditations. If consolidation

⁹ AECOM acknowledged that there are some unknowns pertaining to students currently attending Covington High School or Clifton Middle School who do not ride the bus to school. AECOM, TRANSPORTATION STUDY, *supra*, at 5.

were approved, the consolidated school division would be expected to better meet the accreditation SOQ by pooling the resources available to the consolidated middle school and high school and enhancing the educational opportunities available to local students. *See supra* Supporting Info. & Data pt. I.2.

Regarding available resources, the school divisions are in fiscally stressed localities,¹⁰ which has resulted in decreases in local appropriations from FY2013-2018. *See* Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 8. As observed in the Regimbal-Salmon Report, “Alleghany and particularly Covington rank high on the state measure of fiscal stress scores.” *Id.* at 1; *see also id.* at 32 & tbl. 16. In the Commission on Local Government’s most recent report on fiscal stress, Covington had the ninth highest fiscal stress score among cities and counties in the Commonwealth, and Alleghany County’s was above average at the thirty-ninth highest. Comm’n on Local Gov’t, REPORT ON COMPARATIVE REVENUE CAPACITY, REVENUE EFFORT, AND FISCAL STRESS OF VIRGINIA’S CITIES AND COUNTIES: FISCAL YEAR 2018, at 6 (July 2020), *available at* <https://tinyurl.com/yy2g7dlc>. Meanwhile, Covington has seen some increased State aid on account of modest increases in ADM, while Alleghany County’s State aid has decreased both on account of the treatment of its Local Composite Index (“LCI”) and decreases in its ADM. Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 1, 8. Notably, “[s]ome of the Alleghany membership loss has been pupils transferring to the Covington School District following the June 2013 closure of two Alleghany elementary schools.” REPORT & RECOMMENDATION, *supra*, at 9.

¹⁰ The Commission on Local Government’s “fiscal stress” measures indicate “signs of fiscal weaknesses, or ‘stresses,’ existing in the fiscal position of Virginia’s local governments.” *See* REPORT OF THE JOINT LEGISLATIVE AUDIT & REVIEW COMM’N ON STATE MANDATES ON LOCAL GOV’TS & LOCAL FIN. RESOURCES, H. Doc. No. 15, at 67 (1984), *available at* <https://tinyurl.com/wcljosm>.

As for cooperative arrangements, in addition to offering Virginia Preschool Initiative services in coordination with the YMCA and Head Start, the school divisions are presently cooperating through the Alleghany Highlands Early Learning Partnership. *See generally Alleghany Highlands Early Learning Partnership, AHELPVA.COM, available at <https://tinyurl.com/y6rakudu>.* Consolidation would streamline and support these joint efforts.

The Alleghany County School Division's history also features the consolidation with the former Clifton Forge School Division, approved by this Board in 1981, which preceded Clifton Forge's reversion from an independent city to a town within Alleghany County in 2001. As a result of Clifton Forge's reversion, Alleghany County enjoyed a reduced LCI, which expired in FY2020 resulting in decreased State aid. Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 1-2, 8. To further address such matters, the Local Boards are hopeful that short-term incentives allowing for consolidation will lead to long-term cost savings ultimately resulting in less support being needed from the Commonwealth.

While the localities are presently fiscally stressed with little other alleviation of such stresses in sight, the Local Boards submit that a consolidated school division – pooling the resources of Alleghany County and Covington and increasing efficiencies and course offerings – would enhance the educational opportunities available for local students and better facilitate local schools' satisfaction of the SOQ.

II. COST SAVINGS FROM CONSOLIDATION.

As “evidence of the cost savings to be realized by such consolidation,” Va. Code § 22.1-25(D)(ii), the Regimbal-Salmon Report found that, “[c]early, some significant savings are possible with the merger of school divisions,” Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 2, and

the Finance Subcommittee agreed noting that “opportunities certainly exist for cost savings and efficiencies,” Mem. from Fin. Subcomm. to JCSC at 1, 3, *in* REPORT & RECOMMENDATION, *supra*.

The following are among the potential savings resulting from the school divisions’ consolidation:

- an eventual reduction in total teachers employed, assuming an increase in pupil-teacher ratios in the consolidated division over time, Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 2-3, 39;
- the streamlining of central office administration, and eventually eliminating duplicative positions, which could save over \$900,000 per year, *id.* at 2-3; 40; and
- savings from the equalization or increase of health benefits more slowly over time, *id.* at 2-3, 36-37.

See also REPORT & RECOMMENDATION, *supra*, at 7, 10, 27-28. With these long-term savings in addition to temporary incentives, the consolidated school division could afford to increase instructional position salaries for the consolidated division staff up to the generally higher instructional pay levels seen currently in the Covington school division. Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 3.

As alluded to above, *see supra* Supporting Information & Data pt. I.3, the Finance Subcommittee recommended that an ERIP program “be implemented by the consolidated division as one of its first actions.” Mem. from Fin. Subcomm. to JCSC at 3, *in* REPORT & RECOMMENDATION, *supra*. There are obvious cost savings associated with the recommended ERIP, which would provide an early retirement option for teachers nearing the end of their career, who are nearly always at the top end of the pay scale. *Id.* at 2. Although there will be initial costs associated with an ERPI program’s implementation, and short-term funding assistance from the State will be vital to properly administer any plan, there will be long-term cost savings. Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 2-3, 41-42; *see also* REPORT & RECOMMENDATION, *supra*, at 29; Mem. from Fin. Subcomm. to JCSC at 2, *in* REPORT & RECOMMENDATION, *supra*.

As acknowledged in the Regimbal-Salmon Report, neighboring Rockbridge County provides an example of a school division that has successfully employed such a program. *See* Regimbal & Salmon, FEASIBILITY REPORT, *supra*, at 2, 41; *see also id.* at 48-51 (Rockbridge County 216-2017 ERIP).

III. PLAN FOR THE TRANSFER OF PROPERTY TO THE CONSOLIDATED SCHOOL BOARD.

Regarding the “plan for the transfer of title to school board property to the resulting combined school board governing the consolidated division,” Va. Code § 22.1-25(D)(iii), it is expected that these details will become clearer in time should consolidation be approved. At present, the plan is that:

- all property, real or other, held by the respective localities shall remain titled as such unless and until the Governing Bodies determine that a title of transfer is appropriate, REPORT & RECOMMENDATION, *supra*, at 34;
- the use of the existing middle school buildings (which would be vacated, as the existing Covington High School building would house the consolidated school division’s middle school) would be determined by the consolidated school board and Governing Bodies, *id.* at 32 n.13; and
- any existing school debt service held by the respective Local Boards would be transferred to the respective locality for retirement, *id.* at 28; Mem. from Fin. Subcomm. to JCSC, at 3, *in* REPORT & RECOMMENDATION, *supra*.

IV. PROCEDURES AND SCHEDULE FOR THE PROPOSED CONSOLIDATION.

The “procedures and a schedule for the proposed consolidation, including completion of current division superintendent and school board member terms,” Va. Code § 22.1-25(D)(iv), are shown in Table 3 below.

Table 3: Consolidation Procedures and Schedule*

	PROCEDURE	REFERENCE(S)
Following Board’s Approval**	Local Boards and Governing Bodies negotiate and enter into agreement regarding school division consolidation matters.	
Within Sixty Days Before July 1, 2022	Governing Bodies appoint the required number of members of the consolidated school board.	Va. Code § 22.1-53(B); REPORT & RECOMMENDATION, <i>supra</i> , at 16-17; Mem. from Governance Subcomm. to JCSC at 1-2, 3, REPORT & RECOMMENDATION, <i>supra</i> .

July 1, 2022	Effective date for consolidation of the school divisions and the school boards.	REPORT & RECOMMENDATION, <i>supra</i> , at 16; Mem. from Governance Subcomm. to JCSC at 2, REPORT & RECOMMENDATION, <i>supra</i> .
Thereafter	Appointment of the consolidated school division's superintendent and assistant superintendent.	REPORT & RECOMMENDATION, <i>supra</i> , at 17; Mem. from Governance Subcomm. to JCSC at 2, REPORT & RECOMMENDATION, <i>supra</i> , at 3.
Before the 2022-2023 School Year	Adopt policy manual for the consolidated school division for use beginning in the 2022-2023 school year.	REPORT & RECOMMENDATION, <i>supra</i> , at 16; Mem. from Governance Subcomm. to JCSC at 2, REPORT & RECOMMENDATION, <i>supra</i> .
2023-2024 School Year	Merger of the student bodies.	REPORT & RECOMMENDATION, <i>supra</i> , at 16.

Notes:

* Should consolidation be approved, it is expected that more details would be added regarding such procedures and schedule as the effective date of consolidation would draw closer.

** By way of comparison, the school boards and governing bodies of Allegheny County and Clifton Forge entered into a June 30, 1982, agreement regarding school division consolidation matters in advance of the July 1, 1982, consolidation of the school divisions. This followed the Board's approval of the consolidation proposal at its meeting of December 11, 1981. 52 MINUTES OF THE STATE BOARD OF EDUCATION, *supra*, at 178-79.

It is expected that the consolidated school division's superintendent would be selected from among the current superintendents of the Allegheny County School Division and Covington City School Division, with the other current superintendent becoming the consolidated school division's assistant superintendent. The assistant superintendent would be elevated to superintendent if that position were later vacated, and the assistant superintendent position would be dissolved if that position were later vacated. REPORT & RECOMMENDATION, *supra*, at 17; Mem. from Governance Subcomm. to JCSC at 2, REPORT & RECOMMENDATION, *supra*, at 3.

Regarding the current members of the Local Boards, five members have terms that expire on June 30, 2022, the day before the proposed effective date for consolidation. Allowing these terms to expire could result in seven members carrying-over from the Local Boards, four from Allegheny County and three from Covington, consistent with desired composition of the consolidated school board. REPORT & RECOMMENDATION, *supra*, at 16-17; Mem. from Governance Subcomm. to JCSC at 2, REPORT & RECOMMENDATION, *supra*, at 3. Appointments

to the consolidated school board would be made within sixty days before consolidation's effective date of July 1, 2020, consistent with § 22.1-53(B) of the Virginia Code.

