

Miscellaneous 2114 Definition: "Ethnic Groups"

General Comment: EQS Application to Independent Schools General Comment

DRAFT Public Comment Summary

Rule 2000 - Education Quality Standards

Last Updated: 1/26/24

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NOTE: THESE ARE NOT THE FINAL RESPONSES FROM THE BOARD. THEY ARE ONLY IN Sarah's NOTE FORM"

Comment Number	Comment Description	Applicable Section	Name of Commenter	Summary of Comment	Specific Change (if offered)	SBE Response
4	Submitted in Writing	General Comment: EQS Application to Independent Schools	Clark, Mimi	EQS must apply to all educational organizations that take state or federal funds. If programs do not comply, they should lose public financial support. EQS does not currently apply to independent schools and they receive public funding, so they should follow the same rules. Support all children by requiring all schools receiving public funds to follow the same rules.		Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications of the Rule remain

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Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Bachman, Molly

Nothing in EQS makes explicit that they apply to independent schools. Advocates that EQS should apply to independent schools. Suggests that remaining silent on the topic means that SBE would tolerate a lesser standards of equity. All schools receiving public dollars must follow the same rules.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications of the Board's

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Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Diaz Smith, Flor (on  
behalf of Vermont  
School Boards  
Association)

VSBA supports changes throughout the EQS that focus on providing equitable, anti-racist, culturally responsible, ant discriminatory and inclusive educational opportunities for all students. Oppose decision to not include Independent Schools under this rule. Wishes to see culture and commitment to preparing all students to participate effectively in a diverse state. EQS should be applicable to all publicly funded students in VT. Two sets of rules is inequitable and

Create a single set of standards applicable to all publicly funded students.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications

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Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Holcombe, Rebecca

IDEA requires students placed in independent schools must have access to the same standards of education. Separate and lesser standards do not achieve this. Separate and unequal rules for schools is a violation of the common benefit command of the Vermont Constitution. Vermont has failed to continually improve standards for independent schools, allowing them to fall behind public school requirements in quality and transparency. A minimum course of

Apply EQS to both public and Independent Schools. Require open enrollment of any independent school receiving public funds. Require publication of performance data, including assessment scores, for independent school receiving public funds. Ensure state rules comply with federal law.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications

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Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Ingoe, Colin and Brian  
Bloomfield, Sharon  
Howell, Tamara Mount,  
Tim Newbold, Karen  
O'Neill Thompson,  
Margaret Schlachter,  
Dan Skoglund, CJ  
Spirito, Roy Starling,  
Mark Tashjan, Carson  
Thuber, Jennifer  
Zaccara

Support including  
ethnic and social equity  
studies as part of the  
standards that govern  
approved independent  
schools. Disappointed  
with commenters  
conflating the  
application of these  
standards to  
independent schools  
with other unrelated  
aspects. Do not support  
unilateral application of  
EQS to independent  
schools because it  
would be a major policy  
shift and exceeds  
Board's authority.  
Current framework  
reflects important  
differences in

The Board  
acknowledges and  
accepts the comment.

Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Lundeen, Mary (on  
Behalf of Vermont  
Council of Special  
Education  
Administrators)

VCSEA supports  
purpose of EQS.  
Believes that EQS  
standards must become  
part of the independent  
school approval  
process. Concerned that  
Independent schools  
are not held to the same  
level of accountability  
because (1) they are not  
required to implement  
an assessment system  
that consists of  
formative and  
summative assessments  
and provides data to  
inform instruction,  
measure progress, and  
assist teams in ensuring  
students meet  
graduation

requirements. (2) ...

EQS apply to  
Independent Schools.  
Suggests that the LEA  
or VCSEA  
representative be part  
of the school review  
process.

Title 16 directs the  
Board to regulate public  
and independent  
schools through  
different statutory  
provisions (16 VSA 165  
and 16 VSA 166,  
respectively). By  
exercising its authority  
under both provisions,  
the Board is achieving  
the intended outcome  
that the principles of  
Act 1 apply to both  
public and independent  
schools. By law, EQS  
applies only to public  
schools and  
independent schools  
choosing to participate  
in EQS. The Board's  
proposed modifications  
of the Board's ...

