

To: Tammy Kolbe, Kim Gleason
From: Lyle Jepson
Date: 4-23-2023
Subj: EQS Revisions
Cc: Jennifer Samuelson

I appreciate the time and dedicated effort that has been committed to revisions of the Series 2000 Education Quality Standards on the part of the Act 1 Committee and State Board of Education subcommittee. I also recognize that I am late to the table in providing comments. I do so now, not to slow the process, but to instead ask for clarity on the changes being made, so that I can more comfortably celebrate the completion of the process with all of you.

If she is so willing, I think it would be best for me to meet with Tammy, as chair of the subcommittee, (or her designee) prior to the next meeting. Doing so may provide me with the feedback needed to resolve any outstanding questions that I have.

I see the changes that we need to make in our society and in education as a marathon and not a sprint. We need to have the stamina to maintain change in the long-term for the benefit of the families, the students, and the economic livelihood of our state. Reading the 4-10-23 version of the changes in its entirety, and in one sitting, I was left wondering if this document is aspirational, is intended to guarantee the specific outcomes, or is a mix of both. Regardless, the value in moving forward with the goals as outlined is essential for Vermont.

My comments and questions are, in large part, from an implementation standpoint. What is the strategy to oversee and follow up on the requirements that are outlined? Our inability, as the State Board of Education, to follow through on such important work cannot be seen by the stakeholders as a misleading disappointment.

From my experience in education there are several areas that are significant pinch points that could inhibit implementation. Anything is possible, if the pinch points can be overcome. They include:

- the availability of guidance from the Agency of Education, which provides for consistency state-wide,
- consistency in reporting on a state-wide basis, which allows for remediation through action planning,
- the availability of professional development time for educators,
- consistent professional development and consistently available professionals to provide the training,
- and funding.

Complicating all of this is the fact that the state lacks a unified school calendar, as well as a state-wide teacher contract, both of which would optimize access to professional development for educators.

Comments and questions:

2110 Statement of Purpose

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

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

2112 Education Quality Standards

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

2114 Definitions

1. “Academic record” – Should “Academic record” *may* read “Academic Record” *shall*? There will be significant statewide inconsistency, otherwise.
8. “Civic and community engagement” – In my opinion, “social justice movements” seems as if it was tagged on and may be out of place in the absence of “volunteerism and community service”.
10. “College and Career Readiness” – In my opinion, “socially and culturally inclusive” appears to be tagged on and appears out of place.
14. “Discrimination” – In my opinion, the last sentence appears to be a commentary and not part of a definition.
18. “Equity” or “Equitable” – Should “occupational training” read “technical education”? “Occupational” may be a dated term.
34. “Racism” – In my opinion, the last sentence appears to be a commentary and not part of a definition.
43. “Transferable skills” – Should “intercultural competency” have its own definition? It will support the creation of specific content relevant to curriculum development.

2120.2 Flexible Pathways

In the second paragraph “Students must be allowed...” Is “must” interchangeable with “shall”, or should “may” be used instead?

A great deal of professional development and Agency monitoring of flexible pathways will be required to ensure that school staff “will” implement flexible pathways as required by 2120.2.

2120.4 Personalized Learning Plans

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

2120.5 Curriculum Content

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

Overall thoughts:

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

As an example, in the area of educational equity, the revisions require professional development at a significantly enhanced level to enable educators to develop equity policies, create integrated curriculum, and monitor results in what may be the absence of the Agency of the Education’s capacity to supply guidance. In one policy area, it would appear that a determination has been made that restorative justice practices will be the process followed by all schools by saying “Educators *shall* (my emphasis) be supported in: fostering classroom culture based on the tenets of restorative justice practices: relationships, respect, responsibility, repair, and reintegration.” This too will require significant professional development state-wide, a marathon and not a sprint, and will require concurrence regarding the adoption of this process on the part of schools, each of whom appear to have flexibility in how they choose to implement disciplinary practices. (See Title 16 Chapter 25 Subchapter 004)

It is my hope that, because I have not been as engaged as perhaps I should have been in the development of the revised EQS Standards, that all of the above has been taken into account and I am merely catching up to the good work and reflection that has already occurred.