

STATE PERFORMANCE PLAN / ANNUAL PERFORMANCE REPORT: PART B

for STATE FORMULA GRANT PROGRAMS under the Individuals with Disabilities Education Act

**For reporting on
FFY 2019**

Vermont



**PART B DUE
February 1, 2021**

**U.S. DEPARTMENT OF EDUCATION
WASHINGTON, DC 20202**

Introduction

Instructions

Provide sufficient detail to ensure that the Secretary and the public are informed of and understand the State's systems designed to drive improved results for students with disabilities and to ensure that the State Educational Agency (SEA) and Local Educational Agencies (LEAs) meet the requirements of IDEA Part B. This introduction must include descriptions of the State's General Supervision System, Technical Assistance System, Professional Development System, Stakeholder Involvement, and Reporting to the Public.

Intro - Indicator Data

Executive Summary

The Secretary and the Deputy Secretary for the Vermont Agency of Education (VT AOE) provide direction to the Student Support Services Division which is composed of the Special Education, Vermont Multi-Tiered System of Support (VTmtss) and Early Education Team. These teams work in collaboration to provide leadership, oversight, technical assistance and support for building capacity at the Local Education Agency (LEA) level to meet state and federal requirements for special education, assessment, and other direct support services for students PreK-12 in Vermont schools. The VT AOE Special Education Team, comprised of a State Director, six program staff, a part-time phone support provider, and three compliance monitors, provides the field with technical assistance, professional development, compliance oversight, and continuous improvement support. The Special Education Team maintains a vision statement to guide and align practices:

"Our team, together with all stakeholders, ensures access, opportunity, and equity by providing solution-based oversight, leadership and support to build capacity and improve student outcomes."

Currently, the Special Education Monitoring (Monitoring) staff review ongoing regulatory compliance submissions and address noncompliance with the field. Issues, concerns and findings are shared with the Special Education Programming (Program) staff, who identify and design universal, targeted and intensive technical assistance (TA) in response to statewide LEA needs. The aim is to provide support in addressing noncompliance, while keeping continuous programmatic improvement at the forefront of VT AOE and LEA practice. VT AOE's Monitoring and Program activities are further described in other sections within this report.

Program staff offer direct support to the field, focusing their work on unmet LEA needs, and sustaining best practices for children and youth with disabilities. Additionally, Program staff participate in on-site monitoring teams or support desk audit reviews and Monitoring staff assist in the provision of TA as appropriate. The entire Special Education Team (Team), meets weekly to share information and engage in problems of practice related to supporting LEAs, parents/families, and other stakeholders. The Team also reviews patterns and trends across multiple data sources, to drive priority setting, and spotlight current and anticipated concerns within the field during quarterly Data Retreats.

In addition to the weekly meetings, the Team meets monthly with representatives from other teams/divisions at VT AOE (Extended Team) including Legal, Data, Fiscal, Early Learning, Assessment and the Interagency Coordinator (responsible for residential/independent school placement concerns for students with disabilities). These meetings follow the same format as the weekly Team meetings and include topics that span multiple VT AOE teams and divisions with these cross-team discussions leading to collaborative solutions and action items. This cross-team approach began in FFY2016 to ensure alignment of initiatives and consistent messaging related to special education across all VT AOE teams. The Special Education Team is also actively engaged in collaboration in agency-wide programmatic activities such as reviewing data related to Vermont's Every Student Succeeds Act (ESSA) State Plan, participating in school and LEA-level continuous improvement conversations, serving on internal teams that coordinate responses to state law and policy (including Act 173: a recent act related to Vermont's Special Education funding model), advising on independent school rate setting, as well as spearheading technical assistance and supports related to IDEA B requirements. Members of the Special Education Team also engage and collaborate regularly with statewide agencies and has an active voice on the Interagency Core Team (i.e. VT AOE, Dept. of Labor, Division of Vocational Rehabilitation, Developmental Services), State Rehabilitation Council, Vermont Special Education Advisory Panel, and Vermont Interagency Coordinating Council.

Vermont's Act 173 was passed during FFY2017 and shifts education funding from a reimbursement model to a census based model. As a result of Act 173, and under the direction of the VT AOE Secretary, the Special Education Team serves in a leadership capacity with other VT AOE Divisions in developing guidance and resources supporting Educational Support Teams (EST), local comprehensive assessment systems (LCAS), coordinated curriculum (CC), needs-based professional learning (NBPL) systems, and an Act 173 Evaluation Plan. Although the work of Act 173 has been delayed somewhat in light of the pandemic, it is anticipated that the influence on IDEA B program work will be substantial, and has led to a comprehensive review of current statewide LEA practices, and an inclusion of APR data that is different than reported in previous Vermont APRs. The VT AOE Special Education Team has identified Act 173 implementation support to be a top priority for this calendar year.

The VT AOE continues to develop its new approach (effective FFY18) to our SPP/APR coordination and reporting. Previously, the SPP/APR report was compiled by a few key people within VT AOE, and was more siloed in its programmatic application. In 2019, the VT AOE determined that this was not in alignment with our collaborative approach to leadership, oversight, and support, and that the SPP/APR could be more effectively leveraged as a driver for institutional change. As a result, for the FFY18 APR report, all members of the Special Education Team have been involved in SPP/APR data analysis, and report writing, under the joint leadership of the State Director and the IDEA Part B Manager. There are monthly meetings to review improvement activities and data, with the FFY19 and 20 foci on measuring the impact of our improvement activities on LEA performance to determine impact of our work. This change has been met with excitement and enthusiasm within our program team; staff are embracing their roles as stewards of specific indicators, and have been fully engaged in a collaborative writing process. This approach is enhancing our programmatic support to the field, and further bringing clarity and communication with the field regarding indicators at the state and local levels, with the indicators informing priority-setting and conversations across the State.

Finally, the middle of March 2020, the COVID-19 pandemic struck the United States. Vermont Governor Phil Scott declared a State of Emergency and schools statewide experienced a brief closure before shifting to full time remote learning for the remainder of the 2019-20 school year. In this short period of time, the VT AOE Special Education Team was tasked with getting out a significant volume of guidance, tools and templates for districts and other stakeholders. The influx of requests for technical assistance and support were also significant. The VT AOE responded with increased communication with Special Education Directors across the state and with members of the Vermont Family Network, Vermont Special Education Advisory Panel, and Vermont Council of Special Education Administrators. The VT AOE Special Education Team collaborated across divisions and departments extensively to ensure alignment and messaging were clear and consistent. As part of the VT AOE efforts to get out timely and accurate information, the State Director attended regular calls and check-ins with national TA providers to network with other states on their actions and compare approaches during truly novel times. We particularly appreciated the interactions with NCSI, NASDSE, CASE, IDC, CADRE, and ECTA, who were able

to help us navigate uncharted territory. For examples of some of VT AOE's COVID-19-related special education guidance, please view the COVID-19 section on our website: <https://education.vermont.gov/news/covid-19-guidance-vermont-schools>.

Additional information related to data collection and reporting

As part of a comprehensive and robust General Supervision System, our data inform the work of the VT AOE Special Education Team. The data contained in this SPP/APR were obtained through the following collection methods. Note that some indicators utilize data from more than one source, and are listed multiple times.

Formal Data Collections:

- DC#06/Fall Student Census (Indicators 1, 9, and 10)
- DC#04/End of Year Census (Indicators 1, and 4. Some indicator 3 inputs typically originate here, but data were waived for FFY2019.)
- Child Count (Indicators 1, 2, 5, 6, 7, 8, 9, 10, and 14. Some indicator 3 inputs typically originate here, but data were waived for FFY2019.)
- Child Count Exiting (Indicators 2, 7, and 14)

Surveys:

- Parent Involvement Survey (Indicator 8)
- Post-Secondary Outcomes Survey (Indicator 14)

Other Data Sources:

- Monitoring Cycle (Indicators 11, 12, 13)
- Assessment Extracts (Indicator 3)
- Dispute Records (Indicators 15, 16)

During FFY19, VT AOE was able to continue with data collections largely as planned. Some modifications were made to collections in the later part of the year due to the State of Emergency and extended school dismissals caused by the COVID-19 pandemic. VT AOE's DC#04/End of Year Census was delayed by one month and the deadline was extended to allow districts ample time to prepare. The Child Count Exiting collection, which includes Early Childhood Outcomes data, included instructions to collaborate with parents and use available technologies to rate students. Our post-secondary outcomes survey was administered by staff trained in grief and trauma responsiveness, and survey questions were reviewed to ensure information on the impact of the pandemic could be reported. There was a COVID-19 impact on data collections for Indicators 11, 12, and 13, which are collected through the cyclic monitoring process. The monitoring process closed early in March and data were not collected for the remainder of the school year due to the hardship districts were experiencing, as well as uncertainty about the reliability and validity of information coming in during the pandemic. Districts that were in the cohort for the 19-20 school year were added into the cohort for the 20-21 school year for Indicators 11, 12, and 13. Finally, and most critically, school year 2020 statewide assessments were cancelled in Vermont as they were across the nation. VT AOE obtained a waiver for the 2019-20 school year.

Due to the state of emergency as directed by the governor, on March 21, 2020, Vermont has received a waiver, pursuant to section 8401(b) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, of the assessments, accountability and school identification, and reporting requirements due to COVID-19. The state's application can be found at <https://education.vermont.gov/documents/esea-waiver>. Data for Indicators 3 and 17 were not collected because state assessment requirements were waived. Vermont's State-Identified Measurable Result (SiMR) for Indicator 17 is determined by statewide assessment data.

There continues to be collaborative and interactive meetings among the VT AOE Special Education Team and members of Data, Finance, Legal, and other VT AOE areas to understand data sources, and analyze patterns and trends to determine unmet need, targeted technical assistance, need for policy and/or guidance, and improvement activities at the VT AOE and LEA levels. Examples of this work include the Data Quarterly meeting, the SPP/APR Monthly Work Group, Bi-Weekly Data Work Group, and the OSEP State Determination Task Force. All groups continued to meet without interruption during the pandemic.

Number of Districts in your State/Territory during reporting year

52

General Supervision System

The systems that are in place to ensure that IDEA Part B requirements are met, e.g., monitoring, dispute resolution, etc.

A comprehensive description of VT AOE's general supervision system and a summary of support from national technical assistance providers are attached as "Vermont AOE General Supervision System.pdf".

Technical Assistance System

The mechanisms that the State has in place to ensure the timely delivery of high quality, evidenced based technical assistance and support to LEAs.

In order to provide a more unified approach to technical assistance, monitoring and professional learning opportunities, VT AOE has developed cross-team and cross-division collaboratives. The cross-team and cross-division internal structure allows for better alignment and greater flexibility of professional learning and braided funding opportunities. VT AOE teams work together to develop a network of consultants with expertise in providing support to schools in implementing evidence-based practices, school-wide improvement models, and prevention models to improve instruction and learning for every student in Vermont. The VT AOE Special Education Team is an active part of the cross-team and cross-division collaboratives in order to ensure that technical assistance and professional learning provided in support of IDEA and state rules and regulations are aligned across state initiatives. These activities are designed to ensure access, opportunity, and equity with the goal of improving student outcomes. The VT AOE Special Education Team provides a range of professional development and technical assistance activities to LEAs, professionals, and families with the intention improving student outcomes and compliance with IDEA. Technical assistance and professional learning are provided by the special education program team staff at three levels of engagement:

Universal: Available to all LEAs, professional staff, and families. Universal TA is based on statewide priorities, posted on our website. Examples include:

- technical assistance email/phone options for providing regular and open communication between the special education team and LEA administrators, teachers, and parents (available 24 hours a day, seven days a week)
- referrals to Vermont's parent information center, Vermont Family Network (VFN)
- an online centralized bank of vetted resources (<https://education.vermont.gov/student-support/vermont-special-education/technical-assistance-requests-and-professional-development>) on topics such as SPP/APR indicators, special education implications for state laws, evidence-based practices in instruction and systemic supports.
- statewide guidelines and guidance documents, memos, and FAQs
- statewide conferences, webinars, online office hours, and
- the provision of professional development in early intervention and educational services through collaboration with the early education team.

All LEAs have access to VT AOE tools, products, webinars, and resources.

Targeted: Offered individually to LEAs based on the results of a targeted monitoring activity, performance on Local Special Education Determinations (LSED), or performance on other federal program requirements, which may require short or long-term engagement between LEA and the VT AOE Special Education Team to improve student outcomes. The specific nature of the technical assistance will depend on the urgency or severity of identified need but could include remote or in-person coaching, targeted workshops, webinars, and office hours.

Targeted support was required for districts who fell into the Needs Intervention category of the LSED and one additional district as part of their corrective action plan. These targeted TA topics included: IEP development and goal writing, post-secondary transition planning and support, co-teaching, data literacy implementation, improvement science strategies, and special education implications for VTmtss, Vermont's Education Quality Standards (EQS) and the Vermont Early Learning Standards (VELS). In these specific cases TA was provided by Program staff with the cross-team and cross-division collaboration utilizing some webinar and presentation formats, but typically through ongoing collaborative coaching relationships.

Targeted TA can also take the form of supporting districts on a specific topic through Cross State Learning Collaboratives. Targeted TA plans may be arranged with and LEA or group of LEAs to meet customized needs and often include these kinds of activities:

- In person or virtual presentations at regional or district-specific event(s)
- Developing events and meetings to further SSIP efforts
- Supporting survey development or other engagement efforts
- Finding, adapting, or developing resources to address areas of LEA need or general inquiry
- Short-term consultation related to SSIP planning, implementation, and evaluation
- Regularly scheduled check-in calls with SSIP participants

Intensive: Required for a small number of LEAs based on the results of noncompliance and/or performance issues supported by multiple data sources, often as a result of a targeted monitoring activity or the annual assignment of Needs Intervention/Needs Substantial Intervention status. Intensive TA may require sustained and in-depth engagement between LEA and VT AOE Special Education Team to improve student outcomes. These supports will be coordinated and/or delivered to the LEA by special education and extended special education staff members as part of a LEA improvement or corrective action plan. The specific nature of the intensive technical assistance will depend on the urgency or severity of identified need but could include remote or in-person coaching, targeted workshops, webinars, and office hours. Intensive TA plans are developed for LEAs that have the need and capacity to engage in an ongoing, deep systems transformation endeavor with VT AOE. This category of TA should result in changes to policy, program, practice, or operations that support increased LEA capacity and/or improved outcomes at multiple systems levels. Any LEA with a Needs Intervention or Needs Substantial Intervention Determination from VT AOE is offered Intensive TA, which is customized for each LEA and described in a collaboratively developed Intensive TA Plan. Additional states may also engage in Intensive TA based on an in-take process that includes collaboratively assessing with the LEA, their needs and readiness to engage in Intensive TA.

The VT AOE Early Childhood Special Education Team is comprised of special education specialists who also reside on the Early Education team and provide ongoing technical assistance and support throughout the state to all public and private early childhood programs.

Close collaboration between the VT AOE Special Education Team is common with multiple divisions and teams at VT AOE. Collaboration is not limited to the Finance and Data Divisions, but relationships have been developed with representatives of the other teams in the Student Support Division (Early Education, Multi-Tiered Systems of Support), the Federal Student Education Programs Division (Title funding staff members and Interagency Coordinator), the Education Quality Division (independent school coordinator, licensing and school improvement specialists), and the Student Pathways Division (general education staff).

Starting in March 2020, the Technical Assistance and Professional Learning team focused on delivering technical assistance and guidance to LEAs in order to necessary for them to provide students who qualify for special education services the education and support they needed. The team engaged in consistent feedback loops with stakeholders to develop documents on best practices for instruction during remote learning, templates for guiding IEP conversations and documentation, and impacts on transition services, social emotional learning. The team has been available via our Technical Assistance phone and email line, as well as through our Technical Assistance request form to meet the needs of the field. While the majority of the team's TA efforts involved emails, telephone responses, and listening tours with administrators, examples of guidance documents can be found in the Special Education section of the VT AOE COVID-19 Response website: <https://education.vermont.gov/news/covid-19-guidance-vermont-schools>.

Professional Development System

The mechanisms the State has in place to ensure that service providers have the skills to effectively provide services that improve results for students with disabilities.