V. PLAN FOR REPRESENTATION ON THE CONSOLIDATED SCHOOL BOARD.

Regarding the “plan for proportional school board representation of the localities comprising the new school division, including details regarding the appointment or election processes currently ensuring such representation and other information as may be necessary to evidence compliance with federal and state laws governing voting rights,” Va. Code § 22.1-25(D)(v):

- presently, the Alleghany County School Board is comprised of seven members, appointed from the County's magisterial districts,¹¹ by a majority vote of the Alleghany County Board of Supervisors, and the Covington City School Board is comprised of five members, appointed at-large by a majority vote of all members of the Covington City Council; and
- the consolidated school board would be comprised of seven members, four appointed by the Alleghany County Board of Supervisors and three appointed by the Covington City Council.

As contemplated under the Virginia Code, the consolidated school division would be composed “of more than one county or city,” *id.* § 22.1-52, and therefore the composition of the consolidated school board would “be composed of no fewer than six nor more than nine members,” with the exact number determinable by agreement of the Governing Bodies, *id.* § 22.1-53(A). “Unless the governing bodies of the counties and cities in a school division composed of . . . more than one county or city agree upon some other equitable and reasonable criteria, the number of members of the school board from each county and city . . . thereof in the division shall be apportioned according to the population in the school division of each such county or city . . . , provided that each county or city shall have at least one member.” *Id.* § 22.1-53(A). Terms of the

¹¹ For the magisterial districts represented by the Alleghany County School Board's members, see Alleghany County Code §§ 26-2 and -3.

consolidated school board members would be staggered, *id.* § 22.1-53(B), and the respective Governing Body would determine whether to appoint its school board members by district or at large, *id.* § 22.1-54.

Consistent with § 22.1-53 of the Virginia Code, the consolidated school board would be composed of seven members as agreed by the Governing Bodies. Based on “equitable and reasonable criteria,” *id.* § 22.1-53(A), four members would be appointed by the Alleghany County Board of Supervisors and three would be appointed by the Covington City Council.¹² In addition, a two-thirds vote would be required on significant matters such as the hiring or termination of superintendents and the construction or closure of facilities. REPORT & RECOMMENDATION, *supra*, at 16-17; Mem. from Governance Subcomm. to JCSC at 2, REPORT & RECOMMENDATION, *supra*, at 2-3. The four-three split reflects equitable considerations ensuring that Covington will have meaningful representation on the consolidated school board, whereas it presently has control over its own school division. Furthermore, the four-three split is reasonable as it is generally consistent with the approach taken by Alleghany County and the former City of Clifton Forge after the Board approved their school divisions’ consolidation in 1981.¹³

¹² The members would be appointed by the respective Governing Bodies, unless the voters approved direct election pursuant to an appropriate referendum. *Cf.* Va. Code § 22.1-57.1 (“If a county and city . . . constitute a consolidated school division, each county or city shall be treated as a separate entity for the purposes of this article and be entitled to hold its own referendum and proceed to elect the same number of members to the consolidated board as have been appointed from the county or city.”).

¹³ The agreement between the school boards and governing bodies of Alleghany County and Clifton Forge provided that, “[f]or the first two years of operation as the [consolidated] Alleghany Highlands School Board, the Board shall consist of five members from Alleghany County appointed by the Board of Supervisors and four members from Clifton Forge appointed by the City Council. Thereafter, the School Board will consist of five members from Alleghany County and three members from Clifton Forge.” REPORT & RECOMMENDATION, *supra*, at 14 (quoting Alleghany County-Clifton Forge Agreement § 4 (June 30, 1982).) Until Clifton Forge’s reversion to a town within Alleghany County in 2001, the proportion of population in the respective localities was approximately 25% (Clifton Forge) and 75% (Alleghany County). *See generally* Univ. of Va. Weldon Cooper Ctr. for Pub. Serv., Demogr. Res. Grp., INTERCENSAL ESTIMATES FOR VIRGINIA, COUNTIES, AND CITIES: 1990-2000 (2003), available at <https://tinyurl.com/w273qg8>; Univ. of Va. Weldon Cooper Ctr. for Pub. Serv., REVISED INTERCENSAL ESTIMATES FOR VIRGINIA LOCALITIES: 1980-1990, available at <https://tinyurl.com/y3oeqpyb>. Weldon Cooper has estimated the 2020 population of Alleghany County at 14,950 and Covington at 5677, Univ. of Va. Weldon Cooper Ctr. for Pub. Serv., Demogr. Res. Grp., VIRGINIA POPULATION PROJECTIONS (2019), available at <https://tinyurl.com/sej8v6k>, and the

There are no issues foreseen regarding compliance with federal or State voting rights laws.¹⁴

VI. LOCAL SUPPORT FOR CONSOLIDATION.

As “evidence of local support for the proposed consolidation,” Va. Code § 22.1-25(D)(vi), the Governing Bodies and Local Boards have adopted resolutions in support (**Exhibits A-D**), and recent poll results indicate that a majority of residents across the localities also support the proposed consolidation.

As recognized in the resolutions of the Governing Bodies and Local Boards, the consolidation of the school divisions “would be in the best interest of both the people of the City of Covington and Alleghany County and would further the interest of the Commonwealth in promoting strong and viable public school districts.” (**Exhibits A-D.**)

Public support was also demonstrated in the results of a third-party poll administered by 20-20 Insight. The views of the residents across Alleghany County and Covington are reflected in Table 4 below:

2025 populations at 14,237 and 6352, respectively, Univ. of Va. Weldon Cooper Ctr. for Pub. Serv., Demogr. Res. Grp., VIRGINIA POPULATION PROJECTIONS (2017), available at <https://tinyurl.com/y6mksjmj>.

¹⁴ There is presently no preclearance requirement under federal or State voting rights laws, *Shelby County v. Holder*, 570 U.S. 529 (2013), and the appointment processes are consistent with federal and State laws governing voting rights, *Irby v. Va. State Bd. of Elections*, 889 F.2d 1352 (4th Cir. 1989) (appointment of school boards did not violate the Fourteenth or Fifteenth Amendments to the U.S. Constitution or § 2 of the Voting Rights Act); *Wilkins v. West*, 264 Va. 447, 467, 571 S.E.2d 100, 111 (2002) (the Virginia Constitution’s antidiscrimination clause is “congruent with” the Equal Protection Clause of the U.S. Constitution).

Table 4: Public Support for Consolidation in Allegheny County and Covington

INITIAL POLL ON CONSOLIDATION		
	Very Supportive / Mostly Supportive	Mostly Unsupportive / Not at All
Percentage	54%	38%

RESIDENTS MORE LIKELY TO SUPPORT CONSOLIDATION					
	After hearing about additional educational opportunities.	If it means financial savings	If it means additional opportunities to use JRTC.	If there are no changes to elementary education.	If the Allegheny High School and Covington High School buildings would both be used.
Percentage	72%	68%	63%	51%	38%

RETEST POLL AFTER CONSIDERING THE ABOVE		
	Likely to Support	Unlikely to Support
Percentage	59%	36%

Source:
20-20 Insight, CONSOLIDATION POLL, *supra*.

The results of the poll show that 54% of the community is either very supportive or mostly supportive of the consolidation.¹⁵ This number increased after citizens learned of the benefits of consolidation such as additional educational opportunities, financial savings, and additional opportunities to utilize JRTC. After considering the benefits, a total of 59% of the community is in support of the proposition.

While a larger majority might be desired, this level of support has been notably absent from other attempts to consolidate in Virginia and should be considered a favorable factor in this instance. For example, “[c]itizen concern about losing local identity and control have been cited as reasons for the failure of efforts to consolidate school divisions in . . . Wise County and the City

¹⁵ Support for consolidation is slightly higher in Allegheny County and slightly lower in Covington. On the initial poll, 60% of Allegheny County residents were very supportive or mostly supportive (32% mostly unsupportive or not supportive at all), while 38% of Covington residents were very supportive or mostly supportive (55% mostly unsupportive or not supportive at all). After hearing more about the benefits of consolidation, those numbers improved to 65% likely to support in Allegheny County (30% unlikely) and 40% likely to support in Covington (53% unlikely). 20-20 Insight, CONSOLIDATION POLL, *supra*.

of Norton . . . and Rockbridge County and the City of Lexington.” J. Legis. Audit & Review Comm’n, REPORT TO THE GOVERNOR AND GENERAL ASSEMBLY: LOCAL GOVERNMENT AND SCHOOL DIVISION CONSOLIDATION 4 (Sept. 2014) [hereafter JLARC, CONSOLIDATION REPORT], available at <https://tinyurl.com/yyjzlnou>. And the existing support for school consolidation across Alleghany County and Covington is a reversal of the results in the unsuccessful 2011 referendum on the consolidation of the localities. That referendum failed, with approximately 44% in favor and 56% opposed across Alleghany County and Covington. *Should Alleghany County and the City of Covington Consolidate?* (2011), VA. DEP’T OF ELECTIONS, available at <https://tinyurl.com/y3bx24tn>.¹⁶ Similarly, in other States “the issue of closing schools has proven to be particularly challenging because of citizen concerns about children changing schools and losing the part of their local identity that is tied to high school athletics.”¹⁷ JLARC, CONSOLIDATION REPORT, *supra*, at 13.

On what can be a very emotional issue, it is significant that there is public support in favor of the consolidation of school systems, that public support improves after learning more about the proposed consolidation, and that this type of public support has not been seen recently with other efforts to consolidate school divisions.

CONCLUSION

Very early in this process, it was acknowledged that “[t]he youth are our future and whether they go to your schools or our schools, they are a part of this community.” ALLEGHANY CNTY. BD. OF SUPERVISORS REG. MTG MINUTES, *supra*, at 6 (Jan. 2, 2019). Support for students, families,

¹⁶ Approximately 45% of Alleghany County voters were in favor with 55% opposed, and approximately 38% of Covington residents were in favor with 62% opposed. *Should Alleghany County and the City of Covington Consolidate?* (2011), VA. DEP’T OF ELECTIONS, *supra*.

