

2120 Curriculum and Instruction: Arts Education Requirements	2121 Professional Resources: Educator Support: Antisemitism	2114 Definition: "Discrimination" and Statement of Purpose re: Discrimination	2121 Professional Resources: Educator Support: Tiered Systems of Support
--	---	---	--

2120 Curriculum and Instruction: Should Address Antisemitism	Comments about Antisemitism
Miscellaneous	2114 Definition: "Ethnic Groups"

General Comment: EQS Application to Independent Schools
General Comment

Vermont State Board of Education

DRAFT Public Comment Summary

Rule 2000 - Education Quality Standards

Last Updated: 1/26/24

*DISCLAIMER: This spreadsheet is an organizational tool strictly for the use of the State Board. This tool is prepared

Comment Number	Comment Description	Applicable Section	Name of Commenter	Summary of Comment	Specific Change (if offered)	SBE Response
125	Submitted in Writing	2114 Definition: "Discrimination"	Albright, Heidi	Asks not to alter language in Statement of Purpose or discrimination definition. Supports protecting students from discrimination who are outside the parameters of protected classes. Protections must be expanded and discrimination prohibited.		
126	Submitted in Writing	2114 Definition: "Discrimination"	Bouchey, Heather (for Agency of Education)	Concerned that proposed/current definition of discrimination would have unintended consequences. Points out that explicitly adopting a definition	Reconsider proposed definition.	

127	Submitted in Writing	2114 Definition: "Discrimination"	Garces, Amanda and Mark Hage	Opposes future changes to definition of discrimination, Insert "caste" as category in current version of
128	Submitted in Writing	2114 Definition: "Discrimination"	Inoue, Emilie	Asks to retain current antidiscrimination language. Asks SBE to
129	Submitted in Writing	2114 Definition: "Discrimination"	Mordoff, Christa	Opposes proposed changes to the
130	Submitted in Writing	2114 Definition: "Discrimination"	Nold, Christie	Recounts the way that those with education experience participate in or become decisionmakers and asks that it be considered. Suggests
131	Submitted in Writing	2114 Definition: "Discrimination"	Price, Traci (on behalf of Windsor Southeast Supervisory Union)	Watching and participating in EQS developments. Surprised by comments made by Buxton as
132	Submitted in Writing	2114 Definition: "Discrimination"	Reyes, Cynthia	Supports Act 1 Working Group definition. Questions diverging legal opinions. Disappointed that the change signals that
133	Submitted in Writing	2114 Definition: "Discrimination"	Samuelson, Jennifer (SBE Chair)	Reiterates SBE's intention to align Rules
134	Submitted in Writing	2114 Definition: "Discrimination"	Schoenfeld, Susan	Supports original anti- discrimination
135	Submitted in Writing	2114 Definition: "Discrimination"	Yee, Deidre	Request that the strong anti-discrimination definition remain and
136	Submitted in Writing	2114 Definition: "Discrimination"	Yoon, Paul	Supports Hage and Garces Oct 15 response. Wishes to retain current
138	Submitted in Writing	2110 Statement of Purpose: Proposed Changes	Albright, Heidi	Asks not to alter language in Statement of Purpose or

165	Oral Comment 9/28/23	2110 Statement of Purpose: Proposed	Clough, Mark	Supports the statement of purpose in the EQS	
139	Submitted in Writing	2110 Statement of Purpose: Proposed Changes	Garces, Amanda and Mark Hage	Act 1 Working Group unanimously endorsed definition. Oppose future changes to align with Rule 2200. Intended to expressly define and expand and	Change interfere in 2200 version.
2	Submitted in Writing	General Comment: Oppose specific reference to antisemitism	Jewish Vermonters (Katharine Shapiro, Jamie Spector, Elizabeth Blum, Perry Bellow-Handelman, Brian Tokar, David Martin, Jane Alper, Joe Alper, Tevye Kelman, Sarah Lowry, Debra Stoleroff, Andrew Simon, Nelson Kasfir, Josh Golin, Alan Berolzheimer, Alissa Mesibov, Nora Paley, Aaila Kaye, Andrew Shapiro, Spoon Agave, Gene Bergman, Central VT Jewish Chavurah for Justice and Liberation, Jewish Voice for Peace Vermont)	Fully support final definitions of Ethnic Groups and Ethnic Studies as written. Disappointed in views and tactics of JCVT. Claims JCVT played adversarial role in the process, placing experience of Jews before those of other marginalized groups. Ethnic Group definition was adopted because listing groups could never be inclusive enough. Absence of explicit mention of Jews or antisemitism does not exclude, despite many commenters claiming it does. Many	
80	Submitted in Writing	2114 Definition: "Ethnic Groups"	Anderson, Carol	Include Jewish People in the definition of ethnic groups defined	
81	Submitted in Writing	2114 Definition: "Ethnic Groups"	Barba, Betty	Appalled that section B not included. Current	

