

Vermont State Board of Education

DRAFT Public Comment Summary

Rule 2000 - Education Quality Standards

Last Updated: 2/10/24

*DISCLAIMER: This spreadsheet is an organizational tool strictly for the use of the State Board. This tool is prepared by Sarah Buxton, special counsel for the State Board of Education. The summaries and representations contained herein do not reflect the views of the Board. The State Board of Education considers any written comments as they were submitted in their original form and any oral comment as provided at a public hearing.

Comment Description	Applicable Section	Name of Commenter	Summary of Comment	Specific Change (if offered)	SBE Response	Sarah's Notes
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.	<ol style="list-style-type: none"> 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 	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts.	check class load, size authority; credit requirement issue.
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.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context.	
Submitted in Writing	2110 Statement of Purpose: Proposed Changes	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.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context.	
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Alexander, Judy	Cites multiple examples of how current school practices, cultures, and calendars conflict with practice of Judaism. Describes lack of awareness or teaching about Spanish Inquisition and forced conversion to Catholicism. Notes lack of awareness about the Holocaust, pogroms, ghettos, history of State of Israel. With increase in antisemitic incidents, it is important to include Jewish history and experience in the Standards		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	
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.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts and includes music.	
Submitted in Writing	2114 Definition: "Ethnic Groups"	Anderson, Carol	Include Jewish People in the definition of ethnic groups defined in Section B. Antisemitism has increased dramatically. Cites horror of Holocaust and conflict and deaths in Israel. No longer believes that one can be anti-Israel without being antisemitic toward American Jews.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Anderson, Carol	No longer believes that one can be anti-Israel without being antisemitic toward American Jews and wishes this to be considered in contemplating curriculum changes.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 Rule remain consistent this provision of the law.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Barba, Betty	Appalled that section B not included. Current events and hatred toward Jews suggests responsibility to educate youth to prevent hatred.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Bernat, James and Judith	Restore the curricular subject of antisemitism which remains a chronic problem internationally. The disturbing data on the increase in antisemitism in USA, usually a product of ignorance and superstition, makes this a serious issue with important educational implications.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 to persecution or genocide. The disturbing data on the increase in antisemitism in USA, usually a product of ignorance and superstition, makes this a serious issue with important educational implications.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Betterman, Ellen	Standards adopted should include curriculum specifically addressing antisemitism.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Betterman, Ellen	Standards adopted should include language about ethnic groups that have historically been subject to persecution or genocide, as was included by the legislature.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Bettmann, Michael	Supports including curriculum addressing antisemitism.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Bettmann, Michael	Supports including of language about ethnic groups that have been historically subject to persecution and genocide (section B) as included by the legislature.	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic Groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Blicher, Brooke	Antisemitism continues to exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Blicher, Brooke	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Bornstein, Selma	The rise of antisemitism requires attention. History of genocide and ignorance about history will perpetuate uninformed opinions and intolerance. Future generations must learn from the past to experience the promise of a true democracy.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Discrimination"	Bouchee, Heather (for Agency of Education)	Concerned that proposed/current definition of discrimination would have unintended consequences. Points out that explicitly adopting a definition broader than its legal definition is problematic in its application to other rules or in other contexts. The definition is markedly different from any definition of the same term in state or federal civil rights law. When and if it is applied, even mistakenly, in other contexts, problems will ensue. Provide illustrative example. Reconsider whether the definition is necessary to accomplish the purpose of the rule and whether its prudent to formalize a definition that is so different from other legal definitions of the same work. Consider limiting application.	Reconsider proposed definition.	The Board appreciates and accepts this comment. The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context.

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	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts.	check class load, size authority; credit requirement issue.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Bradford, Daniel	Opposes eliminating Jewish People from the definition of Ethnic Group. Not deeply religious and explains that being Jewish is more than a religious observance, it is also an ethnicity. Cites experience with antisemitism and wishes to increase protections against hate like this. Urges greater understanding of being Jewish.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Bradford, Jill	Disappointed that antisemitism is removed from scope of rules. Cites regular experience with antisemitism in Vermont and sparse opportunity for VT students to interact with Jewish individuals during school years. Declares that it is imperative that curricula provide information about antisemitism and its impact on society	Keep antisemitism within the scope of curricular changes.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	
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.)]
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 of the Rule remain consistent this provision of the law.	
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Cahn-Flores, Ariel	Cites recent personal examples of antisemitism. Identified need for school educators and administrators to have the tools they need to combat antisemitism and racism. Include antisemitism and Jews as an ethnic group in education standards.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	

Submitted in Writing	2121 Professional Resources: Educator Support: Antisemitism	Cahn-Flores, Ariel	Identified need for school educators and administrators to have the tools they need to combat antisemitism and racism.		The Board accepts and appreciates the comment. In addition to a lengthy section devoted to new supports, trainings, and professional development opportunities for educators to strengthen anti-racist, inclusive, and culturally and linguistically responsive school experience for all students, and to cultivate the knowledge, skills and practices required to identify and remediate discrimination, the final proposed rule will also require that schools provide anti-racist, culturally responsive, anti-discriminatory, and inclusive instructional materials and resources for educators and student use.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Cahn-Flores, Ariel	Include Section B as part of Ethnic Group so that the Jewish people aren't eliminated in the definition. Cites recent personal examples of antisemitism. Identified need for school educators and administrators to have the tools they need to combat antisemitism and racism.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.
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.	<ol style="list-style-type: none"> 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 	<p>The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts.</p> <p>check class load, size authority; credit requirement issue.</p>
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.	<ol style="list-style-type: none"> 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 	<p>The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts.</p> <p>check class load, size authority; credit requirement issue.</p>
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Carroll, Jamie	Supports inclusion of Section B. The Jewish community continues to be treated as the exception to hate. Cites personal experience of antisemitism.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.		consult with AOE