¹⁷ “In one state it was remarked that ‘the most difficult animal to kill is a school mascot.’” JLARC, CONSOLIDATION REPORT, *supra*, at 13.


and the school systems' faculty and staff is the common thread uniting each aspect of this Proposal. The Local Boards submit that this process would not have made it this far had they not shared the same feeling, which has yielded substantial cooperation between Alleghany County and Covington in the interest that their students be served in the best manner possible. The Local Boards wish for such cooperation to continue with a consolidated school division that will promote the commonweal through a better offering of educational opportunities for their students, which will also be to the benefit of the respective localities and of the Commonwealth as a whole.

Accordingly, the Local Boards respectfully request the consolidation of their respective school divisions.

Dated: October 23, 2020

Respectfully submitted,

ALLEGHANY COUNTY SCHOOL BOARD
and COVINGTON CITY SCHOOL BOARD,
by and through their JOINT COMMITTEE
ON SCHOOL CONSOLIDATION

By: 
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Stephen C. Piepgrass (VSB # 71361)
Robert S. Claiborne, Jr. (VSB # 86332)
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Counsel

APPENDIX I:
MEMBERS OF THE JOINT COMMITTEE ON SCHOOL CONSOLIDATION



Jacob Wright
ALLEGHANY COUNTY SCHOOL BOARD



Jonathan Arritt
COVINGTON CITY SCHOOL BOARD



Erika Hunter
COVINGTON CITY SCHOOL BOARD



Allan Tucker
COVINGTON CITY COUNCIL



Tom Sibold
MAYOR, CITY OF COVINGTON



Matt Garten
ALLEGHANY COUNTY BOARD OF SUPERVISORS



James Griffith
ALLEGHANY COUNTY BOARD OF SUPERVISORS



Gerald Franson
ALLEGHANY COUNTY SCHOOL BOARD

**APPENDIX II:
TIMELINE OF NOTABLE STEPS TOWARD SCHOOL CONSOLIDATION, 2018-2020**

The following is a timeline of certain notable school consolidation efforts and events, from 2018-2020, that have preceded the filing of this Proposal. This timeline is not exhaustive, as there have been various updates to the respective school boards and local governing bodies and various individual acts contributing to the process.

DATE	EVENT
Oct. 2018	Meeting of the Allegheny County School Board wherein School Board Member Jacob Wright presented a draft letter regarding potential cooperation and joint services with the Covington City School Board. Allegheny County School Board approves committee to review Mr. Wright's letter in advance of further action thereon.
Nov. 2018	Meeting of the Allegheny County School Board's Joint Services Committee wherein the Committee approved Mr. Wright's letter regarding potential cooperation and joint services with the Covington City School Board. Meeting of the Allegheny County School Board wherein the School Board approved Mr. Wright's letter for distribution to the Allegheny County Board of Supervisors, Covington City Council, and Covington City School Board, suggesting that each body appoint two members to serve on a joint committee to discuss a plan regarding potential cooperation and joint services among the school divisions (the "JCSC"). The Allegheny County School Board also appointed two members to the JCSC.
Dec. 2018 – Jan. 2019	Meeting of the Covington City Council, wherein the Council agreed to meet with Allegheny County representatives regarding cooperation and joint services among the school divisions and appointed two members to the JCSC. Meeting of the Allegheny County Board of Supervisors wherein the Board appointed two members to the JCSC. Meeting of the Covington City School Board wherein the Board appointed two members to the JCSC.
May 2019	Recognizing the appointments to the JCSC and the deliberations and efforts of the respective school boards and governing bodies, the General Assembly appropriates "funds as incentive funding to support costs incurred by such joint efforts of Allegheny County School Board, Allegheny County Board of Supervisors, Covington City School Board and the City of Covington City Council toward investigating and determining benefits of operating a joint school division."
Aug. 2019	Initial organizational meeting of the JCSC.

Sept. 2019	<p>Meeting of the JCSC presenting potential pros and cons of consolidation and discussing retention of legal services.</p> <p>Meeting of the JCSC updating as to retention of Troutman Sanders LLP (later Troutman Pepper Hamilton Sanders LLP, hereafter “Troutman”), proposed mission statement, visit from the Virginia Secretary of Education, and next steps in exploring consolidation.</p>
Oct. 2019	<p>Meeting of the JCSC updating as to presentation from Troutman regarding the consolidation process and examples of joint-school efforts in the Commonwealth and approving entry into a contract with a fiscal analyst to engage in review of a school consolidation.</p> <p>Meeting of the JCSC with public comment regarding governance, budget, and equalization of pay matters pertaining to a potential consolidation.</p>
Nov. 2019	<p>JCSC contracts with consultants James Regimbal and Richard Salmon to provide a fiscal analysis relating to school consolidation.</p> <p>Meeting of the JCSC updating regarding fiscal analysis of James Regimbal and Richard Salmon and discussing governance issues in a consolidated school division.</p> <p>Meeting of the JCSC discussing governance issues in a consolidated school division and further input from educational professionals.</p>
Dec. 2019	<p>Meeting of the JCSC discussing governance issues in a consolidated school division and how to address existing debts and budgetary matters in a consolidated school division including capital improvements.</p> <p>Meeting of the JCSC discussing anticipated fiscal analysis of James Regimbal and Richard Salmon, possible short-term incentives, capital improvement assessment, and possible subject-matter subcommittees.</p> <p>Finalization of James Regimbal and Richard Salmon’s <i>Study Regarding the Feasibility for Consolidation of Covington City and Alleghany County School Divisions</i>.</p> <p>Meeting of the JCSC with James Regimbal and Richard Salmon present to give their fiscal study report.</p>
Jan. 2020	<p>General Assembly amends budget retaining funds for study of school division consolidation.</p>
Mar.-Aug. 2020	<p>Meetings of the JCSC’s Finance, Governance, Facilities, Transportation, and Curriculum Subcommittees regarding respective subject matters under a consolidated school division. Among these were approximately six meetings of the Finance Subcommittee, six meetings of the Governance Subcommittee, eight meetings of the Facilities Subcommittee, and three meetings of the Curriculum Subcommittee.</p>
Aug. 2020	<p>Finalization of the JCSC’s <i>Report & Recommendation</i> on the proposed school consolidation, including memoranda from the JCSC’s Finance, Governance, Facilities, Transportation, and Curriculum Subcommittees.</p>

<p>Sept. 2020</p>	<p>Presentations to the respective governing bodies and school boards regarding the proposed consolidation of school divisions, and public hearing on the same.</p> <p>The respective governing bodies and school boards adopt resolutions supporting the consolidation of school divisions.</p>
<p>Oct. 2020</p>	<p>Polling results finalized regarding public opinion on school division consolidation in Allegheny County and the City of Covington.</p> <p>AECOM study finalized regarding transportation matters in a consolidated school division.</p> <p>Allegheny County School Board and Covington City School Board submit joint proposal to the Board of Education requesting consolidation of school divisions.</p>

EXHIBIT A

**BOARD OF SUPERVISORS
COUNTY OF ALLEGHANY
Covington, Virginia**

At an adjourned meeting of the Board of Supervisors, Alleghany County, Virginia held on Wednesday, September 9, 2020 at 6:00 P.M., in Gleason Forum Hall of Mountain View Elementary School thereof, the following action was taken:

<u>MEMBERS:</u>	<u>VOTE:</u>
G. Matt Garten, Chairman	Yes
Stephen A. Bennett, Vice-Chair	Yes
Shannon P. Cox	Yes
James M. Griffith	Yes
Cletus W. Nicely	No
Richard L. Shull	Yes
M. Joan Vannorsdall	Yes

On motion of Mr. Griffith, seconded by Mr. Garten that the following resolution be adopted:

**RESOLUTION AUTHORIZING THE CONSOLIDATION OF
ALLEGHANY COUNTY AND CITY OF COVINGTON SCHOOL DISTRICTS**

WHEREAS, Alleghany County has determined that the consolidation of its public schools with the City of Covington public schools would be in the best interests of both the people of the City of Covington and Alleghany County and would further the interest of the Commonwealth in promoting strong and viable public school districts; and

WHEREAS, the consolidation can improve the educational opportunities and resources of public education in Alleghany County; and

WHEREAS, the consolidation will result in a more equitable use of the resources and distribution of the liabilities of Alleghany County and the City of Covington; and

WHEREAS, the consolidation can result in fiscal savings and governmental efficiencies;

NOW, THEREFORE, BE IT RESOLVED by the Alleghany County Board of Supervisors that:

1. Pending approval from the Virginia Department of Education and subject to any necessary appropriations from the Virginia General Assembly, Alleghany County approves of and shall initiate and pursue all such procedures as may be necessary to accomplish the consolidation of public schools between the City of Covington and Alleghany County as outlined in the Virginia Code (Va. Code § 22.1-25 et seq.) and in a manner consistent with the recommendations of the Joint Committee on School Consolidation (which are adopted herein by reference);
2. The County Attorney and County Manager are authorized, with the approval of this Board, to take all other such actions and to employ such special consultants as may be necessary to accomplish the objectives set forth herein including, but not limited to, signing and memorializing any agreements necessitated by DOE between the respective localities; and,
3. The Board of Supervisors, throughout the course of these proceedings, shall continue to work toward an amicable resolution of this matter with the appropriate officials of the City of Covington.

Adopted as Mr. Bennett, Mrs. Cox, Mr. Garten, Mr. Griffith, Mr. Shull, and Ms. Vannorsdall voted yes. Mr. Nicely voted no.

