

**State Performance Plan / Annual Performance Report:
Part B**

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

**For reporting on
FFY18**

Vermont



PART B DUE February 3, 2020

**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 of Education and the Deputy Secretary for the Agency of Education provide direction to the Student Support Services Division which is composed of the Special Education, Vermont Multi-Tiered System of Support (VTmtss) and Early Learning teams. 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 PK-12 in Vermont schools. The Special Education Team, comprised of a State Director, six program staff, a part-time phone support provider, and two compliance monitors, provides the field with technical assistance, professional development, compliance oversight, and continuous improvement support. The Special Education Team recently articulated its 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."

In 2019, the Special Education Team went through a redesign to improve the deployment of resources and to work more effectively as a unified organization. Currently, the Special Education Monitoring staff review ongoing regulatory compliance and address noncompliance with the field. Issues, concerns and findings are delivered to the Special Education Programming staff, who identify and design universal and targeted technical assistance in response to LEA needs that are common, statewide. The aim is to provide support in addressing noncompliance, while keeping continuous programmatic improvement at the forefront of Agency Of Education and LEA practice. The Programming 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, Monitoring staff may assist in the provision of technical assistance (TA) as appropriate, and Programming staff may serve on on-site monitoring teams or support desk audit reviews.

The Special Education Team meets weekly as a whole to share updates from their areas as well as to engage in problems of practice, in which the Team shares and discusses calls and emails from the field, and documents issues and responses. Additionally, the full team collaborates during Data Quarterly Retreats, looking at patterns and trends across multiple data sources, to drive priority setting, and spotlight current and anticipated concerns within the field. Vermont's Monitoring and Programming activities are also described in other sections within this report.

Additionally, the Agency Of Education supports a Special Education Extended Team, which includes members from the Agency Of Education's legal, data management, finance, Early Childhood Education, Alternate Assessment, and residential/independent school placement staff members. This group joins the Special Education Team monthly to share updates, and to identify issues and concerns which span multiple Agency Of Education teams and divisions supporting Special Education. Cross team discussions lead to solutions and action items which are documented, tracked, and evaluated collaboratively. This cross-team approach began in FFY2016 to ensure alignment of initiatives and consistent messaging across Agency Of Education teams supporting Special Education.

The Special Education Team is also an active part of additional programmatic collaborations across the Agency Of Education, engaging in 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. Other interagency work/collaboration where the Special Education Team has an active voice includes the Interagency Core Team (i.e. Agency Of Education, Dept. of Labor, Division of Vocational Rehabilitation, Developmental Services), State Rehabilitation Council, Special Education Advisory Council, and Vermont Interagency Coordinating Council.

Vermont's Act 173 was passed during FFY2017 and requires a major shift in education funding from a reimbursement model to a census based model. Although its impact is not yet known, the influence on IDEA B program work will be substantial, and has led to both a more extensive review of current LEA practice statewide, and an expression of APR data that is different than was shared in previous Vermont APRs. As a result of Act 173, and under the direction of the Agency Of Education Secretary, the Special Education Team serves in a leadership capacity with other 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.

It is important to note that the Agency Of Education actively pursues support and utilizes technical assistance from national OSEP-supported technical assistance providers, including NCSI, CADRE, IDC, and CIFR, on a regular basis. For example, the Agency Of Education is part of CADRE's intensive workgroup on improving its Administrative Complaints System for the next two years. The Agency Of Education is also receiving intensive technical assistance services from the IDC to improve its data collection and management system. NCSI is providing support to the Agency Of Education in strategic planning, enhancing our SPP/APR writing process, defining appropriate measures for significant disproportionality, and strengthening our SSIP efforts. We view these organizations as valuable partners in our work, and plan to continue to take advantage of their guidance and resources as we continue to improve upon our data collection, monitoring, and programmatic practices and systems in the coming years.