Submitted in Writing	2120 Curriculum and Instruction: Should Address 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 maintain a safe, accessible .. " Appreciates and encourages the studying of genocide which would include the Holocaust - "This requires a critical examination ... " If Jewish people are named0 as a marginalized group and antisemitism is named a protected type of discrimination then other religions, especially Muslim, should be named. Proud to be Jewish with lineage of those who fight for the freedom of others. Cites Trump era Holocaust Rights Association Definition of antisemitism, declaring it dangerous. Notes Human Rights Watch named Israel as an apartheid state.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 maintain a safe, accessible .. " Appreciates and encourages the studying of genocide which would include the Holocaust - "This requires a critical examination ... " If Jewish people are named0 as a marginalized group and antisemitism is named a protected type of discrimination then other religions, especially Muslim, should be named. Proud to be Jewish with lineage of those who fight for the freedom of others. Cites Trump era Holocaust Rights Association Definition of antisemitism, declaring it dangerous. Notes Human Rights Watch named Israel as an apartheid state.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	General Comment: Antisemitism	Chen, Alyssa	See written comment.		See responses to written comment.
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 consistent this provision of the law.
Oral Comment 9/28/23	2110 Statement of Purpose: Proposed Changes	Clough, Mark	Supports the statement of purpose in the EQS as well as the language throughout the EQS that support the statement of purpose.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context.
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 Rule remain consistent this provision of the law.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Coen, A	Asks to follow law and legislative intent in defining ethnic group so it includes "part b."	Include "Part B" in definition of Ethnic Group.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Coen, A	Asks to follow law and legislative intent in defining ethnic group so Vermont students learn about people, values, customs, contributions, and ongoing struggles of those who lost lives and endured persecution rather than just historical statistics.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	
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.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Cope, Paula	Requests that Act 1 Part B be included in the EQS in order to include the impact genocide and persecution have on people past and present. Cites specific personal examples of antisemitic behavior.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Oral Comment 10/3/23	General Comment: Support for EQS	Curry, Liz	Cites specific examples of segregation in Vermont schools. Supports the EQS as a way to personalize the classroom by creating conditions that support each student's learning needs.		The Board acknowledges and appreciates the comment.	
Submitted in Writing	General Comment	Davies, Maria (on behalf of Vermont Education Equity Collective)	VEEC hopes the standards are passed. References letter, not attached.		The Board acknowledges and appreciates the comment.	
Oral Comment 10/3/23	General Comment: Personal Experience	Decker, Dana	Cites specific examples of racism and antisemitism. Supports the EQS.		The Board acknowledges and appreciates the comment.	
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 are vital and require their own specific requirements outline like physical education. Request changes (outlined here) to create more equitable opportunities for students and ensure long-term viability of art programs in schools.	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 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."	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts.	check class load, size authority; credit requirement issue.

Submitted in Writing	2121 Professional Resources: Educator Support: 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 are vital and require their own specific requirements outline like physical education. Request changes (outlined here) to create more equitable opportunities for students and ensure long-term viability of art programs in schools.	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."	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts and includes music.	check class load, size authority; credit requirement issue.
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.	See response to written comment.	
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 confusing.	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 Rule remain consistent this provision of the law.	
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Doucet, Eliza	Recounts history and values of Jewish people. Cites challenges and horrible experiences of her grandparents and declares continued pride and devotion to heritage. Requests that Ethnic Groups include Jewish Vermonters not just as example of genocide but as those who persevered. Advocates for teaching about the Holocaust alongside teaching about Jews as a people and culture. Promotes teaching children that antisemitism exists and that Jewish people are so much more than a historical horror story.	Define Ethnic Groups as it is defined in Act 1.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	
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 pride and devotion to heritage. Requests that Ethnic Groups include Jewish Vermonters not just as example of genocide but as those who persevered. Advocates for teaching about the Holocaust alongside teaching about Jews as a people and culture. Promotes teaching children that antisemitism exists and that Jewish people are so much more than a historical horror story.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Oral Comment 9/28/23	2114 Definition: "Ethnic Groups"	Doucet, Eliza	See written comment.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Oral Comment 9/28/23	2120 Curriculum and Instruction: Should Address Antisemitism	Doucet, Emma	Requests that Part B be included and that students are taught Jewish culture alongside tragedy. Cites personal examples of antisemitism. Asserts that Vermonters need to learn more about Judaism and recognize it in communities.	Define Ethnic Groups as it is defined in Act 1.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	

Oral Comment 9/28/23	2114 Definition: "Ethnic Groups" & 2120 Curriculum and Instruction: Should Address Antisemitism	Doucet, Emma	Requests that Part B be included and that students are taught Jewish culture alongside tragedy. Cites personal examples of antisemitism. Asserts that Vermonters need to learn more about Judaism and recognize it in communities.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 of the Rule remain consistent this provision of the law.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Dunne, Gered	Antisemitism continues to exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Dunne, Gered	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Dunwoody, Phil	Supports Section B being included.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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. Reiterates what Matthew Vogel said about the national strategy to combat antisemitism. Cites personal examples, examples in Vermont, and examples in the United States of antisemitic behavior. Requests that the original language of part B be put back in the curriculum.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Elsberg, Stuart	Supports Section B of the Vermont legislation. Supports teaching about America's antisemitic history in order to prevent this history from continuing.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Fainsilber, David	Part B of Act 1 must be included in the definition of Ethnic Groups and the Frameworks. This is to help ensure inclusion of Jews and other minorities.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Feinberg, Susan & Barry	Support adopting Rules that include ethnic groups that have been historically subject to persecution or genocide including antisemitism. It would be a serious mistake not to define the Jewish community as an ethnic group. Cite examples of antisemitism in the community. Assert that the legislature intended for the definition to acknowledge the issue. Believes that education will combat the ignorance that is leading to hate and violence.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 including antisemitism. It would be a serious mistake not to define the Jewish community as an ethnic group. Cite examples of antisemitism in the community. Assert that the legislature intended for the definition to acknowledge the issue. Believes that education will combat the ignorance that is leading to hate and violence.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	General Comment: Antisemitism	Felson, Ethan	Cites specific personal examples of antisemitic behavior.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Fishman, K. Heidi	Public and faith community comments requested inclusion of Jewish people in defining ethnic group, contrary to legislative language. Antisemitism is a problem and continues today, including reference to Oct 7 bombings. VT should acknowledge that Jews are scared in present circumstances and be willing to address their needs. Educators should acknowledge impact of racial slurs, swastikas, and disregard for holy days on Jewish students.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	General comment	Francis, Eli	Supports the updates to the EQS as proposed by the Act One Working Group. Cites specific personal examples of inclusion and exclusion in school settings. Asserts that they have not experienced personal specific examples of ethnic or racial discrimination, but recognizes that it is a significant issue in their district and beyond.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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. 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 consistent this provision of the law.
Oral Comment 10/3/23	General Comment: Response to Commenters	Garces, Amanda	See written comment	See responses to written comment.

check if additional comment.