The VT AOE Special Education Team considered a variety of data sources when determining the professional development components of a statewide TA/PD plan for service providers across Vermont. In reviewing the data, the team identified patterns around shared needs from data collected by a variety of teams/divisions within the VT AOE. On an ongoing basis, the VT AOE Special Education Team reviews data and findings from integrated monitoring activities, field reviews and site visits; reflects on statewide feedback collected informally and through regional events like regional meetings with LEA Special Education Directors; evaluates technical assistance requests; and researches national trends in special education. Based on these data, the team outlines a plan for professional development and establishes a calendar of implementation and data-based decision making. Throughout the process, there is an emphasis on utilizing principles of implementation science with respect to program design and evaluation. In addition to the COVID-19 Guidance and statewide support, the Team offerings for this year included: Educational Benefit Training, statewide training on specific indicators (ex. Indicator 13), IEP Goal Writing, PBIS and Social Emotional Supports, a series on Supporting Paraeducators, Universal Resources Website Library, Targeted technical assistance for districts in Needs Intervention. Other examples of professional learning topics include: Multi-State Panels on topics such as Reopening in COVID-19, Restraint and Seclusion, and Disproportionality, Professional Learning Sessions on Discipline for students with disabilities, Inclusive Practices, Writing Effective State Performance Plans, Making and Implementing Participation and Accommodations Decisions for English Learners with Disabilities, Formative Assessment in Remote Learning, ESSA and WIOA Requirements: Alternate Assessments, and Inclusion of All Students, Requirements for Post Secondary Transition, and Strategies and Practices in Providing Related Services to Enhance the Continuity of Learning During COVID-19. Further, VT AOE partnered with NCSI to provide multiple sessions of professional development to the Vermont Special Education Advisory Panel to help its membership learn how to effectively advise, communicate, and provide feedback to the VT AOE on its work addressing the unmet needs of students with disabilities. The VT AOE partnered with VTmtss team to provide systems coaching training with systems coaches, and the VT AOE created and implemented instructional coaching, teaching fidelity training with district and school level coaches.

The VT AOE provides supports, leadership, oversight, and expertise for the VTPBIS Summer Institute in June and our VTPBIS Annual Forum in August. Some examples of the content presented or sponsored by the VT AOE are as follows:

- Building a Runway for Resilience: Using an MTSS Framework to Align Restorative Approaches and Trauma-Responsive Schools
- Exploring Implicit Bias for a Compassionate Understanding of All Students

- Local Comprehensive Assessment Systems in Personalized, Proficiency-Based Education
- Using your Educational Support Team to Build Collaborative Capacity
- Deepening and Expanding Restorative Approaches within a Multi-Tiered System of Supports
- Foundations and Implementation of Restorative Approaches
- Helping All Students and Adults Thrive in the Classroom: Positive and Proactive Classroom Supports
- Creating Trauma Responsive School Communities and Fostering Resistance
- From Chaos to Cosmos: Building an Interconnected Systems Framework that Integrates Mental Health with PBIS

Stakeholder Involvement

The mechanism for soliciting broad stakeholder input on targets in the SPP, including revisions to targets.

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

Apply stakeholder involvement from introduction to all Part B results indicators (y/n)

YES

Reporting to the Public

How and where the State reported to the public on the FFY18 performance of each LEA located in the State on the targets in the SPP/APR as soon as practicable, but no later than 120 days following the State's submission of its FFY 2018 APR, as required by 34 CFR §300.602(b)(1)(i)(A); and a description of where, on its Web site, a complete copy of the State's SPP, including any revision if the State has revised the SPP that it submitted with its FFY 2018 APR in 2020, is available.

Vermont LEA SPP/APR reports are located here under Local Annual Performance Reports: <https://education.vermont.gov/data-and-reporting/school-reports/special-education-reports>

Intro - Prior FFY Required Actions

The State has not publicly reported on the FFY 2017 (July 1, 2017-June 30, 2018) performance of each LEA located in the State on the targets in the State's performance plan as required by section 616(b)(2)(C)(ii)(I) of IDEA. With its FFY 2019 SPP/APR, the State must provide a Web link demonstrating that the State reported to the public on the performance of each LEA located in the State on the targets in the SPP/APR for FFY 2017. In addition, the State must report with its FFY 2019 SPP/APR, how and where the State reported to the public on the FFY 2018 performance of LEA located in the State on the targets in the SPP/APR.

In the FFY 2019 SPP/APR, the State must report FFY 2019 data for the State-identified Measurable Result (SiMR). Additionally, the State must, consistent with its evaluation plan described in Phase II, assess and report on its progress in implementing the SSIP. Specifically, the State must provide: (1) a narrative or graphic representation of the principal activities implemented in Phase III, Year Five; (2) measures and outcomes that were implemented and achieved since the State's last SSIP submission (i.e., April 1, 2020); (3) a summary of the SSIP's coherent improvement strategies, including infrastructure improvement strategies and evidence-based practices that were implemented and progress toward short-term and long-term outcomes that are intended to impact the SiMR; and (4) any supporting data that demonstrates that implementation of these activities is impacting the State's capacity to improve its SiMR data.

Response to actions required in FFY 2018 SPP/APR

In FFY 2019 SPP/APR provide a Web link demonstrating that the State reported to the public on the performance of each LEA located in the State on the targets in the SPP/APR for FFY 2017: Link is <https://education.vermont.gov/documents/local-annual-performance-reports-sy-2017-2018-list>

In FFY 2019 SPP/APR the State must report with its FFY 2019 SPP/APR, how and where the State reported to the public on the FFY 2018 performance of LEA located in the State on the targets in the SPP/APR: Link is <https://education.vermont.gov/documents/local-annual-performance-reports-sy-2018-2019>

In FFY 2019 SPP/APR report FFY 2019 data for the State-identified Measurable Result (SiMR): Link is <https://education.vermont.gov/sites/aoe/files/documents/edu-vt-ssip-p3y4-report-april-2020.pdf>

In FFY 2019 SPP/APR assess and report on its progress in implementing the SSIP. Specifically the State must provide:

- A narrative or graphic representation of the principal activities implemented in Phase III, Year Five
- Measures and outcomes that were implemented and achieved since the State's last SSIP submission (i.e., April 1, 2020)

- A summary of the SSIP's coherent improvement strategies, including infrastructure improvement strategies and evidence-based practices that were implemented and progress toward short-term and long-term Part B outcomes that are intended to impact the SiMR
 - Any supporting data that demonstrates that implementation of these activities is impacting the State's capacity to improve its SiMR data
- Link is <https://education.vermont.gov/sites/aoe/files/documents/edu-vt-ssip-p3y4-report-april-2020.pdf>

Intro - OSEP Response

Due to the circumstances created by the COVID-19 pandemic, and resulting school closures, the State does not have any FFY 2019 data for indicator 17.

Intro - Required Actions

Indicator 1: Graduation

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of youth with Individualized Education Programs (IEPs) graduating from high school with a regular high school diploma. (20 U.S.C. 1416 (a)(3)(A))

Data Source

Same data as used for reporting to the Department of Education (Department) under Title I of the Elementary and Secondary Education Act (ESEA).

Measurement

States may report data for children with disabilities using either the four-year adjusted cohort graduation rate required under the ESEA or an extended-year adjusted cohort graduation rate under the ESEA, if the State has established one.

Instructions

Sampling is not allowed.

Describe the results of the State's examination of the data for the year before the reporting year (e.g., for the FFY 2019 SPP/APR, use data from 2018-2019), and compare the results to the target. Provide the actual numbers used in the calculation.

Provide a narrative that describes the conditions youth must meet in order to graduate with a regular high school diploma and, if different, the conditions that youth with IEPs must meet in order to graduate with a regular high school diploma. If there is a difference, explain.

Targets should be the same as the annual graduation rate targets for children with disabilities under Title I of the ESEA.

States must continue to report the four-year adjusted cohort graduation rate for all students and disaggregated by student subgroups including the children with disabilities subgroup, as required under section 1111(h)(1)(C)(iii)(II) of the ESEA, on State report cards under Title I of the ESEA even if they only report an extended-year adjusted cohort graduation rate for the purpose of SPP/APR reporting.

1 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2011	79.07%

FFY	2014	2015	2016	2017	2018
Target >=	86.00%	86.00%	86.00%	86.00%	86.00%
Data	70.26%	79.85%	80.77%	82.14%	79.88%

Targets

FFY	2019
Target >=	86.00%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

Prepopulated Data

Source	Date	Description	Data
SY 2018-19 Cohorts for Regulatory Adjusted-Cohort Graduation Rate (EDFacts file spec FS151; Data group 696)	07/27/2020	Number of youth with IEPs graduating with a regular diploma	791
SY 2018-19 Cohorts for Regulatory Adjusted-Cohort Graduation Rate (EDFacts file spec FS151; Data group 696)	07/27/2020	Number of youth with IEPs eligible to graduate	954
SY 2018-19 Regulatory Adjusted Cohort Graduation Rate (EDFacts file spec FS150; Data group 695)	07/27/2020	Regulatory four-year adjusted-cohort graduation rate table	82.91%

FFY 2019 SPP/APR Data

Number of youth with IEPs in the current year's adjusted cohort graduating with a regular diploma	Number of youth with IEPs in the current year's adjusted cohort eligible to graduate	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
791	954	79.88%	86.00%	82.91%	Did Not Meet Target	No Slippage

Graduation Conditions

Choose the length of Adjusted Cohort Graduation Rate your state is using:

Extended ACGR

If extended, provide the number of years

6

Provide a narrative that describes the conditions youth must meet in order to graduate with a regular high school diploma and, if different, the conditions that youth with IEPs must meet in order to graduate with a regular high school diploma. If there is a difference, explain.

VT AOE provides guidance to LEAs in developing local graduation requirements. The information below is extracted from Section 2120.7 of Vermont's Education Quality Standards regarding Graduation Requirements: A student meets the requirements for graduation when the student demonstrates evidence of proficiency in the curriculum outlined in 2120.5, and completion of any other requirements specified by the local board of the school attended by the student. For students eligible for special education services under IDEA or protected by Section 504 of the federal Rehabilitation Act, the student shall meet the same graduation requirements as nondisabled peers in an accommodated and/or modified manner. These modifications will be documented in each student's IEP.

As always, Vermont requires one diploma for all students, there is no IEP diploma or alternative diploma. For students with intensive needs, VT AOE created and led a multi-year (with representative stakeholder input) accessibility project which created a system and a tool for students with intensive needs to access the proficiency based graduation requirements (PBGRs), the PBGR Access Plan. VT AOE is committed to flexible pathways towards graduation for all students.

Are the conditions that youth with IEPs must meet to graduate with a regular high school diploma different from the conditions noted above? (yes/no)

NO

Provide additional information about this indicator (optional)

This indicator reflects data from school year 2018-2019, which occurred entirely before the COVID-19 pandemic and resultant State of Emergency.

The VT AOE provided training and resources specific to helping districts work with general educators on topics such as understanding how proficiencies should be accessible for graduation, training for Proficiency Based Graduation Readiness access plan, the access tool, and the checklist. Efforts for technical assistance and professional development are directed toward making graduation accessible and meaningful and being intentional about linking these practices to the actual indicator and making connections. We have provided transition training and made efforts to message how the trainings are intentionally linked to this indicator. Future work will support principles of Universal Design for Learning (UDL) and ensuring districts are understanding UDL, a major component of general education that we need to tap into so we can ensure content accessibility related to graduation.

Although Vermont did not meet its target for indicator 1, the 6-year graduation rate for students with IEPs did improve from the previous year.

1 - Prior FFY Required Actions

None

1 - OSEP Response

1 - Required Actions

Indicator 2: Drop Out

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of youth with IEPs dropping out of high school. (20 U.S.C. 1416 (a)(3)(A))

Data Source

OPTION 1:

Same data as used for reporting to the Department under section 618 of the Individuals with Disabilities Education Act (IDEA), using the definitions in EDFacts file specification FS009.

OPTION 2:

Use same data source and measurement that the State used to report in its FFY 2010 SPP/APR that was submitted on February 1, 2012.

Measurement

OPTION 1:

States must report a percentage using the number of youth with IEPs (ages 14-21) who exited special education due to dropping out in the numerator and the number of all youth with IEPs who left high school (ages 14-21) in the denominator.

OPTION 2:

Use same data source and measurement that the State used to report in its FFY 2010 SPP/APR that was submitted on February 1, 2012.

Instructions

Sampling is not allowed.

OPTION 1:

Use 618 exiting data for the year before the reporting year (e.g., for the FFY 2019 SPP/APR, use data from 2018-2019). Include in the denominator the following exiting categories: (a) graduated with a regular high school diploma; (b) received a certificate; (c) reached maximum age; (d) dropped out; or (e) died.

Do not include in the denominator the number of youths with IEPs who exited special education due to: (a) transferring to regular education; or (b) who moved, but are known to be continuing in an educational program.

OPTION 2:

Use the annual event school dropout rate for students leaving a school in a single year determined in accordance with the National Center for Education Statistic's Common Core of Data.

If the State has made or proposes to make changes to the data source or measurement under Option 2, when compared to the information reported in its FFY 2010 SPP/APR submitted on February 1, 2012, the State should include a justification as to why such changes are warranted.

Options 1 and 2:

Data for this indicator are "lag" data. Describe the results of the State's examination of the data for the year before the reporting year (e.g., for the FFY 2019 SPP/APR, use data from 2018-2019), and compare the results to the target.

Provide a narrative that describes what counts as dropping out for all youth and, if different, what counts as dropping out for youth with IEPs. If there is a difference, explain.

2 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2013	4.19%

FFY	2014	2015	2016	2017	2018
Target <=	3.25%	3.25%	3.25%	3.25%	3.20%
Data	3.36%	3.45%	1.81%	4.17%	3.05%

Targets

FFY	2019
Target <=	3.20%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for

school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

Please indicate the reporting option used on this indicator

Option 2

Prepopulated Data

Source	Date	Description	Data
SY 2018-19 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/27/2020	Number of youth with IEPs (ages 14-21) who exited special education by graduating with a regular high school diploma (a)	494
SY 2018-19 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/27/2020	Number of youth with IEPs (ages 14-21) who exited special education by receiving a certificate (b)	5
SY 2018-19 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/27/2020	Number of youth with IEPs (ages 14-21) who exited special education by reaching maximum age (c)	14
SY 2018-19 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/27/2020	Number of youth with IEPs (ages 14-21) who exited special education due to dropping out (d)	156
SY 2018-19 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/27/2020	Number of youth with IEPs (ages 14-21) who exited special education as a result of death (e)	2

Has your State made or proposes to make changes to the data source under Option 2, when compared to the information reported in its FFY 2010 SPP/APR submitted on February 1, 2012? (yes/no)

NO

Use a different calculation methodology (yes/no)

NO

Change numerator description in data table (yes/no)

NO

Change denominator description in data table (yes/no)

NO

FFY 2019 SPP/APR Data

Number of youth with IEPs who exited special education due to dropping out	Total number of High School Students with IEPs by Cohort	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
156	4,656	3.05%	3.20%	3.35%	Did Not Meet Target	Slippage

Provide reasons for slippage, if applicable

Vermont's low student population means that any small changes in student drop outs have a comparatively large impact on the overall data. This is evidenced by the volatility of Vermont's indicator 2 data from FFY2015 through FFY2018, when each year the measure varied by more than one percentage point. For FFY2019, VT AOE observed that 13 of the 156 students who were dropped out in school year 2018-2019 were reported in the following child count as having been enrolled for at least part of the following school year. The VT AOE will verify that LEAs are correctly reporting drop out data.

Economic conditions were a possible reason for an increase in dropping out during school year 2018-2019. During early 2019, the US economy was rapidly adding jobs, particularly low-skilled jobs. Vermont's unemployment rate for the period of July 2018-June 2019 ranged between 2.3 percent and 2.5 percent. Additionally, VT AOE observed that several LEAs with higher drop-out rates were located in ski resort areas, which frequently hire unskilled workers. VT AOE's indicator 14 survey for FFY19 was performed on the same group of youth with IEPs exiting high school that are represented in this indicator. The percentage of respondents in indicator 14, category #2 (competitively employed), increased by 4.6 percentage points from FFY2018 to FFY2019. These job market conditions may have provided some motivation for students to drop out of high school.

Provide a narrative that describes what counts as dropping out for all youth

Vermont defines a drop out as follows:

Students who were enrolled at the start of the reporting period, were not enrolled at the end of the reporting period, and did not exit special education through any of the other exit reasons. This includes dropouts, runaways, expulsions, status unknown, and students who moved and are not known to be continuing in another educational program. Students with 10 consecutive days of unexcused absences are included in the report as dropouts.

Is there a difference in what counts as dropping out for youth with IEPs? (yes/no)

NO

If yes, explain the difference in what counts as dropping out for youth with IEPs below.

Provide additional information about this indicator (optional)

This indicator reflects data from school year 2018-2019, which occurred entirely before the COVID-19 pandemic and resultant State of Emergency.