Finally, the Agency Of Education is excited to report that we are taking a new approach to our SPP/APR coordination and reporting. Previously, the SPP/APR report was compiled by a few key people within the agency, and was more siloed in its programmatic application. In 2019, the Agency Of Education determined that this was not in alignment with our collaborative approach to leadership, oversight, and support, and that the SPP/APR could 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. This change has been met with excitement and enthusiasm within our program team; staff are embracing their new roles as stewards of specific indicators, and have been fully engaged in a collaborative writing process. Going forward, we believe that this approach will enhance our programmatic support to the field, and further unite us as a community, with the indicators informing priority-setting and conversations across the State.

Number of Districts in your State/Territory during reporting year

54

General Supervision System

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

Vermont's revised general supervision and monitoring system reflects the Agency Of Education's (AOE) commitment to providing leadership, oversight, to ensure all students' equitable access to educational opportunities. This system frames compliance and improvement conversations with LEAs, with the goal of ensuring that each and every student is receiving a free and appropriate public education (FAPE). The purpose of our general supervision system is to ensure LEAs appropriately implement the IDEA and Vermont special education rules, and improve outcomes for students with disabilities.

In 2019, changes in state and federal educational practices caused the AOE to reexamine our results-driven accountability monitoring practices. Although the AOE's former monitoring system was meeting federal requirements, we did not feel it was robust enough to fully identify issues of noncompliance or to facilitate the identification of necessary programmatic supports. This revised system includes a differentiated approach to monitoring and support provision. The AOE's engagement with an LEA within our revised system is based upon the LEA's Special Education Determination (LSED) status. Determinations are associated with prescribed levels of monitoring engagement, including reviews of LEA's improvement activities or corrective action plans, on-site visits, file reviews, and desk audits, as applicable. On-site visits will typically be scheduled either in the late fall or late spring, and will overlap with other AOE site visits, whenever possible. Final monitoring reports will be shared with LEAs during the summer, and will include summarized monitoring outcomes, common themes and trends, findings of noncompliance, and corrective requirements. The Special Education Monitoring Team conducts all monitoring activities, tracks corrective action plans, and ensures that monitoring and improvement activities align with LEA needs. Additional information can be found on the AOE's special education website: <https://education.vermont.gov/student-support/special-education>, and our revised monitoring manual has been uploaded as an attachment to this report.

The State Performance Plan (SPP) is designed to evaluate and describe improvements to Vermont's implementation of Parts B and C. The SPP is a critical component of our general supervision system, and informs the development of Vermont's special education policies and procedures. The AOE is committed to messaging the SPP to the field, and holds conversations with special education stakeholders, including the Special Education Advisory Council, about its role in general supervision. The AOE has also improved our implementation of SPP activities and initiatives, and recently assigned indicator stewards across our programming staff, making it both a compliance monitoring activity and a program improvement component of our general supervision system.

The AOE's finance team, which coordinates our IDEA fiscal management, is currently undergoing a reorganization to better ensure effective administration of the IDEA Part B grant. The team currently collaborates with Special Education programming staff to review and approve grant applications, and monitor expenditures; this collaboration will continue, going forward. The finance team also updates and revises policies, procedures, and practices that support monitoring distribution and use of funds. Uniform guidance is disseminated to the field; dedicated staff provide technical assistance to LEAs, and manage grants through the AOE's Grants Management System (GMS). The Agency of Education uses a risk assessment tool to assess subrecipients, and designates them as low, moderate, or high risk, which may impact conditions associated with their awards. Finance staff utilize monitoring activities, such as desk audits, the collection of assurances, program review, single audit review, desk review, frequent financial reporting, and site visits, to verify appropriate expenditure of funds. Final fiscal reports are shared with the Special Education Team, and the finance team tracks LEA corrective action plans to completion.

The AOE reviews the subrecipients chosen for monitoring in a given year and determines if each should receive an on-site or a desk review. To make this determination, fiscal and programmatic teams consider variables including risk assessments, the complexity of program requirements, the scope of the review. During desk review and site reviews, AOE staff request fiscal or programmatic documentation, as appropriate, to determine that fiscal spending aligns with funding restrictions and the grant agreement. Findings are communicated to subrecipients, which are required to address noncompliance through corrective actions.

