


# MEMORANDUM

TO: Superintendents  
FROM: Daniel M. French, Ed.D., Secretary   
SUBJECT: Required Data Submission Escalation Procedure  
DATE: September 25, 2020

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## Purpose

The purpose of this memo is to outline the context and concrete conditions surrounding the Agency of Education (AOE) formalization of a required data submission escalation procedure as well as communicate this procedure to our field partners. The [AOE Data Submission Escalation Procedure](#) is now available on the AOE website.

## Ensuring Continued Access to Public Dollars for Education Programs

As the State Education Agency (SEA), one of AOE's functions is to administer the federal dollars that support education in Vermont (16 V.S.A §§ 43, 44). In order to maintain eligibility for these public funds, the SEA must report required data at the federal level. Accurate and timely data submission relies heavily on LEAs reporting data to AOE.

Longstanding challenges that both AOE and our field partners have had with establishing and supporting the culture, human resources, and technical infrastructure required for modern education data work have resulted in the need for AOE to show leadership in this area.

This effort started with the creation of the Data Management and Analysis Division (DMAD) at the AOE in October of 2018, precipitated increased cross-Divisional collaboration internally on core data workflows, and now continues with AOE's formalization and communication to field partners surrounding roles and responsibilities in this collective, statewide work.

This concerted attention began none too soon as in the last year, due to those longstanding challenges mentioned above, Vermont has received negative determinations from federal partners at both the [Office of Special Education Programs \(OSEP\)](#) and USDOE's administrators of Title III in part as a result of LEAs non-submission, late submission, and submission of poor quality required data.

Shortcomings in these key workflows have resulted in risk to Vermont's continued access to critical federal Title dollars statewide.

## Freedom and Unity

If Vermont is to maintain federal compliance and retain access to crucial dollars supporting some of our most vulnerable students, we must recognize that we are all in this work together

as a state and we must prioritize it accordingly.

Vermont's success or failure in meeting federal compliance relies on all LEAs fulfilling their responsibilities surrounding timely and accurate required data submissions to the SEA. This includes but is not limited to responsibilities such as meeting required data submission deadlines, responding to and addressing data quality issues, and prioritizing the support and professional development of local staff in creating and sustaining a culture of data quality.

The AOE has consulted national best practices, adopted federal standards and developed a [Required Data Escalation Procedure](#). This procedure establishes and communicates the expectation that LEAs will prioritize required data collections and fulfills the AOE's responsibility to oversee this work to maintain access to core funds.

In the coming months, AOE will also be establishing and submitting corrective action plans to federal partners as part of this work writ large.

### **The Agency of Education's Commitment**

As part of Vermont's collective effort in the area of required data stewardship and submissions, AOE commits to:

1. Providing a regularly scheduled avenue where LEA staff can receive training and ask questions about required data submissions.
2. Ensuring there are dedicated AOE staff who answer field questions during business hours. Since adjusting its standard operating procedures, DMAD prioritizes responding to all questions within 1 business day, usually in less than 1 hour.
3. Annually updated support materials that are provided for each data collection.
4. Creating a knowledge base that will allow DMAD documentation to be fully searchable and centrally located via the web.
5. Regularly scheduled communications (e.g. newsletters) announcing changes and training opportunities for field partners.