

## HISTORY OF SCHOOL FINANCE IN CONNECTICUT

**1927:** The Division of Research and Surveys of Connecticut's State Board of Education address school inequality in the state in a study called *Financing Education in Connecticut: a Proposed Plan to Enable the State of Connecticut to Meet More Adequately its Educational Responsibility*. The group was appointed by the Connecticut General Assembly to revise education statutes and narrow the inequality gap that resulted from a variety of factors including: fiscal issues, rural vs. urban demographics, and access to school transportation. The report made several recommendations, including allocation of state grant money for students, and encouraged the use of town tax revenue for school financing.<sup>1</sup>

**1973:** Led by parent and lawyer Wesley Horton, a group of parents from Canton file suit against Governor Thomas J. Meskill, and other state officials, alleging Connecticut's method of funding public schools violates the state's constitution.<sup>2</sup>

**1977:** The Connecticut Supreme Court issues its ruling in *Horton v. Meskill* and finds the state's school finance system is unconstitutional because it allows "property wealthy" towns to spend more on education with less effort, impeding children's constitutional rights to an equal education. The Connecticut Supreme Court also rules the state has a constitutional obligation to make up for the disparities in town wealth, however, the Court does not address the overall level or sufficiency of state education aid nor does it propose specific remedies to address the disparities. Rather, the Court rules it is up to the legislature to devise a constitutional system for funding the state's public schools. Finally, the Court affirms local control of school districts and rules that property taxes are a viable means of funding public schools, and that all towns are not required to have the same per student spending amount.<sup>3</sup>

**1979:** In response to the *Horton v. Meskill* ruling, the General Assembly adopts the state's first major education equalization funding formula, the Guaranteed Tax Base (GTB) grant.<sup>4</sup>

**1979:** The State Board of Education and an education finance advisory group launch an 18-month study of education finance reform that eventually recommends the long-term goal of state education aid being "at least equal to local revenues" for public elementary and secondary education.<sup>5</sup>

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<sup>1</sup> Rose, C. (2012). *Milestones in Connecticut Education: 1912-2012* (2012-R-0094). Hartford, CT: Office of Legislative Research. Retrieved from <https://www.cga.ct.gov/2012/rpt/2012-R-0094.htm>.

<sup>2</sup> Connecticut Conference of Municipalities (2014). *Major Issues in Financing PreK-12 Public Education: Achieving a Balanced Local-State Relationship*. New Haven, CT: Connecticut Conference of Municipalities. Available from [http://ccm-docs.org/CB\\_Education/Education.html](http://ccm-docs.org/CB_Education/Education.html).

<sup>3</sup> *Horton v. Meskill*, 172 Conn. 615 (1977).

<sup>4</sup> P.A. 79-128.

<sup>5</sup> Connecticut State Department of Education. (2011, September 15). *Connecticut's Education Cost Sharing (ECS) Grant: History, Formula & Challenges*. Presentation to the Education Cost Sharing Task Force. Hartford, CT. Retrieved from

**1985:** Following the adoption of the GTB formula, the *Horton* plaintiffs file suite against the State of Connecticut again, this time challenging how the *Horton v. Meskill* decision was implemented. In their second suit against the State, the plaintiffs address the adequacy of state education funding and argue the only remedy for funding disparities is for the state to fund 50 percent of the state's overall cost of education. The trial court and Connecticut Supreme Court reject this argument and uphold the GTB formula—and the state's categorical grant distribution—while noting its equalizing effects were undermined by some implementation factors. In its ruling, the Connecticut Supreme Court finds mandating a fixed expenditure share to the state “did not provide a sound basis for assuring a proper distribution of responsibility or of funding for substantially equal education opportunities.”<sup>6</sup>

**1988:** The General Assembly adopts the Education Cost Sharing (ECS) formula as a way to take property wealth into consideration when distributing state education aid. The ECS grant is passed to make up the difference between what a community can afford to pay and what it costs to run a public school system. The 1988 formula takes into account a town's property wealth, income, poverty, number of students, and student performance when determining the amount of state education aid a town is eligible for. The General Assembly sets a \$4,800 per pupil “foundation” for the ECS formula that is supposed to represent the average estimate cost of educating a student.<sup>7</sup>