Data for a majority of Special Education Team activities, including child count, discipline, educational environments, assessment, dispute resolution, and exits from special education, are collected, verified, and reported out by the AOE's Data Management and Analysis Division (DMAD). DMAD team members responsible for Special Education data include an IDEA Data Administration Director and a Special Education Data Specialist. Both joined the AOE in late summer, 2019, as a part of building AOE capacity to support SPP/APR-related data collections and technical assistance provision. DMAD is prioritizing making child count data both more complete for the AOE and less burdensome for LEAs, while simultaneously modernizing AOE data collection, governance, and storage systems. Analysis processes are being transitioned into more modern, powerful, and flexible toolsets representative of current best practices in Data Science. DMAD goals and objectives are in alignment with the standards and practices outlined on the Federal Data Strategy website. DMAD staff and Special Education Team members frequently collaborate to improve data collection and reporting practices. Examples include no longer allowing Child Count to be submitted with blanks in the initial evaluation date, which improves the accuracy of our collections; and the addition of a timely and accurate data component to the monitoring system this year, to reinforce the importance of timely and accurate data submissions.

Dispute Resolution is led by the AOE Legal Division, which works in collaboration with Special Education Team staff to offer a mediation and due process hearing system and state complaint process. One of their priorities in this upcoming year is to make improvements to the Administrative State Complaints system, and to more effectively continue engagement with special education stakeholders as partners in our programmatic work. With that in mind, the Legal Team, in conjunction with the Special Education Team, will seek to engage the Special Education Advisory Council, LEAs, parent organizations, and other education stakeholders in improving the Written State Complaint process. Areas of desired improvement include a new approach to building public awareness and stakeholder engagement, timeliness, and eliminating parental fear of retaliation as a result of participating in the written complaint process. The Legal Team, in conjunction with the Special Education Team, examines every hearing decision to identify procedural and/or substantive violations of IDEA by the LEA. The teams collaborate on findings of noncompliance, and review evidence of correction of noncompliance as part of the general supervision system. Additionally, the Special Education Team reviews dispute resolution data to identify issues related to LEA performance, and to inform monitoring and technical assistance activities.

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, Vermont 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. Agency Of Education (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 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 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 is provided by the special education program team staff at three levels of engagement:

Universal: Available to all LEAs and professional staff, and families. Includes; technical assistance phone line and email address which provides regular and open communication between the special education program and monitoring staff with LEA administrators, teachers and parents 24 hours a day, seven days a week, referrals to Vermont's parent information center, Vermont Family Network (VFN), online resource bank made up of vetted resources based on statewide special education priority topics including; SPP/APR indicators, special education implications for state laws, evidence-based practices in instruction and systemic supports etc., statewide releases of guidelines, guidance documents, memos, FAQs based on statewide special education priorities etc., statewide conferences, webinars, online office hours on statewide special education content priorities, and the provision of professional development in early intervention and educational services through collaboration with the early learning team.

Targeted: Offered individually to LEAs based on the results of a discrete question or a focused monitoring activity, may require short or long-term engagement between LEA and 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, office hours etc. Recent topics of targeted support include: IEP development, post-secondary transition planning and support, co-teaching, data literacy implementation, and improvement science strategies.

Intensive: Required for a small number of LEAs based on the results of a discrete issue or focused monitoring activity, may require sustained and in-depth engagement between LEA and special education team to improve student outcomes. These supports will be delivered coordinated and/or delivered to the LEA by special education staff members as part of a LEA improvement plan. 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, office hours etc.

The Early Childhood Team, includes special education specialists who provide ongoing technical assistance to public and private early childhood programs throughout the state.

AOE staff who support special education aren't limited to our Special Education and Data divisions. Additional staff members who collaborate closely with our Special Education team can be found in our Early Childhood and Independent School Teams, Finance Division, Multi-Tiered Systems of Support Team, Federal Student Education Programs division (as represented by our Title funding staff members and Interagency Coordinator, and Education Quality Division (which includes licensing and school improvement specialists).

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 Special Education Team engages in continual professional development to ensure it provides up to date technical assistance to the field. Minimally the special education program team has availed itself of technical assistance, professional learning and support from the following:

NCSI – Vermont received Intensive support on its SSIP work, including facilitation of SSIP activities and strengthening its scale up plan, Vermont benefited from networking and shared practices through the Results-Based Accountability Collaboratives. Vermont received on-site visits with NCSI TA providers, to work on examining Special Education Team practices, strategic planning, enhancing targeted technical assistance, and building a more robust monitoring system.