The VT AOE has created and will expand its technical assistance and professional development around student engagement, professional learning plans, and levels of student engagement that reduce/prevent drop out. The VT AOE Special Education Team partners with the VT AOE Student Pathways Division and continues efforts to look at a way to measure student engagement and find correlation with drop out/retention. These findings will lead to guidance documents and enhancement to the Grad Readiness Tool, specifically the student engagement column. We anticipate looking at these data to inform our work.

2 - Prior FFY Required Actions

None

2 - OSEP Response

2 - Required Actions

Indicator 3B: Participation for Students with IEPs

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Participation and performance of children with IEPs on statewide assessments:

- A. Indicator 3A – Reserved
- B. Participation rate for children with IEPs
- C. Proficiency rate for children with IEPs against grade level and alternate academic achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

3B. Same data as used for reporting to the Department under Title I of the ESEA, using EDFacts file specifications FS185 and 188.

Measurement

B. Participation rate percent = [(# of children with IEPs participating in an assessment) divided by the (total # of children with IEPs enrolled during the testing window)]. Calculate separately for reading and math. The participation rate is based on all children with IEPs, including both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year.

Instructions

Describe the results of the calculations and compare the results to the targets. Provide the actual numbers used in the calculation.

Include information regarding where to find public reports of assessment participation and performance results, as required by 34 CFR §300.160(f), i.e., a link to the Web site where these data are reported.

Indicator 3B: Provide separate reading/language arts and mathematics participation rates, inclusive of all ESEA grades assessed (3-8 and high school), for children with IEPs. Account for ALL children with IEPs, in all grades assessed, including children not participating in assessments and those not enrolled for a full academic year. Only include children with disabilities who had an IEP at the time of testing.

3B - Indicator Data

Reporting Group Selection

Based on previously reported data, these are the grade groups defined for this indicator.

Group	Group Name	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grade 9	Grade 10	Grade 11	Grade 12	HS
A	Overall	X	X	X	X	X	X	X	X	X	X	X

Historical Data: Reading

Group	Group Name	Baseline	FFY	2014	2015	2016	2017	2018
A	Overall	2005	Target >=	99.25%	99.25%	99.25%	99.25%	99.25%
A	Overall	98.33%	Actual	95.25%	96.07%	95.87%	NVR	

Historical Data: Math

Group	Group Name	Baseline	FFY	2014	2015	2016	2017	2018
A	Overall	2005	Target >=	99.25%	99.25%	99.25%	99.25%	99.25%
A	Overall	98.42%	Actual	94.40%	96.22%	95.73%	NVR	

Targets

Subject	Group	Group Name	2019
Reading	A >=	Overall	99.25%
Math	A >=	Overall	99.25%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for

school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

FFY 2019 Data Disaggregation from EDFacts

Include the disaggregated data in your final SPP/APR. (yes/no)

YES

Data Source:

SY 2019-20 Assessment Data Groups - Reading (EDFacts file spec FS188; Data Group: 589)

Date:

Reading Assessment Participation Data by Grade

Grade	3	4	5	6	7	8	9	10	11	12	HS
a. Children with IEPs											
b. IEPs in regular assessment with no accommodations											
c. IEPs in regular assessment with accommodations											
f. IEPs in alternate assessment against alternate standards											

Data Source:

SY 2019-20 Assessment Data Groups - Math (EDFacts file spec FS185; Data Group: 588)

Date:

Math Assessment Participation Data by Grade

Grade	3	4	5	6	7	8	9	10	11	12	HS
a. Children with IEPs											
b. IEPs in regular assessment with no accommodations											
c. IEPs in regular assessment with accommodations											
f. IEPs in alternate assessment against alternate standards											

FFY 2019 SPP/APR Data: Reading Assessment

Group	Group Name	Number of Children with IEPs	Number of Children with IEPs Participating	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A	Overall				99.25%		N/A	N/A

FFY 2019 SPP/APR Data: Math Assessment

Group	Group Name	Number of Children with IEPs	Number of Children with IEPs Participating	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A	Overall				99.25%		N/A	N/A

Regulatory Information

The SEA, (or, in the case of a district-wide assessment, LEA) must make available to the public, and report to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children: (1) the number of children with disabilities participating in: (a) regular assessments, and the number of those children who were provided accommodations in order to participate in those assessments; and (b) alternate assessments aligned with alternate achievement standards; and (2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children, including children with disabilities, on those assessments. [20 U.S.C. 1412 (a)(16)(D); 34 CFR §300.160(f)]

Public Reporting Information

Provide links to the page(s) where you provide public reports of assessment results.

Vermont’s practice is, to the extent possible, to provide public reports of assessment results for disabled students in the same place as it provides comparable data for nondisabled students. Please see the following areas of our website for:

(1) the number of children with disabilities participating in

(a) regular assessments with and without accommodations:

<https://education.vermont.gov/data-and-reporting/school-reports/special-education-reports> (under the “Assessment Report” heading.)

(b) alternate assessments aligned with alternate achievement standards:

<https://schoolsnapshot.vermont.gov/> (For each school, select “Academic Proficiency,” “Additional Information,” and View “AA-AAAS Assessed Students.”)

(2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children on those assessments: <https://education.vermont.gov/data-and-reporting/vermont-education-dashboard> (Select “Assessment,” select a school, year and test, then select the school results question “Differences in achievement by disability status?”)

Provide additional information about this indicator (optional)

Due to the state of emergency as directed by the governor, on March 21, 2020, Vermont has received a waiver, pursuant to section 8401(b) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, of the assessments, accountability and school identification, and reporting requirements due to COVID-19. The state’s application can be found at <https://education.vermont.gov/documents/esea-waiver>.

3B - Prior FFY Required Actions

The State did not provide data for FFY 2018. The State must provide the required data for FFY 2019 in the FFY 2019 SPP/APR.

Within 90 days of the receipt of the State’s 2020 determination letter, the State must provide to OSEP a Web link that demonstrates that it has reported, for FFY 2018, to the public, on the statewide assessments of children with disabilities in accordance with 34 C.F.R. § 300.160(f). In addition, OSEP reminds the State that in the FFY 2019 SPP/APR, the State must include a Web link that demonstrates compliance with 34 C.F.R. § 300.160(f) for FFY 2019.

Response to actions required in FFY 2018 SPP/APR

The State has provided to OSEP Web links that demonstrate that it has reported, for FFY 2018, to the public, on the statewide assessments of children with disabilities in accordance with 34 C.F.R. § 300.160(f)

(1) the number of children with disabilities participating in

(a) regular assessments with and without accommodations: <https://education.vermont.gov/documents/special-education-assessment-accommodations-school-year-2019>

(b) alternate assessments aligned with alternate achievement standards: <https://schoolsnapshot.vermont.gov/> (For each school, select “Academic Proficiency,” “Additional Information,” and View “AA-AAAS Assessed Students.”)

(2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children on those assessments: <https://education.vermont.gov/data-and-reporting/vermont-education-dashboard> (Select “Assessment,” select a school, year and test, then select the school results question “Differences in achievement by disability status?”)

3B - OSEP Response

OSEP’s response to the State’s FFY 2018 SPP/APR required the State to provide OSEP with a Web link that demonstrates that it has reported, for FFY 2018, to the public, on the statewide assessments of children with disabilities in accordance with 34 C.F.R. § 300.160(f). The State provided the required information.

The State was not required to provide any data for this indicator. Due to the circumstances created by the COVID-19 pandemic, and resulting school closures, the State received a waiver of the assessment requirements in section 1111(b)(2) of the ESEA, and, as a result, does not have any FFY 2019 data for this indicator.

3B - Required Actions

Indicator 3C: Proficiency for Students with IEPs

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Participation and performance of children with IEPs on statewide assessments:

- A. Indicator 3A – Reserved
- B. Participation rate for children with IEPs
- C. Proficiency rate for children with IEPs against grade level and alternate academic achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

3C. Same data as used for reporting to the Department under Title I of the ESEA, using EDFacts file specifications FS175 and 178.

Measurement

C. Proficiency rate percent = [(# of children with IEPs scoring at or above proficient against grade level and alternate academic achievement standards) divided by the (total # of children with IEPs who received a valid score and for whom a proficiency level was assigned)]. Calculate separately for reading and math. The proficiency rate includes both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year.

Instructions

Describe the results of the calculations and compare the results to the targets. Provide the actual numbers used in the calculation.

Include information regarding where to find public reports of assessment participation and performance results, as required by 34 CFR §300.160(f), i.e., a link to the Web site where these data are reported.

Indicator 3C: Proficiency calculations in this SPP/APR must result in proficiency rates for reading/language arts and mathematics assessments (combining regular and alternate) for children with IEPs, in all grades assessed (3-8 and high school), including both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year. Only include children with disabilities who had an IEP at the time of testing.

3C - Indicator Data

Reporting Group Selection

Based on previously reported data, these are the grade groups defined for this indicator.

Group	Group Name	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grade 9	Grade 10	Grade 11	Grade 12	HS
A	Overall	X	X	X	X	X	X	X	X	X	X	X

Historical Data: Reading

Group	Group Name	Baseline	FFY	2014	2015	2016	2017	2018
A	Overall	2014	Target >=	12.13%	12.13%	12.15%	12.20%	12.25%
A	Overall	12.13%	Actual	12.13%	14.16%	13.31%	NVR	

Historical Data: Math

Group	Group Name	Baseline	FFY	2014	2015	2016	2017	2018
A	Overall	2014	Target >=	7.21%	7.21%	7.25%	7.30%	7.35%
A	Overall	7.21%	Actual	7.21%	9.25%	8.51%	NVR	

Targets

Subject	Group	Group Name	2019
Reading	A >=	Overall	12.25%
Math	A >=	Overall	7.35%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

FFY 2019 Data Disaggregation from EDFacts

Include the disaggregated data in your final SPP/APR. (yes/no)

YES

Data Source:

SY 2019-20 Assessment Data Groups - Reading (EDFacts file spec FS178; Data Group: 584)

Date:

Reading Proficiency Data by Grade

Grade	3	4	5	6	7	8	9	10	11	12	HS
a. Children with IEPs who received a valid score and a proficiency was assigned											
b. IEPs in regular assessment with no accommodations scored at or above proficient against grade level											
c. IEPs in regular assessment with accommodations scored at or above proficient against grade level											
f. IEPs in alternate assessment against alternate standards scored at or above proficient against grade level											

Data Source:

SY 2019-20 Assessment Data Groups - Math (EDFacts file spec FS175; Data Group: 583)

Date:

Math Proficiency Data by Grade

Grade	3	4	5	6	7	8	9	10	11	12	HS
a. Children with IEPs who received a valid score and a proficiency was assigned											
b. IEPs in regular assessment with no accommodations scored at or above proficient against grade level											
c. IEPs in regular assessment with accommodations scored at or above											

Grade	3	4	5	6	7	8	9	10	11	12	HS
proficient against grade level											
f. IEPs in alternate assessment against alternate standards scored at or above proficient against grade level											

FFY 2019 SPP/APR Data: Reading Assessment

Group	Group Name	Children with IEPs who received a valid score and a proficiency was assigned	Number of Children with IEPs Proficient	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A	Overall				12.25%		N/A	N/A

FFY 2019 SPP/APR Data: Math Assessment

Group	Group Name	Children with IEPs who received a valid score and a proficiency was assigned	Number of Children with IEPs Proficient	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A	Overall				7.35%		N/A	N/A

Regulatory Information

The SEA, (or, in the case of a district-wide assessment, LEA) must make available to the public, and report to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children: (1) the number of children with disabilities participating in: (a) regular assessments, and the number of those children who were provided accommodations in order to participate in those assessments; and (b) alternate assessments aligned with alternate achievement standards; and (2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children, including children with disabilities, on those assessments. [20 U.S.C. 1412 (a)(16)(D); 34 CFR §300.160(f)]

Public Reporting Information

Provide links to the page(s) where you provide public reports of assessment results.

Vermont's practice is, to the extent possible, to provide public reports of assessment results for disabled students in the same place as it provides comparable data for nondisabled students. Please see the following areas of our website for:

- (1) the number of children with disabilities participating in
 - (a) regular assessments with and without accommodations: <https://education.vermont.gov/data-and-reporting/school-reports/special-education-reports> (under the "Assessment Report" heading.)
 - (b) alternate assessments aligned with alternate achievement standards: <https://schoolsnapshot.vermont.gov/> (For each school, select "Academic Proficiency," "Additional Information," and View "AA-AAAS Assessed Students.")

- (2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children on those assessments: <https://education.vermont.gov/data-and-reporting/vermont-education-dashboard> (Select "Assessment," select a school, year and test, then select the school results question "Differences in achievement by disability status?")

Provide additional information about this indicator (optional)

Due to the state of emergency as directed by the governor, on March 21, 2020, Vermont has received a waiver, pursuant to section 8401(b) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, of the assessments, accountability and school identification, and reporting requirements due to COVID-19. The state's application can be found at <https://education.vermont.gov/documents/esea-waiver>.

3C - Prior FFY Required Actions

The State did not provide data for FFY 2018. The State must provide the required data for FFY 2019 in the FFY 2019 SPP/APR .

Within 90 days of the receipt of the State's 2020 determination letter, the State must provide to OSEP a Web link that demonstrates that it has reported, for FFY 2018, to the public, on the statewide assessments of children with disabilities in accordance with 34 C.F.R. § 300.160(f). In addition, OSEP reminds the State that in the FFY 2019 SPP/APR, the State must include a Web link that demonstrates compliance with 34 C.F.R. § 300.160(f) for FFY 2019.

Response to actions required in FFY 2018 SPP/APR

The State has provided to OSEP Web links that demonstrate that it has reported, for FFY 2018, to the public, on the statewide assessments of children with disabilities in accordance with 34 C.F.R. § 300.160(f)

(1) the number of children with disabilities participating in

(a) regular assessments with and without accommodations: <https://education.vermont.gov/documents/special-education-assessment-accommodations-school-year-2019>

(b) alternate assessments aligned with alternate achievement standards: <https://schoolsnapshot.vermont.gov/> (For each school, select “Academic Proficiency,” “Additional Information,” and View “AA-AAAS Assessed Students.”)

(2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children on those assessments: <https://education.vermont.gov/data-and-reporting/vermont-education-dashboard> (Select “Assessment,” select a school, year and test, then select the school results question “Differences in achievement by disability status?”)

3C - OSEP Response

OSEP’s response to the State’s FFY 2018 SPP/APR required the State to provide OSEP with a Web link that demonstrates that it has reported, for FFY 2018, to the public, on the statewide assessments of children with disabilities in accordance with 34 C.F.R. § 300.160(f). The State provided the required information.

The State was not required to provide any data for this indicator. Due to the circumstances created by the COVID-19 pandemic, and resulting school closures, the State received a waiver of the assessment requirements in section 1111(b)(2) of the ESEA, and, as a result, does not have any FFY 2019 data for this indicator.

3C - Required Actions

Indicator 4A: Suspension/Expulsion

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results Indicator: Rates of suspension and expulsion:

A. Percent of districts that have a significant discrepancy in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Data Source

State discipline data, including State's analysis of State's Discipline data collected under IDEA Section 618, where applicable. Discrepancy can be computed by either comparing the rates of suspensions and expulsions for children with IEPs to rates for nondisabled children within the LEA or by comparing the rates of suspensions and expulsions for children with IEPs among LEAs within the State.

Measurement

Percent = [(# of districts that meet the State-established n size (if applicable) that have a significant discrepancy in the rates of suspensions and expulsions for greater than 10 days in a school year of children with IEPs) divided by the (# of districts in the State that meet the State-established n size (if applicable))] times 100.

Include State's definition of "significant discrepancy."

Instructions

If the State has established a minimum n size requirement, the State may only include, in both the numerator and the denominator, districts that met that State-established n size. If the State used a minimum n size requirement, report the number of districts excluded from the calculation as a result of this requirement.

Describe the results of the State's examination of the data for the year before the reporting year (e.g., for the FFY 2019 SPP/APR, use data from 2018-2019), including data disaggregated by race and ethnicity to determine if significant discrepancies are occurring in the rates of long-term suspensions and expulsions of children with IEPs, as required at 20 U.S.C. 1412(a)(22). The State's examination must include one of the following comparisons:

- The rates of suspensions and expulsions for children with IEPs among LEAs within the State; or
- The rates of suspensions and expulsions for children with IEPs to nondisabled children within the LEAs

In the description, specify which method the State used to determine possible discrepancies and explain what constitutes those discrepancies.