A COPY TESTE:

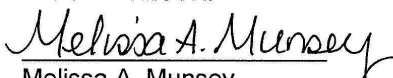

Melissa A. Munsey
Deputy Clerk to the Board

EXHIBIT B



P.O. Drawer 140, 100 Central Circle
Low Moor, VA 24457

**RESOLUTION
AUTHORIZING THE CONSOLIDATION OF
ALLEGHANY COUNTY AND CITY OF COVINGTON SCHOOL DISTRICTS**

During a called meeting on September 9, 2020, the Allegheny County School Board took the following action:

	<u>VOTE</u>
Jacob L. Wright, Chairman	YES
Danielle I. Morgan, Vice Chairwoman	YES
Gerald E. Franson	YES
Donnie T. Kern	NO
Jennifer S. Seckner	YES
Falling Spring District	VACANT
Jackson River District	VACANT

On motion of Mr. Franson, seconded by Mrs. Morgan, that the following resolution be adopted:

WHEREAS, the Allegheny County School Board has determined that the consolidation of its public schools with the City of Covington public schools would be in the best interests of both the people of the City of Covington and Allegheny County and would further the interest of the Commonwealth in promoting strong and viable public school districts;

WHEREAS, the consolidation can improve the educational opportunities and resources of public education in Allegheny County;

WHEREAS, the consolidation will result in a more equitable use of the resources and distribution of the liabilities of Allegheny County and the City of Covington; and,

WHEREAS, the consolidation can result in fiscal savings and governmental efficiencies;

NOW, THEREFORE, BE IT RESOLVED BY THE ALLEGHANY COUNTY SCHOOL BOARD THAT:

1. Pending approval from the Virginia of Department of Education and subject to any necessary appropriations from the Virginia General Assembly, the Alleghany County School Board approves of and shall initiate and pursue all such procedures as may be necessary to accomplish the consolidation of public schools between the City of Covington and Alleghany County as outlined in the Virginia Code (Va. Code § 22.1-25 et seq.) and in a manner consistent with the recommendations of the Joint Committee on School Consolidation (which are adopted herein by reference);
2. The Alleghany County School Board Chair is authorized, with the approval of this Board, to take all other such actions and to employ such special consultants as may be necessary to accomplish the objectives set forth herein including, but not limited to, signing and memorializing any agreements necessitated by the Virginia Department of Education between the respective localities; and,
3. The Alleghany County School Board, throughout the course of these proceedings, shall continue to work toward an amicable resolution of this matter with the appropriate officials of the City of Covington.

Adopted this 9th day of September, 2020.

Attest:



Lorie C. Bess, Clerk of the Alleghany County School Board

EXHIBIT C

RESOLUTION

**AUTHORIZING THE CONSOLIDATION OF
ALLEGHANY COUNTY AND CITY OF COVINGTON SCHOOL DISTRICTS**

WHEREAS the City of Covington has determined that the consolidation of its public schools with Alleghany County public schools would be in the best interests of both the people of the City of Covington and Alleghany County and would further the interest of the Commonwealth in promoting strong and viable public school districts;

WHEREAS the consolidation can improve the educational opportunities and resources of public education in the City of Covington;

WHEREAS the consolidation will result in a more equitable use of the resources and distribution of the liabilities of Alleghany County and the City of Covington; and,

WHEREAS the consolidation can result in fiscal savings and governmental efficiencies;

**NOW, THEREFORE, BE IT RESOLVED
BY THE COUNCIL OF THE CITY OF COVINGTON, VIRGINIA THAT:**

1. Pending approval from the Virginia Department of Education and subject to any necessary appropriations from the Virginia General Assembly, the City of Covington approves of and shall initiate and pursue all such procedures as may be necessary to accomplish the consolidation of public schools between the City of Covington and Alleghany County as outlined in the Virginia Code (Va. Code § 22.1-25 et seq.) and in a manner consistent with the recommendations of the Joint Committee on School Consolidation (which are adopted herein by reference);
2. The City Attorney and City Manager are authorized, with the approval of Council, to take all other such actions and to employ such special consultants as may be necessary to accomplish the objectives set forth herein; and,
3. The City Council, throughout the course of these proceedings, shall continue to work toward an amicable resolution of this matter with the appropriate officials of Alleghany County.

Adopted this 10th day of September, 2020.

* * * * *

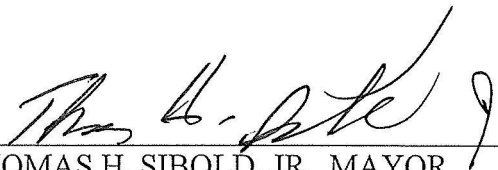
RESOLUTION

ADOPTED BY AFFIRMATIVE VOTES OF THE COUNCIL OF THE CITY OF COVINGTON, VIRGINIA AS EVIDENCED BY THE FOLLOWING VOTES:

DATE: 9/10/2020

VOTE BY COVINGTON CITY COUNCIL: 3 FOR; 2 AGAINST

- MAYOR THOMAS H. SIBOLD, JR. FOR
- VICE MAYOR DAVID S. CROSIER FOR
- COUNCILMAN EDMOND J. "EDDIE" ENTSMINGER AGAINST
- COUNCILMAN RAYMOND C. HUNTER FOR
- COUNCILMAN S. ALLAN TUCKER AGAINST



 THOMAS H. SIBOLD, JR., MAYOR

ATTEST:



 EDITH S. WOOD, CITY CLERK

EXHIBIT D



COVINGTON CITY PUBLIC SCHOOLS

340 E. WALNUT STREET
COVINGTON, VIRGINIA 24426
(540) 965-1400
(540) 965-1404 FAX

OFFICE OF THE SUPERINTENDENT

RESOLUTION

AUTHORIZING THE CONSOLIDATION OF ALLEGHANY COUNTY AND CITY OF COVINGTON SCHOOL DISTRICTS

During a called meeting on September 10, 2020, the Covington City School Board took the following action:

	<u>VOTE</u>
Tamala Preston, Chair	YES
Bert Baker, Vice-Chair	NO
Jonathan Arritt	YES
Erika Hunter	NO
Tonya Jones	YES

On a motion by Mr. Arritt, seconded by Ms. Jones, the Board adopted the following resolution:

WHEREAS, the City of Covington School Board has determined that the consolidation of its public schools with Alleghany County Public Schools would be in the best interests of both the people of the City of Covington and Alleghany County and would further the interest of the Commonwealth in promoting strong and viable public school districts;

WHEREAS, the consolidation can improve the educational opportunities and resources of public education in the City of Covington;

WHEREAS, the consolidation will result in a more equitable use of the resources and distribution of the liabilities of Alleghany County and the City of Covington; and,

WHEREAS, the consolidation can result in fiscal savings and governmental efficiencies;

**NOW, THEREFORE, BE IT RESOLVED,
BY THE SCHOOL BOARD OF THE CITY OF COVINGTON, VIRGINIA THAT:**

1. Pending approval from the Virginia of Department of Education and subject to any necessary appropriations from the Virginia General Assembly, the School Board of the City of Covington approves of and shall initiate and pursue all such procedures as may be necessary to accomplish the consolidation of public schools between the City of Covington and Alleghany County as outlined in the Virginia Code (Va. Code § 22.1-25 et seq.) and in a manner consistent with the recommendations of the Joint Committee on School Consolidation (which are adopted herein by reference);
2. The Covington City School Board Chair is authorized, with the approval of the Board, to take all other such actions and to employ such special consultants as may be necessary to accomplish the objectives set forth herein including, but not limited to, signing and memorializing any agreements necessitated by DOE between the respective localities; and,
3. The Covington City School Board, throughout the course of these proceedings, shall continue to work toward an amicable resolution of this matter with the appropriate officials of Alleghany County.

Adopted this 10th day of September, 2020.

Attest:



Rebecca J. Irvine, Clerk of the Covington City School Board

EXHIBIT E

Dr. Cochran



November 23, 1970

The Honorable Andrew P. Miller
Attorney General of Virginia
Richmond, Virginia 23219

Dear General Miller:

Pursuant to your request I am pleased to enclose herewith a listing of school divisions established since 1950 and certain excerpts from the Minutes of the Board's meetings regarding the creation of new divisions.

In accordance with constitutional provisions and legislative requirements, the State Board of Education divides the State into school divisions. At present there are 134 counties and cities and 125 school divisions. Each of 116 divisions consists of a county or city; each of the remaining 9 divisions consists of two counties or a county and a city.

Each county and city has a separate school board whether a school division consists of two or more political subdivisions or one political subdivision. Under the revised Constitution the supervision of all of the schools of a division is vested in a single school board.

In considering a proposal for the establishment of a new division, it has been the policy of the Board to invite the affected parties, school boards and governing bodies, to submit their recommendations. While the Board has normally approved requests for the formation of new divisions when the affected parties are in agreement with such requests, this does not reflect the careful and thorough consideration given by the Board to each proposal. It should be emphasized that the Board reaches the decision which it considers best in light of circumstances for the education of the children involved.

The Honorable Andrew P. Miller
Page 2
11/23/70

In January of 1969 the Board expressed a policy position with respect to the principle of the consolidation of school divisions with the view of creating administrative units appropriate to present-day educational needs, but also noted the impracticality of effecting such consolidations under existing law.

We shall be glad to discuss this further with you at your convenience.

Sincerely yours,



Woodrow W. Wilkerson
Superintendent of Public Instruction

Enc.

WWW/p

cc - State Board Members

ESTABLISHMENT OF SCHOOL DIVISIONS

1950 - 1970

<u>School Division</u>	<u>Effective Date</u>	<u>Comments</u>
County of Princess Anne and City of Virginia Beach	July 1, 1952	The county was formerly a school division. Virginia Beach was a town until Jan. 1, 1952, the effective date of its being declared a city. The county and city later merged to form one political subdivision.
County of Alleghany and City of Covington	July 1, 1953	The county was formerly a school division. Covington was a town within the county until Dec. 20, 1952, the effective date of its being declared a city.
Charles City County and New Kent County	July 1, 1953	The counties of Charles City, New Kent, and James City formerly constituted one school division.
Warwick City and York County	July 1, 1952	A school division had previously consisted of Warwick County and York County.
Hampton City	July 1, 1953	The City of Hampton and Elizabeth City County previously constituted one school division. By legislative enactment the county was made a part of the city.