**1989:** Led by Elizabeth Horton Sheff, a group of city and suburban parents file suit on behalf of their 18 children against Governor William O’Neill. The plaintiffs argue that public schools in Hartford are segregated, underfunded, and deny students in the Hartford area their constitutional right to an adequate and equal education due to the disparities in the distribution of funding and resources between communities of color in Hartford and the adjacent, majority white, suburbs.<sup>8</sup>

**1990:** In the first of a number of changes and revisions to the ECS formula, the General Assembly limits the overall amount of state education funds available to cities and towns under the ECS formula.<sup>9</sup>

**1991:** General Assembly reduces ECS hold-harmless grants to towns for FY’ 1992 and amends formula so towns—for years beyond FY’ 1992—are not guaranteed a minimum four percent increase in ECS aid every year.<sup>10</sup>

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[https://www.cga.ct.gov/ed/tfs%5C20110815\\_Education%20Cost%20Sharing%20Task%20Force%5C20110915/Connecticut%20Education%20Cost%20Sharing%20Grant%20-%20History,%20Formula%20&%20Challenges.pdf](https://www.cga.ct.gov/ed/tfs%5C20110815_Education%20Cost%20Sharing%20Task%20Force%5C20110915/Connecticut%20Education%20Cost%20Sharing%20Grant%20-%20History,%20Formula%20&%20Challenges.pdf).

<sup>6</sup> *Horton v. Meskill*, 195 Conn. 24 (1985).

<sup>7</sup> P.A. 88-358.

<sup>8</sup> Complaint, *Sheff v. O’Neill*, Superior Court, judicial district of Hartford/New Britain at Hartford (April 26, 1989). Retrieved from [http://www.sheffmovement.org/wp-content/uploads/2014/05/1989\\_Original-Sheff-Complaint.pdf](http://www.sheffmovement.org/wp-content/uploads/2014/05/1989_Original-Sheff-Complaint.pdf).

<sup>9</sup> Connecticut Conference of Municipalities (2014). *Major Issues in Financing PreK-12 Public Education: Achieving a Balanced Local-State Relationship*. New Haven, CT: Connecticut Conference of Municipalities. Available from [http://ccm-docs.org/CB\\_Education/Education.html](http://ccm-docs.org/CB_Education/Education.html).

<sup>10</sup> P.A. 91-7 (June Special Session).

**1992:** The legislature caps the annual increase in ECS aid a town can receive at 4.35 percent, regardless of the town's entitlement under the ECS formula. General Assembly also revises the hold-harmless grants and extends the three-year phase-in plan of the Minimum Expenditure Requirement (MER) by one-year. In its 1992 changes to the ECS formula, the General Assembly also establishes alternate versions of the MER. The legislature also eliminates all reimbursements for gifted and talented programs, reduces the minimum state reimbursement for special education costs from 10 percent to zero percent, and establishes a special education hold-harmless grant for towns that would lose money.<sup>11</sup>

**1993:** General Assembly freezes ECS foundation at \$4,800 for FY' 1994 and FY' 1995.<sup>12</sup>

**1995:** General Assembly creates new ECS formula, adding students with disabilities to the ECS resident student count and increasing the foundation by \$911 to \$5,711 in an attempt to include special education costs in the main education equalization aid grant to Connecticut municipalities. At the same time, Connecticut eliminates its primary special education grant and caps increases in state education aid to no more than two percent. The General Assembly also adds a 10 percent weight to the student need count for students with limited English whose local district is not offering a bilingual education program. Finally, the General Assembly sets a new MER, eliminates the hold-harmless grant, and adds a "stop-loss" provision that ensures no city or town's state education aid can be cut by more than a certain amount from year-to-year.<sup>13</sup>

**1996:** Connecticut Supreme Court rules in *Sheff v. O'Neill* and finds Hartford's public schools are racially segregated and in violation of the state's constitution anti-segregation provision. The Court finds the racial segregation—regardless of whether or not it is the result of intentional state action—deprives the plaintiff's children of their right to substantially equal educational opportunity. The Court orders the State to take remedial measures but defers to the legislature to develop a constitutional remedy.<sup>14</sup>

**1997:** General Assembly responds to *Sheff v. O'Neill* decision by passing 3-part legislation that includes: 1) a five-year state takeover of the Hartford school system; 2) a major new commitment to early childhood education throughout the state; and 3) the basic structure of a two-way, voluntary integration program, including a new regional magnet school system and an expanded interdistrict transfer program to be known as "Project Concern" and, eventually, "Open Choice."<sup>15</sup>

**1997:** Legislature extends ECS formula through FY' 1999 with a \$5,711 foundation, a two percent cap, and a minus nine percent stop-loss provision. General Assembly reduces MER for towns with declining enrollments, but mandates Priority School Districts receive

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<sup>11</sup> P.A. 92-262.