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Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Myers, Chelsea  
(Vermont  
Superintendents  
Association)

VSA supports more  
inclusive and culturally  
responsive standards,  
policies, and practices  
in VT Schools. Please  
note the unfunded  
demands and mandates  
that Superintendents  
are managing at this  
time. Approved  
independent schools  
should be required to  
abide by the same  
standards as public  
schools.

Approved independent  
schools would be  
required to abide by the  
same standards as  
public schools.

Title 16 directs the  
Board to regulate public  
and independent  
schools through  
different statutory  
provisions (16 VSA 165  
and 16 VSA 166,  
respectively). By  
exercising its authority  
under both provisions,  
the Board is achieving  
the intended outcome  
that the principles of  
Act 1 apply to both  
public and independent  
schools. By law, EQS  
applies only to public  
schools and  
independent schools  
choosing to participate  
in EQS. The Board's  
proposed modifications  
of the Board's

11	Submitted in Writing	General Comment: Applying EQS to Approved Independent Schools	Odell, Neil (on behalf of Vermont School Boards Association)	VSBA supports changes throughout the EQS that focus on providing equitable, anti-racist, culturally responsive, anti discriminatory and inclusive educational opportunities for all students. EQS should be applicable to all publicly funded students in VT. Questions why the Board exempted Independent Schools, perhaps an oversight. The existence of two sets of standards, even if identical, encourages future divergence and sends a message that students in independent schools are not worthy	Create a single set of standards applicable to all publicly funded students.	Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications of the Board's
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12	Submitted in Writing	General Comment: Applying EQS to Approved Independent Schools	Raymond, Adrienne	Generally supportive of EQS. They create clear expectations and requirements. They support inclusivity and accessibility and promote equitable education in publicly funded schools. Doesn't fully support because they won't be applied to every publicly funded school. Advocates that they apply to all publicly funded schools.	The legislature directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools.
13	Submitted in Writing	General Comment: Applying EQS to Approved Independent Schools	Schoenfeld, Susan	Concerned about Independent schools getting a waiver rather than following statewide guidelines. Thinks something is missing in the waiver section of EQS to address this.	The legislature directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools.

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Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Unruh, Jo-Anne

Concerned that EQS not applicable to independent schools creating lack of accountability. No requirement for transparency or accountability for students in independent schools. Designation of independent schools as meeting EQS is lacking b/c it allows them to charge more without transparency and accountability. Assurances are insufficient; the same rules must apply. **The following are comments on 2200:**  
**1. AOE lacks capacity**

Budgeting and Finance within Independent Schools needs to be transparent. AUE must have capacity and regulatory authority to oversee and monitor budgeting and financial accountability of approved independent schools that receive public tuition. Public School administration should be included in with formal investigations are initiated. Accreditation must be required to consider Vermont and federal SPED regulations. 2226 Statement must indicate

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications

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Submitted in Writing

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Windsor County  
Senators (Senator Dick  
McCormack, Senator  
Alison Clarkson, and  
Senator Rebecca White)

Urge that public tax  
dollars support only  
institutions that comply  
with state requirements  
including  
antidiscrimination  
provisions.

The Board acknowledges and appreciates the comment. Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. Comments regarding Rule 2200 will be shared and reviewed with the Rule 2200 Committee.

Submitted in Writing

General Comment:  
EQS application to  
Independent Schools

Koenig, Mark

Concern about EQS changes may stem from Makin decision. Independent Schools cite differences from public schools, including governance structures. No specifics or details provided to support how EQS could be changes to apply to them. AOE and SBE have not provided timely rulings in how organizations implement exemptions. Cite Kolbe motion re: Mid Vermont Christian School approval postponement as example of delay in enforcement. Example of Board's requirements

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications of the Board's

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Oral Comment 9/14/23

General Comment:  
Applicability of EQS to  
independent schools

Caraco, Mike

Supports the work of Act 1 working group pertaining to ethnic and social equity standards. Believes that Proposed EQS rule 2121.2 would cause issues by forcing unlicensed educators at independent schools to seek licensure. Licensure is not a determinant of educator quality. Values the autonomy that allows hiring qualified teachers through a robust recruiting and hiring process instead.