James City County and Williamsburg City	July 1, 1953	The city of Williamsburg was previously a school division; James City County was previously a part of a separate division which consisted of this political subdivision and the counties of Charles City and New Kent.
City of Norton	July 1, 1954	Norton was formerly a town and operated as a separate special school district.
City of Galax	July 1, 1954	Galax was formerly a town and operated as a separate special school district.
Warwick City	July 1, 1955	Warwick City and York County had previously been established as a single school division, effective July 1, 1952.
York County	July 1, 1955	
Amelia County	July 1, 1957	Amelia County and Nottoway Co. had previously constituted a single school division.
Nottoway County	July 1, 1957	
Alleghany County	July 1, 1958	Alleghany Co. and the City of Covington had previously constituted a single school division.
Covington City	July 1, 1958	
Newport News City	July 1, 1958	The City of Warwick and Newport News merged to form one political subdivision.

April 23, 1953

NEW SCHOOL DIVISIONS, ESTABLISHMENT OF

Alleghany County and Covington City - Establishment of - as School Divisions, Effective July 1, 1953 - In accordance with resolutions submitted by the School Boards of Alleghany County and the City of Covington (established as a city of the second class on December 20, 1952) and on recommendation of Superintendent Howard, the Board upon motion duly made and seconded, under authority of Section 22-30, established the school division of the County of Alleghany and the City of Covington, effective July 1, 1953.

Charles City and New Kent Counties, Establishment of - as School Division - In accordance with resolutions submitted by the School Boards of Charles City and New Kent Counties, and on recommendation of Superintendent Howard, the Board, on motion duly made and seconded, under authority of Section 22-30, established the school division of the Counties of Charles City and New Kent, effective July 1, 1953.

Warwick City and York County, Establishment of - as School Division - Attention of the Board was called to Chapter 706 of the Acts of the Assembly of 1952, approved April 8, 1952, to provide a charter and form of government for the City of Warwick and to provide for the adoption thereof.

In accordance with the provisions of this act and under authority of Code Section 22-30, and upon recommendation of Superintendent Howard, the Board, upon motion duly made and seconded, established the School Division of Warwick City and York County, effective July 1, 1953.

Hampton City - Establishment of - as School Division - By legislative enactment Elizabeth City County has been made a part of the City of Hampton. Under authority of Section 22-30, the Board, upon motion duly made and seconded, established the school division of Hampton City (replacing the Division of Elizabeth City County and Hampton City), effective July 1, 1953.

James City County and Williamsburg City - Establishment of - as School Division - Upon recommendation of Superintendent Howard and under authority of Section 22-30, the Board, upon motion duly made and seconded, tentatively established the school division of James City County and the City of Williamsburg, effective July 1, 1953. This action was made subject to final approval by Supt. Howard after satisfactory arrangements have been made jointly by the two (2) school boards concerned.

February 24, 1955

CITY OF WARWICK AND COUNTY OF YORK - SEPARATE SCHOOL DIVISIONS

At the request of the School Boards of the City of Warwick and the County of York, supported by proper resolutions dated February 9th and 17th, respectively, upon recommendation of Superintendent Howard and under authority of Section 22-30 of the Code and Section 132 of the Constitution, the Board, upon motion duly made and seconded, abolished the joint school division of Warwick City and York County and established as separate school divisions the City of Warwick and the County of York, effective July 1, 1955; subject to the filing of evidence with the State Board that the tax-levying body in each subdivision concurs.

March 28, 1957

New School Divisions - Establishment of - Amelia County and Nottoway County - Separate School Divisions - The Board, upon motion duly made and seconded abolished the joint school division of Amelia and Nottoway Counties and established as separate school divisions the county of Amelia and the county of Nottoway, effective July 1, 1957. This action was taken under authority of Section 22-30 of the Code and Section 132 of the Constitution, and requested by proper resolutions of the school boards and Boards of Supervisors of Amelia and Nottoway Counties.

April 24, 1958

Separate School Divisions - Alleghany County and Covington City - On recommendation of Superintendent Paschall, the Board by motion duly made and seconded, abolished the joint school division of Alleghany County-Covington City and established as separate school divisions the County of Alleghany and the City of Covington. This action was taken under authority of Section 22-30 of the Code and Section 132 of the Constitution. The Board instructed Superintendent Paschall to inform Alleghany County and Covington City that this action is within the limits of constitutional and statutory authority granted the State Board of Education and that the Board has no authority in the matter other than as stated herein.

EXHIBIT F

Memorandum

To: Stephen C. Piepgrass
Partner
Troutman Pepper

From: David B. Roden
Senior Consulting Manager
AECOM

Date: October 21, 2020

Re: AECOM's Analysis of Alleghany County and Covington City School Bus Routes

This memorandum is in response to your email of October 5th and October 15th requesting and authorizing a review of the potential transportation impacts of merging the Alleghany County and Covington City School Divisions. The proposed plan includes consolidating high school students from both divisions at the Alleghany High School and consolidating middle school students (6th, 7th and 8th grades) at the existing Covington High School. The elementary school students would continue to attend their current school with the possible exception of 4th and 5th grade students who currently attend the Jeter Watson Intermediate School in Covington.

Table 3 in the *CovingtonAlleghany Final Report 12.28.19.docx* reports the distribution of students by grade for the two school divisions for the 2018-2019 school year. This table suggests that 288 high school students (grades 9-12) would need to transfer from the Covington High School to the Alleghany High School and 474 middle school students (grades 6-8) would need to transfer from the Clifton Middle School in Alleghany County to the reconfigured middle school at the Covington High School site. These numbers, of course, change each year as students progress through their education.

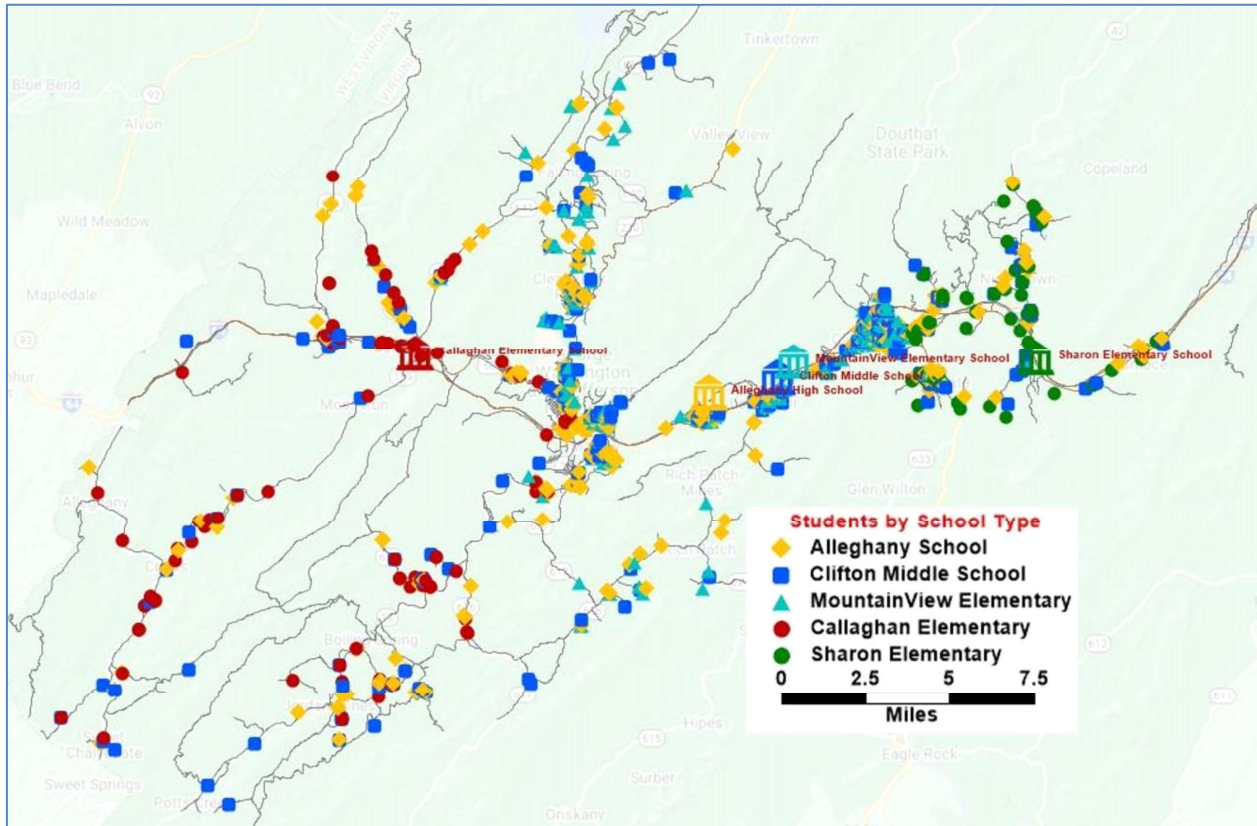
The challenge is to consider how the existing bus routes operated by the two school divisions might be reconfigured to support the new school assignments or if additional resources may be needed to support the proposed consolidation.

In support of our analysis, the school divisions provide Excel spreadsheet files containing the following information:

1. *ACPS Bus Stops.xls* contains stops, times and coordinates for each bus route in the AM and PM periods for Monday-Tuesday and Thursday-Friday school days.
2. *ACPS Bus Stops by student.xls* contains the name and address of students, their grade and the school they attend, and the bus routes and stops they use and their ride times in the AM and PM periods.
3. *Scan20200918_13042681.xlsx* contains route and stop locations for the Covington City system. A PDF scan of handwritten counts of the number of riders on each route were also provided.

To relate the stop and student locations to roadways in Allegheny County, AECOM downloaded and converted the roadway files from OpenStreetMap.org into a transportation network. This enabled us to plot the stop and student coordinates on a County map to better understand the roadway path of existing bus routes and how these routes might be adjusted to accommodate the proposed consolidation plans. Figure 1 shows the home location of Allegheny County Public School students who take the bus by school type.

Figure 1: Home Location of Allegheny School Bus Riders by School



One of the complications and potential issues for this analysis is that almost all of the existing bus routes serve students from multiple schools. The student population is also spread over a very large area with relatively few connecting roadways which make bus routing complex and ride times for many students over 60 minutes long. Table 1 below is a distribution of ride times for Alleghany students. Overall, 15 percent of the students ride the bus for over 60 minutes with 22 percent of the Clifton Middle School students riding the bus for over 60 minutes.