<sup>12</sup> P.A. 93-145.

<sup>13</sup> P.A. 95-226.

<sup>14</sup> *Sheff v. O'Neill*, 238 Conn. 1, 678 A.2d 1267 (1996).

<sup>15</sup> P.A. 97-290.

at least the same aid as the year before and at least 70 percent of their entitled aid under the ECS formula.<sup>16</sup>

**1998:** Seven children file suit against Connecticut claiming the state's Supreme Court 1977 ruling in *Horton v. Meskill* is not being implemented. The case is known as *Johnson v. Rowland* and a dozen municipalities fund the lawsuit, including: Bridgeport, Coventry, East Hartford, Manchester, Meriden, New Britain, and New Haven.<sup>17</sup>

**1998:** Legislature raises ECS foundation from \$5,711 to \$5,775 and raises the cap on annual aid increases from two percent to five percent. General Assembly also reduces the maximum stop-loss percentage from minus nine percent to minus five percent, and requires any ECS aid increases to be used for educational purposes without supplanting local education funding.<sup>18</sup>

**1999:** General Assembly implements several changes to the ECS formula, including: a hold-harmless provision for nonpriority districts guaranteeing no municipality receives less state education aid than it did the previous year; a minimum level of state funding aid equal to six percent of the ECS foundation; and a two percent increase to the foundation, bringing it to \$5,891. The General Assembly also eliminates the minus five percent stop-loss provision and raises the ECS cap from five percent to six percent for three years and eliminates the cap beginning in FY' 2004. In its changes, the legislature also requires Priority School Districts receive at least the same per-student ECS grant as they did the previous year and establishes a minimum grant for 12 transitional districts of at least 40 percent of what they are entitled to under the formula. Finally, the General Assembly extends the MER for two fiscal years, requiring a higher MER for towns with increasing enrollments and allowing municipalities with declining enrollments to reduce their MER.<sup>19</sup>

**2000:** Legislature passes bill requiring districts spend at least their per-pupil MER for the previous year plus any increases in their per pupil ECS aid.<sup>20</sup>

**2001:** General Assembly provides each town whose ECS grant is capped a proportional share of \$25 million for fiscal year 2001-02 and \$50 million for FY' 2002-03. For all cities and towns, the legislature also implements a minimum grant increase of 1.68 percent for FY' 2001-02 and 1.2 percent for FY' 2002-03.<sup>21</sup>

**2002:** Dissatisfied with the rate of school integration since the Connecticut Supreme Court's 1996 ruling, the *Sheff v. O'Neill* plaintiffs return to court.<sup>22</sup>

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<sup>16</sup> P.A. 97-318.

<sup>17</sup> Connecticut Conference of Municipalities (2014). *Major Issues in Financing PreK-12 Public Education: Achieving a Balanced Local-State Relationship*. New Haven, CT: Connecticut Conference of Municipalities. Available from [http://ccm-docs.org/CB\\_Education/Education.html](http://ccm-docs.org/CB_Education/Education.html).

<sup>18</sup> P.A. 98-168.

<sup>19</sup> P.A. 99-217.

<sup>20</sup> P.A. 00-187.

<sup>21</sup> P.A. 01-1 (June Special Session).

<sup>22</sup> National Access Network. (2010, April). *Access Quality Education: Connecticut Litigation*. Retrieved from [http://www.schoolfunding.info/states/ct/lit\\_ct.php3](http://www.schoolfunding.info/states/ct/lit_ct.php3).