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 prohibit discrimination. Disagrees with use of belief rather than prohibit. No mention of student in proposed 2200 rule language. Offered previous explanation and justification for the Group's recommendation that the language be included. Notes that 2200 language defers to parameters of anti-discrimination law with regard to enforcement. Discusses concept of interference in 2200 Rules and believes it doesn't create a sufficient firewall against discrimination.	Change interfere in 2200 version.	The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules.
Submitted in Writing	2114 Definition: "Discrimination"	Garces, Amanda and Mark Hage	Opposes future changes to definition of discrimination, asserting that the changes are inconsistent with Act 1 Working Group intent. Passed unanimously. Caste should be inserted into definition.	Insert "caste" as category in current version of Discrimination.	The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules.
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, not curriculum. Restated position and recommended definitions.		The Board accepts this comment and will review the use of the terms referenced and ensure that they are defined and used in alignment with legislative intent in the final proposed rule.
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 of the Rule remain consistent this provision of the law.
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Goldman, Pam	Opposes the elimination of Part B in Act 1. Pam's child cites specific personal examples of antisemitism they faced in schools. They assert that it is important for children their age to understand what it means to be Jewish and the impact of their actions.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	2120 Curriculum and Instruction: Should Address Antisemitism	Gottsegen, Dan	Opposes the elimination of Part B in Act 1. Cites specific personal examples of antisemitism that their children faced in schools. Asserts that inclusive environments need to include all groups. Cites specific personal examples of antisemitism that other family members have experienced. Asserts that students and faculty are not aware of Jewish history and it is important that this changes.	Define Ethnic Groups as it is defined in Act 1.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.

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 children faced in schools. Asserts that inclusive environments need to include all groups. Cites specific personal examples of antisemitism that other family members have experienced. Asserts that students and faculty are not aware of Jewish history and it is important that this changes.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 or genocide." Doesn't believe there was an intention to exclude Jews in attempt to make rules more broad and inclusive. Fears that by leaving out language it inadvertently suggests that antisemitism is less damaging or concerning and will fail to teach the history. Cites present day examples of antisemitism and recounts the WWII genocide and lack of US involvement in stopping it because of antisemitism.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Gottsegen, Nicole Johnson	Supports the goals of 2000. Supports Rules explicitly addressing antisemitism. Cites present day examples of antisemitism and recounts the WWII genocide and lack of US involvement in stopping it because of antisemitism. Must directly teach the history of antisemitism and work to stop it to achieve goals of 2000.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Greenberg, Laurie	Legislation requires EQS to include ethnic groups "that have been historically subject to persecution or genocide." Do not eliminate Section B to ensure VT students are educated about the history of racism, antisemitism, bigotry, and gender bias. Textbooks and state standards do not provide comprehensive coverage of slavery, civil rights, holocaust, and other histories of oppression and resistance. History will repeat itself and progress will be lost in advancing equitable policies and rights.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 eliminate Section B to ensure VT students are educated about the history of racism, antisemitism, bigotry, and gender bias. Textbooks and state standards do not provide comprehensive coverage of slavery, civil rights, holocaust, and other histories of oppression and resistance. History will repeat itself and progress will be lost in advancing equitable policies and rights.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 9/28/23	2114 Definition: "Ethnic Groups"	Hague, Eileen	Requests the inclusion of Part B in the EQS. Asserts that they agree with the rest of the curriculum, but do not agree with the exclusion of Act 1 Part B. States that Vermont should be upholding the federal national strategy combatting antisemitism.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Haigh, Ilene	Include ethnic groups "that have been historically subject to persecution or genocide" in definition for Standards and Framework. This is consistent with the White House's National Strategy to Counter Antisemitism.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Haigh, Ilene	Require teaching of Jewish Experience as part of curriculum. This is consistent with the White House's National Strategy to Counter Antisemitism.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 study is a floor; it is not aspirational. Cites specific examples of shortcomings of approved independent school practices, opportunities, and philosophies and teachings. Diverting public funds from public schools in rural areas drives fragmentation and segregation based on religious identity. No data and information available about performance of schools that taxpayers or legislators can look at. Previous data suggests that independent school performance is weaker than that of peer public schools. The harm caused by lower standards outweighs hypothetical harm caused to schools in requiring them to comply with EQS. It is unjust to allow independent schools to practice selective enrollment or "cull" students. This enables social and economic polarization. Data suggests that a disproportionate number of disadvantaged students from tuition towns are served by public schools rather than independent schools, suggesting segregation impacts counter to public policy. Consider whether rules onerous to independent schools should be	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 of the Rule remain consistent this provision of the law. Comments will also be sent to the Rule 2200 Committee for consideration in response.

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 governance structures. Historic academies have never been public schools. School leaders are accountable to parents ultimately. Governance structures are flexible, responsive, oriented too long-term sustainability, and helps attract independent contributions. The system is working well. Sending school districts retain the power to construct and operation their own public school and end tuitioning. If EQS were applied to independent schools, the following problems would occur: (1) 2121.2 - Assert that the current requirement for qualifications is sufficient; licensure is not the best measure of teacher quality and preparedness. Cites examples. (2) 2120.6 - a superintendent would be responsible for developing curricula for all independent schools; additional problems of overlapping SU involvement. (3) 2121.1 - superintendent would supervise an employee employed and supervised by a separate board. Further, some aspects of 2200 are not applicable to public schools: (1) subject to public scrutiny, review every 5 years. (2) complaint process available. (3) Documentation requirements and		The Board acknowledges and appreciates the comment.
Submitted in Writing	2114 Definition: "Discrimination"	Inoue, Emilie	Asks to retain current antidiscrimination language. Asks SBE to be transparent about decision-making and share legal analysis. Taking out language is oppression by omission. Asks to be heard, seen, and learned from.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules. The Board has been transparent in its process and discusses matters in executive session only when necessary and when the nature of the discussion meets one of the statutorily reasons to conduct protected discussion.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Jacoby, Nir	Antisemitism continues to exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Jacoby, Nir	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