IDC – Vermont received general support on its child count data collection, 618 data submission, and SPP/APR, including data processes documentation, guidance for our new data manager beginning in fall 2019, IDC provides feedback, and clarification of rules and policies. IDC has agreed to continue its work with Vermont through the provision of intensive TA aimed to build capacity in data collection and management.

CADRE – The State Director of Special Education and staff attorney from the Agency of Education Legal Team are part of a Written State Complaints Intensive TA Workgroup with seven other states. This work involves frequent virtual meetings, an annual face to face meeting, and TA support on project planning and logic modeling.

Vermont has also received general support over the year from NTACT, CIFR, ECTA, DASY, NCPMI (National Center for Pyramid Model Innovations) at both universal and targeted levels. The State Director participated in new director meetings and received mentoring through the National Association of State Directors of Special Education (NASDSE).

In addition to a comprehensive on-boarding process, the Special Education Team offers ongoing professional development to all of its staff members, including a combination of universally-offered professional development and professional development that is specific to the needs of each staff member, with the goal of ensuring the development of the knowledge and skills necessary to support LEAs and stakeholders in ensuring FAPE in the LRE.

The Special Education Programming Team considers a variety of data sources when determining the professional development components of a statewide TA/PD plan. In reviewing the data, the team identifies patterns around shared needs from data collected by the Agency Of Education, reviews other Agency Of Education Division findings from field reviews and site visits, reflects on feedback collected across the state informally and through regional events, monitors technical assistance requests that come into the Agency Of Education, 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 this process, there is an emphasis on utilizing the principles of implementation science with respect to program design and evaluation. Examples of offerings include:

*Autism Spectrum Disorder: Success in the Workforce

*Interagency Core Transition Teams Conference: Making Vermont High School Graduation Requirements Accessible for All Students with The Proficiency-Based Graduation Requirements Access Plan

*Vermont Family Network: Restraints and Seclusion Webinar

*BEST Conference: Rule 4500 Restraint and Seclusion?

*State of the State Webinars

*Implementation Training for Alternate Assessment

*Using Progress Monitoring Data to Make Instructional Decisions

*Math Ed Camps
*Ed Benefit

Stakeholder Involvement

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

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

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 FFY17 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 2017 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 2017 APR in 2019, is available.

Individual LEAs were not notified within the 120 day timeframe following the State's submission of its FFY2017 APR due to staff capacity and an inability to access data. The DMAD and Special Education Team are new team members and are working with IDC to build capacity with respect to timely and accurate data collection and reporting. In the future, Vermont anticipates being on time with reporting on individual LEA performance as part of its comprehensive general supervision system. The Vermont Agency of Education anticipates making these individual performance reports available June 2020.

There were no revisions to the SPP after the FY2017 submission. A final copy of the FFY2017 APR was made available to the public via the Vermont Agency of Education website: <https://education.vermont.gov/data-and-reporting/school-reports/special-education-reports> under the section titled data and reporting - Annual Performance Reports. The SEA Determination letter from OSEP was uploaded on Vermont's website and results were shared with the Special Education Advisory Council, Vermont Council of Special Education Administrators, and regional meetings of special education administrators. LEAs will be notified about their individual SPP/APR determinations by the time OSEP seeks Clarification on the FFY2018 SPP/APR and results will be posted on Vermont website.

Intro - Prior FFY Required Actions

In the FFY 2018 SPP/APR, the State must report FFY 2018 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 4; (2) measures and outcomes that were implemented and achieved since the State's last SSIP submission (i.e., April 1, 2019); (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- and long-term outcomes that are intended to impact the SiMR; and (4) any supporting data that demonstrates that implementation of these activities are impacting the State's capacity to improve its SiMR data.

Response to actions required in FFY 2017 SPP/APR

Intro - OSEP Response

The State has not publicly reported on the FFY 2017 (July 1, 2017-June 30, 2018) performance of each local educational agency (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.