The Board acknowledges and appreciates the comment.

144

Oral Comment 9/14/23

General Comment:  
Allocation of funding

Gingold, Jason

independent schools that receive public funds should be held to the same standards as public schools. Allocating public funds to independent schools who discriminate goes against the Vermont Constitution. independent schools lack the transparency of public schools but independent schools still accept public funds. If a school accepts funding, they should be subject to the same rules as public schools.

Rules should apply to schools equally.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications

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Oral Comment 9/14/23

General Comment:  
Applicability of EQS to  
independent schools

Tester, Lorelee

Fully supports Act 1. It is important to the isolated rural students without proper resources are provided a "second home" at school so they have the opportunity to thrive. While still supporting Act 1, does not support having the entire education quality standard Rule services apply to everyone. The EQS should not apply to independent schools which are not governed by a school board or Superintendent. If applied, the EQS would seriously erode the institution's ability to

EQS should not apply to independent schools. Do not have the teaching license requirement.

The Board acknowledges and appreciates the comment.

146

Oral Comment 9/14/23

General Comment:  
Applicability of EQS to  
independent schools

Nichols, Jay

Act 1 should apply  
equally to public and  
independent schools  
funded by taxpayer  
dollars.

Rules should apply to  
schools equally.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications of the Board's



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Oral Comment 9/14/23

General Comment:  
Applicability of EQS to  
independent schools

Young, Chris

Urges the board to fully consider implications of any rule change and what a rule change would mean for the constitutional requirements of providing an equal education experience to Vermont students. Concern that having two sets of rules would lead to a substantially unequal educational experience.

Rules should apply to schools equally.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications

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Oral Comment 9/14/23

General Comment:  
Applicability of EQS to  
independent schools

Maguire, Erin

Supports the EQS. It's important to have education leadership in equity across the state. Additionally, when a independent school accepts tax money, they should then be subject to the same rules as public schools.

Rules should apply to schools equally.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications

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Oral Comment 9/14/23

General Comment:  
Applicability of EQS to  
independent schools

Dow, Judy

Supports Act 1 and  
believes that the same  
rules should apply to all  
schools.

Rules should apply to  
schools equally.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications

153

Oral Comment 9/14/23

General Comment:  
Against having two  
standards

Gannon, Mary

Educational equality  
benefits everyone, not  
just those with  
additional needs.  
Creating two standards  
will have consequences  
such as losing diverse  
people, students, and  
families.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools.

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Oral Comment 9/28/23

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Clough, Mark

Requests that independent schools that receive public tuition from Vermont taxpayer funded education fund be subject to the same rules as public schools. Supports the statement of purpose in the EQS as well as the language throughout the EQS that support the statement of purpose.

Include independent schools that receive public tuition in the updated EQS.

Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications of the Regulations See response to written comment.

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Oral Comment 10/3/23

General Comment:  
Applying EQS to  
Approved Independent  
Schools

Diaz Smith, Flor (on behalf of Vermont School Boards Association)

See written comment.

Create a single set of standards applicable to all publicly funded students.

178	Oral Comment 10/3/23	General Comment: Applying EQS to Approved Independent Schools	Burrows, Elizabeth	Asserts that if public tax dollars are going to an independent school, it should have to adhere to the same standards as public schools.	Create a single set of standards applicable to all publicly funded students.	Title 16 directs the Board to regulate public and independent schools through different statutory provisions (16 VSA 165 and 16 VSA 166, respectively). By exercising its authority under both provisions, the Board is achieving the intended outcome that the principles of Act 1 apply to both public and independent schools. By law, EQS applies only to public schools and independent schools choosing to participate in EQS. The Board's proposed modifications to the Regulations
181	Oral Comment 10/3/23	General Comment: Applying EQS to Approved Independent Schools	Raymond, Adrienne	See written comment		See response to written comment.
189	Oral Comment 10/3/23	General Comment: EQS Application to Public Schools	Koenig, Mark	See written comment		See response to written comment.
194	Oral Comment 10/3/23	General Comment: Applying EQS to independent schools	Odell, Neil	See written comment	Any publicly funded schools, either independent or public, should follow the same rules and standards.	See response to written comment.