Indicator 4A: Provide the actual numbers used in the calculation (based upon districts that met the minimum n size requirement, if applicable). If significant discrepancies occurred, describe how the State educational agency reviewed and, if appropriate, revised (or required the affected local educational agency to revise) its policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, to ensure that such policies, procedures, and practices comply with applicable requirements.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If discrepancies occurred and the district with discrepancies had policies, procedures or practices that contributed to the significant discrepancy and that do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, describe how the State ensured that such policies, procedures, and practices were revised to comply with applicable requirements consistent with the Office of Special Education Programs (OSEP) Memorandum 09-02, dated October 17, 2008.

If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training, etc.) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for 2018-2019), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

4A - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	1.67%

FFY	2014	2015	2016	2017	2018
Target <=	0.00%	0.00%	0.00%	0.00%	0.00%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2019
Target <=	0.00%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special

Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont’s approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

FFY 2019 SPP/APR Data

Has the state established a minimum n-size requirement? (yes/no)

NO

Number of districts that have a significant discrepancy	Number of districts in the State	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
0	54	0.00%	0.00%	0.00%	Met Target	No Slippage

Choose one of the following comparison methodologies to determine whether significant discrepancies are occurring (34 CFR §300.170(a))

Compare the rates of suspensions and expulsions of greater than 10 days in a school year for children with IEPs among LEAs in the State

State’s definition of “significant discrepancy” and methodology

Vermont defines a significant discrepancy for any individual LEA as a rate of out-of-school suspension/expulsions greater than ten days that is more than 3 percent of that LEA’s total special education population. For FFY19, this is approximately 9 times the rate for the state of Vermont as a whole (0.33 percent).

The out-of-school suspension/expulsion rate is derived from the total number of out-of-school suspension/expulsions more than 10 days for special education students in an LEA (numerator) divided by the total number of special education students in the LEA (denominator).

The source information for the numerator in the LEA calculations was the same as that used to populate the “Children with Disabilities (IDEA) Suspensions/Expulsions” EdFacts file for school year 2018-2019. The source information for the denominator in the LEA calculations was the same as that used to populate the “Children with Disabilities (IDEA) School Age” and “Children with Disabilities (IDEA) Early Childhood” EdFacts files for the school year 2018-2019.

Provide additional information about this indicator (optional)

This indicator reflects data from school year 2018-2019, which occurred entirely before the COVID-19 pandemic and resultant State of Emergency.

Vermont’s compliance for this indicator can be attributed to the collaboration with the University of Vermont PBIS network and a statewide system for positive behavioral interventions and supports (pbis); as well as on-going training and coaching on evidence based behavioral interventions, FBAs/BIPs, trauma and resiliency, restorative practices, social emotional learning, and guidance on when/how to conduct manifestation determination meetings.

During the global pandemic, VT AOE has provided guidance, TA, and training for LEAs and families designed, in part, to prevent suspensions due to COVID-19 safety issues. Topics covered include the impact of face mask and physical distancing implications on behaviors, responding to challenging behaviors of school-aged children at home and in child care centers, disciplinary considerations and the use of restraints and seclusions during the 2020-21 school year, how a school-wide PBIS framework can help schools to pivot during challenging times, nurturing and supporting staff resilience during challenging times, and proactive crisis planning for students with complex needs during the COVID-19 pandemic. Vermont’s PBIS State Team has undergone professional development that is designed to promote equity and has established an equity action plan that will be evaluated on an annual basis.

Review of Policies, Procedures, and Practices (completed in FFY 2019 using 2018-2019 data)

Provide a description of the review of policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Beginning with SY2019-2020 VT AOE developed a discipline policy review tool for compliance with state and federal regulations; this tool also incorporates opportunities to review policies for best practices as needed and is publicly posted on the website. As part of the state monitoring system, VT AOE requires LEAs to submit discipline policies, procedures and practices as part of cyclic monitoring activities.

Any findings of non-compliance identified in cyclic monitoring will generate further analysis of policies, procedures, and practices by Vermont’s special education program monitoring team consistent with CFR § 300.170. When appropriate, Vermont requires LEAs to revise policies, practices, and procedures relating to: development and implementation of IEPs; the use of positive behavioral intervention and supports; and use of procedural

safeguards to comply with state and federal regulations. The reporting of any findings of noncompliance and the corrections will be consistent with OSEP Memo 09-02.

The State DID NOT identify noncompliance with Part B requirements as a result of the review required by 34 CFR §300.170(b)

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

4A - Prior FFY Required Actions

None

4A - OSEP Response

4A - Required Actions

Indicator 4B: Suspension/Expulsion

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Compliance Indicator: Rates of suspension and expulsion:

B. Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Data Source

State discipline data, including State's analysis of State's Discipline data collected under IDEA Section 618, where applicable. Discrepancy can be computed by either comparing the rates of suspensions and expulsions for children with IEPs to rates for nondisabled children within the LEA or by comparing the rates of suspensions and expulsions for children with IEPs among LEAs within the State.

Measurement

Percent = [(# of districts that meet the State-established n size (if applicable) for one or more racial/ethnic groups that have: (a) a significant discrepancy, by race or ethnicity, in the rates of suspensions and expulsions of greater than 10 days in a school year of children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards) divided by the (# of districts in the State that meet the State-established n size (if applicable) for one or more racial/ethnic groups)] times 100.

Include State's definition of "significant discrepancy."

Instructions

If the State has established a minimum n size requirement, the State may only include, in both the numerator and the denominator, districts that met that State-established n size. If the State used a minimum n size requirement, report the number of districts excluded from the calculation as a result of this requirement.

Describe the results of the State's examination of the data for the year before the reporting year (e.g., for the FFY 2019 SPP/APR, use data from 2018-2019), including data disaggregated by race and ethnicity to determine if significant discrepancies are occurring in the rates of long-term suspensions and expulsions of children with IEPs, as required at 20 U.S.C. 1412(a)(22). The State's examination must include one of the following comparisons

- The rates of suspensions and expulsions for children with IEPs among LEAs within the State; or
- The rates of suspensions and expulsions for children with IEPs to nondisabled children within the LEAs

In the description, specify which method the State used to determine possible discrepancies and explain what constitutes those discrepancies.

Indicator 4B: Provide the following: (a) the number of districts that met the State-established n size (if applicable) for one or more racial/ethnic groups that have a significant discrepancy, by race or ethnicity, in the rates of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) the number of those districts in which policies, procedures or practices contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If discrepancies occurred and the district with discrepancies had policies, procedures or practices that contributed to the significant discrepancy and that do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, describe how the State ensured that such policies, procedures, and practices were revised to comply with applicable requirements consistent with the Office of Special Education Programs (OSEP) Memorandum 09-02, dated October 17, 2008.

If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training, etc.) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for 2018-2019), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

Targets must be 0% for 4B.

4B - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2009	0.00%

FFY	2014	2015	2016	2017	2018
Target	0%	0%	0%	0%	0%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2019
Target	0%

FFY 2019 SPP/APR Data

Has the state established a minimum n-size requirement? (yes/no)

YES

If yes, the State may only include, in both the numerator and the denominator, districts that met the State-established n size. Report the number of districts excluded from the calculation as a result of the requirement.

52

Number of districts that have a significant discrepancy, by race or ethnicity	Number of those districts that have policies procedure, or practices that contribute to the significant discrepancy and do not comply with requirements	Number of Districts that met the State's minimum n-size	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
0	0	2	0.00%	0%	0.00%	Met Target	No Slippage

Were all races and ethnicities included in the review?

YES

State's definition of "significant discrepancy" and methodology

Vermont's definition of significant discrepancy in the rates of long-term out-of-school suspensions and expulsions, by race or ethnicity, is a rate of greater than 3 percent of students with IEPs in any race or ethnicity group experiencing out-of-school suspension or expulsion for more than 10 school days during the year. For FFY19, this is approximately 9 times the rate for the state of Vermont as a whole (0.33 percent).

VT AOE's methodology entails the following steps:

First, VT AOE applies a minimum cell size of 4: In each LEA, race and ethnicity categories in which fewer than 4 students with disabilities experience long-term out-of-school suspensions and expulsions are excluded. In 52 of 54 districts, all race and ethnicity categories were excluded due to cell size.

Then, separately, for each race and ethnicity category, VT AOE aggregates each LEA's total number of IEP students who were suspended or expelled out of school for greater than 10 days, and divides by the total number of IEP students of that race or ethnicity in the LEA. This process produces the rate of long-term out-of-school suspensions and expulsions by race and ethnicity for each LEA.

Finally, separately, for each race and ethnicity category, VT AOE identifies LEAs which have a long-term out-of-school suspension/expulsion rate of greater than 3 percent.

Provide additional information about this indicator (optional)

This indicator reflects data from school year 2018-2019, which occurred entirely before the COVID-19 pandemic and resultant State of Emergency.

Vermont's compliance for this indicator can be attributed to the collaboration with the University of Vermont PBIS network and a statewide system for positive behavioral interventions and supports (pbis); as well as on-going training and coaching on evidence based behavioral interventions, FBAs/BIPs, trauma and resiliency, restorative practices, social emotional learning, and guidance on when/how to conduct manifestation determination meetings.

During the global pandemic, VT AOE has provided guidance, TA, and training for LEAs and families designed, in part, to prevent suspensions due to COVID-19 safety issues. Topics covered include the impact of face mask and physical distancing implications on behaviors, responding to challenging behaviors of school-aged children at home and in child care centers, disciplinary considerations and the use of restraints and seclusions during the 2020-21 school year, how a school-wide PBIS framework can help schools to pivot during challenging times, nurturing and supporting staff resilience during challenging times, and proactive crisis planning for students with complex needs during the COVID-19 pandemic. Vermont's PBIS State Team has undergone professional development that is designed to promote equity and has established an equity action plan that will be evaluated on an annual basis.

Review of Policies, Procedures, and Practices (completed in FFY 2019 using 2018-2019 data)

Provide a description of the review of policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Beginning with SY2019-2020 VT AOE developed a discipline policy review tool for compliance with state and federal regulations; this tool also incorporates opportunities to review policies for best practices as needed and is publicly posted on the website. As part of the state monitoring system, VT AOE requires LEAs to submit discipline policies, procedures and practices as part of cyclic monitoring activities.

Any findings of non-compliance identified in cyclic monitoring will generate further analysis of policies, procedures, and practices by Vermont's special education program monitoring team consistent with CFR § 300.170(b). When appropriate, Vermont requires LEAs to revise policies, practices, and procedures relating to: development and implementation of IEPs; the use of positive behavioral intervention and supports; and use of procedural

safeguards to comply with state and federal regulations. The reporting of any findings of noncompliance and the corrections will be consistent with OSEP Memo 09-02.

The State DID NOT identify noncompliance with Part B requirements as a result of the review required by 34 CFR §300.170(b)

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the *regulatory requirements*

Describe how the State verified that each *individual case* of noncompliance was corrected

4B - Prior FFY Required Actions

None

4B - OSEP Response

4B- Required Actions

Indicator 5: Education Environments (children 6-21)

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Education environments (children 6-21): Percent of children with IEPs aged 6 through 21 served:

- A. Inside the regular class 80% or more of the day;
- B. Inside the regular class less than 40% of the day; and
- C. In separate schools, residential facilities, or homebound/hospital placements.

(20 U.S.C. 1416(a)(3)(A))

Data Source

Same data as used for reporting to the Department under section 618 of the IDEA, using the definitions in EDFacts file specification FS002.

Measurement

Percent = [(# of children with IEPs aged 6 through 21 served inside the regular class 80% or more of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.

Percent = [(# of children with IEPs aged 6 through 21 served inside the regular class less than 40% of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.

Percent = [(# of children with IEPs aged 6 through 21 served in separate schools, residential facilities, or homebound/hospital placements) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.

Instructions

Sampling from the State's 618 data is not allowed.

Describe the results of the calculations and compare the results to the target.

If the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA, explain.

5 - Indicator Data

Historical Data

Part	Baseline	FFY	2014	2015	2016	2017	2018
A	2005	Target >=	79.00%	79.00%	79.00%	79.00%	79.00%
A	77.89%	Data	74.93%	75.76%	76.77%	77.82%	77.86%
B	2005	Target <=	7.00%	7.00%	7.00%	7.00%	7.00%
B	8.59%	Data	6.29%	5.72%	5.15%	4.61%	4.56%
C	2005	Target <=	3.75%	3.75%	3.75%	3.75%	3.75%
C	5.81%	Data	5.77%	5.94%	6.05%	6.03%	6.36%

Targets

FFY	2019
Target A >=	79.00%
Target B <=	7.00%
Target C <=	3.75%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/08/2020	Total number of children with IEPs aged 6 through 21	13,427
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/08/2020	A. Number of children with IEPs aged 6 through 21 inside the regular class 80% or more of the day	10,590
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/08/2020	B. Number of children with IEPs aged 6 through 21 inside the regular class less than 40% of the day	602
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/08/2020	c1. Number of children with IEPs aged 6 through 21 in separate schools	710
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/08/2020	c2. Number of children with IEPs aged 6 through 21 in residential facilities	149
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/08/2020	c3. Number of children with IEPs aged 6 through 21 in homebound/hospital placements	13

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

FFY 2019 SPP/APR Data

Education Environments	Number of children with IEPs aged 6 through 21 served	Total number of children with IEPs aged 6 through 21	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A. Number of children with IEPs aged 6 through 21 inside the regular class 80% or more of the day	10,590	13,427	77.86%	79.00%	78.87%	Did Not Meet Target	No Slippage
B. Number of children with IEPs aged 6 through 21 inside the regular class less than 40% of the day	602	13,427	4.56%	7.00%	4.48%	Met Target	No Slippage
C. Number of children with IEPs aged 6 through 21 inside separate schools, residential facilities, or homebound/hospital placements [c1+c2+c3]	872	13,427	6.36%	3.75%	6.49%	Did Not Meet Target	Slippage

Use a different calculation methodology (yes/no)

NO

Part	Reasons for slippage, if applicable
C	VT AOE reports slippage on Indicator 5C from the (FFY 2018) rate of 6.36 percent to the FFY 2019 rate 6.49 percent, an increase of 0.13 percentage points. The Special Education and Data Teams have disaggregated the data and have seen an increase over one year in the number of students with disabilities placed in separate schools by LEAs, particularly students with other health impairment (+17) and those with emotional disturbance (+16). The percentage of students placed in separate schools whose primary disability was other health impairment increased from 10.00 percent in FFY18 to 11.83 percent in FFY19. While a much larger percentage of students placed in

Part	Reasons for slippage, if applicable
	separate schools have a primary disability of emotional disturbance, their percentage decreased slightly from 60.60 percent in FFY18 to 59.44 percent in FFY19. IEP Teams make decisions regarding placement based upon student need. An increase in student need for additional support and treatment prompted LEAs to look to the services and instruction provided within the separate schools as the best placement to meet their needs.

Provide additional information about this indicator (optional)

FFY19 data for this indicator are based on VT’s Child Count collection with a Dec 1, 2019 reference date. As the data refer to a period prior to the State of Emergency brought about by COVID-19, and in fact were collected prior to the emergency, this indicator for FFY19 was not affected by COVID-19.

Upon further analyses of data, the VT AOE has identified several improvement activities for implementation: convene a stakeholder LRE work group to meet periodically and dive into data with AOE (biggest category was ED in out of district and there is a need for understanding why ED numbers are so high); guidance on reintegration of kids from Independent/private/residential schools back to LEA, SSIP survey going out to Directors included LRE questions that help inform the VT AOE, provide data literacy tools on how districts can use their LRE data for decision-making, message our AOE LRE Continuum document, address PBIS and best practices for keeping kids in class as part of the annual PBIS conference, provide professional development for content coaches help instructors keep kids in the classroom, make connections with VTmtss ESTs and message accordingly. We are revising our IEP Forms and will include a review of options before making a placement selection as part of the document.

Over this year, the AOE partnered with VT Department of Mental Health and mental health Designated Agencies (DAs) through working sessions that addressed LEA partnerships with DAs and access to behavioral and mental health supports; the emphasis was provision of services through contractors who support eligible students within the school community during COVID-19. This also led to a collaborative working subgroup with DMH focused on delivery system and payment reform for Vermont Behavioral Interventionists.

Finally, the VT AOE Special Education Team identified addressing the critical shortage area for special education personnel as a top priority in 2021. The overarching goal is attracting, recruiting, and retaining qualified educators and professionals with the knowledge, skills, and dispositions to educate and support students with disabilities, The emphasis is equitable access to highly prepared personnel regardless of geographical location. Another emphasis is identifying and providing professional development for general educators on educating and supporting students with disabilities.

5 - Prior FFY Required Actions

None

5 - OSEP Response

5 - Required Actions

Indicator 6: Preschool Environments

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Preschool environments: Percent of children aged 3 through 5 with IEPs attending a:

- A. Regular early childhood program and receiving the majority of special education and related services in the regular early childhood program; and
- B. Separate special education class, separate school or residential facility.