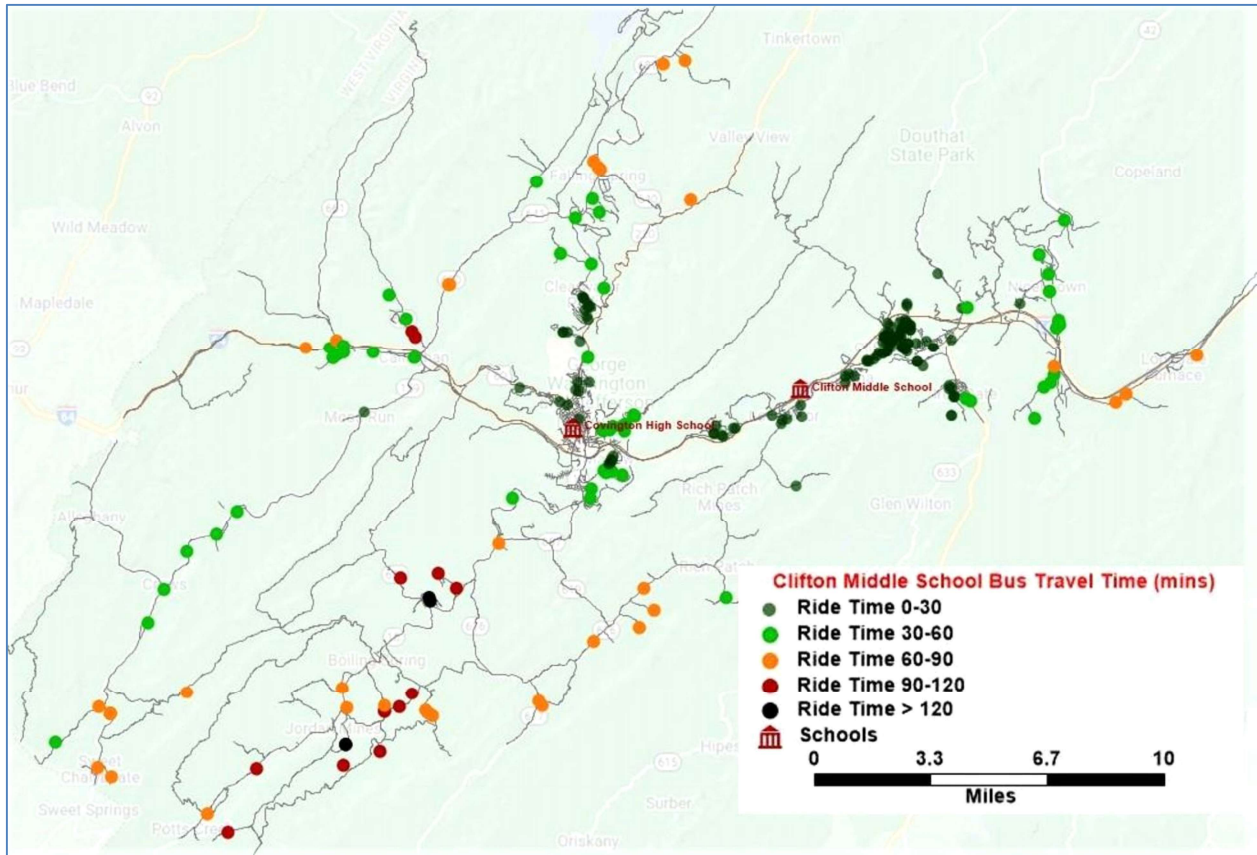
Table 1: Bus Ride Times for Alleghany County Students

	Bus Ride Time (minutes)				
	<=30	<=60	<=90	> 90	Total
Elementary School	308	100	56	12	476
	65%	21%	12%	3%	100%
Middle School	113	64	34	16	227
	50%	28%	15%	7%	100%
High School	151	149	40	8	348
	43%	43%	11%	2%	100%
Total	572	313	130	36	1051
	54%	30%	12%	3%	100%

The two high schools are 6 miles apart or approximately 15 minutes by bus. The new middle school is 9 miles or about 20 minutes west of Clifton Middle School. Some students will inevitably have longer travel times while others have reduced travel times. The travel times for students currently attending Covington High School will increase by about 15 minutes but their total travel time is likely to remain under 60 minutes. Ride times for Clifton Middle School students are more complicated. The new location is more centrally located and has the potential to reduce the travel times for all students that live west of the current school while increasing travel times for students that live east of Clifton Middle School. Currently 43 percent of the Clifton Middle School students live east of the school and 57 percent of the students live west of the school.

As shown in Figure 2, most of the long travel times to Clifton Middle School are west of the school and generally west of the new middle school location at the Covington High School site. These students are likely to see a significant reduction in their travel times. The student shown with green and orange dots at the eastern side of the county are likely to have travel times greater than 60 or 90 minutes, respectively. It is useful to note that one of the primary reasons so many of the students south of Covington have very long travel times is that the bus routes they take first serve elementary students at Callaghan Elementary School to the west before they travel to Alleghany High School and then to Clifton Middle School to the east. With the new middle school location, it is likely these routes could drop the middle school students at the Covington High School site on their way to Callaghan Elementary School and reduce the travel times for these students still further. It may also be more efficient for Alleghany High School students on these routes to transfer to a Covington route that serves Alleghany High School rather than continue on the bus to Callaghan Elementary School.

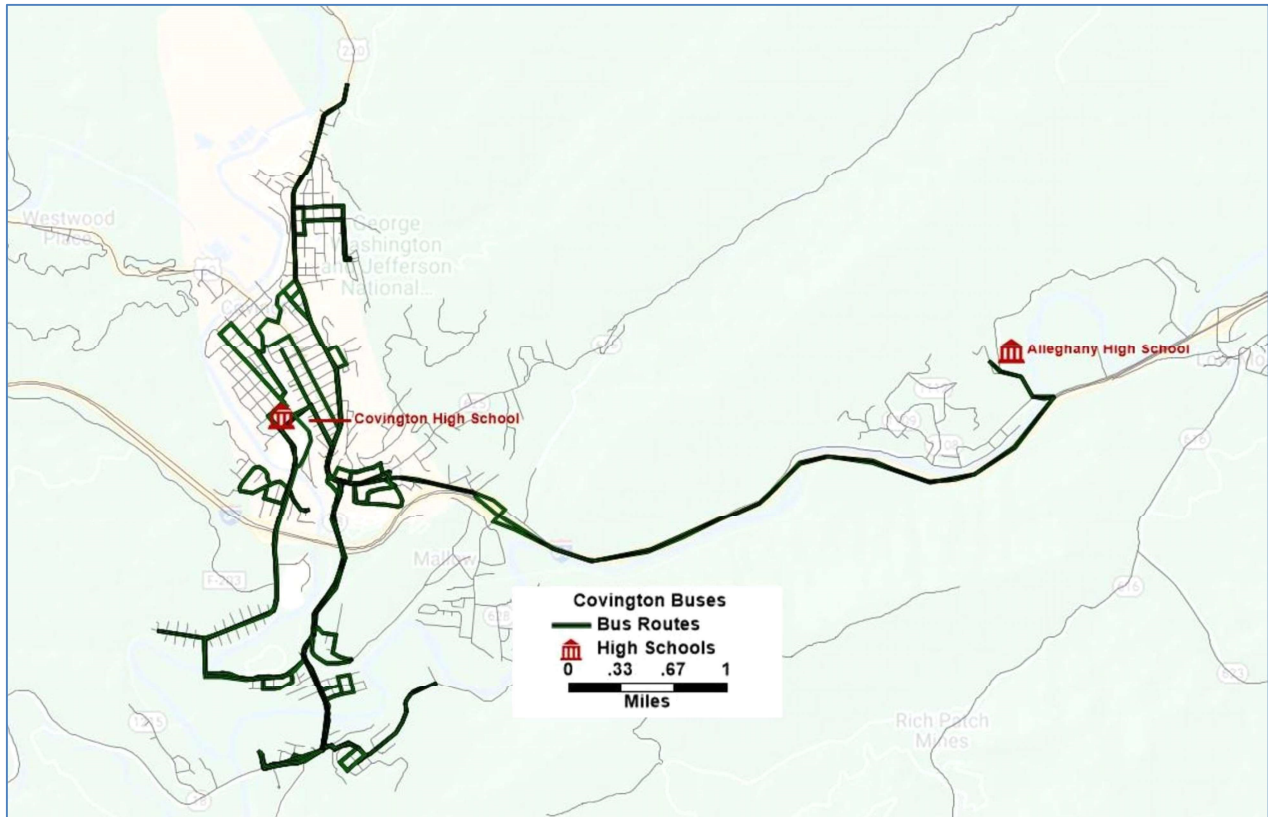
Figure 2: Travel Times for Bus Riders to Clifton Middle School



At present approximately 259 of the 474 students attending Clifton Middle School use a school bus to get to school. That implies that about 215 students either walk, ride a bicycle or are driven to school by a parent or friend. It is likely that the majority of these students will need to travel by school bus to attend the new middle school at the Covington High School site. The routes to the east of the Clifton Middle School will be routed past the school on their way to the new middle school site. Since these buses also serve Mountain View Elementary school, these routes should have some capacity to pick-up additional students at or near the Clifton Middle School. It may also be possible to coordinate routes between Covington and Alleghany High School with trips from Clifton Middle School to Covington as a two-way shuttle system.

Detailed data about the home location of Covington High School students was not provided. As such the best we could do was assume the current bus routes that serve Covington High School could or should continue as they do now with extensions to Alleghany High School. This will add approximately 15 minutes to student travel times. Figure 3 shows a potential extension of Covington bus routes to Alleghany High School. It is likely that some of the 288 students at Covington High School that will be transferred to Alleghany High School do not currently ride the bus. This will increase the demand for routes near Covington High School to Alleghany High School further supporting the concept of a potential shuttle connection between the two schools.

