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1. I am concerned that the opening paragraph to Series 2000 – Education Quality Standards does not begin with the goal of “affording all students a quality education, which is equitable to all, and cost effective in delivery.” The statement in the opening paragraph instead begins with - “equitable, anti-racist, culturally responsive, anti-discriminatory, and inclusive” superseding quality and disregarding affordability, and the statement is repeated no less than eight times throughout the document. I am left feeling that we are myopically focused on a sprint and are not preparing for the needed action to prepare, train and take part in the needed marathon.

Response:

Concur. The suggested edit is consistent with recommendations by the Act 1 Working Group. That said, the prior EQS does not reference affordability and the Committee is unclear whether this is consistent with statute, since 16 VSA 1 does not speak to cost, nor does 16 VSA 165 (which creates the EQS).

Proposed revised text:

The purpose of these rules is to ensure that all Vermont students are afforded educational opportunities that are substantially equal in quality and are equitable, anti-racist, culturally responsive, anti-discriminatory, and inclusive, and ~~substantially equal in quality t, thus~~ enabling each student to achieve or exceed the standards approved by the State Board of Education.

2. Within the definitions section, would it be advisable to provide a definition for “private right of action”, found in 2110 at the end of the second to last paragraph?

Response:

This term was in the 2014 EQS. This is a legal term of art, open to judicial interpretation, and not a definition specific to the EQS. We recommend not introducing a specific interpretation in the EQS.

3. My understanding is that CTE is called “career *and* technical education?” Other than on page 28 of the document, whenever referenced, it is now titled “career technical education”.

Response:

AOE recommended that the definition be update to read “career technical education” since this is aligned with terminology used by AOE. We recommend no change.

4. The “extent to which the EQS applies to independent schools” needs to be resolved, as noted in the document.

Response:

Agreed.

5. “Academic record” – Should “Academic record” **may** read “Academic Record” **shall**? There will be significant statewide inconsistency, otherwise.

Response:

This was discussed with AOE during the subcommittee’s work. AOE shared that there are elements where local discretion should be used in including items as a part of the academic record (e.g., IEP). However, there are elements that must not be included (e.g., disciplinary history). We concur with AOE’s recommendation to keep this language as “may” versus shall.

6. “Civic and community engagement” – In my opinion, “social justice movements” seems as if it was tagged on and may be out of place in the absence of “volunteerism and community service”.

Response:

We would appreciate clarification regarding a suggested edit.

7. “College and Career Readiness” – In my opinion, “socially and culturally inclusive” appears to be tagged on and appears out of place.

Response:

We would appreciate clarification regarding a suggested edit.

8. “Discrimination” – In my opinion, the last sentence appears to be a commentary and not part of a definition.

Response:

This subcommittee was intentional in leaving that sentence in the definition to clarify that how discrimination may occur to provide guidance to educational leaders in the field. We recommend no change.

9. “Equity” or “Equitable” – Should “occupational training” read “technical education”? “Occupational” may be a dated term.

Response:

We will check with AOE to see if this change is consistent with other language changes that were recommended.

10. “Racism” – In my opinion, the last sentence appears to be a commentary and not part of a definition.

Response:

This subcommittee was intentional in leaving that sentence in the definition to clarify that how discrimination may occur to provide guidance to educational leaders in the field. We recommend no change.

11. “Transferable skills” – Should “intercultural competency” have its own definition? It will support the creation of specific content relevant to curriculum development.

Response:

The committee is unsure whether this terms is defined elsewhere or is commonly understood. We will confer with Act 1 Working Group and AOE to see if there is a working definition and whether they think a definition should be added.

Noting: There should be a strikethrough that there should be a strikethrough starting with “work habits” to the end of the sentence. This should be revised in the document. *

12. Flexible Pathways (2120.2) In the second paragraph “Students must be allowed...” Is “must” interchangeable with “shall”, or should “may” be used instead? A great deal of professional development and Agency monitoring of flexible pathways will be required to ensure that school staff “will” implement flexible pathways as required by 2120.2.

Response:

We believe this statement is consistent with 16 VSA 941, which creates this requirement. This language was unchanged from the prior version of the EQS. However, we will confer with AOE to confirm.

13. Is there a process for Agency guidance and oversight in place?

Response:

The process for Agency guidance is articulated in 16 VSA Section 941. This process was not restated in the prior version of the EQS. Whether the SBE has a responsibility to clarify AOE’s responsibilities with respect to PLPs is something that the SBE should discuss.

14. e) physical education – i. “or the equivalent thereof”. Who determines what is equivalent? Can playing a sport or taking dance classes be included in a Personalized Learning Plan and “count” towards “one and one-half years”?

Response:

Per statute, this is a local determination (16 VSA 941).

15. General comment: There will be a substantial need for professional development, and questions about the resources and time available for this work.

Response:

Rule 2121.1 speaks to school leadership and adequate time for implementation. 2121.3 creates a requirement for needs-based professional learning.

16. Question of aspirational vs. operational role played by EQS.

Response:

The Committee vetted the question of the ability for the EQS to be operationalized with local practitioners who testified. All agreed that these are the right standards to guide the direction of their work and are “implementable.”