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Oral Comment 10/3/23

General Comment:  
Applying EQS to  
independent schools

Talmadge, Lisa

Concern over the  
different standards for  
public and independent  
school who accept  
taxpayer dollars. If a  
school gets public  
funding, they should  
follow the same  
standards.

The same rules should  
apply to all schools.

Title 16 directs the  
Board to regulate public  
and independent  
schools through  
different statutory  
provisions (16 VSA 165  
and 16 VSA 166,  
respectively). By  
exercising its authority  
under both provisions,  
the Board is achieving  
the intended outcome  
that the principles of  
Act 1 apply to both  
public and independent  
schools. By law, EQS  
applies only to public  
schools and  
independent schools  
choosing to participate  
in EQS. The Board's  
proposed modifications  
of the Rules require  
consult with AOE

28

Submitted in Writing

2121 Professional  
Resources: Educator  
Support: Tiered  
Systems of Support

Census-Based Funding  
Advisory Group

Implementation of  
MTSS remains highly  
variable across the state.  
Unclear if because rules  
are not clear or lack of  
oversight and  
implementation  
support. Recommends  
SBE contemplate how  
to provide clarity to  
LEAs through oversight  
or other mechanism.

29	Submitted in Writing	2121 Professional Resources: Educator Support: Tiered Systems of Support	Myers, Chelsea (Vermont Superintendents Association)	VSA supports more inclusive and culturally responsive standards, policies, and practices in VT Schools. EQS and Act 173 should be aligned with regard to multi-tiered systems of support.	EQS and Act 173 should be aligned with regard to multi-tiered systems of support.	compare 173
137	Submitted in Writing	2114 Definition: "Culturally Responsive Teaching"	Brown, Roger	Applauds Mount Mansfield School District. Urges greater emphasis and efforts in promoting bi-lingual fluency. Fluency in foreign language is high form or cultural sensitivity. Worried that definitions might inadvertently result in teaching students about Latin America, for example, instead of teaching the language. Suggests setting statewide fluency goals. This would promote tolerance and inclusion better than current approach.	Set goal of having 80% of elementary school students in Vermont graduate with fluency in two languages in the next eight years.	Cite provisions where this held elsewhere. (also note that State Board doesn't have authority to do this under 16 VSA 164) [color code & point to how to resolve the commenter's issue (e.g. legislative, SU, AOE, etc.)]

1

Submitted in Writing

General Comment:  
Personalized Learning  
Experiences

Stoleroff, Debra

Strongly supports personal learning experiences for students and believes the updated standards will foster personalization in and out of classrooms. Also believes standards will improve educational opportunities for students historically excluded or marginalized. Not providing the most equitable education opportunities does a disservice to the future of Vermont and society. Supports adopting EQS changes as proposed by the Act 1 working

The Board acknowledges and appreciates the comment.

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Submitted in Writing

Comment:  
Noncompliance Review

Smith, Robert

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Create process for requesting that the AOE conduct a review of the school's noncompliance with EQS. AOE would issue public findings that the Agency would rely on to make the determination.

Create process for requesting that the AOE conduct a review of the school's noncompliance with EQS.

review District Quality Standards to see if there's overlap with this ask. Consider a response that notes the variety of ways that review might be initiated at the local level first.