82	Submitted in Writing	2114 Definition: "Ethnic Groups"	Bernat, James and Judith	Restore the Jewish people to list of ethnic groups that have historically been subject	
83	Submitted in Writing	2114 Definition: "Ethnic Groups"	Betterman, Ellen	Standards adopted should include	
84	Submitted in Writing	2114 Definition: "Ethnic Groups"	Bettmann, Michael	Supports including of language about ethnic groups that have been historically subject to persecution and	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic
85	Submitted in Writing	2114 Definition: "Ethnic Groups"	Blicher, Brooke	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
86	Submitted in Writing	2114 Definition: "Ethnic Groups"	Bradford, Daniel	Opposes eliminating Jewish People from the definition of Ethnic Group. Not deeply	
87	Submitted in Writing	2114 Definition: "Ethnic Groups"	Cahn-Flores, Ariel	Include Section B as part of Ethnic Group so that the Jewish people	
88	Submitted in Writing	2114 Definition: "Ethnic Groups"	Coen, A	Asks to follow law and legislative intent in defining ethnic group	Include "Part B" in definition of Ethnic Group.
89	Submitted in Writing	2114 Definition: "Ethnic Groups"	Cohen, Michael M.	EQS and Frameworks must include the same definition of Ethnic Groups that was used in Act 1 and include Part B.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.
90	Submitted in Writing	2114 Definition: "Ethnic Groups"	Doucet, Eliza	Recounts history and values of Jewish people. Cites challenges and horrible experiences of her grandparents and declares continued	Define Ethnic Groups as it is defined in Act 1.

91	Submitted in Writing	2114 Definition: "Ethnic Groups"	Dunne, Gered	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
92	Submitted in Writing	2114 Definition: "Ethnic Groups"	Fainsilber, David	Part B of Act 1 must be included in the	Define Ethnic Groups as it is defined in Act 1.
93	Submitted in Writing	2114 Definition: "Ethnic Groups"	Feinberg, Susan & Barry	Support adopting Rules that include ethnic groups that have been historically subject to persecution or genocide	
94	Submitted in Writing	2114 Definition: "Ethnic Groups"	Fishman, K. Heidi	Public and faith community comments requested inclusion of Jewish people in the defecction of ethnic	
95	Submitted in Writing	2114 Definition: "Ethnic Groups"	Gottsegen, Nicole Johnson	Supports the goals of 2000. Legislation defined ethnic groups to include those "that have been historically subject to persecution	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.
96	Submitted in Writing	2114 Definition: "Ethnic Groups"	Greenberg, Laurie	Legislation requires EQS to include ethnic groups "that have been historically subject to persecution or genocide." Do not	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.
97	Submitted in Writing	2114 Definition: "Ethnic Groups"	Haigh, Ilene	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
98	Submitted in Writing	2114 Definition: "Ethnic Groups"	Jacoby, Nir	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."

99	Submitted in Writing	2114 Definition: "Ethnic Groups"	Jenkyn, Lawrence	Legislation requires EQS to include ethnic groups "that have been historically subject to persecution or genocide," as Section B	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.
100	Submitted in Writing	2114 Definition: "Ethnic Groups"	Kaplan, Deborah	Concerned about eliminating Section B from Ethnic Groups definition. Standards	Include "Part B" in definition of Ethnic Group.
101	Submitted in Writing	2114 Definition: "Ethnic Groups"	Kasden, Larry	Revise definition of ethnic group because people of different ethnicities and nationalities can have the same religion.	Revise wording from "ethnic group" to "ethnic and religious groups that have been historically subject to persecution.
102	Submitted in Writing	2114 Definition: "Ethnic Groups"	Koenig, Mark	Understands concern and optics of removing specific reference to Judaism from current language. Agrees with working group's revisions to remove list that might unintentionally limit or narrow the definition of discrimination. Given historical considerations, including broader references to religious groups might alleviate concerns while ensuring no group is excluded.	Include phrase " ... including, but not limited to those of Jewish, Christian, Muslim, Hindi, or Sikh faith ..."