States were instructed to submit Phase III, Year Four, of the State Systemic Improvement Plan (SSIP), indicator B-17, by April 1, 2020. The State provided the required information. The State provided a target for FFY 2019 for this indicator, and OSEP accepts the target.

Intro - 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.

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 2018 SPP/APR, use data from 2017-2018), 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	2011	79.07%			
FFY	2013	2014	2015	2016	2017
Target >=	86.00%	86.00%	86.00%	86.00%	86.00%
Data	79.63%	70.26%	79.85%	80.77%	82.14%

Targets

FFY	2018	2019
Target >=	86.00%	86.00%

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

Prepopulated Data

Source	Date	Description	Data
SY 2017-18 Cohorts for Regulatory Adjusted-Cohort Graduation Rate (EDFacts file spec FS151; Data group 696)	10/02/2019	Number of youth with IEPs graduating with a regular diploma	810
SY 2017-18 Cohorts for Regulatory Adjusted-Cohort Graduation Rate (EDFacts file spec FS151; Data group 696)	10/02/2019	Number of youth with IEPs eligible to graduate	1,014

Source	Date	Description	Data
SY 2017-18 Regulatory Adjusted Cohort Graduation Rate (EDFacts file spec FS150; Data group 695)	10/02/2019	Regulatory four-year adjusted-cohort graduation rate table	79.88%

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
810	1,014	82.14%	86.00%	79.88%	Did Not Meet Target	Slippage

Provide reasons for slippage, if applicable

In Vermont it is common practice to extend the services for students with intensive needs on an individualized basis up to the student's 22nd birthday. Reasons vary, but typically the LEAs offer increased access to transition services with the student continuing their education longer than their same age peers. Recent policy shifts in Vermont toward proficiency-based learning, as well as a "graduation readiness tool," a way for IEP teams to quantify access to transition services and readiness to graduate, have encouraged many IEP teams to maximize transition services and time frames. This tool helps teams make sure all necessary pieces of transition planning are covered prior to the student officially graduating, This policy shift and use of the new tool likely contributed to the slippage in the data for the reported cohort.

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.

Vermont 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 of 2019-2020 school year (not a part of this reporting period) Vermont has shifted away from a credit bearing system to a proficiency-based graduation system. As always, Vermont still does one diploma for all students, there is no IEP diploma or alternative diploma. For students with intensive needs Vermont created and led a multi year long (with representative stakeholder input) accessibility project which created a system and a tool (the PBGR Access Plan) for students with intensive needs to access the proficiency based graduation requirements (PBGRs). Vermont 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

If yes, explain the difference in conditions that youth with IEPs must meet.

Provide additional information about this indicator (optional)

Six-year ACGR data were prepopulated into the SPP/APR template for Vermont. Vermont used to submit 4, 5, and 6 year ACGRs, but since 2018 has submitted only 4 and 6 year ACGRs. However, Vermont has attached four-year, five-year, and six-year ACGRs for context in understanding progress towards the target.

1 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

1 - OSEP Response

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

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 C009.

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 2018 SPP/APR, use data from 2017-2018). 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 2018 SPP/APR, use data from 2017-2018), 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	2013	4.19%			
FFY	2013	2014	2015	2016	2017
Target <=	3.25%	3.25%	3.25%	3.25%	3.25%
Data	4.19%	3.36%	3.45%	1.81%	4.17%

Targets

FFY	2018	2019
Target <=	3.20%	3.20%

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

Please indicate the reporting option used on this indicator

Option 2

Prepopulated Data

Source	Date	Description	Data
SY 2017-18 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/30/2019	Number of youth with IEPs (ages 14-21) who exited special education by graduating with a regular high school diploma (a)	0
SY 2017-18 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/30/2019	Number of youth with IEPs (ages 14-21) who exited special education by receiving a certificate (b)	0
SY 2017-18 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/30/2019	Number of youth with IEPs (ages 14-21) who exited special education by reaching maximum age (c)	0
SY 2017-18 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/30/2019	Number of youth with IEPs (ages 14-21) who exited special education due to dropping out (d)	0
SY 2017-18 Exiting Data Groups (EDFacts file spec FS009; Data Group 85)	05/30/2019	Number of youth with IEPs (ages 14-21) who exited special education as a result of death (e)	0

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
XXX	XXX	XXX	XXX	XXX	XXX	XXX

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

If yes, provide justification for the changes below.