25	Submitted in Writing	2126: Site Visits	Smith, Robert	The integrated field review process should include Site visits of all schools, not just SU/SD offices, every 5 years and AOE should not determine a school complies with EQS absent a Site visit.	Require Site visits to schools every five years as a condition of determination that the school meets EQS.	Point to DQS Standards; defer to that process.
26	Submitted in Writing	2126.2: Review, Secretary's Recommendations, and State Board Action	Smith, Robert	Require schools to conduct annual survey of parents and guardians, using standard format and method set by AOE to measure parent/guardian assessment of EQS components. Surveys should be submitted to AOE and made available to the public. Should be used by AOE to determine if EQS standards are being met.	Include survey results as consideration in determining if school meeting EQS.	Point to 2121.1 2121.2 and 2126.1 as mechanism to receive and consider feedback.
27	Submitted in Writing	2121.2: Staff	Smith, Robert	Establish minimum number of full time equivalent professional staff required to be employed by a school. Suggest 5 FTE. Anything small is likely to be too small to meet requirements of the rules.	Require that not less than 5 full time equivalent professional staff be employed by a school.	Respects the judgement of the local school officials to make the determination; check to see if within authority.

140

Submitted in Writing

2110 Statement of Purpose: Use of Word Critical

Kindsvatter, Aaron (on behalf of Foundation Against Intolerance and Racism (FAIR))

The word "critical" appears without the qualifier "thinking" in three spots creating ambiguity in the meaning of critical. The word critical may mean scrutinizing examination or require a critical race theory (CRT) informed analysis. If the latter is true, educators would instruct through a lens of personal narratives rather than facts. Cites examples of where teachers may be confused. References Frameworks and resources named to support possibility of

Remove term "critical" in the three places it appears in Sections 2110 and 2114.

In regulatory analysis, the meaning of a word is its "plain and ordinary use" unless it's otherwise distinguished in a definition.

13

Submitted in Writing

Comment: Parental Waiver

Schoenfeld, Susan

Concerned about Independent schools getting a waiver rather than following statewide guidelines. Thinks something is missing in the waiver section of EQS to address this.

Waiver Section is intended to allow schools with opportunity to pursue alternative method for meeting requirements of the rules. It does not apply to Independent Schools unless they voluntarily follow EQS.

141	Submitted in Writing	2125: Continuous Improvement Plan	Smith, Robert	Require schools to conduct annual survey of parents and guardians, using standards format and method set by AOE to measure parent/guardian assessment of EQS components. Surveys should be submitted to AOE and made available to the public. Should be used by AOE to determine if EQS standards are being met.	Require schools to conduct annual survey of parents and guardians, using standards format and method set by AOE to measure parent/guardian assessment of EQS components.	Point to 2121.1 2121.2 and 2126.1 as mechanism to receive and consider feedback.
71	Submitted in Writing	2120 Curriculum and Instruction: Arts Education Requirements	Ackerman, Ruth	Rule may hinder delivery of equitable arts education. Revise requirements regarding arts education to K-12; include minimum class requirements and maximum class loads that vary by discipline and developmental level; require schools with 300+ students employ a full-time arts instructor.	1. Separate Arts Education Section (like Physical Education) with four subject areas and minimum class requirements. 2. Address maximum class loads that vary by discipline and developmental level. 3. Mandate full-time arts instructor for schools with 300+ students	Board approves standards; No statewide curriculum; SUs develop and implement curriculum aligned with the standards approved by the State Board. Legislature provides the level of specificity similar to PE.

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Submitted in Writing

2120 Curriculum and Instruction: Arts Education Requirements

Bowker, Abbie

Arts are essential to exposing students to new possibilities and preparing them to be creative contributors to the 21st century. Revise requirements regarding arts education to K-12; include minimum class requirements and maximum class loads; require schools with 300+ students employ a full-time arts instructor.

- 1. Separate Arts Education Section (like Physical Education).
- 2. K-8 students required to take one performing arts and one visual arts class per week/full year.
- 3. 9-12 students required to take one year of performing or visual arts during high school.
- 4. Mandate full-time arts instructor for schools with 300+ students

see above. Check class loads authority.