103	Submitted in Writing	2114 Definition: "Ethnic Groups"	Kramer, Roseanne	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
104	Submitted in Writing	2114 Definition: "Ethnic Groups"	LeDrew, Susan	Disappointed that the definition of Ethnic Groups eliminates the	
105	Submitted in Writing	2114 Definition: "Ethnic Groups"	Leff, Susan	Revise definition of ethnic group to be exactly as it appears in Act 1, including section B. VT Legislators included this because they want k-12 students	Define Ethnic Groups as it is defined in Act 1.
106	Submitted in Writing	2114 Definition: "Ethnic Groups"	Meier, Joslyn	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
107	Submitted in Writing	2114 Definition: "Ethnic Groups"	Miller, S.	Requests that section B of the definition of Ethnic Groups be	Include "Part B" in definition of Ethnic Group.
108	Submitted in Writing	2114 Definition: "Ethnic Groups"	Moritz, Daphne	Include Section B as part of Ethnic Group so that the Jewish people aren't eliminated in the definition. Attacks on Israel should be enough	Include "Part B" in definition of Ethnic Group.
109	Submitted in Writing	2114 Definition: "Ethnic Groups"	Mueller, Jessica	JCVT advocates for exact Act 1 language. Legislature adopted definition because they wanted Vermont's	Define Ethnic Groups as it is defined in Act 1.
110	Submitted in Writing	2114 Definition: "Ethnic Groups"	Pasch, James (of Anti-Defamation League on behalf of client SCVT)	Requests that Part B be reinserted in definition of "Ethnic Group." Supports ethnic studies program that teaches	Include "Part B" in definition of Ethnic Group.

111	Submitted in Writing	2114 Definition: "Ethnic Groups"	Patt, Avram	Supports Rules except of omission of "part b" in definition of "ethnic groups." Son of Jewish parents who escaped the Holocaust. Current legislator who claims partial responsibility for inclusion of "part b" in Act 1. "Part B" language includes impacts of bias	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.
112	Submitted in Writing	2114 Definition: "Ethnic Groups"	Pinsof-DePillis, Debra Ann	Please include Part B. Include education of all people with histories of	Include "Part B" in definition of Ethnic Group.
113	Submitted in Writing	2114 Definition: "Ethnic Groups"	Rojansky Family	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
114	Submitted in Writing	2114 Definition: "Ethnic Groups"	Rosenbloom, Jonathan	Urges explicit incorporation of ethnic groups that have historically endured persecution or genocide	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic
115	Submitted in Writing	2114 Definition: "Ethnic Groups"	Shapiro, Kathy	Support broad and inclusive language as it exists in 2113, without singling out groups. Supports this approach as part of broader	
116	Submitted in Writing	2114 Definition: "Ethnic Groups"	Sobel, Maya	Opposes changing wording of definition of ethnic groups because it	
117	Submitted in Writing	2114 Definition: "Ethnic Groups"	Solitaire, C.	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."

118	Submitted in Writing	2114 Definition: "Ethnic Groups"	Stein, Susanna	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
119	Submitted in Writing	2114 Definition: "Ethnic Groups"	Vermont Holocaust Memorial	Legislative findings cited increase reports of antisemitism and Islamophobia in Vermont VTHM	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic
120	Submitted in Writing	2114 Definition: "Ethnic Groups"	Vogel, Matthew (Individual and as ED of the Hillel at UVM)	US DOE's OCR recently resolved claims of antisemitism at UVM. Supports same definition of Ethnic Groups as in Act 1,	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.
121	Submitted in Writing	2114 Definition: "Ethnic Groups"	Weisman, Tobie (ED and on behalf of Jewish Communities of Vermont)	JCVT supports a comprehensive and pedagogically sound ethnic studies program for VT educational system. Advocated for and supported definitions as passed by the legislature. Does not	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.
122	Submitted in Writing	2114 Definition: "Ethnic Groups"	Weisman, Tobie (ED and on behalf of Jewish Communities of Vermont)	Key Vermont clergy worked with the legislature to add "groups that have been historically subject to persecution of genocide" to Act 1 definition. Request changes. Removing "groups" would not call for groups to be studied. Adding "persecution" to list of harms will cause	Define Ethnic Groups as it is defined in Act 1.