Figure 3: Potential Bus Route for Covington High School Students to Attend Allegheny High School



Conclusions

Based on the data and time available for this analysis, AECOM believes the combined school bus capacity of the Covington City and Allegheny County school divisions should be adequate to serve the needs of the consolidated system based on one high school and one middle school. The current routes can continue to serve the elementary schools. A few adjustments to these routes can improve the travel times for the majority of Clifton Middle School students and potentially some Allegheny High School students who currently travel by bus. The Covington High School students will have about 15 minutes added to their bus trips. The big unknown in this analysis is the number of students who attend Covington High School and Clifton Middle School that currently do not ride the bus but may need to ride a bus to attend their new school location. Additional capacity on one or more bus routes connecting Clifton Middle School, Allegheny High School and Covington High School will be needed to accommodate the increased demand. It is our belief that the existing bus routes and the available bus capacity can be reconfigured to serve this need.

EXHIBIT G

20-20 Insight, LLC

Poll of VA Consolidation, Oct 10-13, 2020, MoE: 95% Conf. Level

LV = 254 Respondents, Margin of Error: +/- 6.1%

Q1 Which of the following best describes your residency?

LV

75	Alleghany County
25	Covington City
X	Something else

Q2 Which race/ethnicity best describes you?

LV

96	White
1	Black/Afr-Am
2	Hispanic
0	Asian/PI
1	Am-Ind/AK-Nat
0	Other/Refuse

Q3 Can you tell me how old you are?

LV

21	18-34
21	35-49
29	50-64
28	65+
2	Refused

Q4 Are you are a male or a female?

LV

54	Female
46	Male
0	Refused

20-20 Insight, LLC

Poll of VA Consolidation, Oct 10-13, 2020, MoE: 95% Conf. Level

LV = 254 Respondents, Margin of Error: +/- 6.1%

Q5 There is a proposal to consolidate the two school systems of Alleghany County and the City of Covington into one combined system. Based on what you know, on a scale of 1 to 5, where 1 means you don't support it at all and 5 means you are very supportive, how would you rate the proposal to consolidate the two school systems into one combined system?

Remember, 1 means don't support it at all, and 5 means you are very supportive.

LV	
31	1 - Don't Support at All
7	2
6	3
5	4
49	5 - Very supportive
3	Not Sure
327	Mean

Q6 I am going to read some statements about a potential school consolidation. After you hear each one, tell me if that makes you more or less likely to support consolidation.

Are you more or less likely to support consolidation if...

		More likely to support	Less likely to support	No difference	Not sure
A	It means financial savings for both communities.	LV 68	4	25	3
B	It resulted in more educational opportunities for students?	LV 72	3	21	4
C	It was ensured that there would be no changes in elementary education?	LV 51	8	35	6
D	It meant more opportunities for students to take advantage of the offerings of Jackson River Technical Center?	LV 63	4	31	2
E	It meant that both the Alleghany High School and Covington High School buildings would continued to be utilized for student instruction - one for middle school and one for high school?	LV 38	13	43	6

20-20 Insight, LLC

Poll of VA Consolidation, Oct 10-13, 2020, MoE: 95% Conf. Level

LV = 254 Respondents, Margin of Error: +/- 6.1%

Q7 You've heard some statements about the potential school consolidation. After hearing these statements, assuming them to be true, are you likely to support consolidation, or not?

LV

59	Likely to support consolidation
36	Not likely to support consolidation
6	Not sure

Q8 Please choose the option that describes your household's annual income in a typical year.

LV

36	\$0k-\$25k
24	\$25k-\$50k
18	\$50k-\$75k
9	\$75k-\$100k
13	\$100k-\$200k
0	\$200k+
0	Not Sure or Refuse

Q9 What was the last year of education you completed?

LV

3	Didn't Grad HS
32	HS Grad
45	Some college/trade school
11	College Grad
9	Post Grad
0	Not Sure/Refuse
80	Non-College
20	College+

20-20 Insight, LLC

Poll of VA Consolidation, Oct 10-13, 2020, MoE: 95% Conf. Level

LV = 254 Respondents, Margin of Error: +/- 6.1%

Q10 Are you, or an immediate family member currently employed by either school division?

LV

9	Personally employed
12	Immediate family employed
78	Not employed
1	Not sure

Q11 Do you have any school aged children in your household?

LV

39	Have school aged children in household
61	Do not
0	Not Sure

LV	
21	18-34
21	35-49
29	50-64
28	65+
2	Refused

Residence:	19	Allegany County
Residence:	26	Covington City
Age:	100	18-34
Age:	0	35-49
Age:	0	50-64
Age:	0	65+
Gender:	29	Female
Gender:	11	Male
Consolidation Initial:	26	1 - Dont Support at All
Consolidation Initial:	36	2
Consolidation Initial:	25	3
Consolidation Initial:	16	4
Consolidation Initial:	15	5 - Very supportive
Retest:	16	Likely to support consolidation
Retest:	26	Not likely to support consolidation
Retest:	27	Not sure
Income:	22	\$0k-\$25k
Income:	23	\$25k-\$50k
Income:	25	\$50k-\$75k
Income:	14	\$75k-\$100k
Income:	10	\$100k-\$200k
Education:	19	Non-College
Education:	28	College+
Employee:	25	Personally employed
Employee:	12	Immediate family employed
Employee:	22	Not employed
Kids in School:	19	Have school aged children in household
Kids in School:	32	Do not

Q4 Are you are a male or a female?

LV	
54	Female
46	Male
0	Refused

Residence:	51	Allegany County
Residence:	46	Covington City
Age:	76	18-34
Age:	51	35-49
Age:	40	50-64
Age:	55	65+
Gender:	100	Female
Gender:	0	Male
Consolidation Initial:	58	1 - Dont Support at All
Consolidation Initial:	79	2
Consolidation Initial:	66	3
Consolidation Initial:	69	4
Consolidation Initial:	54	5 - Very supportive
Retest:	50	Likely to support consolidation
Retest:	58	Not likely to support consolidation
Retest:	76	Not sure
Income:	47	\$0k-\$25k
Income:	33	\$25k-\$50k
Income:	46	\$50k-\$75k
Income:	44	\$75k-\$100k
Income:	52	\$100k-\$200k
Education:	53	Non-College
Education:	47	College+
Employee:	65	Personally employed
Employee:	56	Immediate family employed
Employee:	52	Not employed
Kids in School:	63	Have school aged children in household
Kids in School:	48	Do not

Q5 There is a proposal to consolidate the two school systems of Alleghany County and the City of Covington into one combined system. Based on what you know, on a scale of 1 to 5, where 1 means you don't support it at all and 5 means you are very supportive, how would you rate the proposal to consolidate the two school systems into one combined system?

Remember, 1 means don't support it at all, and 5 means you are very supportive.

LV	
31	1 - Dont Support at All
7	2
6	3
5	4
49	5 - Very supportive
3	Not Sure
327	Mean

Residence: Allegheny County	25	39	43	27	20	33	28	100	0	0	0	0	0	2	15	14	35	35	32	23	25	29	31	27	42	31	42	30	46	21
Residence: Covington City	48	12	4	5	7	10	3	0	100	0	0	0	0	7	1	11	11	5	7	3	1	7	5	9	13	9	13	5	6	7
Age: 18-34	7	7	4	5	7	3	4	0	0	0	0	0	0	6	2	29	6	6	8	2	4	6	7	9	10	5	6	7		
Age: 35-49	7	4	7	3	4	7	4	0	0	0	0	0	0	8	1	8	1	6	3	18	10	4	10	6	6	4	7	5		
Age: 50-64	5	7	4	8	6	4	7	4	0	0	0	100	0	8	1	8	1	6	3	18	10	4	10	6	6	4	7	5		
Age: 65+	49	3	36	40	53	62	41	58	0	0	0	0	100	82	2	1	41	49	58	52	54	49	47	34	40	53	30	61		
Gender: Female	3	4	2	2	4	2	2	3	0	0	0	0	0	1	3	13	5	2	2	0	2	3	3	1	0	3	3	3		
Gender: Male	3	4	2	2	4	2	2	3	0	0	0	0	0	1	3	13	5	2	2	0	2	3	3	1	0	3	3	3		
Consolidation Initial: 1 - Dont Support at All	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Consolidation Initial: 2	200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Consolidation Initial: 3	300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Consolidation Initial: 4	400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Consolidation Initial: 5 - Very supportive	500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Retest: Likely to support consolidation	463	124	186	288	328	363	369	353	324	337	280	310	334	263	369															
Retest: Not likely to support consolidation																														
Retest: Not sure																														
Income: \$0k-\$25k																														
Income: \$25k-\$50k																														
Income: \$50k-\$75k																														
Income: \$75k-\$100k																														
Income: \$100k-\$200k																														
Education: Non-College																														
Education: College+																														
Employee: Personally employed																														
Employee: Immediate family employed																														
Employee: Not employed																														
Kids in School: Have school aged children in household																														
Kids in School: Do not																														

Q6 I am going to read some statements about a potential school consolidation. After you hear each one, tell me if that makes you more or less likely to support consolidation.

A Are you more or less likely to support consolidation if...

It means financial savings for both communities.

LV	
68	More likely to support
4	Less likely to support
25	No difference
3	Not sure

Residence: Allegheny County	74	50	59	62	75	71	65	72	25	55	79	84	93	93	28	10	0	8	64	62	80	72	74	68	68	55	61	71	60	74	
Residence: Covington City	50	3	8	4	0	2	6	12	0	0	0	0	0	0	10	7	58	7	24	33	16	27	24	25	26	30	37	22	30	21	
Age: 18-34	3	7	3	8	4	0	2	6	12	0	0	0	0	0	10	7	58	7	24	33	16	27	24	25	26	30	37	22	30	21	
Age: 35-49	3	4	3	1	3	5	5	1	6	7	10	3	0	0	4	26	4	4	4	2	1	2	3	6	4	2	3	4	2		
Age: 50-64																															
Age: 65+																															
Gender: Female																															
Gender: Male																															
Consolidation Initial: 1 - Dont Support at All																															
Consolidation Initial: 2																															
Consolidation Initial: 3																															
Consolidation Initial: 4																															
Consolidation Initial: 5 - Very supportive																															
Retest: Likely to support consolidation																															
Retest: Not likely to support consolidation																															
Retest: Not sure																															
Income: \$0k-\$25k																															
Income: \$25k-\$50k																															
Income: \$50k-\$75k																															
Income: \$75k-\$100k																															
Income: \$100k-\$200k																															
Education: Non-College																															
Education: College+																															
Employee: Personally employed																															
Employee: Immediate family employed																															
Employee: Not employed																															
Kids in School: Have school aged children in household																															
Kids in School: Do not																															

B Are you more or less likely to support consolidation if...