(20 U.S.C. 1416(a)(3)(A))

Data Source

Same data as used for reporting to the Department under section 618 of the IDEA, using the definitions in EDFacts file specification FS089.

Measurement

Percent = [(# of children aged 3 through 5 with IEPs attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program) divided by the (total # of children aged 3 through 5 with IEPs)] times 100.

Percent = [(# of children aged 3 through 5 with IEPs attending a separate special education class, separate school or residential facility) divided by the (total # of children aged 3 through 5 with IEPs)] times 100.

Instructions

Sampling from the State's 618 data is not allowed.

Describe the results of the calculations and compare the results to the target.

If the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA, explain.

6 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Part	Baseline	FFY	2014	2015	2016	2017	2018
A	2011	Target >=	71.78%	71.78%	71.78%	71.78%	71.78%
A	71.58%	Data	76.58%	76.44%	75.81%	75.61%	73.12%
B	2011	Target <=	6.19%	6.19%	6.19%	6.19%	6.19%
B	6.39%	Data	2.53%	1.80%	1.00%	0.70%	0.63%

Targets

FFY	2019
Target A >=	71.78%
Target B <=	6.19%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field,

guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/08/2020	Total number of children with IEPs aged 3 through 5	2,128
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/08/2020	a1. Number of children attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program	1,531
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/08/2020	b1. Number of children attending separate special education class	3
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/08/2020	b2. Number of children attending separate school	5
SY 2019-20 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/08/2020	b3. Number of children attending residential facility	0

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

FFY 2019 SPP/APR Data

Preschool Environments	Number of children with IEPs aged 3 through 5 served	Total number of children with IEPs aged 3 through 5	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A. A regular early childhood program and receiving the majority of special education and related services in the regular early childhood program	1,531	2,128	73.12%	71.78%	71.95%	Met Target	No Slippage
B. Separate special education class, separate school or residential facility	8	2,128	0.63%	6.19%	0.38%	Met Target	No Slippage

Use a different calculation methodology (yes/no)

NO

Provide additional information about this indicator (optional)

FFY19 data for this indicator are based on VT's Child Count collection with a Dec 1, 2019 reference date. As the data refer to a period prior to the State of Emergency brought about by COVID-19, and in fact were collected prior to the emergency, this indicator for FFY19 was not affected by COVID-19.

Both State targets were met for Indicator 6: Preschool Environments. Regular monitoring meetings were implemented with the Part B Data Manager in order to establish consistent communication and monitoring between the data and programmatic sides of the indicator. Several changes were made this year in order to help Supervisory Unions/ School Districts improve their practices based on current data analysis. For example, SU/SDs not meeting the State target received technical assistance in which a root cause analysis was performed using critical questions. In addition, TA included review of the IDC B-6 Data reporting tools: Educational Environments. Ages 3 through 5 and the ECTA Determining LRE Placements Reference Points and Discussion Prompts document. To account for the change in reporting 5- year-olds in kindergarten, in their current environment, Vermont's Early Childhood Special Education IEP (Form 5) was modified. A memo was released explaining the change and the requirements for LEAs. Additional resources were provided on inclusion. The 619 Coordinator attended several Indicator 6 data sessions through National Association of State Directors of Special Education (NASDSE) and ECTA/DaSy in order to improve practice and TA. VT AOE currently has an Inclusion Coordinator who is actively involved in the ECTA's Inclusion Community of Practice. Modules are being developed to address inclusion and Indicator 6 reporting.

6 - Prior FFY Required Actions

None

6 - OSEP Response

6 - Required Actions

Indicator 7: Preschool Outcomes

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of preschool children aged 3 through 5 with IEPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/ communication and early literacy); and
- C. Use of appropriate behaviors to meet their needs.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

State selected data source.

Measurement

Outcomes:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and
- C. Use of appropriate behaviors to meet their needs.

Progress categories for A, B and C:

- a. Percent of preschool children who did not improve functioning = [(# of preschool children who did not improve functioning) divided by (# of preschool children with IEPs assessed)] times 100.
- b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
- c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of preschool children with IEPs assessed)] times 100.
- d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers = [(# of preschool children who improved functioning to reach a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
- e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers = [(# of preschool children who maintained functioning at a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes:

Summary Statement 1: Of those preschool children who entered the preschool program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program.

Measurement for Summary Statement 1: Percent = [(# of preschool children reported in progress category (c) plus # of preschool children reported in category (d)) divided by (# of preschool children reported in progress category (a) plus # of preschool children reported in progress category (b) plus # of preschool children reported in progress category (c) plus # of preschool children reported in progress category (d))] times 100.

Summary Statement 2: The percent of preschool children who were functioning within age expectations in each Outcome by the time they turned 6 years of age or exited the program.

Measurement for Summary Statement 2: Percent = [(# of preschool children reported in progress category (d) plus # of preschool children reported in progress category (e)) divided by (the total # of preschool children reported in progress categories (a) + (b) + (c) + (d) + (e))] times 100.

Instructions

Sampling of **children for assessment** is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See [General Instructions](#) on page 2 for additional instructions on sampling.)

In the measurement include, in the numerator and denominator, only children who received special education and related services for at least six months during the age span of three through five years.

Describe the results of the calculations and compare the results to the targets. States will use the progress categories for each of the three Outcomes to calculate and report the two Summary Statements. States have provided targets for the two Summary Statements for the three Outcomes (six numbers for targets for each FFY).

Report progress data and calculate Summary Statements to compare against the six targets. Provide the actual numbers and percentages for the five reporting categories for each of the three outcomes.

In presenting results, provide the criteria for defining "comparable to same-aged peers." If a State is using the Early Childhood Outcomes Center (ECO) Child Outcomes Summary (COS), then the criteria for defining "comparable to same-aged peers" has been defined as a child who has been assigned a score of 6 or 7 on the COS.

In addition, list the instruments and procedures used to gather data for this indicator, including if the State is using the ECO COS.

7 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Part	Baseline	FFY	2014	2015	2016	2017	2018
A1	2014	Target >=	86.63%	86.63%	86.63%	86.63%	87.13%
A1	86.63%	Data	86.63%	85.17%	76.67%	81.75%	NVR
A2	2014	Target >=	40.91%	40.91%	40.91%	40.91%	41.41%

A2	40.91%	Data	40.91%	51.06%	68.75%	48.64%	NVR
B1	2014	Target >=	87.30%	87.30%	87.30%	87.30%	87.80%
B1	87.30%	Data	87.30%	84.44%	80.65%	84.65%	NVR
B2	2014	Target >=	32.49%	32.49%	32.49%	32.49%	32.99%
B2	32.49%	Data	32.49%	39.44%	58.33%	36.05%	NVR
C1	2014	Target >=	86.00%	86.00%	86.00%	86.00%	86.50%
C1	86.00%	Data	86.00%	79.27%	75.00%	85.21%	NVR
C2	2014	Target >=	54.71%	54.71%	54.71%	54.71%	55.21%
C2	54.71%	Data	54.71%	61.27%	76.04%	57.28%	NVR

Targets

FFY	2019
Target A1 >=	87.13%
Target A2 >=	41.41%
Target B1 >=	87.80%
Target B2 >=	32.99%
Target C1 >=	86.50%
Target C2 >=	55.21%

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

FFY 2019 SPP/APR Data

Number of preschool children aged 3 through 5 with IEPs assessed

537

Outcome A: Positive social-emotional skills (including social relationships)

Outcome A Progress Category	Number of children	Percentage of Children
a. Preschool children who did not improve functioning	5	0.93%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	81	15.08%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	193	35.94%

Outcome A Progress Category	Number of children	Percentage of Children
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	118	21.97%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	140	26.07%

Outcome A	Numerator	Denominator	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program. <i>Calculation: (c+d)/(a+b+c+d)</i>	311	397	NVR	87.13%	78.34%	Did Not Meet Target	N/A
A2. The percent of preschool children who were functioning within age expectations in Outcome A by the time they turned 6 years of age or exited the program. <i>Calculation: (d+e)/(a+b+c+d+e)</i>	258	537	NVR	41.41%	48.04%	Met Target	No Slippage

Outcome B: Acquisition and use of knowledge and skills (including early language/communication)

Outcome B Progress Category	Number of Children	Percentage of Children
a. Preschool children who did not improve functioning	8	1.49%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	78	14.53%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	277	51.58%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	149	27.75%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	25	4.66%

Outcome B	Numerator	Denominator	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
B1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program. <i>Calculation: (c+d)/(a+b+c+d)</i>	426	512	NVR	87.80%	83.20%	Did Not Meet Target	N/A
B2. The percent of preschool children who were functioning within age expectations in Outcome B by the time they turned 6 years of age or exited the program. <i>Calculation: (d+e)/(a+b+c+d+e)</i>	174	537	NVR	32.99%	32.40%	Did Not Meet Target	N/A

Outcome C: Use of appropriate behaviors to meet their needs

Outcome C Progress Category	Number of Children	Percentage of Children
a. Preschool children who did not improve functioning	6	1.12%

Outcome C Progress Category	Number of Children	Percentage of Children
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	75	13.97%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	156	29.05%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	136	25.33%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	164	30.54%

Outcome C	Numerator	Denominator	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
C1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program. <i>Calculation: (c+d)/(a+b+c+d)</i>	292	373	NVR	86.50%	78.28%	Did Not Meet Target	N/A
C2. The percent of preschool children who were functioning within age expectations in Outcome C by the time they turned 6 years of age or exited the program. <i>Calculation: (d+e)/(a+b+c+d+e)</i>	300	537	NVR	55.21%	55.87%	Met Target	No Slippage

Does the State include in the numerator and denominator only children who received special education and related services for at least six months during the age span of three through five years? (yes/no)

YES

Sampling Question	Yes / No
Was sampling used?	NO

Did you use the Early Childhood Outcomes Center (ECO) Child Outcomes Summary Form (COS) process? (yes/no)

YES

List the instruments and procedures used to gather data for this indicator.

Early Childhood Outcomes (ECO) entry, exit and progress data is determined and collected by LEA IEP teams through the IEP process. In 2013, VT AOE began to implement the use of the integrated ECO IEP. Instruments used to gather ECO entry, exit and progress data are a local IEP decision, however Teaching Strategies Gold (TSGOLD) is the state approved universal PreK progress monitoring assessment that is required two times per year. VT AOE does not use TSGOLD conversion tables. IEP teams are instructed to use TSGOLD as one source among multiple sources come to consensus; and inform entry, exit and progress data. ECO data is collected via the Child Count data collection two times per year and entered into the Child Outcomes Summary(COS) calculator for SPP APR preparation. VT AOE's ECO Practice and Procedures Manual, along with ECTA resources, provide guidance, tools, and support for IEP teams to make determinations and reporting.

Provide additional information about this indicator (optional)

The State of Emergency caused by the COVID-19 pandemic forced the long-term dismissal of schools in Spring of school year 2019-2020. The large majority of VT's Early Childhood Outcomes (ECO) scores reported in this indicator were assigned during this time period.

We suspect that the pandemic may have impacted ECO ratings in several ways. First, it is conceivable that children's growth and functioning was limited due to child and family anxiety and stress during the pandemic. In addition, VT AOE identified difficulties among LEAs in IEP teaming and decision-making due to school closures and the sudden switch to remote collaboration. Finally, IEP teams worked with limited amounts of information and data to assign appropriate ratings during the period of school closure and remote-only student contact.

Some Vermont families lack access to quality internet service and the technology necessary for online remote interaction. Vermont Department of Public Service has been working in response to the pandemic to expand high-speed internet access for families in Vermont.

Guidance was issued in May to LEAs on best practices of special education data collection, reporting and submission for Indicator 7- Early Childhood Outcomes (ECO) through the at-home learning period which can be found at: <https://education.vermont.gov/sites/aoe/files/documents/edu-guidance-ecse-indicator7-eco.pdf>

7 - Prior FFY Required Actions

The State did not provide valid and reliable data for FFY 2018. The State must provide valid and reliable data for FFY 2019 in the FFY 2019 SPP/APR.

Response to actions required in FFY 2018 SPP/APR

FFY2018 was reported as incomplete data. FFY 2019 shows more complete data with an increase of 128 students and consistent denominators across all outcome areas and summary statements, despite not meeting target in most Summary Statements and Outcomes. The Part B Data manager reached out to LEAs who did not submit complete Indicator 7 data during the July 2020 collection. Through outreach, 100% submission of Indicator 7 data was achieved. Regular data meetings on Indicator 7 were established and attended between the Part B data manager and 619 Coordinator to enhance coordination within AOE. The 619 Coordinator and Inclusion Coordinator analyzed impossible scoring combinations on the Child Outcomes Summary (COS) calculator and provided technical assistance on appropriate use of the decision tree, ECO Practices and Procedures Manual, and COS Calculation Tool to LEAs that did not meet target for Indicator 7. Monthly meeting calls with Center for IDEA Early Childhood Data Systems (DaSy) and the Early Childhood Technical Assistance Center (ECTA) TA specialists continued to occur including a meeting with the Part B Data Manager on procedures and processes to better understand Vermont's data collection on this performance indicator. The Early Childhood Outcomes are embedded into the ECSE IEP process. The ECSE IEP was recently revised for ease of use. A memo was re-released reminding LEAs of the ECOS (Early Child Outcome Systems) Online Professional Learning Modules. This guidance document is adapted from the DaSy and ECTA. Given the recent TA provided to LEAs since this data collection, we expect to see a movement closer to our targets for FFY2020.

7 - OSEP Response

7 - Required Actions

Indicator 8: Parent involvement

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.

(20 U.S.C. 1416(a)(3)(A))

Data Source

State selected data source.

Measurement

Percent = [(# of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities) divided by the (total # of respondent parents of children with disabilities)] times 100.

Instructions

Sampling of parents from whom response is requested is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See [General Instructions](#) on page 2 for additional instructions on sampling.)

Describe the results of the calculations and compare the results to the target.

Provide the actual numbers used in the calculation.

If the State is using a separate data collection methodology for preschool children, the State must provide separate baseline data, targets, and actual target data or discuss the procedures used to combine data from school age and preschool data collection methodologies in a manner that is valid and reliable.

While a survey is not required for this indicator, a State using a survey must submit a copy of any new or revised survey with its SPP/APR.

Report the number of parents to whom the surveys were distributed.

Include the State's analysis of the extent to which the demographics of the parents responding are representative of the demographics of children receiving special education services. States should consider categories such as race and ethnicity, age of the student, disability category, and geographic location in the State.

If the analysis shows that the demographics of the parents responding are not representative of the demographics of children receiving special education services in the State, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics. In identifying such strategies, the State should consider factors such as how the State distributed the survey to parents (e.g., by mail, by e-mail, on-line, by telephone, in-person through school personnel), and how responses were collected.

States are encouraged to work in collaboration with their OSEP-funded parent centers in collecting data.

8 - Indicator Data

Question	Yes / No
Do you use a separate data collection methodology for preschool children?	NO

Targets: Description of Stakeholder Input

One of our priority goals for Calendar Year 2020 was to continue strengthening our engagement with stakeholders. While there is still more work to do, the VT AOE Special Education Team believes it made great strides. Improved outcomes include better products reflective of representative stakeholder input, and an increased understanding of how the SPP/APR grounds the work of the State. During 2020, key stakeholder input was obtained through the engaging the Vermont Special Education Advisory Panel (VT-SEAP) and the Vermont Special Education Administrators Council Executive Board; as well as through check-in sessions hosted by the State Director of Special Education designed for dialogue and technical assistance with Special Education Administrators throughout the state. VT AOE staff serving as individual Indicator Stewards worked with representative stakeholders to examine trends, make comparison to targets, and engage in root causes analyses in order to promote the benefits of using the SPP/APR as a tool for understanding compliance needs and prioritizing continuous improvement. This primarily occurred through the Local Special Education Determinations process – while providing TA, indicator stewards were able to receive feedback on the target set for the indicator in comparison to individual LEA performance. The State Director also worked with the VT-SEAP to review indicator performance in comparison to current targets prior to strategizing on the development of new six years of targets required in the FFY2020 submission. A plan has already been formulated for a busy 2021 calendar year for establishing new rigorous targets based on Vermont trend data. This conversation will be supplemented by a webinar VT AOE staff put together for school leaders to support understanding of the SPP/APR and Vermont's approach. The webinar is located here: <https://www.youtube.com/watch?v=H-NIADVkmOo&feature=youtu.be>

Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

Historical Data

Baseline Year	Baseline Data
2005	28.00%

FFY	2014	2015	2016	2017	2018
Target >=	38.12%	38.12%	38.12%	38.12%	38.12%
Data	37.04%	36.08%	36.75%	37.03%	34.31%

Targets

FFY	2019
Target >=	38.12%

FFY 2019 SPP/APR Data

Number of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities	Total number of respondent parents of children with disabilities	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
586	1,677	34.31%	38.12%	34.94%	Did Not Meet Target	No Slippage

The number of parents to whom the surveys were distributed.