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

If use a different calculation methodology is yes, provide an explanation of the different calculation methodology

FFY 2018 SPP/APR Data

Number of youth with IEPs who exited special education due to dropping out	Total number of all youth with IEPs who were in high school (Ages 14-21)	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
138	4,518	4.17%	3.20%	3.05%	Met Target	No Slippage

Provide reasons for slippage, if applicable

XXX

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

A dropout by state and federal definition is an individual student who is not enrolled in an approved educational program and who has not graduated from high school. In Vermont, a student who is absent for more than ten consecutive school days without authorization is classified as withdrawn. If a truant officer is unable to verify that the student has transferred to a different school or approved educational program (e.g. home school) before the end of the year, the student is considered a dropout for the purposes of this report.

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)

Vermont has been following OSEP guidance to submit and resubmit data on an ongoing basis as we are able. The Agency of Education has been engaging in continuous transparent communication with the US Dept of Education about challenges, including widespread delays caused by a difficult as of 05/30/2019 does not reflect Vermont's most up-to-date data. As such, Vermont is attaching our current EdFacts data, submitted on 8/27/2019.

2 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

2 - OSEP Response

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

The State provided alternate data in an attachment for this indicator. These data are not consistent with the IDEA Part B exiting data it submitted in ED Facts on May 30, 2019. The State submitted updated data in ED Facts on August 27, 2019. However, the IDEA Part B exiting data were frozen on May 29, 2019, and OSEP is unable to include data submitted after that date in the public release data files and products.

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 I	X	X	X	X	X	X	X	X	X	X	X
B												
C												
D												
E												
F												
G												
H												
I												
J												
K												
L												

Historical Data: Reading

Group	Group Name	Baseline	FFY	2013	2014	2015	2016	2017
A	Overall	2005	Target >=	99.25%	99.25%	99.25%	99.25%	99.25%
A	Overall	98.33%	Actual	98.26%	95.25%	96.07%	95.87%	NVR
B			Target >=					
B			Actual					
C			Target >=					

C			Actual					
D			Target >=					
D			Actual					
E			Target >=					
E			Actual					
F			Target >=					
F			Actual					
G			Target >=					
G			Actual					
H			Target >=					
H			Actual					
I			Target >=					
I			Actual					
J			Target >=					
J			Actual					
K			Target >=					
K			Actual					
L			Target >=					
L			Actual					

Historical Data: Math

Group	Group Name	Baseline	FFY	2013	2014	2015	2016	2017
A	Overall	2005	Target >=	99.25%	99.25%	99.25%	99.25%	99.25%
A	Overall	98.42%	Actual	97.83%	94.40%	96.22%	95.73%	NVR
B			Target >=					
B			Actual					
C			Target >=					
C			Actual					
D			Target >=					
D			Actual					
E			Target >=					
E			Actual					
F			Target ≥					
F			Actual					
G			Target >=					
G			Actual					
H			Target >=					
H			Actual					
I			Target >=					
I			Actual					
J			Target >=					
J			Actual					
K			Target >=					
K			Actual					

L			Target >=					
L			Actual					

Targets

	Group	Group Name	2018	2019
Reading	A >=	Overall	99.25%	99.25%
Reading	B >=			
Reading	C >=			
Reading	D >=			
Reading	E >=			
Reading	F >=			
Reading	G >=			
Reading	H >=			
Reading	I >=			
Reading	J >=			
Reading	K >=			
Reading	L >=			
Math	A >=	Overall	99.25%	99.25%
Math	B >=			
Math	C >=			
Math	D >=			
Math	E >=			
Math	F >=			
Math	G >=			
Math	H >=			
Math	I >=			
Math	J >=			
Math	K >=			
Math	L >=			

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

FFY 2018 Data Disaggregation from EDFacts

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

YES

Data Source:

SY 2018-19 Assessment Data Groups - Reading (EDFacts file spec FS188; Data Group: 589)

Date:

04/08/2020

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 2018-19 Assessment Data Groups - Math (EDFacts file spec FS185; Data Group: 588)

Date:

04/08/2020

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 2018 SPP/APR Data: Reading Assessment

Group	Group Name	Number of Children with IEPs	Number of Children with IEPs Participating	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A	Overall			NVR	99.25%		N/A	N/A
B							N/A	N/A
C							N/A	N/A
D							N/A	N/A
E							N/A	N/A
F							N/A	N/A
G							N/A	N/A
H							N/A	N/A
I							N/A	N/A
J							N/A	N/A
K							N/A	N/A

Group	Group Name	Number of Children with IEPs	Number of Children with IEPs Participating	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
L							N/A	N/A

Group	Group Name	Reasons for slippage, if applicable
A	Overall	XXX
B		XXX
C		XXX
D		XXX
E		XXX
F		XXX
G		XXX
H		XXX
I		XXX
J		XXX
K		XXX
L		XXX

FFY 2018 SPP/APR Data: Math Assessment

Group	Group Name	Number of Children with IEPs	Number of Children with IEPs Participating	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A	Overall			NVR	99.25%		N/A	N/A
B							N/A	N/A
C							N/A	N/A
D							N/A	N/A
E							N/A	N/A
F							N/A	N/A
G							N/A	N/A
H							N/A	N/A
I							N/A	N/A
J							N/A	N/A
K							N/A	N/A
L							N/A	N/A

Group	Group Name	Reasons for slippage, if applicable
A	Overall	XXX
B		XXX
C		XXX
D		XXX
E		XXX
F		XXX
G		XXX
H		XXX

Group	Group Name	Reasons for slippage, if applicable
I		XXX
J		XXX
K		XXX
L		XXX

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 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: as there are no comparable data for nondisabled students on assessment accommodations, Vermont will be adding this information at <https://education.vermont.gov/data-and-reporting/school-reports/special-education-reports>, under the “Assessment Report” heading. Online posting will be further delayed due to increased demands on the AOE’s communications team during the COVID-19 pandemic. Anticipated posting date May 30, 2020.

(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?” Online posting will be further delayed due to increased demands on the AOE’s communications team during the COVID-19 pandemic. Anticipated posting date May 15, 2020.

NB: For years prior to FFY17, the number of students participating in alternate assessments based on grade-level academic standards, as well as their performance on regular and alternate assessments, can be found at <https://education.vermont.gov/data-and-reporting/educational-performance>. Select ‘Historical NECAP, DLM and VTAAP Assessment Reports.’

NB: Vermont anticipates having FFY18 public reports of all of the above assessment results posted in the locations noted above by mid-June 2020.

Provide additional information about this indicator (optional)

Please see the attachments to this indicator.

Vermont is currently undergoing implementation of its SLDS. This change has been very challenging for many districts and despite the Agency Of Education’s support efforts, some continue to be late in making their required data submissions to the AOE. As such, the data required for this indicator were not ready for the December EdFacts due date. Agency Of Education staff are currently working intensively on data validation for the 2018-2019 school year. Agency Of Education is reporting in attachments to the FFY2018 SPP/APR preliminary data for those districts that have passed initial stages of data validation related to assessment eligibility, and has excluded 4 districts which have failed these initial validation checks. It is our goal that the data validation will be complete and the data to create the EdFacts files will be ready to post in Spring 2020 and updated during the APR Clarification Period. Vermont’s plans for 2020 include enhancing support for SLDS data submissions via regular recorded webinars and FAQ documents.

3B - Prior FFY Required Actions

The State did not provide data for FFY 2017. The State must provide the required data for FFY 2018 in the FFY 2018 SPP/APR. Within 90 days of the receipt of the State’s 2019 determination letter, the State must provide to OSEP a Web link that demonstrates that it has reported, for FFY 2017, to the public, on the statewide assessments of children with disabilities in accordance with 34 CFR §300.160(f). In addition, OSEP reminds the State that in the FFY 2018 SPP/APR, the State must include a Web link that demonstrates compliance with 34 CFR §300.160(f) for FFY 2018.