Oral Comment 10/3/23	General Comment: Antisemitism	Jen and Phoebe	Cite specific personal examples of antisemitism. Wants legislative definition to remain.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Jenkyn, Lawrence	Legislation requires EQS to include curriculum to address "antisemitism." Do not eliminate legislative intent to ensure VT students are educated about the history of racism, antisemitism, bigotry, and gender bias.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 in definition of Ethnic Groups. Do not eliminate Section B to ensure VT students are educated about the history of racism, antisemitism, bigotry, and gender bias.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 Jewish people benefit from white privilege. Specifically naming and elevating antisemitism would use white privilege to separate community from others who suffer from multiple intersecting forms of oppression. Must stand together against all forms of discrimination, harassment, and hate. JCVT has focused on the IHRA definition of antisemitism which conflates antisemitism with anti-Zionism, criticism of Israel, and support for rights of Palestinians. ADL has strong ties to the State of Israel. JCVT wrongfully accuses members of Coalition of being anti Israel and antisemitic. Antisemitism exists and is on the rise. Critical to understand proponents are not those who criticize Israel.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.	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	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts.

Submitted in Writing	2121 Professional Resources: Educator Support: Antisemitism	Kanell, Beth	Vermont has had Jewish connections since it's founding - particularly in NEK. Few Jews are known to residents and few choose to be known. Cites personal examples of fear of antisemitism and calls on raising awareness and increasing education among educators, including post 1945, on Jewish history and culture.		The Board accepts and appreciates the comment. In addition to a lengthy section devoted to new supports, trainings, and professional development opportunities for educators to strengthen anti-racist, inclusive, and culturally and linguistically responsive school experience for all students, and to cultivate the knowledge, skills and practices required to identify and remediate discrimination, the final proposed rule will also require that schools provide anti-racist, culturally responsive, anti-discriminatory, and inclusive instructional materials and resources for educators and student use.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Kanell, Beth	Vermont has had Jewish connections since it's founding - particularly in NEK. Few Jews are known to residents and few choose to be known. Cites personal examples of fear of antisemitism and calls on raising awareness and increasing education in curricula, including post 1945, on Jewish history and culture.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Kaplan, Deborah	Antisemitism is on the rise and, along with recent events, support and illustrate the importance of educating children on historical facts of antisemitism.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Kaplan, Deborah	Concerned about eliminating Section B from Ethnic Groups definition. Standards must include in its definition of groups historically subjected to persecution. Antisemitism is on the rise and, along with recent events, support and illustrate the importance of educating children on historical facts of antisemitism.	Include "Part B" in definition of Ethnic Group.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Kaplan, Deborah	Concerned about eliminating Section B from Ethnic Groups definition. Standards must include in its definition of groups historically subjected to persecution. Antisemitism is on the rise and, along with recent events, support and illustrate the importance of educating children on historical facts of antisemitism.	Include "Part B" in definition of Ethnic Group.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.	The Board declines to further define the terms "critical" and "thinking," intending them to have their plain and ordinary meaning when used in this Rule.

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 confusion.	Remove term "critical" in the three places it appears in Sections 2110 and 2114.	The Board declines to further define the terms "critical" and "thinking," intending them to have their plain and ordinary meaning when used in this Rule.
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 confusion.	Remove term "critical" in the three places it appears in Sections 2110 and 2114.	The Board declines to further define the terms "critical" and "thinking," intending them to have their plain and ordinary meaning when used in this Rule.
Oral Comment 9/14/23	2120 Curriculum and Education: Arts Education Requirement	Koch, Alexis	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.	The language around the arts and music education needs to be more specific.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts and includes music. See response to written comment.
Oral Comment 10/3/23	General Comment: EQS Application to Public Schools	Koenig, Mark	See written comment		
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 lender requirements to illustrate conditions that need to be followed. Independent schools should abide by the same requirements of transparency, accreditation, and nondiscrimination or not be permitted taxpayer funds. Urges adoption of single standard.		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 consistent this provision of the law. Comments will also be sent to the Rule 2200 Committee for consideration in response. The Board acknowledges and appreciates the remaining comment.
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 ..."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Kramer, Roseanne	Antisemitism continues to be exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.

Submitted in Writing	2114 Definition: "Ethnic Groups"	Kramer, Roseanne	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	LeDrew, Susan	Disappointed that the definition of Ethnic Groups eliminates the Jewish people and urges inclusion in the definition. Cites examples of antisemitism experienced by granddaughter and locally.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	LeDrew, Susan	Education should not include only tragic events, but should also include wonderful contributions made by Jews. Cites examples of antisemitism experienced by granddaughter and locally. Students deserve the very best. May be behind peers post high-school because of lack of exposure to other cultures, ethnicities and ideas.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2121 Professional Resources: Educator Support: Antisemitism	LeDrew, Susan	Lack of diversity in students and staff is worrisome because students may be behind peers post high-school because of lack of exposure to other cultures, ethnicities and ideas.		The Board accepts and appreciates the comment. In addition to a lengthy section devoted to new supports, trainings, and professional development opportunities for educators to strengthen anti-racist, inclusive, and culturally and linguistically responsive school experience for all students, and to cultivate the knowledge, skills and practices required to identify and remediate discrimination, the final proposed rule will also require that schools provide anti-racist, culturally responsive, anti-discriminatory, and inclusive instructional materials and resources for educators and student use.
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 to learn about struggles of groups, including Jews, that have been subjected to persecution and genocide. This aligns with the White House's National Strategy to Counter Antisemitism. Explains this strategy. Cites person experience with antisemitism in Vermont, including her daughter's experiences. Language should be exactly as in section B. Including inclusion as Jewish History is worrisome because it may equate Judaism and Zionism.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Leff, Susan	See written comment	Define "Ethnic Groups" according to Section B.	See response to written comment.
Oral Comment 9/14/23	General Comment: Support for the EQS	Lentzner, Addie	Supports the EQS rules. The lack of education to students regarding racism and historically relevant events is unacceptable. Education is the solution to racism in the country. Ethnic studies is proven to increase graduation rates by over 15% as well.		The Board acknowledges and appreciates the comment.
Submitted in Writing	General Comment: Antisemitism	Levy, Aliza	Must include that antisemitism is rampant in the world, USA, and VT.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Litz, Dina	Include antisemitism and the Jewish experience in education standards. Requests that this is prioritized considering recent events.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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) a process for meeting high-quality programs is not evident in EQS; and accurate data for IEP's are not available and could cause problems. Claims AOE lacks authority to provide oversight and monitor Independent Schools serving students with disabilities - particularly financial accountability. Advocated for teacher licensure for professionals. Suggests that the LEA or VCSEA representative be part of the school review process.	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 Rule remain consistent this provision of the law.
Oral Comment 9/14/23	General Comment: Cultural Studies	Maguire, Erin	Studying the genocide of a culture is different that studying the history and culture of the people.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 of the Rule remain consistent this provision of the law.
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Malloy, Lori	Supports Section B. Cites specific examples of racism and antisemitism.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