14,981

Percentage of respondent parents

11.19%

Since the State did not report preschool children separately, discuss the procedures used to combine data from school age and preschool surveys in a manner that is valid and reliable.

Analysis of the survey data utilizing Rasch modeling was completed with Winsteps v.4.6.2 software. The statistical summary of the 2020 analysis is found below.

The two surveys, one for parents of preschool students and one for parents of students in Kindergarten through Grade 12, were combined for the purpose of the Rasch analysis.

Standard: A 95% likelihood of a response of “agree,” “strongly agree” or “very strongly agree” with the item on the NCSEAM survey’s Partnership Efforts scale: “The school explains what options parents have if they disagree with a decision of the school.”

The question used for the measurement standard is identical on both the school age and preschool surveys.

PART B Preschool Special Education

Percent at or above: 600/550 55%/65% (SE of the mean = 3.7%)

Number of Valid Responses: 220 Measurement reliability: 0.86-0.94

Mean Measure: 634 Measurement SD 151

PART B Grades K - 12 Percent at or above: 600/550 31%/43% (SE of the mean = 1.4%)

Number of Valid Responses: 1457

Measurement reliability: 0.91-0.94

Mean Measure: 552 Measurement SD 144

PART B ALL

Percent at or above: 600/550 35%/46% (SE of the mean = 0.7%)

Number of Valid Responses: 1677

Measurement reliability: 0.91-0.94

Mean Measure: 563 Measurement SD 148

Sampling Question	Yes / No
Was sampling used?	NO

Survey Question	Yes / No
Was a survey used?	YES
If yes, is it a new or revised survey?	NO
The demographics of the parents responding are representative of the demographics of children receiving special education services.	NO

If no, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics.

Regular meetings with the Vermont Special Education Advisory Panel sub-committee on Evaluation and Reporting produced a list of messaging ideas (to increase response rates and representativeness) and surveying ideas (both content and process). The state is exploring options such as shortening the survey to reduce respondent burden, switching primary survey distribution from mass-mailing to delivery by schools and/or electronically, and

expanding messaging efforts to new audiences. Parent representatives on the subcommittee believe that LEAs and schools could better capture parents' attention than the State agency or survey vendor could.

Include the State's analyses of the extent to which the demographics of the parents responding are representative of the demographics of children receiving special education services.

The survey achieved representativeness in most, but not all, demographic categories of children receiving special education services. VT AOE defined representativeness in a category as a difference by 3.00 percentage points or less between the percent of eligible children in that category and the percent of children for whom surveys were returned. In a few categories, VT AOE's Parent Involvement Survey for school year 2019-2020 did not meet this bar for representativeness. Parents of students with developmental delay made up 3.64% more of the respondent population than expected, while parents of students with emotional disturbance made up 4.43% less of the respondent population than expected. Parents of children in the 3-to-5-year age group and the 6-to-11-year age group made up 3.72% and 3.26% more, respectively, of the respondent population than the eligible population. Meanwhile, those of 12-17 year-olds had the lowest response rates and made up 5.40% less of the respondent group than the eligible group. Efforts are underway to better target families of students with emotional disturbance and families of 12-17 year old students.

Please see the attached chart for full details on respondent representativeness for VT AOE's Parent Involvement Survey.

Provide additional information about this indicator (optional)

The entire open period for VT AOE's Parent Involvement Survey occurred during the COVID-19 pandemic and resultant State of Emergency. While our overall response rate may have increased with more people at home, it is difficult for the state to quantify the effect, since other efforts were made during FFY19 to increase awareness of the survey and its importance. Some parents expressed questions about whether to answer the survey questions based on the time period before or during the pandemic; citing different experiences between the beginning of the school year and the emergency response in the Spring. VT AOE advised parents to do their best to take all experiences for the year into account, as they would any other year, but acknowledged how difficult that might be.

VT AOE is currently completely overhauling its survey items and distribution/collection plan in collaboration with the Vermont Special Education Advisory Panel. We are under advisement of parents concerning how to make the survey more meaningful, user-friendly, messaged more effectively, and positioned for an increase in response rates.

8 - Prior FFY Required Actions

None

8 - OSEP Response

8 - Required Actions

In the FFY 2020 SPP/APR, the State must report whether its FFY 2020 data are from a response group that is representative of the demographics of children receiving special education services, and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the demographics of the parents responding are representative of the demographics of children receiving special education services.

Indicator 9: Disproportionate Representation

Instructions and Measurement

Monitoring Priority: Disproportionality

Compliance indicator: Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.

(20 U.S.C. 1416(a)(3)(C))

Data Source

State's analysis, based on State's Child Count data collected under IDEA section 618, to determine if the disproportionate representation of racial and ethnic groups in special education and related services was the result of inappropriate identification.

Measurement

Percent = [(# of districts, that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups, with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification) divided by the (# of districts in the State that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups)] times 100.

Include State's definition of "disproportionate representation." Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

Based on its review of the 618 data for FFY 2018, describe how the State made its annual determination as to whether the disproportionate representation it identified of racial and ethnic groups in special education and related services was the result of inappropriate identification as required by 34 CFR §§300.600(d)(3) and 300.602(a), e.g., using monitoring data; reviewing policies, practices and procedures, etc. In determining disproportionate representation, analyze data, for each district, for all racial and ethnic groups in the district, or all racial and ethnic groups in the district that meet a minimum n and/or cell size set by the State. Report on the percent of districts in which disproportionate representation of racial and ethnic groups in special education and related services is the result of inappropriate identification, even if the determination of inappropriate identification was made after the end of the FFY 2019 reporting period (i.e., after June 30, 2020).

Instructions

Provide racial/ethnic disproportionality data for all children aged 6 through 21 served under IDEA, aggregated across all disability categories.

States are not required to report on underrepresentation.

If the State has established a minimum n and/or cell size requirement, the State may only include, in both the numerator and the denominator, districts that met that State-established n and/or cell size. If the State used a minimum n and/or cell size requirement, report the number of districts totally excluded from the calculation as a result of this requirement because the district did not meet the minimum n and/or cell size for any racial/ethnic group.

Consider using multiple methods in calculating disproportionate representation of racial and ethnic groups to reduce the risk of overlooking potential problems. Describe the method(s) used to calculate disproportionate representation.

Provide the number of districts that met the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups identified with disproportionate representation of racial and ethnic groups in special education and related services and the number of those districts identified with disproportionate representation that is the result of inappropriate identification.

Targets must be 0%.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training, etc.) and any enforcement actions that were taken. If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

9 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2005	0.00%

FFY	2014	2015	2016	2017	2018
Target	0%	0%	0%	0%	0%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2019
Target	0%

FFY 2019 SPP/APR Data

Has the state established a minimum n and/or cell size requirement? (yes/no)

YES

If yes, the State may only include, in both the numerator and the denominator, districts that met the State-established n and/or cell size. Report the number of districts excluded from the calculation as a result of the requirement.

0

Number of districts with disproportionate representation of racial and ethnic groups in special education and related services	Number of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification	Number of Districts that met the State's minimum n-size	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
0	0	52	0.00%	0%	0.00%	Met Target	No Slippage

Were all races and ethnicities included in the review?

YES

Define "disproportionate representation." Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

VT AOE uses a combination of techniques to measure whether any racial or ethnic group is identified for special education services at a higher rate than other groups. Weighted risk ratios are used when populations are large and diverse enough to support their accuracy; in other cases, alternate risk ratios are used. VT AOE uses a comparison group cell size of 11 to determine whether to use a weighted or alternate risk ratio; additionally, VT AOE does not identify districts with a target group cell size less than 11. VT AOE does not use an n size for indicator 9. VT AOE uses 1 year of data for indicator 9.

VT AOE has a 2-criterion system to identify LEAs with disproportionate representation in special education, used in combination with a minimum cell size for the target group. A challenge for VT AOE in identifying disproportionate representation is the homogeneity of Vermont's student population. In both regular education and special education settings, more than 90 percent of the total student population has historically been reported as white. In addition, the counts of children receiving special education in each LEA are relatively small, averaging just over 225 students per LEA. Taken together, the homogeneity of the student population and relatively small child counts result in a situation where the addition of just one child into special education can create a large difference in the race/ethnicity composition of children receiving IDEA-B services in an LEA. To address these challenges, VT AOE created the following method designed to provide meaningful, valid and reliable identification for LEAs with disproportionate representation:

Minimum cell/n sizes: VT AOE uses a minimum cell size of 11 to avoid volatility in Weighted Risk Ratios and to ensure compliance with our state's data privacy policy. VT AOE does not use a minimum n size.

Criterion 1: A difference greater than or equal to 10 between the actual and expected counts of students with disabilities in a race/ethnicity category.

For a district to be identified with disproportionate representation, VT AOE requires that there be at least 10 more students receiving special education services than would be expected. Expected counts are calculated in two steps. First, the LEA's total student count in a race/ethnic group is divided by the LEA's total student population to find the portion of students in that race/ethnic group. This result is then multiplied by the number of students with disabilities in the LEA.

Criterion 2: LEA-level Weighted Risk Ratio greater than 3.0 or LEA-level Alternate Risk Ratio greater than 3.0.

VT AOE uses a Weighted Risk Ratio with a threshold of 3.0. If the comparison group cell size is less than 11, an Alternate Risk Ratio calculation is used, also with a threshold of 3.0. These calculations are described in the IDEA Data Center's Technical Assistance Guide entitled "Methods for Assessing Racial/Ethnic Disproportionality in Special Education" and found at https://ideadata.org/sites/default/files/media/documents/2017-09/idc_ta_guide_for_508-010716.pdf.

Describe how the State made its annual determination as to whether the disproportionate representation it identified of racial and ethnic groups in special education and related services was the result of inappropriate identification.

The VT AOE used Child Count data and Fall Student Census data to complete the calculations and apply the criteria described above. No LEA in the State is identified with disproportionate representation in any disability category based on these criteria.

Provide additional information about this indicator (optional)

FFY19 data for this indicator are based on VT AOE's Child Count collection with a Dec 1, 2019 reference date, in combination with VT AOE's DC#06/Fall Student Census data with an Oct 1, 2019 reference date. As the data refer to a period prior to the State of Emergency brought about by COVID-19, and in fact were collected prior to the emergency, this indicator for FFY19 was not affected by COVID-19.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

9 - Prior FFY Required Actions

In the State's FFY 2019 SPP/APR, the State must include all required components of the definition of disproportionate representation, including the calculation method(s) being used; the threshold at which disproportionate representation is identified; and, as appropriate, the number of years of data used in the calculation, and any minimum cell and/or n-sizes.

Response to actions required in FFY 2018 SPP/APR

In VT AOE's FFY19 SPP/APR, we have included a revised description of the definition of disproportionate representation and ensured that our answer is clear and includes all required components. The methodology behind this definition has not changed. VT AOE utilized TA from IDC to revise the language in our definition of disproportionate representation. The definition included in VT AOE's FFY19 SPP/APR was reviewed by two employees within OSEP to ensure that it is now clear and complete.

9 - OSEP Response

9 - Required Actions

Indicator 10: Disproportionate Representation in Specific Disability Categories

Instructions and Measurement

Monitoring Priority: Disproportionality

Compliance indicator: Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.

(20 U.S.C. 1416(a)(3)(C))

Data Source

State's analysis, based on State's Child Count data collected under IDEA section 618, to determine if the disproportionate representation of racial and ethnic groups in specific disability categories was the result of inappropriate identification.

Measurement

Percent = [(# of districts, that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups, with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification) divided by the (# of districts in the State that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups)] times 100.

Include State's definition of "disproportionate representation." Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

Based on its review of the 618 data for FFY 2019, describe how the State made its annual determination as to whether the disproportionate representation it identified of racial and ethnic groups in specific disability categories was the result of inappropriate identification as required by 34 CFR §§300.600(d)(3) and 300.602(a), e.g., using monitoring data; reviewing policies, practices and procedures, etc. In determining disproportionate representation, analyze data, for each district, for all racial and ethnic groups in the district, or all racial and ethnic groups in the district that meet a minimum n and/or cell size set by the State. Report on the percent of districts in which disproportionate representation of racial and ethnic groups in special education and related services is the result of inappropriate identification, even if the determination of inappropriate identification was made after the end of the FFY 2019 reporting period (i.e., after June 30, 2020).

Instructions

Provide racial/ethnic disproportionality data for all children aged 6 through 21 served under IDEA, aggregated across all disability categories.

States are not required to report on underrepresentation.

If the State has established a minimum n and/or cell size requirement, the State may only include, in both the numerator and the denominator, districts that met that State-established n and/or cell size. If the State used a minimum n and/or cell size requirement, report the number of districts totally excluded from the calculation as a result of this requirement because the district did not meet the minimum n and/or cell size for any racial/ethnic group.

Consider using multiple methods in calculating disproportionate representation of racial and ethnic groups to reduce the risk of overlooking potential problems. Describe the method(s) used to calculate disproportionate representation.

Provide the number of districts that met the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups identified with disproportionate representation of racial and ethnic groups in special education and related services and the number of those districts identified with disproportionate representation that is the result of inappropriate identification.

Targets must be 0%.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training, etc.) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

10 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2005	0.00%

FFY	2014	2015	2016	2017	2018
Target	0%	0%	0%	0%	0%
Data		0.00%	0.00%	0.00%	0.00%

Targets

FFY	2019
Target	0%

FFY 2019 SPP/APR Data

Has the state established a minimum n and/or cell size requirement? (yes/no)

YES

If yes, the State may only include, in both the numerator and the denominator, districts that met the State-established n and/or cell size. Report the number of districts excluded from the calculation as a result of the requirement.

0

Number of districts with disproportionate representation of racial and ethnic groups in specific disability categories	Number of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification	Number of Districts that met the State's minimum n-size	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
0	0	52	0.00%	0%	0.00%	Met Target	No Slippage

Were all races and ethnicities included in the review?

YES

Define "disproportionate representation." Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

VT AOE uses a combination of techniques to measure whether any racial or ethnic group is identified for special education services in certain disability categories at a higher rate than other groups. Six disability categories are examined: autism, specific learning disabilities, other health impairments, emotional disturbance, speech and language impairments, and intellectual disability. Weighted risk ratios are used when populations are large and diverse enough to support their accuracy; in other cases, alternate risk ratios are used. VT AOE uses a comparison group cell size of 11 to determine whether to use a weighted or alternate risk ratio; additionally, VT AOE does not identify districts with a target group cell size less than 11. VT AOE does not use an n size for indicator 10. VT AOE uses 1 year of data for indicator 10.

VT AOE has a 2-criterion system to identify LEAs with disproportionate representation in the 6 selected special education disability categories, used in combination with a minimum cell size for the target group. A challenge for VT AOE in identifying disproportionate representation is the homogeneity of Vermont's student population. In both regular education and special education settings, more than 90 percent of the total student population has historically been reported as white. In addition, the counts of children receiving special education in each LEA are relatively small, averaging just over 225 students per LEA. Taken together, the homogeneity of the student population and relatively small child counts result in a situation where the addition of just one child into a disability category can create a large difference in the race/ethnicity composition of children receiving IDEA-B services for that disability in an LEA. To address these challenges, VT AOE created the following method designed to provide meaningful, valid and reliable identification for LEAs with disproportionate representation:

Minimum cell/n sizes: VT AOE uses a minimum cell size of 11 to avoid volatility in Weighted Risk Ratios and to ensure compliance with our state's data privacy policy. VT AOE does not use a minimum n size.

Criterion 1: A difference greater than or equal to 10 between the actual and expected counts of students in a race/ethnicity group identified with the target disability category.

For a district to be identified with disproportionate representation, VT AOE requires that there be at least 10 more students receiving services for any of the 6 disability categories than would be expected. Expected counts are calculated in two steps. First, the LEA's total student count in a race/ethnic group is divided by the LEA's total student population to find the portion of students in that race/ethnic group. This result is then multiplied by the number of students with the target disability in the LEA.

Criterion 2: LEA-level Weighted Risk Ratio greater than 3.0 or LEA-level Alternate Risk Ratio greater than 3.0.

VT AOE uses a Weighted Risk Ratio with a threshold of 3.0. If the comparison group cell size is less than 11, an Alternate Risk Ratio calculation is used, also with a threshold of 3.0. These calculations are described in the IDEA Data Center's Technical Assistance Guide entitled "Methods for Assessing Racial/Ethnic Disproportionality in Special Education" and found at https://ideadata.org/sites/default/files/media/documents/2017-09/idec_ta_guide_for_508-010716.pdf.