It resulted in more educational opportunities for students?

31	No difference	27	43	40	36	32	21	32	29	68	45	18	17	8	9	70	13	33	35	27	30	23	30	32	57	29	28	38	26	
2	Not sure	2	3	1	1	3	4	1	4	2	5	5	0	2	2	3	7	2	1	0	12	2	2	2	3	6	2	2	2	3

E Are you more or less likely to support consolidation if...

It meant that both the Allegheny High School and Covington High School buildings would continued to be utilized for student instruction - one for middle school and one for high school?

LV		Residence: Allegheny County	Residence: Covington City	Age: 18-34	Age: 35-49	Age: 50-64	Age: 65+	Gender: Female	Gender: Male	Consolidation Initial: 1 - Dont Support at All	Consolidation Initial: 2	Consolidation Initial: 3	Consolidation Initial: 4	Consolidation Initial: 5 - Very supportive	Retest: Likely to support consolidation	Retest: Not likely to support consolidation	Retest: Not sure	Income: \$0k-\$25k	Income: \$25k-\$50k	Income: \$50k-\$75k	Income: \$75k-\$100k	Income: \$100k-\$200k	Education: Non-College	Education: College+	Employee: Personally employed	Employee: Immediate family employed	Employee: Not employed	Kids in School: Have school aged children in household	Kids in School: Do not		
38	More likely to support	40	32	33	30	37	52	35	43	5	21	26	48	62	58	6	32	44	37	30	36	38	40	13	13	27	15	11	25	47	
13	Less likely to support	11	19	13	15	18	7	11	15	27	19	15	8	4	6	27	6	15	10	10	16	16	13	13	27	15	11	16	11	25	47
43	No difference	43	41	52	52	35	38	48	36	63	43	25	42	33	33	61	30	33	49	51	48	42	40	52	42	55	40	51	37	47	
6	Not sure	6	8	2	3	9	4	6	7	4	17	34	2	1	3	7	32	9	4	8	0	3	7	3	7	6	6	9	5	47	

Q7 You've heard some statements about the potential school consolidation. After hearing these statements, assuming them to be true, are you likely to support consolidation, or not?

LV		Residence: Allegheny County	Residence: Covington City	Age: 18-34	Age: 35-49	Age: 50-64	Age: 65+	Gender: Female	Gender: Male	Consolidation Initial: 1 - Dont Support at All	Consolidation Initial: 2	Consolidation Initial: 3	Consolidation Initial: 4	Consolidation Initial: 5 - Very supportive	Retest: Likely to support consolidation	Retest: Not likely to support consolidation	Retest: Not sure	Income: \$0k-\$25k	Income: \$25k-\$50k	Income: \$50k-\$75k	Income: \$75k-\$100k	Income: \$100k-\$200k	Education: Non-College	Education: College+	Employee: Personally employed	Employee: Immediate family employed	Employee: Not employed	Kids in School: Have school aged children in household	Kids in School: Do not
59	Likely to support consolidation	65	40	45	50	61	72	54	65	3	8	59	88	99	100	0	0	51	58	68	70	63	59	59	43	50	61	43	69
36	Not likely to support consolidation	30	53	47	44	34	24	38	33	90	80	13	3	1	0	100	0	41	37	28	29	32	36	32	51	44	33	48	28
6	Not sure	5	7	8	6	5	4	8	2	7	12	28	8	0	0	0	100	8	6	4	1	5	5	9	6	7	6	9	4

Q8 Please choose the option that describes your household's annual income in a typical year.

LV
36 \$0k-\$25k
24 \$25k-\$50k
18 \$50k-\$75k
9 \$75k-\$100k
13 \$100k-\$200k
0 \$200k+
0 Not Sure or Refuse

Residence: Allegheny County	Residence: Covington City	Age: 18-34	Age: 35-49	Age: 50-64	Age: 65+	Gender: Female	Gender: Male	Consolidation Initial: 1 - Dont Support at All	Consolidation Initial: 2	Consolidation Initial: 3	Consolidation Initial: 4	Consolidation Initial: 5 - Very supportive
32	47	26	24	17	28	29	17	25	17	26	24	24
25	21	22	15	20	12	15	21	13	18	25	10	22
19	16	22	14	17	28	29	17	25	17	26	24	24
18	16	22	15	20	12	15	21	13	18	25	10	22
9	6	6	13	10	9	8	11	8	5	2	32	10
13	10	6	18	16	11	12	13	12	3	8	24	14
0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0

Retest: Likely to support consolidation	Retest: Not likely to support consolidation	Retest: Not sure	Income: \$0k-\$25k	Income: \$25k-\$50k	Income: \$50k-\$75k	Income: \$75k-\$100k	Income: \$100k-\$200k	Education: Non-College	Education: College+	Employee: Personally employed	Employee: Immediate family employed	Employee: Not employed	Kids in School: Have school aged children in household	Kids in School: Do not
31	42	51	100	0	0	0	0	40	19	39	23	38	33	38
23	25	23	0	100	0	0	0	24	22	30	22	23	22	25
21	14	13	0	0	100	0	0	17	24	20	15	19	20	17
11	8	2	0	0	0	100	0	8	14	1	17	9	12	8
14	12	10	0	0	0	0	100	11	22	11	23	12	14	12
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Q9 What was the last year of education you completed?

LV
3 Didn't Grad HS
32 HS Grad
45 Some college/trade school
11 College Grad
9 Post Grad
0 Not Sure/Refuse

80 Non-College
20 College+

Residence: Allegheny County	Residence: Covington City	Age: 18-34	Age: 35-49	Age: 50-64	Age: 65+	Gender: Female	Gender: Male	Consolidation Initial: 1 - Dont Support at All	Consolidation Initial: 2	Consolidation Initial: 3	Consolidation Initial: 4	Consolidation Initial: 5 - Very supportive
3	2	0	1	4	5	1	6	1	0	6	0	5
30	41	32	27	36	35	30	36	30	28	33	23	34
46	40	41	52	35	48	48	40	52	56	37	38	42
11	10	15	13	14	5	11	11	11	15	9	18	10
9	6	12	8	10	7	10	8	7	2	15	20	9
0	0	0	0	0	0	0	0	0	0	0	0	0
79	83	73	80	76	89	79	81	82	84	76	62	81
21	17	27	20	24	11	21	19	18	16	24	38	19

Retest: Likely to support consolidation	Retest: Not likely to support consolidation	Retest: Not sure	Income: \$0k-\$25k	Income: \$25k-\$50k	Income: \$50k-\$75k	Income: \$75k-\$100k	Income: \$100k-\$200k	Education: Non-College	Education: College+	Employee: Personally employed	Employee: Immediate family employed	Employee: Not employed	Kids in School: Have school aged children in household	Kids in School: Do not
4	1	6	8	0	0	0	0	4	0	0	6	3	1	5
34	31	29	38	36	26	25	27	41	0	21	29	33	32	33
42	50	35	44	46	48	44	39	56	0	30	36	48	44	45
10	11	19	5	10	14	20	19	0	56	20	16	9	14	9
10	7	12	5	8	12	11	15	0	44	28	12	6	9	9
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
80	82	69	90	82	74	69	66	100	0	51	72	84	77	82
20	18	31	10	18	26	31	34	0	100	49	28	16	23	18

Q10 Are you, or an immediate family member currently employed by either school division?

LV	
9	Personally employed
12	Immediate family employed
78	Not employed
1	Not sure

Residence:	Allegheny County	Residence:	Allegheny County
38		8	
62	Covington City	13	Covington City
0		1	
Age:	18-34	Age:	18-34
61		11	
39	35-49	5	35-49
0		10	
Age:	50-64	Age:	50-64
28		14	
74	65+	11	65+
0		81	
Age:	18-34	Age:	18-34
61		11	
39	35-49	5	35-49
0		10	
Age:	50-64	Age:	50-64
28		14	
74	65+	11	65+
0		81	

Gender:	Female	Gender:	Female
54		12	
68	Male	7	Male
0		11	
Consolidation Initial:	1 - Dont Support at All	Consolidation Initial:	1 - Dont Support at All
41		13	
65	2	12	2
0		24	
Consolidation Initial:	3	Consolidation Initial:	3
42		20	
51	4	13	4
0		10	
Consolidation Initial:	5 - Very supportive	Consolidation Initial:	5 - Very supportive
75		7	
0		10	

Retest:	Likely to support consolidation	Retest:	Likely to support consolidation
71		7	
47	Not likely to support consolidation	13	Not likely to support consolidation
0		14	
Retest:	Not sure	Retest:	Not sure
39		9	
64	Income: \$0k-\$25k	14	Income: \$0k-\$25k
0		7	
64	Income: \$25k-\$50k	11	Income: \$25k-\$50k
0		10	
57	Income: \$50k-\$75k	10	Income: \$50k-\$75k
0		1	
51	Income: \$75k-\$100k	8	Income: \$75k-\$100k
0		21	
56	Income: \$100k-\$200k	8	Income: \$100k-\$200k
0		2	

Education:	Non-College	Education:	Non-College
62		6	
54	College+	22	College+
0		2	
Employee:	Personally employed	Employee:	Personally employed
69		100	
31	Immediate family employed	0	Immediate family employed
0		0	
67	Not employed	100	Not employed
0		0	

Kids in School:	Have school aged children in household	Kids in School:	Have school aged children in household
100		7	
0	Do not	10	Do not
0		13	

Q11 Do you have any school aged children in your household?

LV	
39	Have school aged children in household
61	Do not
0	Not Sure