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 expression and representation, can support inclusive and diverse perspectives and practices, provides for multimodal and experiential learning, provides opportunity for emotional expression, contributes to wellbeing, inspires creativity and innovation, prepares students for participation in global experiences and the workforce, and promotes a sense of community and civic engagement. Arts education should not be tied to global citizenship; more than one form of artistic expression should be noted to express intention of a well-rounded arts education; the arts should be a stand alone category under curriculum. (see specific recommendations.)	1. Create artistic expression requirements similar to physical education. 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. All students graduating from high school be required to complete 1 art credit from fine/perfuming arts disciplines.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts.	check class load, size authority; credit requirement issue.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Meier, Joslyn	Antisemitism continues to be exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	
Submitted in Writing	2114 Definition: "Ethnic Groups"	Meier, Joslyn	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Miller, S.	Antisemitism continues to be exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Miller, S.	Requests that children have curriculum that includes leaning about the Jewish experience. Cites recent antisemitism in Upper Valley and concerned that it VT students don't learn about Jewish Americans it will only feed into more exclusion, antisemitism, racism, and hate.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	

Submitted in Writing	2114 Definition: "Ethnic Groups"	Miller, S.	Requests that section B of the definition of Ethnic Groups be withheld. Cites recent antisemitism in Upper Valley and concerned that it VT students don't learn about Jewish Americans it will only feed into more exclusion, antisemitism, racism, and hate.	Include "Part B" in definition of Ethnic Group.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.	1. Separate Arts Education Section (like Physical Education) with four subject areas (visual arts, theater, music, dance) and minimum class requirements. 2. Address maximum class loads that vary by discipline and developmental level (e.g. K-8 and 9-12). 3. Mandate full-time arts instructor for schools with 300+ students.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts. check class load, size authority; credit requirement issue.
Submitted in Writing	2114 Definition: "Discrimination"	Mordoff, Christa	Opposes proposed changes to the definition. Asks for transparency.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules. The Board has been transparent in its process and discusses matters in executive session only when necessary and when the nature of the discussion meets one of the statutorily reasons to conduct protected discussion. The Board acknowledges and appreciates the comment.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Moritz, Daphne	Describes the nuance in trying to categorize Judaism as a religion in the modern sense. Cites rise in antisemitism in Vermont and historic accounts of antisemitism worldwide. VT students must learn about Jews and Jewish History. The White House has issued the National Strategy to Counter Antisemitism which supports increasing awareness and understanding of antisemitism. The Jewish experience can be glossed over or eliminated from curriculum when it is perceived that antisemitism doesn't exist.		
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 to justify including Part B. Describes the nuance in trying to categorize Judaism as a religion in the modern sense. Cites rise in antisemitism in Vermont and historic accounts of antisemitism worldwide. VT students must learn about Jews and Jewish History. The White House has issued the National Strategy to Counter Antisemitism which supports increasing awareness and understanding of antisemitism.	Include "Part B" in definition of Ethnic Group.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 9/14/23	2120 Curriculum and Education: Arts Education Requirement	Moss, Andrea	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.	The language around the arts and music education needs to be more specific.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts and includes music. check class load, size authority; credit requirement issue.

Submitted in Writing	2114 Definition: "Ethnic Groups"	Mueller, Jessica	JCVT advocates for exact Act 1 language. Legislature adopted definition because they wanted Vermont's children to learn about cultures and contributions of groups, including Jews who have historically been subjected to persecution and genocide. This aligns with White House Strategy to Counter Antisemitism. Quotes and cites President Biden's words in support of position. Genocides and Persecutions should not be studied as standalone incidents.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Mueller, Jessica	See written comment.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
Oral Comment 10/3/23	General Comment: Definitions	Murray, [No First Name Recorded]	Cites specific examples of racism and antisemitism. Supports keeping the specific language of the legislature.	x	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
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.	review 173	
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 Rule remain consistent this provision of the law. The Board will incorporate addition information provided by this organization into the final economic impact statement required in the Vermont APA rulemaking process.	The Board will incorporate information provided about the fiscal impact of these rules into the economic impact statement.
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 Rule remain consistent this provision of the law.	
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 white, able-bodied, neurotypical perspective dominates. Applauds the work of the Act 1 working group - particularly their dedication and knowledge from study and lived experience. Asserts the group was designed with inclusion in mind. Suggests those with most institutional power are the architects of change. With regard to anti-discrimination, believes the community leaders of Act 1 know what is needed. Wants SBE to respect working group recommendations.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules.	
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.	