123	Submitted in Writing	2114 Definition: "Ethnic Groups"	Weiss, Carolyn	Include ethnic groups "that have been historically subject to persecution or	Include words "that have been historically subject to persecution or genocide."
124	Submitted in Writing	2114 Definition: "Ethnic Groups"	Windsor County Senators (Senator Dick McCormack, Senator Alison Clarkson, and Senator Rebecca White)	Urge inclusion of a history of oppression and/or genocide in the list of criteria for groups warranting attention. Genocide deserves special attention in the	Include words "that have been historically subject to persecution or genocide."
143	Oral Comment 9/14/23	2114 Definition: Ethnic Groups	Weisman, Tobie	Recommends returning to the same exact definitions that were already passed by the state legislature rather than the new definitions. The new	Return to the legislature's definitions.
160	Oral Comment 9/28/23	2114 Definition: "Ethnic Groups"	Edleson, David	Asserts the importance of teaching about the persecution, successes, and experience of the Jewish community.	Define Ethnic Groups as it is defined in Act 1.
161	Oral Comment 9/28/23	2114 Definition: "Ethnic Groups"	Wilhelm, Zalman	Requests that Part B remain in the EQS as it	Define Ethnic Groups as it is defined in Act 1.
162	Oral Comment 9/28/23	2114 Definition: "Ethnic Groups"	Doucet, Eliza	See written comment.	Define Ethnic Groups as it is defined in Act 1.
163	Oral Comment 9/28/23	2114 Definition: "Ethnic Groups" & 2120 Curriculum and Instruction: Should	Doucet, Emma	Requests that Part B be included and that students are taught Jewish culture alongside	Define Ethnic Groups as it is defined in Act 1.
164	Oral Comment 9/28/23	2114 Definition: "Ethnic Groups"	Hague, Eileen	Requests the inclusion of Part B in the EQS. Asserts that they agree	Define Ethnic Groups as it is defined in Act 1.
169	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Cope, Paula	Requests that Act 1 Part B be included in the EQS inorder to include	Define Ethnic Groups as it is defined in Act 1.

170	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Prue, Jennifer	Asserts that excluding Jews from the ethnic group definitions is	Define Ethnic Groups as it is defined in Act 1.
173	Oral Comment 10/3/23	General Comment: Antisemitism	Jen and Phoebe	Cite specific personal examples of	
174	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Sternberg, Jeremy	Requests that Jews are included in the definition of ethnic groups. Asserts that	Define Ethnic Groups as it is defined in Act 1.
175	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Gottsegen, Dan	Opposes the elimination of Part B in Act 1. Cites specific personal examples of antisemitism that their	Define Ethnic Groups as it is defined in Act 1.
176	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Mueller, Jessica	See written comment.	Define Ethnic Groups as it is defined in Act 1.
177	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Goldman, Pam	Opposes the elimination of Part B in Act 1. Pam's child cites	Define Ethnic Groups as it is defined in Act 1.
179	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Pasch, James (of Anti-Defamation League on behalf of client SCVT	See written comment	Include "Part B" in definition of Ethnic Groups.
180	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Carroll, Jamie	Supports inclusion of Section B. The Jewish	
182	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Leff, Susan	See written comment	Define "Ethnic Groups" according to Section B.
183	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Patt, Avram	Cites specific examples of oppression and anti-	
184	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Shapiro, Kathy	See written comment	
190	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Malloy, Lori	Supports Section B. Cites specific examples	
191	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Elsberg, Stuart	Supports Section B of the Vermont legislation.	
192	Oral Comment 10/3/23	General Comment: Definitions	Murray, [No First Name Recorded]	Cites specific examples of racism and anti-	
195	Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Dunwoody, Phil	Supports Section B being included.	

16	Submitted in Writing	General Comment: Antisemitism	Chen, A.	Many concerns of Jewish commenters are already addressed in updated EQS. EQS provides a strong stance against antisemitism based on bullying and harassment in EQS - "Each school shall
17	Submitted in Writing	General Comment: Antisemitism	Levy, Aliza	Must include that antisemitism is rampant
18	Submitted in Writing	General Comment: Antisemitism	Rotman, Arline	Include antisemitism in the rules for inclusion.
19	Submitted in Writing	General Comment: Response to Commenters	Garces, Amanda and Mark Hage	Call attention to document provided to SBE in 2022 explaining changes to ethnic group definition. Explains process and extent of collaboration with CRE. Disputes assertions that Jewish students and families will not be well served by the proposed EQS rules. Affirm continued commitment to inclusivity. Illustrated history of communications between Working Group and JCVT, characterized as being respectful and open. Note the groups task was to draft standards,
188	oral comment 12.7.23	One implementation Date	Vermont Superintendent Association	Request EQS implementation date of July 1, 2025