Describe how the State made its annual determination as to whether the disproportionate overrepresentation it identified of racial and ethnic groups in specific disability categories was the result of inappropriate identification.

The VT AOE used Child Count data and Fall Student Census data to complete the calculations and apply the criteria described above. No LEA in the State is identified with disproportionate representation in any disability category based on these criteria.

Provide additional information about this indicator (optional)

FFY19 data for this indicator are based on VT AOE's Child Count collection with a Dec 1, 2019 reference date, in combination with VT AOE's DC#06/Fall Student Census data with an Oct 1, 2019 reference date. As the data refer to a period prior to the State of Emergency brought about by COVID-19, and in fact were collected prior to the emergency, this indicator for FFY19 was not affected by COVID-19.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

10 - Prior FFY Required Actions

In the State's FFY 2019 SPP/APR, the State must include all required components of the definition of disproportionate representation, including the calculation method(s) being used; the threshold at which disproportionate representation is identified; and, as appropriate, the number of years of data used in the calculation, and any minimum cell and/or n-sizes.

Response to actions required in FFY 2018 SPP/APR

In VT AOE's FFY19 SPP/APR, we have included a revised description of the definition of disproportionate representation and ensured that our answer is clear and includes all required components. The methodology behind this definition has not changed. VT AOE utilized TA from IDC to revise the language in our definition of disproportionate representation. The definition included in VT AOE's FFY19 SPP/APR was reviewed by two employees within OSEP to ensure that it is now clear and complete.

10 - OSEP Response

10 - Required Actions

Indicator 11: Child Find

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Child Find

Compliance indicator: Percent of children who were evaluated within 60 days of receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that timeframe.

(20 U.S.C. 1416(a)(3)(B))

Data Source

Data to be taken from State monitoring or State data system and must be based on actual, not an average, number of days. Indicate if the State has established a timeline and, if so, what is the State's timeline for initial evaluations.

Measurement

- a. # of children for whom parental consent to evaluate was received.
 - b. # of children whose evaluations were completed within 60 days (or State-established timeline).
- Account for children included in (a), but not included in (b). Indicate the range of days beyond the timeline when the evaluation was completed and any reasons for the delays.

Percent = [(b) divided by (a)] times 100.

Instructions

If data are from State monitoring, describe the method used to select LEAs for monitoring. If data are from a State database, include data for the entire reporting year.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data. Provide the actual numbers used in the calculation.

Note that under 34 CFR §300.301(d), the timeframe set for initial evaluation does not apply to a public agency if: (1) the parent of a child repeatedly fails or refuses to produce the child for the evaluation; or (2) a child enrolls in a school of another public agency after the timeframe for initial evaluations has begun, and prior to a determination by the child's previous public agency as to whether the child is a child with a disability. States should not report these exceptions in either the numerator (b) or denominator (a). If the State-established timeframe provides for exceptions through State regulation or policy, describe cases falling within those exceptions and include in b.

Targets must be 100%.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training, etc.) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

11 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	69.74%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	98.48%	97.89%	97.74%	97.58%	97.13%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

(a) Number of children for whom parental consent to evaluate was received	(b) Number of children whose evaluations were completed within 60 days (or State-established timeline)	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
208	202	97.13%	100%	97.12%	Did Not Meet Target	No Slippage

Number of children included in (a) but not included in (b)

6

Account for children included in (a) but not included in (b). Indicate the range of days beyond the timeline when the evaluation was completed and any reasons for the delays.

The number of days between the end of the 60-day window and date of completion range from 18-91; reasons for the delays included a lack of qualified evaluators in particular geographic areas of the state, which caused delays in scheduling. These LEA's did not obtain parental agreement for delay.

Indicate the evaluation timeline used:

The State used the 60 day timeframe within which the evaluation must be conducted

What is the source of the data provided for this indicator?

State monitoring

Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data.

Beginning in SY2018-2019, LEAs were divided into 3 cohorts (approximately 17 LEAs/cohort) for mandatory cyclic monitoring every 3 years. Vermont state policy is for data to be collected within a state developed monitoring system as part of the 3-year monitoring cycles. Data is collected through a state developed spreadsheet for LEA self-reporting of completed initial evaluations for the time period July 1 – March 1 of the current school year. Vermont reviews submissions within this state developed state monitoring system, and at the end of each school year LEAs receive written feedback identifying student-level issues of noncompliance and opportunities for differentiated technical assistance. Districts who do not meet 100% compliance are included as part of the next year's monitoring activities for this indicator, and the results are factored into the LEAs determination status. For FFY2019, data submissions were scheduled for Jan 15, 2020 and spring 2020. However, the only data collection Vermont was able to obtain was on January 15, 2020 due to COVID-19.

Provide additional information about this indicator (optional)

For FFY2019, data submissions were scheduled for Jan 15, 2020 and March 15, 2020. However, the only data collection VT AOE was able to obtain was on January 15, 2020 due to COVID-19. Although additional data would have been collected during spring 2020, special education program monitoring activities for SY2019-2020 were disrupted on March 15, 2020 as a result of the Governor's executive orders declaring a state of emergency in Vermont. As the state of emergency is still in effect as of the date of the FFY2019 SPP APR report, the VT AOE collected and verified updated information for any LEA that did not meet compliance targets by including that LEA in selective monitoring for SY2020-2021. Data for this indicator were verified and updated in the fall of 2020 when schools resumed in-person services and had access to student files.

A new tool was rolled out through Monitoring that calculates dates to help LEA with reporting with deadlines. LEA must have Child Find policies and procedures which is checked through cyclic monitoring. The VT AOE recognizes LEAs need training on Child Find requirements and conducting evaluations, discrepancy model/MTSS identification, and proportionate share/meaningful consultations and is preparing these supports for upcoming improvement activities.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
10	10	0	0

FFY 2018 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

Based on a review of updated data obtained in FFY2019 through the state monitoring system, Vermont has determined that all three (3) LEAs who had late initial evaluations in FFY2018 are now meeting 100% compliance with federal regulations related to indicator 11. Vermont also verified that each LEA area of non-compliance was corrected within one year from identification and that this is not a systemic issue.

Vermont's reviews updated data collected within the state monitoring system. Districts who do not meet compliance targets as part of the 3-year cyclic monitoring activities, are required to participate in selective monitoring the following year for each area where noncompliance was identified. Updated data is collected for all completed initial evaluations for the time period July 1 – March 1 of the second monitoring year. Vermont reviews this updated data to ensure that each LEA is 100% compliant for this indicator, that there are no systemic issues per OSEP Memo 09-02, and the LEA is implementing federal regulatory requirements .

Describe how the State verified that each individual case of noncompliance was corrected

Based on an updated review of individual student records for each of the ten (10) students reported in FFY2018 with late initial evaluations, Vermont has determined that although late, all ten (10) students received an initial evaluation and eligibility determination.

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

11 - Prior FFY Required Actions

None

11 - OSEP Response

11 - Required Actions

Because the State reported less than 100% compliance for FFY 2019, the State must report on the status of correction of noncompliance identified in FFY 2019 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2020 SPP/APR, that it has verified that each LEA with noncompliance identified in FFY 2019 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA, consistent with OSEP Memo 09-02. In the FFY 2020 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2019, although its FFY 2019 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2019.

Indicator 12: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Compliance indicator: Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.

(20 U.S.C. 1416(a)(3)(B))

Data Source

Data to be taken from State monitoring or State data system.

Measurement

- a. # of children who have been served in Part C and referred to Part B for Part B eligibility determination.
- b. # of those referred determined to be NOT eligible and whose eligibility was determined prior to their third birthdays.
- c. # of those found eligible who have an IEP developed and implemented by their third birthdays.
- d. # of children for whom parent refusal to provide consent caused delays in evaluation or initial services or to whom exceptions under 34 CFR §300.301(d) applied.
- e. # of children determined to be eligible for early intervention services under Part C less than 90 days before their third birthdays.
- f. # of children whose parents chose to continue early intervention services beyond the child's third birthday through a State's policy under 34 CFR §303.211 or a similar State option.

Account for children included in (a), but not included in b, c, d, e, or f. Indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed, and the reasons for the delays.

Percent = [(c) divided by (a - b - d - e - f)] times 100.

Instructions

If data are from State monitoring, describe the method used to select LEAs for monitoring. If data are from a State database, include data for the entire reporting year.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data. Provide the actual numbers used in the calculation.

Category f is to be used only by States that have an approved policy for providing parents the option of continuing early intervention services beyond the child's third birthday under 34 CFR §303.211 or a similar State option.

Targets must be 100%.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training, etc.) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

12 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2005	86.44%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	100.00%	100.00%	100.00%	100.00%	100.00%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

a. Number of children who have been served in Part C and referred to Part B for Part B eligibility determination.	92
b. Number of those referred determined to be NOT eligible and whose eligibility was determined prior to third birthday.	6

c. Number of those found eligible who have an IEP developed and implemented by their third birthdays.	85
d. Number for whom parent refusals to provide consent caused delays in evaluation or initial services or to whom exceptions under 34 CFR §300.301(d) applied.	1
e. Number of children who were referred to Part C less than 90 days before their third birthdays.	0
f. Number of children whose parents chose to continue early intervention services beyond the child's third birthday through a State's policy under 34 CFR §303.211 or a similar State option.	0

Measure	Numerator (c)	Denominator (a-b-d-e-f)	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
Percent of children referred by Part C prior to age 3 who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.	85	85	100.00%	100%	100.00%	Met Target	No Slippage

Number of children who served in part C and referred to Part B for eligibility determination that are not included in b, c, d, e, or f
0

Account for children included in (a), but not included in b, c, d, e, or f. Indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed, and the reasons for the delays.

Attach PDF table (optional)

What is the source of the data provided for this indicator?

State monitoring

Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data.

The State target for 100% compliance for FFY19 Indicator 12: Transition from Part C to Part B (Early Childhood Transition) was fully met for FFY19. Beginning in SY2018-2019, LEAs were divided into 3 cohorts (approximately 17 LEAs/cohort) for mandatory cyclic monitoring every 3 years. VT AOE policy is for data to be collected within a state developed monitoring system as part of the 3-year monitoring cycles. Data is collected through a state developed spreadsheet for LEA self-reporting of early childhood transitions completed for the time period July 1 – March 1 of the current school year. For this indicator, VT AOE requested from each LEA the child's name, date of birth, date of referral to Part B, date of the transition meeting, the date an IEP was developed, and the date of parental consent for the provision of the IEP services. Although Part B is not required to collect information for Part C Indicator 8 a, b, and c, we include this information in our collection in order to validate and confirm accuracy. An Interagency Agency Agreement (IAA) was revised and was enacted. This IAA includes the process and responsibilities for sharing data between Children's Integrated Services (CIS)/Early Intervention (EI) and the VT AOE, such as monthly submissions of notification data from CIS/EI to the VT AOE. Beginning with the 2020-2021 school year, the VT AOE Early Education team are collecting and monitoring Indicator 12 data as submitted from LEAs chosen for the monitoring cycle.

Provide additional information about this indicator (optional)

Indicator 12 data was submitted by LEAs on or before January 15, 2020. However, due to COVID-19 school closures beginning March 15, 2020, the final planned LEA submission was not collected. For LEAs in the FFY2019 monitoring cycle, 100% of children referred to Part B from Part C had an IEP in place by the child's third birthday and therefore are considered in full compliance for this indicator.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

12 - Prior FFY Required Actions

None

12 - OSEP Response

12 - Required Actions

Indicator 13: Secondary Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Compliance indicator: Secondary transition: Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.

(20 U.S.C. 1416(a)(3)(B))

Data Source

Data to be taken from State monitoring or State data system.

Measurement

Percent = [(# of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority) divided by the (# of youth with an IEP age 16 and above)] times 100.

If a State's policies and procedures provide that public agencies must meet these requirements at an age younger than 16, the State may, but is not required to, choose to include youth beginning at that younger age in its data for this indicator. If a State chooses to do this, it must state this clearly in its SPP/APR and ensure that its baseline data are based on youth beginning at that younger age.

Instructions

If data are from State monitoring, describe the method used to select LEAs for monitoring. If data are from a State database, include data for the entire reporting year.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data and if data are from the State's monitoring, describe the procedures used to collect these data. Provide the actual numbers used in the calculation.

Targets must be 100%.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training, etc.) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

13 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2009	22.60%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	74.34%	91.49%	88.03%	100.00%	71.25%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

Number of youth aged 16 and above with IEPs that contain each of the required components for secondary transition	Number of youth with IEPs aged 16 and above	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
16	152	71.25%	100%	10.53%	Did Not Meet Target	Slippage

Provide reasons for slippage, if applicable

Beginning in SY2018-2019, LEAs were divided into 3 cohorts (approximately 17 LEAs/cohort) for mandatory cyclic monitoring every 3 years. VT AOE policy is for data to be collected within a state developed monitoring system as part of the 3-year monitoring cycles. Data collection became a single submission on March 15th for the time period July 1 – March 1 of the current school year. Prior to FFY2018, Vermont's state monitoring practice included a review of data from a smaller subset of LEAs (approximately 6-8 LEAs/cycle) every 6 years with VT AOE following a former OSEP directive to calculate LEA compliance based on multiple data collections which were reviewed for compliance after the LEA corrected their transition plans based on technical assistance and feedback from VT AOE.

The VT AOE understands this shift in the state monitoring system and reporting practices to be the primary reason behind the slippage. An additional underlying factor may be a lack of understanding by high school special educators for developing appropriate independent living goals and communication/training related to LEA staff turnover at both the district and building level. VT AOE identified independent living goals as the most common area of non-compliance. If any single area is determined to be non-compliant, the entire transition plan is considered non-compliant.

What is the source of the data provided for this indicator?

State monitoring

Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data.

VT AOE policy is for data to be collected within a state developed monitoring system as part of the 3-year monitoring cycles. Special Education program monitoring activities open annually in September and LEA submissions for this indicator are due on March 15th. The state monitoring system requires submission of a state developed spreadsheet (LEA self-report) based on the transition criteria developed by National Technical Assistance Center on Transition (NTACT). This self-report is provided by the LEA for a minimum of 10 post-secondary transition plans completed for the time period July 1 – March 1 of the current school year. These 10 plans are collected through electronic submissions and reviewed by VT AOE for compliance based on the NTACT criteria for student and outside agency involvement; post-secondary/annual goals and transition services for education/training, employment, and independent living; and courses of study. Blanks in any area on individual student plans are interpreted as not addressed by the team and considered non-compliant by VT AOE. At the end of each school year LEAs receive written feedback identifying student-level issues of noncompliance and opportunities for differentiated technical assistance. Districts who do not meet 100% compliance are included as part of the next year's monitoring activities for this indicator, and the results are factored into the LEAs determination status.

Question	Yes / No
Do the State's policies and procedures provide that public agencies must meet these requirements at an age younger than 16?	NO

Provide additional information about this indicator (optional)

Special education program monitoring activities for SY2019-2020 were disrupted on March 15, 2020 as a result of the Governor's executive order(s) declaring a state of emergency in Vermont. As the state of emergency is still in effect as of the date of the FFY2019 SPP APR report, the VT AOE will collect and verify updated information for any LEA that did not meet compliance targets by including that LEA in selective monitoring for SY2020-2021.

The VT AOE engages in regular/ongoing consultation with NTACT. Utilizing this support to build capacity at the local level, the VT AOE has begun providing an expanded range of technical assistance opportunities. This includes a redesigned, more comprehensive IEP post secondary transition plan template, universal TA posted on its website, and statewide trainings designed to foster Indicator 13 compliance. The VT AOE is also proactively preparing districts in upcoming monitoring cycles with specific and targeted technical assistance.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
5	4	0	1

FFY 2018 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

In FFY2018, 5 of the 8 LEAs with cyclic monitoring reviews had non-compliant findings in one or more student records. In FFY2019, VT AOE reviewed 10 additional (new) post-secondary transition plans for each of the 5 LEAs where non-compliance was identified. VT AOE verified that in 4 of the 5 LEAs all of the non-compliance has been systemically corrected. The one remaining LEA received an on-site visit in December 2020 that further identified areas of systemic non-compliance related to post-secondary transition plans. As a result of this on-site visit, the VT AOE required this LEA to participate in additional technical assistance followed by fiscal and program monitoring activities; those results will be included as part of FFY2020 reporting.