**2003:** After two evidentiary hearings, the *Sheff* plaintiffs and the governor come to a mediated agreement as to the implementation of a number of voluntary, interdistrict programs designed to reduce the racial and ethnic isolation of Hartford students. This temporary, four-year settlement—approved by both the General Assembly and the trial court—is known as the Phase I stipulated agreement and requires, among other things, the State spend \$45 million over four years to establish eight additional magnet schools in the Hartford area. The out-of-court settlement also requires the State to increase the percentage of Hartford students attending integrated schools to 30 percent by 2007.<sup>23</sup>

**2003:** General Assembly eliminates the hold-harmless provision for Priority School Districts and the ECS density supplement, which gave additional funds to towns with higher-than-average population density. The legislature also distributes a \$53 million “cap supplement” to capped towns for FY’ 2004, reduces every town’s FY’ 2004 grant by three percent, and requires Bridgeport, Hartford, and New Haven to receive at least their FY’ 2003 grant plus \$1 million.<sup>24</sup>

**2003:** Lack of funding for legal fees causes *Johnson v. Rowland* to be withdrawn.<sup>25</sup>

**2004:** Density supplement is restored to the ECS formula after being eliminated in 2003 and the General Assembly gives each town an ECS grant equal to its previous year’s grant, plus 23.27 percent of the difference between its FY’ 2004 grant and the town’s full entitlement under the ECS formula.<sup>26</sup>

**2005:** Connecticut Coalition for Justice in Education Funding (CCJEF) files lawsuit against the State of Connecticut alleging the state’s school finance system is unconstitutional and denies students suitable and substantially equal educational opportunities. CCJEF also claims Connecticut’s school finance system fails to prepare students for higher education, secure meaningful employment, and participate in the political lives of their communities.<sup>27</sup>

**2006:** Governor Jodi Rell forms a Commission on Education Finance to examine how Connecticut funds its public schools.<sup>28</sup>

**2007:** Based on recommendations from the Commission on Education Finance, Gov. Rell proposes changes to the state’s school finance system, including:<sup>29</sup>

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<sup>23</sup> Stipulation and Order, *Sheff v. O’Neill*, Superior Court, judicial district of New Britain, Docket No. X03-89-042119S (January 22, 2003). Retrieved from [http://www.sheffmovement.org/wp-content/uploads/2014/04/2003\\_Stipulation-and-Order\\_Ex71.pdf](http://www.sheffmovement.org/wp-content/uploads/2014/04/2003_Stipulation-and-Order_Ex71.pdf).

<sup>24</sup> P.A. 03-6 (June Special Session).

<sup>25</sup> Connecticut Conference of Municipalities (2014). *Major Issues in Financing PreK-12 Public Education: Achieving a Balanced Local-State Relationship*. New Haven, CT: Connecticut Conference of Municipalities. Available from [http://ccm-docs.org/CB\\_Education/Education.html](http://ccm-docs.org/CB_Education/Education.html).

<sup>26</sup> P.A. 04-252.

<sup>27</sup> Amended Complaint, *Connecticut Coalition for Justice in Education Funding, Inc. v. Rell*, Superior Court, judicial district of Hartford, Docket No. CV-94-533485-S (January 20, 2006). Retrieved from <http://www.ccjef.org/documents/Plaintiffs%27%20Amended%20Complaint,%20Jan%2020,%202006.pdf>.

<sup>28</sup> Office of the Governor of Connecticut. (2006, January 9). Governor Rell Announces First Meeting of Education Finance Commission [Press release]. Retrieved from <http://www.ct.gov/Governorrell/cwp/view.asp?A=2425&Q=308410>.

- Increasing the ECS grant \$1.1 billion over the next five years to \$2.7 billion
- Increasing the foundation from \$5,891 to \$9,867
- Increasing the State Guaranteed Wealth Level (SGWL) to 1.75
- Raising the minimum aid ratio from six percent to 10 percent
- Calculating “Need Students” using 33 percent of a district’s Title I poverty count and 15 percent of students with Limited English Proficiency
- Eliminating grant caps

After Rell’s proposals, the General Assembly ends up adopting a budget that increases total education funding \$237 million, including \$182 million for the ECS grant, and increases weights for low-income students and English Language Learners. Additionally, the ECS formula’s foundation is increased to \$9,687, the minimum aid ratio is increased to nine percent of the foundation and 13 percent for the 20 school districts with the highest concentration of low-income students, and the SGWL is increased to 1.75. The General Assembly also eliminates supplemental ECS aid based on poverty concentration, higher-than-average population density, and low-achieving students.<sup>30</sup>

**2007:** *Sheff* plaintiffs return to court again claiming the State has failed to increase the percentage of Hartford students attending integrated schools to 30 percent by the designated time under the 2003 settlement.<sup>31</sup>