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Submitted in Writing

2120 Curriculum and Instruction: Arts Education Requirements

Carino, Julie

Rule may hinder delivery of equitable arts education. Revise requirements regarding arts education to K-12; include minimum class requirements and maximum class loads that vary by discipline and developmental level; require schools with 300+ students employ a full-time arts instructor.

- 1. Separate Arts Education Section (like Physical Education) with four subject areas and minimum class requirements.
- 2. Address maximum class loads that vary by discipline and developmental level.
- 3. Mandate full-time arts instructor for schools with 300+ students

see above. Check class loads authority.

74	Submitted in Writing	2120 Curriculum and Instruction: Arts Education Requirements	Carleton, Rebecca	Rule may hinder delivery of equitable arts education. Revise requirements regarding arts education to K-12; include minimum class requirements and maximum class loads that vary by discipline and developmental level; require schools with 300+ students employ a full-time arts instructor.	1. Separate Arts Education Section (like Physical Education) with four subject areas and minimum class requirements. 2. Address maximum class loads that vary by discipline and developmental level. 3. Mandate full-time arts instructor for schools with 300+ students	see above. Check class loads authority.
75	Submitted in Writing	2120 Curriculum and Instruction: Arts Education Requirements	Desjardins, Kim (on behalf of Vermont Arts Educators Association)	Concerned about including art in Section 2120.5. Current teaching loads assigned by local districts to arts educators are onerous. Arts educators experience higher class sizes and class loads relative to their peers, in Vermont. Including arts as part of global citizenship may inadvertently create additional content expectations in already demanding curriculum. This may also result in cuts in positions if students fulfill arts requirements in global citizenship courses. Arts	1. Remove "the arts" from 2120.5 2. Revise 2120.5(f): Artistic Expression (including visual, media, and performing arts): - Provide students in grades K-8 with a minimum of 1 performing arts and 1 visual arts class per week for the entire school year. - Provide students in grades 9-12 with a minimum of 1 performing arts and 1 visual arts class during their high school career. 3. Amend 2121.2 Staff -- " ... physical education programs) requires. In these cases, the total	see above. Check class loads authority.

76	Submitted in Writing	2120 Curriculum and Instruction: Arts Education Requirements	Julie Cousino	Rule may hinder delivery of equitable arts education. Revise requirements regarding arts education to K-12; include minimum class requirements and maximum class loads that vary by discipline and developmental level; require schools with 300+ students employ a full-time arts instructor.	<ol style="list-style-type: none"> <li>1. Separate Arts Education Section (like Physical Education) with four subject areas and minimum class requirements.</li> <li>2. Address maximum class loads that vary by discipline and developmental level.</li> <li>3. Mandate full-time arts instructor for schools with 300+ students</li> </ol>	see above. Check class loads authority.
77	Submitted in Writing	2120 Curriculum and Instruction: Arts Education Requirements	Mitchell, Emily	Rule may hinder delivery of equitable arts education. Arts invaluable in their own right. Revise requirements regarding arts education to K-12; include minimum class requirements and maximum class loads that vary by discipline and developmental level; require schools with 300+ students employ a full-time arts instructor.	<ol style="list-style-type: none"> <li>1. Separate Arts Education Section (like Physical Education) with four subject areas (visual arts, theater, music, dance) and minimum class requirements.</li> <li>2. Address maximum class loads that vary by discipline and developmental level (e.g. K-8 and 9-12).</li> <li>3. Mandate full-time arts instructor for schools with 300+ students.</li> </ol>	see above. Check class loads authority.