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 of the same education as those in 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 of the Rule remain consistent this provision of the law.
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 students to appreciate the challenges and contributions of different ethnic groups. ADL has tracked over 50 incidents of antisemitic harassment, vandalism and antisemitic propaganda distribution in VT. Argues that EQS definition is inconsistent with legislatures, rendering it noncompliant.	Include "Part B" in definition of Ethnic Group.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 and discrimination that are different that those without the language. Cites current examples of antisemitism and believes that threats may escalate. Recounts definition and historical context for using the word genocide and illustrates broader applicability than to those identified as Jewish. Questions why "part b" was omitted and states that it expressed the legislature's intent. Post-script notes the current conflict between Israel and Hamas and urges separation between consideration of this comment and feelings or emotions regarding the current events. Notes probability of diverging views and experiences among Jewish Americans regarding the State of Israel and Zionism.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Patt, Avram	Cites specific examples of oppression and antisemitism. Supports keeping Section B.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Pinsof-DePillis, Debra Ann	Include education of all people with histories of genocide, including antisemitism. Education is where we must begin to end hate crimes.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.

Submitted in Writing	2121 Professional Resources: Educator Support: Antisemitism	Pinsol-DePillis, Debra Ann	Include education of all people with histories of genocide, including antisemitism. Education of teachers and students is where we must begin to end hate crimes.		The Board accepts and appreciates the comment. In addition to a lengthy section devoted to new supports, trainings, and professional development opportunities for educators to strengthen anti-racist, inclusive, and culturally and linguistically responsive school experience for all students, and to cultivate the knowledge, skills and practices required to identify and remediate discrimination, the final proposed rule will also require that schools provide anti-racist, culturally responsive, anti-discriminatory, and inclusive instructional materials and resources for educators and student use.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Pinsol-DePillis, Debra Ann	Please include Part B. Include education of all people with histories of genocide, including antisemitism. Education of teachers and students is where we must begin to end hate crimes.	Include "Part B" in definition of Ethnic Group.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Pinsol-DePillis, Debra Ann	Please include Part B. Include education of all people with histories of genocide, including antisemitism. Education of teachers and students is where we must begin to end hate crimes.	Include "Part B" in definition of Ethnic Group.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 reported in VTDigger. Questions Buxton's advice as white woman perpetuating power over four years of work by working group. Seeks transparency in decision-making and asks SBE to share legal analysis. Request retain original (proposed) language and not change. Supports adding protected categories.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules. The Board has been transparent in its process and discusses matters in executive session only when necessary and when the nature of the discussion meets one of the statutorily reasons to conduct protected discussion.
Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Prue, Jennifer	Asserts that excluding Jews from the ethnic group definitions is hypocritical for a state presenting itself as committed to social justice and equity. Requests the language of the original act be included.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.		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 consistent this provision of the law.
Oral Comment 10/3/23	General Comment: Applying EQS to Approved Independent Schools	Raymond, Adrienne	See written comment		See response to written comment.

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Reimer, Seth	Describes being asked to draw Santa Claus as a child to illustrate how educators, students, and educational systems are oriented to disregard Jewish students. Advocates that this must be changed.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2121 Professional Resources: Educator Support: Antisemitism	Reimer, Seth	Describes being asked to draw Santa Claus as a child to illustrate how educators, students, and educational systems are oriented to disregard Jewish students. Advocates that this must be changed.		The Board accepts and appreciates the comment. In addition to a lengthy section devoted to new supports, trainings, and professional development opportunities for educators to strengthen anti-racist, inclusive, and culturally and linguistically responsive school experience for all students, and to cultivate the knowledge, skills and practices required to identify and remediate discrimination, the final proposed rule will also require that schools provide anti-racist, culturally responsive, anti-discriminatory, and inclusive instructional materials and resources for educators and student use.
Submitted in Writing	2114 Definition: "Discrimination"	Reyes, Cynthia	Supports Act 1 Working Group definition. Questions diverging legal opinions. Disappointed that the change signals that processes can get taken over in the end. Seeks more information about the impact of the recommended change. Provides personal example of integration and wants to see herself reflected and heard. Seeks reasons for proposed change and disagrees with comments made by Buxton in VTDigger about possible impact of language. Working group wanted to increase protections. Implores SBE to discuss further.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules. The Board has been transparent in its process and discusses matters in executive session only when necessary and when the nature of the discussion meets one of the statutorily reasons to conduct protected discussion.
Oral Comment 10/3/23	2121 Professional Resources: Educator Support: Antisemitism	Riemer, Seth	See written comment.		See responses to written comment.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Rojansky Family	Antisemitism continues to exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Rojansky Family	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Rosenbloom, Jonathan	Urges explicit incorporation of ethnic groups that have historically endured persecution or genocide into the rules. Cites current events and impact of not combatting antisemitism - in VT and worldwide. References WH National Strategy to Counter Antisemitism. Also requests curriculum to address issue of antisemitism.	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic Groups.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Rosenbloom, Jonathan	Urges explicit incorporation of ethnic groups that have historically endured persecution or genocide into the rules. Cites current events and impact of not combatting antisemitism - in VT and worldwide. References WH National Strategy to Counter Antisemitism. Also requests curriculum to address issue of antisemitism.	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic Groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Rotman, Arline	Include antisemitism in the rules for inclusion. Given the tenor of the times and the historical incitement against Jews, don't overlook the need to protect Jewish People.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	General Comment: Antisemitism	Rotman, Arline	Include antisemitism in the rules for inclusion. Given the tenor of the times and the historical incitement against Jews, don't overlook the need to protect Jewish People.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2114 Definition: "Discrimination"	Samuelson, Jennifer (SBE Chair)	Reiterates SBE's intention to align Rules 2200 and 2000, citing specific areas identified for revision.		No comment required.
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.		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 consistent this provision of the law. The Board has reviewed the waiver section of the rule and finds it adequate to serve its intended purpose relative to the public schools it pertains to.
Submitted in Writing	2114 Definition: "Discrimination"	Schoenfeld, Susan	Supports original anti-discrimination language. Should not be an area of compromise.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules.
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.

Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Shapiro, Kathy	See written comment		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 struggle against racism and oppression. Too many oppressed groups to name. Opposes IHRA definition of antisemitism because of many negative issues it raises. Commenters in support of naming antisemitism don't speak for all Vermont Jews. ADL has ties to State of Israel and doesn't speak for all. A special lens on antisemitism ignores threats to other marginalized groups who are non white.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.
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.
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.
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.
Submitted in Writing	Comment: Noncompliance Review	Smith, Robert	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.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Sobel, Maya	Opposes changing wording of definition of ethnic groups because it would change the trajectory of the education of future generations. Cites personal examples of opportunity to learn and examples of past and present acts of antisemitism.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Oral Comment 9/28/23	2120 Curriculum and Instruction: Should Address Antisemitism	Sobel, Maya	See written comment.		See responses to written comment.

Submitted in Writing	2114 Definition: "Ethnic Groups"	Sobel, Maya	Opposes changing wording of definition of ethnic groups because it would change the trajectory of the education of future generations. Cites personal examples of opportunity to learn and examples of past and present acts of antisemitism.		The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Solitaire, C.	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 9/14/23	General Comment: Support for the EQS	Solorzano, Gianni	Racism is a huge issue throughout Vermont schools. Allowing separate rules will lead to two different standards and give privileges to some students over others. Passing the EQS is a step towards supporting all students.		The Board acknowledges and appreciates the comment.
Oral Comment 10/3/23	General Comment: Oppose specific reference to antisemitism	Spector, Jamie	See written comment by "Jewish Vermonters." Gave a personal oral statement separate from the group comment. Asserts that the standards as drafted provide an inclusive, anti-racist, and supportive school environment. States that by not naming any specific group it includes everyone. Opposes creating exceptionalism for discrimination against Jewish people.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Stein, Susanna	Supports new inclusive rules for EQS. Advocates for including Antisemitism in the rules. Cites recent, local examples of antisemitism..	Specify that curriculum address antisemitism and groups that have been historically subject to persecution or genocide.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Stein, Susanna	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to be exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Holocaust Education	Steinerman, Deborah (Vermont Holocaust Memorial)	Legislative findings cited increase reports of antisemitism and Islamophobia in Vermont VTHM requests specific inclusion of Holocaust education in standards/	Specifically include Holocaust education in the standards.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.

Oral Comment 10/3/23	2114 Definition: "Ethnic Groups"	Sternberg, Jeremy	Requests that Jews are included in the definition of ethnic groups. Asserts that removing Part B will increase the rates of antisemitism in Vermont. Asserts that educating students about antisemitism and Jewish culture is good for those who are Jewish and those who are not. Echoes the comments made by others stating that the original definition should be adopted.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 group.		The Board acknowledges and appreciates the comment.
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 Rule remain consistent this provision of the law. The Board acknowledges and appreciates the comment.
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 govern itself, resulting in a slower reaction to issues. Additionally, there are many qualified educators that do not have a license, and by requiring one, the shortage of competent teachers would be increased.	EQS should not apply to independent schools. Do not have the teaching license requirement.	The Board acknowledges and appreciates the comment.
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 a well-rounded education. The arts need to be protected in elementary school with explicit language.	Rename "artistic expression" in 2120.5 "The Arts"	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts and includes music. check class load, size authority; credit requirement issue.
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.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The Board has altered the description of the learning content area related to the arts to more accurately the reflect the variety in disciplines in the arts and includes music.

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 and authority to actively oversee the education of student with disabilities within the independent schools. 2. Independent Schools struggle with serving students, choose discrete services over inclusive education, bill in questionable ways, don't conform to SPED rules and statutes, and no mechanism for LEAs to communicate with AOE. 2. Lack of structure of achieving input from local LEAs 3. Lack of structured connection between financial oversight and transparency required in public schools. 4. Rules lack understanding of the legally prescribed role of LEAs 5. Hiring and retaining qualified staff is a concern 6. Role of IEP Team needs to be affirmed in the rule 7. Strengthening the universal level of instruction in all schools under a census based system model is not addressed 8. Schools dependent of public tax dollars should follow the same rules. 9. Must acknowledge and account for administrative costs born by LEAs in meeting requirements.	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 design of services is consistent with SPED regulations. Define minimum and substantial in 2227. Licensure must be required by teachers providing SPED. In 2229.4, describe what is needed for enrollment policy to suffice. 2223.1 should require detailed and transparent accounting	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 consistent this provision of the law.	x2200
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Vermont Holocaust Memorial	Legislative findings cited increase reports of antisemitism and Islamophobia in Vermont VTHM requests including "groups that have been historically subject to persecution or genocide" in definition of "Ethnic Groups." Only by including will VT students learn the values, customs, contributions, and ongoing struggles of the Jewish people and others similarly situated.	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic Groups.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.	
Submitted in Writing	2114 Definition: "Ethnic Groups"	Vermont Holocaust Memorial	Legislative findings cited increase reports of antisemitism and Islamophobia in Vermont VTHM requests including "groups that have been historically subject to persecution or genocide" in definition of "Ethnic Groups." Only by including will VT students learn the values, customs, contributions, and ongoing struggles of the Jewish people and others similarly situated.	Include words "that have been historically subject to persecution or genocide" in definition of Ethnic Groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.	
oral comment 12.7.23	One implementation Date	Vermont Superintendent Association	Request EQS implementation date of July 1, 2025		The Board appreciates and accepts this comment. Rule Series 2000 and 2200 will have an implementation date of July 1, 2025 unless specific sections require earlier implementation, after weighing the need to protect students and the ease in implementation.	
oral comment 12.7.23	One implementation Date	Vermont Superintendent Association	Request EQS implementation date of July 1, 2025		The Board appreciates and accepts this comment. Rule Series 2000 and 2200 will have an implementation date of July 1, 2025 unless specific sections require earlier implementation, after weighing the need to protect students and the ease in implementation.	
Submitted in Writing	General Comment	Vogel, Jamilah Freya	Supports changes to EQS and stands behind the work of the Act 1 working group. Believes the current draft demonstrates commitment to all students to address current and long-standing disparities. Schools are under pressure in the implementation of equity efforts because of misinformation causing fear of DEI efforts. Advocates for approval of current changes.		The Board acknowledges and appreciates the comment.	
Oral Comment 9/28/23	2120 Curriculum and Instruction: Should Address Antisemitism	Vogel, Matthew	See written comment.		See response to written comment.	

Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	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, which aligns with White House's National Strategy to Counter Antisemitism. Cites examples of antisemitism and advocates that K-12 curriculum must be equitable in a way that recognizes people, not just the act of genocide. Supports teaching ethnic studies in a way that includes the teaching of the Jewish people and all the other people historically subjected to persecution or genocide.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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, which aligns with White House's National Strategy to Counter Antisemitism. Cites examples of antisemitism.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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 definitions dramatically alter the definitions of the defined groups. By removing Part B of the definition of ethnic groups and placing the words genocide and persecution as things to be studied, ethnic studies in the Vermont educational curriculum will wind up erasing the study of Jews and other groups of people who have been subjected to a history of genocide and persecution. Definitions should require teaching about the Jewish people as an ethnic group since antisemitism is rarely about religion, and more so about ethnicity.	Return to the legislature's definitions.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	General Comment: Framework	Weisman, Tobie (ED and on behalf of Jewish Communities of Vermont)	Hopes that Framework will encourage a learning environment where youth will be taught about Jewish Americans and encouraged to act on antisemitic hatred. Cites recent examples of antisemitism at UVM, in Burlington, etc. Invokes White House National Strategy to Counter Antisemitism as example to follow. Opposes Framework and wishes to be informed when the matter is taken up.	(Letter with specific objections and changes to Framework included.)	The Board acknowledges and appreciates the comment. The Board further acknowledges that the comment relates to matters, such as performance standards (i.e. Framework) that are not the subject matter of this rulemaking process.
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 support current definition in rules or framework and believes that the changes alter the definition of the defined groups and will result in erasing the study of Jews and other groups subjected to genocide and persecution. Distinguishes the study of genocides and persecutions as stand-alone incidents from the history, culture, and contributions of those subjected to it. Explains how differently Jewish people may identify related to their religion and asserts that antisemitism is rarely about religion; it's about being anti-Jew. Asks to use legislative definition including Part B because it was approved by legislature after much thought and discussion.	Include words "that have been historically subject to persecution or genocide" (section B) in definition of ethnic groups.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative internet and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards. The Board further acknowledges that the comment also relates to matters, such as performance standards (i.e. Framework) that are not the subject matter of this rulemaking process.

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 studying the act and not the people. Substituting inhuman treatment for genocide is incorrect- genocide is of magnitude worse than inhuman. Defines inhuman. Refers to ADL's Pyramid of Hate and placement of genocide. Recounts Holocaust in Germany and Armenian killings as genocide. Critiques personal bias of Working Group members. Points out that legislature had testimony about objections to the clause "groups that have been historically subject to genocide and persecution" and passed with the language. Critiques Working Group Member public remarks and recounts words that indicate a desire to prevent students from learning about select populations and topics. Further description of Working Group member bias, opinions, positions, etc. that would indicate preference for present language. Cites political movement "critical" or "liberated ethnic studies" as controversial. Provides further information and background; uses CA as example.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2120 Curriculum and Instruction: Should Address Antisemitism	Weiss, Carolyn	Antisemitism continues to exist and grow in the US and Vermont. Provided examples. VT children should learn about Jewish American history in effort to combat antisemitism, racism, and hate. White House developed strategies to promote increased awareness and understanding of antisemitism.	Specify that curriculum address antisemitism and include the Jewish experience in the United States and around the world.	The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
Submitted in Writing	2114 Definition: "Ethnic Groups"	Weiss, Carolyn	Include ethnic groups "that have been historically subject to persecution or genocide" in definition. Antisemitism continues to exist and grow in the US and Vermont. Provided examples.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Oral Comment 9/28/23	2114 Definition: "Ethnic Groups"	Wilhelm, Zalman	Requests that Part B remain in the EQS as it originally was written. Cites personal examples and examples shared with them of antisemitic behavior.	Define Ethnic Groups as it is defined in Act 1.	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
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.		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 consistent this provision of the law.

x2200

Submitted in Writing	2120 Curriculum and Instruction: Should Address Genocide	Windsor County Senators (Senator Dick McCormack, Senator Alison Clarkson, and Senator Rebecca White)	Genocide deserves special attention in the curriculum.		The Board only has the authority to approve standards for student performance. Local supervisory union boards are statutorily charged with developing and implementing curriculum at the local level, which must be aligned with the standards approved by the Board. The proposed final rule modifies the learning content areas to include ethnic and social equity studies which, in addition to the global citizenship learning content area, would appropriately include instruction and learning opportunities addressing contributions, oppression, and genocide of Jewish people through curriculum approved and implemented by local supervisory union boards.
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 curriculum. Cites examples of present day acts of antisemitism. Urge that public tax dollars support only institutions that comply with state requirements including antidiscrimination provisions.	Include words "that have been historically subject to persecution or genocide."	The Board accepts this comment and will review the use of the terms and concepts referenced to ensure that in the final proposed rule, they are appropriately defined and used in alignment with legislative intent and the Board's authority. The Board lacks the power to direct, develop, or implement curriculum. This duty is statutorily assigned to local supervisory union boards.
Submitted in Writing	2114 Definition: "Discrimination"	Yee, Deidre	Request that the strong anti-discrimination definition remain and that the SBE be transparent in its decision-making. After four years of work, shouldn't be altered because of concerns over liability.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules.
Submitted in Writing	2114 Definition: "Discrimination"	Yoon, Paul	Supports Hage and Garces Oct 15 response. Wishes to retain current anti-discrimination definition and calls for transparency in decision-making. Highlight's Hage and Garces' claim that changes shouldn't be made for the purposes of consistency between the two rules.		The Board will adopt the highest level of anti-discriminatory protections for students under the law and apply these in Rule Series 2000 and 2200 using language that is either exactly the same or substantively the same if alterations are necessary given the context. The Board appreciates the recommendations of the Act 1 Working Group and has finalized the Rules considering those recommendations, comment received, the language and intent of Act 1, and other feedback and its own review related to the application, operation, and implementation of the rules. The Board has been transparent in its process and discusses matters in executive session only when necessary and when the nature of the discussion meets one of the statutorily reasons to conduct protected discussion.
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 of the Rule remain consistent this provision of the law.