**2007:** Trial court dismisses several counts of plaintiffs’ complaint in *CCJEF v. Rell* and finds there is no constitutional right under article eighth, section 1 of the Connecticut Constitution to any particular quality of education, and that the issue is non-justiciable. CCJEF appeals the decision.<sup>32</sup>

**2008:** *Sheff* plaintiffs and the State agree to new five-year Phase II settlement that calls for building more magnet schools in the Hartford suburbs and expanding the number of openings available for Hartford children through Project Choice (formerly Project Concern). The Phase II settlement also includes state-run technical and agricultural high schools.<sup>33</sup>

**2008:** Oral arguments for *CCJEF v. Rell* are heard before the Connecticut Supreme Court after CCJEF appeals the trial court’s ruling.<sup>34</sup>

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<sup>29</sup> Governor M. Jodi Rell’s Commission on Education Finance. (2007). *Governor Rell’s Commission on Education Finance – Final Report*. Retrieved from <http://www.ct.gov/opm/lib/opm/budget/educationfinance/edufinancefinalreport.pdf>.

<sup>30</sup> P.A. 07-3 (June Special Session).

<sup>31</sup> Motion for Order Enforcing Judgment and to Obtain a Court-Ordered Remedy, *Sheff v. O’Neill*, Superior Court, judicial district of Hartford, Docket No. HHD-X07-CV89-4026240-S (July 5, 2007). Retrieved from <http://www.sheffmovement.org/wp-content/uploads/2014/05/sheffmotiontoenforcejudgment.pdf>.

<sup>32</sup> Memorandum of Decision on Motion to Strike. *Connecticut Coalition for Justice in Education Funding, Inc. v. Rell*, Superior Court, judicial district of Hartford, Docket No. X-09-CV-05-4019406 (September 17, 2007). Retrieved from <http://www.ccjef.org/documents/Trial%20Court%27s%20Decision%20on%20Defendants%27%20Motion%20to%20Strike.%20Sept%2017,%202007.pdf>.

<sup>33</sup> Stipulation and Proposed Order, *Sheff v. O’Neill*, Superior Court, judicial district of Hartford, Docket No. HHD-X07-CV89-4026240-S (April 4, 2008). Retrieved from [http://www.sheffmovement.org/wp-content/uploads/2014/05/2008\\_SheffPhaseIIStipandOrder.pdf](http://www.sheffmovement.org/wp-content/uploads/2014/05/2008_SheffPhaseIIStipandOrder.pdf).

<sup>34</sup> Connecticut Coalition for Justice in Education Funding, Inc. v. Rell. (2008, April 21). Connecticut Supreme Court Faces Historic Question in Tuesday’s Oral Arguments: Do Children Have the Right to an Adequate Education? [Press release]. Retrieved from [http://ccjef.org/documents/new-pdfs/CCJEF\\_News\\_release\\_on\\_CCJEFvRell\\_oral\\_arguments.pdf](http://ccjef.org/documents/new-pdfs/CCJEF_News_release_on_CCJEFvRell_oral_arguments.pdf).

**2009:** General Assembly overrides statutory ECS formula and allocates state education aid to municipalities through block grants for FY' 2010 and FY' 2011.<sup>35 36</sup>

**2010:** Connecticut Supreme Court reverses trial court's ruling in *CCJEF v. Rell* and in a plurality decision concludes the state's constitution "guarantees Connecticut's public school students educational standards and resources suitable to participate in democratic institutions, and to prepare them to attain productive employment and otherwise to contribute to the state's economy, or to progress on to higher education." The Connecticut Supreme Court remands the case, instructing the trial court to determine whether the standards and resources for public education in Connecticut are adequate. However, the Connecticut Supreme Court does not provide a clear standard or definition for adequacy on which the trial court should make its ruling.<sup>37</sup>

**2011:** General Assembly overrides statutory ECS formula and allocates state education aid to municipalities through block grants for FY' 2012 and FY' 2013.<sup>38</sup>

**2011:** General Assembly passes legislation creating the ECS Task Force to (1) support efforts to increase and make more predictable ECS funding; (2) update and improve the ECS formula; (3) support equitable funding for school choice programs, including interdistrict magnet schools and regional agriscience technology centers; and (4) explore fairer and more reasonable approaches to funding services for students with special educational needs.<sup>39</sup>

**2013:** ECS Task Force issues its final report and recommendations.<sup>40</sup> In response, the General Assembly increases the ECS foundation to \$11,525 and adjusts wealth and need-student calculations to produce what is the current ECS formula. The formula is amended to only include a student need weight for low-income students. Additionally, the updated ECS formula features a faster phase-in of funding, of the difference between their previous entitlements and their updated entitlements under the new formula, for Alliance and Education Reform Districts. Under the phase-in schedule passed by the General Assembly, it would take more than 20 years for districts to receive the full ECS grant they are entitled to under the formula.<sup>41</sup>

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<sup>35</sup> P.A. 09-3 (June Special Session).