Describe how the State verified that each individual case of noncompliance was corrected

In FFY2018, 23 of 80 post-secondary transition plans were found to have areas of non-compliance when reviewed by VT AOE during cyclic monitoring. In FFY2019, VT AOE verified through submission of individually revised student post-secondary transition plans, that all 23 students received a fully compliant plan for post secondary transition requirements.

FFY 2018 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

One non-compliant LEA received an on-site visit in December 2020 that further identified areas of systemic non-compliance related to post-secondary transition plans. As a result of this on-site visit, VT AOE required this LEA to participate in additional technical assistance followed by fiscal and program monitoring activities; those results will be included as part of FFY2020 reporting.

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

13 - Prior FFY Required Actions

None

13 - OSEP Response

13 - Required Actions

Because the State reported less than 100% compliance for FFY 2019, the State must report on the status of correction of noncompliance identified in FFY 2019 for this indicator. In addition, the State must demonstrate, in the FFY 2020 SPP/APR, that the one remaining uncorrected finding of noncompliance identified in FFY 2018 was corrected. When reporting on the correction of noncompliance, the State must report, in the FFY 2020 SPP/APR, that it has verified that each LEA with findings of noncompliance identified in FFY 2019 and the LEA with remaining noncompliance identified in FFY 2018: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA, consistent with OSEP Memo 09-02. In the FFY 2020 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2019, although its FFY 2019 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2019.

Indicator 14: Post-School Outcomes

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Results indicator: Post-school outcomes: Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were:

Enrolled in higher education within one year of leaving high school.

Enrolled in higher education or competitively employed within one year of leaving high school.

Enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.

(20 U.S.C. 1416(a)(3)(B))

Data Source

State selected data source.

Measurement

A. Percent enrolled in higher education = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education within one year of leaving high school) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.

B. Percent enrolled in higher education or competitively employed within one year of leaving high school = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education or competitively employed within one year of leaving high school) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.

C. Percent enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.

Instructions

Sampling of youth who had IEPs and are no longer in secondary school is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates of the target population. (See [General Instructions](#) on page 2 for additional instructions on sampling.)

Collect data by September 2020 on students who left school during 2018-2019, timing the data collection so that at least one year has passed since the students left school. Include students who dropped out during 2018-2019 or who were expected to return but did not return for the current school year. This includes all youth who had an IEP in effect at the time they left school, including those who graduated with a regular diploma or some other credential, dropped out, or aged out.

I. Definitions

Enrolled in higher education as used in measures A, B, and C means youth have been enrolled on a full- or part-time basis in a community college (two-year program) or college/university (four or more year program) for at least one complete term, at any time in the year since leaving high school.

Competitive employment as used in measures B and C: States have two options to report data under “competitive employment” in the FFY 2019 SPP/APR, due February 2021:

Option 1: Use the same definition as used to report in the FFY 2015 SPP/APR, i.e., competitive employment means that youth have worked for pay at or above the minimum wage in a setting with others who are nondisabled for a period of 20 hours a week for at least 90 days at any time in the year since leaving high school. This includes military employment.

Option 2: States report in alignment with the term “competitive integrated employment” and its definition, in section 7(5) of the Rehabilitation Act, as amended by Workforce Innovation and Opportunity Act (WIOA), and 34 CFR §361.5(c)(9). For the purpose of defining the rate of compensation for students working on a “part-time basis” under this category, OSEP maintains the standard of 20 hours a week for at least 90 days at any time in the year since leaving high school. This definition applies to military employment.

Enrolled in other postsecondary education or training as used in measure C, means youth have been enrolled on a full- or part-time basis for at least 1 complete term at any time in the year since leaving high school in an education or training program (e.g., Job Corps, adult education, workforce development program, vocational technical school which is less than a two-year program).

Some other employment as used in measure C means youth have worked for pay or been self-employed for a period of at least 90 days at any time in the year since leaving high school. This includes working in a family business (e.g., farm, store, fishing, ranching, catering services, etc.).

II. Data Reporting

Provide the actual numbers for each of the following mutually exclusive categories. The actual number of “leavers” who are:

1. Enrolled in higher education within one year of leaving high school;
2. Competitively employed within one year of leaving high school (but not enrolled in higher education);
3. Enrolled in some other postsecondary education or training program within one year of leaving high school (but not enrolled in higher education or competitively employed);
4. In some other employment within one year of leaving high school (but not enrolled in higher education, some other postsecondary education or training program, or competitively employed).

“Leavers” should only be counted in one of the above categories, and the categories are organized hierarchically. So, for example, “leavers” who are enrolled in full- or part-time higher education within one year of leaving high school should only be reported in category 1, even if they also happen to be employed. Likewise, “leavers” who are not enrolled in either part- or full-time higher education, but who are competitively employed, should only be reported under category 2, even if they happen to be enrolled in some other postsecondary education or training program.

III. Reporting on the Measures/Indicators

Targets must be established for measures A, B, and C.

Measure A: For purposes of reporting on the measures/indicators, please note that any youth enrolled in an institution of higher education (that meets any definition of this term in the Higher Education Act (HEA)) within one year of leaving high school must be reported under measure A. This could include youth who also happen to be competitively employed, or in some other training program; however, the key outcome we are interested in here is enrollment in higher education.

Measure B: All youth reported under measure A should also be reported under measure B, in addition to all youth that obtain competitive employment within one year of leaving high school.

Measure C: All youth reported under measures A and B should also be reported under measure C, in addition to youth that are enrolled in some other postsecondary education or training program, or in some other employment.

Include the State's analysis of the extent to which the response data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school. States should consider categories such as race and ethnicity, disability category, and geographic location in the State.

If the analysis shows that the response data are not representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics. In identifying such strategies, the State should consider factors such as how the State collected the data.

14 - Indicator Data

Historical Data

Measure	Baseline	FFY	2014	2015	2016	2017	2018
A	2009	Target >=	24.25%	24.25%	24.25%	24.25%	24.25%
A	24.22%	Data	48.89%	38.79%	22.22%	21.94%	22.92%
B	2009	Target >=	56.50%	56.50%	56.50%	56.50%	56.50%
B	56.40%	Data	62.22%	69.63%	64.81%	62.58%	72.92%
C	2009	Target >=	72.00%	72.00%	72.00%	72.00%	72.00%
C	71.97%	Data	73.33%	80.84%	74.07%	78.71%	88.89%

FFY 2019 Targets

FFY	2019
Target A >=	24.25%
Target B >=	56.50%
Target C >=	72.00%

Targets: Description of Stakeholder Input

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Additionally, VT AOE has also utilized parent focus groups to provide input and feedback on work related to the indicators, which ultimately reflect on how we will revise targets. An example of engaging stakeholders is the collaboration with VT-SEAP, VCSEA, VFN, and an independent parent focus group all of whom provided feedback on the administrative complaint process and strategies for ensuring VT AOE has timely responses, and user-friendly tools and procedures for Dispute Resolution. These stakeholders provided great insight into the parent engagement survey/response rates/targets (indicator 8), the SSIP work (Indicator 17) and our data collection for Indicators 11, 12, and 13 (through our state monitoring system).

While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

FFY 2019 SPP/APR Data

Number of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school	163
1. Number of respondent youth who enrolled in higher education within one year of leaving high school	38
2. Number of respondent youth who competitively employed within one year of leaving high school	89
3. Number of respondent youth enrolled in some other postsecondary education or training program within one year of leaving high school (but not enrolled in higher education or competitively employed)	9
4. Number of respondent youth who are in some other employment within one year of leaving high school (but not enrolled in higher education, some other postsecondary education or training program, or competitively employed).	5

Measure	Number of respondent youth	Number of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A. Enrolled in higher education (1)	38	163	22.92%	24.25%	23.31%	Did Not Meet Target	No Slippage
B. Enrolled in higher education or competitively employed within one year of leaving high school (1 +2)	127	163	72.92%	56.50%	77.91%	Met Target	No Slippage
C. Enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment (1+2+3+4)	141	163	88.89%	72.00%	86.50%	Met Target	No Slippage

Please select the reporting option your State is using:

Option 1: Use the same definition as used to report in the FFY 2015 SPP/APR, i.e., competitive employment means that youth have worked for pay at or above the minimum wage in a setting with others who are nondisabled for a period of 20 hours a week for at least 90 days at any time in the year since leaving high school. This includes military employment.

Sampling Question	Yes / No
Was sampling used?	NO

Describe the sampling methodology outlining how the design will yield valid and reliable estimates.

Survey Question	Yes / No
Was a survey used?	YES
If yes, is it a new or revised survey?	NO

Include the State's analyses of the extent to which the response data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school.

The individuals and parents who responded to VT AOE's Post-Secondary Outcomes Survey were representative of the children with IEPs who exited high school during the 2018-19 school year for most, but not all race/ethnicity, disability, and gender demographic categories. Those who responded to the survey (or whose parents responded on their behalf) were compared by demographic category to all who were mailed a survey notice and phoned for a survey. VT AOE defined representativeness in a category as a difference of 3.00 percentage points or less between the percent of eligible youth in

that category and the percent of youth for whom surveys were returned. In a few categories, VT AOE's Post-Secondary Outcomes Survey for school year 2019-2020 did not meet this bar for representativeness.

The largest differences between the survey recipient population and respondents in a disability category were for emotional disturbance and intellectual disability. The portion of respondents in the emotional disturbance category was 3.73 percentage points lower, and the portion in the intellectual disability category was 3.15 percentage points higher, than the surveyed population.

Those who exited high school special education by dropping out were also less likely to respond to the survey. High schoolers with IEPs who dropped out represented a portion of the respondent group 9.76 percentage points smaller than their portion of all survey recipients.

Question	Yes / No
Are the response data representative of the demographics of youth who are no longer in school and had IEPs in effect at the time they left school?	NO

If no, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics.

VT AOE is going to reach out to all districts that had low response rates and make sure they are keeping student phone numbers up to date in child count. Additionally VT AOE will work with NTACT on adopting strategies that other states have used to successfully increase respondent rates.

Provide additional information about this indicator (optional)

The Post-School Outcomes survey was conducted during the State of Emergency brought on by the COVID-19 pandemic. As the survey questions refer to the entire year prior to survey response, VT AOE does not have reason to believe that the pandemic-induced economic recession had a significant effect on FFY19's survey results. VT AOE does acknowledge that the pandemic likely impacted the survey administration and response rates. In order to maximize survey response and ensure the best possible experience for our respondent youth, telephone interviewers were trained in grief and trauma sensitivity before contacting respondents.

A third-party vendor (Potsdam Institute for Applied Research at State University of New York – Potsdam) administers this survey on the behalf of VT AOE.

14 - Prior FFY Required Actions

In the FFY 2019 SPP/APR, the State must report whether the FFY 2019 data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school, and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the response data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school.

Response to actions required in FFY 2018 SPP/APR

VT AOE reported whether the FFY 2019 data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school. The actions the state is taking to address this issue are also reported. The state also included its analysis of the extent to which the response data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school.

14 - OSEP Response

14 - Required Actions

In the FFY 2020 SPP/APR, the State must report whether the FFY 2020 data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school, and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the response data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school.

OSEP notes that one or more of the attachments included in the State's FFY 2019 SPP/APR submission are not in compliance with Section 508 of the Rehabilitation Act of 1973, as amended (Section 508), and will not be posted on the U.S. Department of Education's IDEA website. Therefore, the State must make the attachment(s) available to the public as soon as practicable, but no later than 120 days after the date of the determination letter.

Indicator 15: Resolution Sessions

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / General Supervision

Results Indicator: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements. (20 U.S.C. 1416(a)(3)(B))

Data Source

Data collected under section 618 of the IDEA (IDEA Part B Dispute Resolution Survey in the ED Facts Metadata and Process System (EMAPS)).

Measurement

Percent = (3.1(a) divided by 3.1) times 100.

Instructions

Sampling is not allowed.

Describe the results of the calculations and compare the results to the target.

States are not required to establish baseline or targets if the number of resolution sessions is less than 10. In a reporting period when the number of resolution sessions reaches 10 or greater, develop baseline, targets and improvement activities, and report on them in the corresponding SPP/APR.

States may express their targets in a range (e.g., 75-85%).

If the data reported in this indicator are not the same as the State's data under IDEA section 618, explain.

States are not required to report data at the LEA level.

15 - Indicator Data

Select yes to use target ranges

Target Range not used

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 EMAPS IDEA Part B Dispute Resolution Survey; Section C: Due Process Complaints	11/04/2020	3.1 Number of resolution sessions	2
SY 2019-20 EMAPS IDEA Part B Dispute Resolution Survey; Section C: Due Process Complaints	11/04/2020	3.1(a) Number resolution sessions resolved through settlement agreements	2

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

Targets: Description of Stakeholder Input

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While not directly related to the SPP, during this time of COVID-19, stakeholders also providing amazing insights on unmet needs, supporting the field, guidance under development, or critical reviews of guidance as it was released. We are noting this because everything connects back to the SPP/APR and we kept the indicators in mind as we worked through uncharted territory created by a global pandemic.

Historical Data

Baseline Year	Baseline Data
2005	55.00%

FFY	2014	2015	2016	2017	2018
Target >=	60.00%	60.00%	60.00%	60.00%	60.00%
Data	100.00%	100.00%	0.00%	11.11%	16.67%

Targets

FFY	2019
Target >=	60.00%

FFY 2019 SPP/APR Data

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
2	2	16.67%	60.00%	100.00%	Met Target	No Slippage

Provide additional information about this indicator (optional)

Resolution sessions were held online due to COVID-19. Because of inadequate bandwidth, especially in rural parts of the state, Due Process hearings experienced video, sound and connectivity issues, rendering the process not equitably useful for all. Vermont Department of Public Service has been working in response to the pandemic to expand high-speed internet access for families in Vermont.

Fewer than 10 resolution sessions were held.

15 - Prior FFY Required Actions

None

15 - OSEP Response

The State reported fewer than ten resolution sessions held in FFY 2019. The State is not required to meet its targets until any fiscal year in which ten or more resolution sessions were held.

15 - Required Actions

Indicator 16: Mediation

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / General Supervision

Results indicator: Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3(B))

Data Source

Data collected under section 618 of the IDEA (IDEA Part B Dispute Resolution Survey in the ED Facts Metadata and Process System (EMAPS)).

Measurement

Percent = (2.1(a)(i) + 2.1(b)(ii)) divided by 2.1 times 100.

Instructions

Sampling is not allowed.

Describe the results of the calculations and compare the results to the target.

States are not required to establish baseline or targets if the number of resolution sessions is less than 10. In a reporting period when the number of resolution sessions reaches 10 or greater, develop baseline, targets and improvement activities, and report on them in the corresponding SPP/APR.

States may express their targets in a range (e.g., 75-85%).

If the data reported in this indicator are not the same as the State's data under IDEA section 618, explain.

States are not required to report data at the LEA level.

16 - Indicator Data

Select yes to use target ranges

Target Range not used

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/04/2020	2.1 Mediations held	28
SY 2019-20 EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/04/2020	2.1.a.i Mediations agreements related to due process complaints	4
SY 2019-20 EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/04/2020	2.1.b.i Mediations agreements not related to due process complaints	15

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

Targets: Description of Stakeholder Input

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Historical Data

Baseline Year	Baseline Data
2005	63.00%

FFY	2014	2015	2016	2017	2018
Target >=	82.00%	82.00%	82.00%	82.00%	82.00%
Data	83.33%	70.00%	91.67%	70.83%	64.29%

Targets

FFY	2019
Target >=	82.00%

FFY 2019 SPP/APR Data

2.1.a.i Mediation agreements related to due process complaints	2.1.b.i Mediation agreements not related to due process complaints	2.1 Number of mediations held	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
4	15	28	64.29%	82.00%	67.86%	Did Not Meet Target	No Slippage

Provide additional information about this indicator (optional)

The VT AOE received feedback that COVID-19 had a significant impact on mediation requests. Some mediation requests were withdrawn due to changes in circumstances or lack of access to internet service and the technology necessary to participate remotely. Vermont Department of Public Service has been working in response to the pandemic to expand high-speed internet access for families in Vermont.

16 - Prior FFY Required Actions

None

16 - OSEP Response

16 - Required Actions

Certification

Instructions

Choose the appropriate selection and complete all the certification information fields. Then click the "Submit" button to submit your APR.

Certify

I certify that I am the Chief State School Officer of the State, or his or her designee, and that the State's submission of its IDEA Part B State Performance Plan/Annual Performance Report is accurate.

Select the certifier's role:

Designated by the Chief State School Officer to certify

Name and title of the individual certifying the accuracy of the State's submission of its IDEA Part B State Performance Plan/Annual Performance Report.

Name:

Jacqueline Kelleher

Title:

State Director of Special Education

Email:

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Submitted on:

04/28/21 2:08:55 PM