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Submitted in Writing

2120 Curriculum and  
Instruction: Arts  
Education  
Requirements

Titterton, Emily

Rename "artistic  
expression" in 2120.5  
because it is not a  
content area, not is it  
aligned with board  
approved student  
learning standards,  
National Core Arts  
Standards. The Arts  
include five artforms:  
Visual Art, Music,  
Theater/Drama, Dance,  
and Media Arts.  
Flexibility might be  
necessary for schools  
for financial reasons,  
but a minimum of  
Visual Arts and Music  
should be provided  
with guidance similar to  
the PE section. Must  
balance requirements to  
offer well-rounded

Rename "artistic  
expression" in 2120.5  
"The Arts"

Title VI or Title IX  
research what it says  
about music. (use  
including but not all)

Submitted in Writing

2120 Curriculum and Instruction: Arts Education Requirements

McGregor, Rebecca (on behalf of dance teachers in Vermont; Taryn Colby, Nichole LeFaive-Damon, Rebecca McGregor, and Colleen McHugh)

Support emphasis of arts education in EQS; integral to overall development and success of students. Current draft diminishes the value of arts education - specifically performing arts. Arts education includes visual, music, theater, dance, and more. Arts education is valuable because it: enhances critical thinking about socially relevant themes, improves academic performance, fosters cultural appreciation and diversity, promotes individual cultural

1. Create artistic expression requirements similar to physical education.  
 2. Require one art discipline class per week/ entire year for students pre-K to grade 12. Grade 9-12 shall be in fine or performing arts.  
 3. All students graduating from high school be required to complete 1 art credit from fine/perfuming arts disciplines.

see above. Rewrite mention of arts; suggest language.



152	Oral Comment 9/14/23	2120 Curriculum and Education: Arts Education Requirement	Koch, Alexis	<p>The vagueness in the language around Fine Arts in schools is concerning. Music education is declining in Vermont. The vague language makes music inaccessible and inequitable for all students. Music is important for emotional health and brain development, so there needs to be specific language to protect this important art.</p>	<p>The language around the arts and music education needs to be more specific.</p>	See above.
154	Oral Comment 9/14/23	2120 Curriculum and Education: Arts Education Requirement	Moss, Andrea	<p>Being specific is extremely important as it prevents cutting important things such as music education. We should remove the current obstacles and barriers to artistic expression, particularly music education but other forms as well and be specific in our rulemaking.</p>	<p>The language around the arts and music education needs to be more specific.</p>	see above.

155	Oral Comment 9/14/23	2120 Curriculum and Education: Arts Education Requirement	Tobin, Molly	Concern over the vagueness in the arts language in the curricular content. Concern that the vague language could water down the already lacking arts requirements in the curriculum.	see above.
157	Oral Comment 9/28/23	2120 Curriculum and Instruction: Arts Education Requirements	Allen, Nick	Requests that the EQS include visual and performing arts in the curriculum. Asserts that art teachers request the EQS state clear how students will have access to enriching art programs.	see above

30	Submitted in Writing	2121 Professional Resources: Educator Support: Arts Education Requirements	Desjardins, Kim (on behalf of Vermont Arts Educators Association)	<p>Concerned about including art in Section 2120.5. Current teaching loads assigned by local districts to arts educators are onerous. Arts educators experience higher class sizes and class loads relative to their peers, in Vermont. Including arts as part of global citizenship may inadvertently create additional content expectations in already demanding curriculum. This may also result in cuts in positions if students fulfill arts requirements in global citizenship courses. Arts</p>	<p>3. Amend 2121.2 Staff -- " ... physical education programs) requires. In these cases, the total number of teacher's classes will not exceed 30 classes a week at the elementary level, and equivalent time at the middle and high school levels."</p>	see above.
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Submitted in Writing

General Comment

Kindsvatter, Aaron (on behalf of Foundation Against Intolerance and Racism (FAIR))

The word "critical" appears without the qualifier "thinking" in three spots creating ambiguity in the meaning of critical. The word critical may mean scrutinizing examination or require a critical race theory (CRT) informed analysis. If the latter is true, educators would instruct through a lens of personal narratives rather than facts. Cites examples of where teachers may be confused. References Frameworks and resources named to support possibility of

Remove term "critical" in the three places it appears in Sections 2110 and 2114.

Plain and ordinary meaning

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Oral Comment 10/3/23

2110 Statement of Purpose: Use of Word Critical

Kindsvatter, Aaron

See written comment

Remove the term "critical" from the three draft sections of the EQS.

Plain and ordinary meaning