<sup>36</sup> Moran, J. (2012). *Education Cost Sharing Formula*. (2012-R-0101). Hartford, CT: Office of Legislative Research. Retrieved from <https://www.cga.ct.gov/2012/rpt/2012-R-0101.htm>.

<sup>37</sup> *Connecticut Coalition for Justice in Education Funding, Inc. v. Rell*, 295 Conn. 240 A.2d (2010).

<sup>38</sup> P.A. 11-6.

<sup>39</sup> P.A. 11-48.

<sup>40</sup> State of Connecticut (2013). *Task Force to Study State Education Funding – Final Report*. Available from [http://www.cga.ct.gov/ed/tfs%5C20110815\\_Education%20Cost%20Sharing%20Task%20Force%5C20120123/Education%20Cost%20Sharing%20Task%20Force%20Final%20Report%201-23-13.pdf](http://www.cga.ct.gov/ed/tfs%5C20110815_Education%20Cost%20Sharing%20Task%20Force%5C20120123/Education%20Cost%20Sharing%20Task%20Force%20Final%20Report%201-23-13.pdf).

<sup>41</sup> Conn. Gen. Statutes ch. 172, § 10-262h (2013).

**2013:** Parties in *Sheff v. O'Neill* adopt one-year, court-ordered stipulation allowing State of Connecticut an additional year to reach the 2012-13 goal of 41 percent of Hartford's minority students being in "reduced isolation settings."<sup>42</sup>

**2013:** Parties in *Sheff v. O'Neill* announce a one-year Phase 3 settlement, which increases the number of magnet school seats, expands Open Choice, and allocates funds to strengthen a Hartford neighborhood "lighthouse" school.<sup>43</sup>

**2014:** At the beginning of FY' 14, the state stops using the ECS formula because the state did not have enough money to fund the phase-in. Instead, the state begins making block grants to each municipality to fund public schools.<sup>44</sup>

**2015:** Parties in *Sheff v. O'Neill* adopt one-year extension to the case's Phase 3 settlement.<sup>45</sup>

**2016:** After several years of delays, the remanded *CCJEF v. Rell* trial begins in Hartford Superior Court.<sup>46</sup>

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<sup>42</sup> Stipulation and Order, *Sheff v. O'Neill*, Superior Court, judicial district of Hartford, Docket No. HHD-X07-CV89-4026240-S (April 30, 2013). Retrieved from [http://www.sheffmovement.org/wp-content/uploads/2014/04/2013\\_Stipulation-and-Order.pdf](http://www.sheffmovement.org/wp-content/uploads/2014/04/2013_Stipulation-and-Order.pdf).

<sup>43</sup> Stipulation and Proposed Order, *Sheff v. O'Neill*, Superior Court, judicial district of Hartford, Docket No. HHD-X07-CV89-4026240-S (December 13, 2013). Retrieved from [http://www.sheffmovement.org/wp-content/uploads/2014/05/sheff\\_12-13-13\\_stipulation.pdf](http://www.sheffmovement.org/wp-content/uploads/2014/05/sheff_12-13-13_stipulation.pdf).

<sup>44</sup> P.A. 14-47.

<sup>45</sup> Stipulation and Order, *Sheff v. O'Neill*, Superior Court, judicial district of Hartford, Docket No. HHD-X07-CV89-4026240-S (February 23, 2015). Retrieved from <http://www.sheffmovement.org/wp-content/uploads/2015/02/sheff-settlement-2.23.15.pdf>.

<sup>46</sup> Rabe Thomas, J. (2016, January 12). On trial: Is educational opportunity sufficient everywhere in CT? *The Connecticut Mirror*. Retrieved from <http://ctmirror.org/2016/01/12/on-trial-is-educational-opportunity-sufficient-everywhere-in-ct/>.