Response to actions required in FFY 2017 SPP/APR

Please see the attachments to this indicator. Vermont continues to make progress with the implementation of its SLDS; however, late and incomplete data submissions continue from some LEAs despite multiple communications from Vermont Agency of Education and its coherent, well-communicated approach to train and support the field this past year. Vermont Agency Of Education was unable to post FFY2017 data within 90 days of receipt of OSEP’s letter of determination due to this data being unavailable to the AOE; however, Vermont submitted EdFacts data for FFY2017 last summer on September 6, 2019. Additionally, FFY2017 information is included in an attachment to this report. Agency Of Education staff are currently working intensively on data validation for the 2018-2019 school year. Agency Of Education is reporting in attachments to the FFY2018 SPP/APR preliminary data for those districts that have passed initial stages of data validation related to assessment eligibility, and has excluded 4 districts which have failed these initial validation checks. It is our goal that the data validation will be complete and the data to create the EdFacts files will be ready to post in Spring 2020 and updated during the APR clarification period.

3B - OSEP Response

The State provided targets for FFY 2019 for this indicator, and OSEP accepts those targets.

The State did not provide any data for this indicator. Because the State provided no data for this indicator, OSEP could not determine whether the State met its target.

The State did not provide a Web link demonstrating that the State reported publicly on the participation of children with disabilities on statewide assessments with the same frequency and in the same detail as it reports on the assessments of nondisabled children, as required by 34 C.F.R. § 300.160(f). Specifically, the State has not reported the number of children with disabilities participating in regular assessments, and the number of those children who were provided accommodations (that did not result in an invalid score) in order to participate in those assessments at the State, district and school levels. Also, the State has not reported the number of children with disabilities, if any, participating in alternate assessments based on alternate academic achievement standards, at the State, district, and school levels. The failure to publicly report as required under 34 C.F.R. § 300.160(f) is noncompliance.

OSEP's response to the State's FFY 2017 SPP/APR required the State to provide, within 90 days of the receipt of the State's 2019 determination letter, a Web link that demonstrates that it has reported, for FFY 2017, to the public, on the statewide assessments of children with disabilities in accordance with 34 C.F.R. § 300.160(f). The State provided none of the required information.

3B - 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.

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 ED Facts 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 I	X	X	X	X	X	X	X	X	X	X	X
B												
C												
D												
E												
F												
G												
H												
I												
J												
K												
L												

Historical Data: Reading

Group	Group Name	Baseline	FFY	2013	2014	2015	2016	2017
A	Overall	2014	Target >=	28.00%	12.13%	12.13%	12.15%	12.20%
A	Overall	12.13%	Actual	22.97%	12.13%	14.16%	13.31%	NVR
B			Target >=					
B			Actual					
C			Target >=					

C			Actual					
D			Target >=					
D			Actual					
E			Target >=					
E			Actual					
F			Target >=					
F			Actual					
G			Target >=					
G			Actual					
H			Target >=					
H			Actual					
I			Target >=					
I			Actual					
J			Target >=					
J			Actual					
K			Target >=					
K			Actual					
L			Target >=					
L			Actual					

Historical Data: Math

Group	Group Name	Baseline	FFY	2013	2014	2015	2016	2017
A	Overall	2014	Target >=	25.00%	7.21%	7.21%	7.25%	7.30%
A	Overall	7.21%	Actual	17.14%	7.21%	9.25%	8.51%	NVR
B			Target >=					
B			Actual					
C			Target >=					
C			Actual					
D			Target >=					
D			Actual					
E			Target >=					
E			Actual					
F			Target >=					
F			Actual					
G			Target >=					
G			Actual					
H			Target >=					

H			Actual					
I			Target >=					
I			Actual					
J			Target >=					
J			Actual					
K			Target >=					
K			Actual					
L			Target >=					
L			Actual					

Targets

	Group	Group Name	2018	2019
Reading	A >=	Overall	12.25%	12.25%
Reading	B >=			
Reading	C >=			
Reading	D >=			
Reading	E >=			
Reading	F >=			
Reading	G >=			
Reading	H >=			
Reading	I >=			
Reading	J >=			
Reading	K >=			
Reading	L >=			
Math	A >=	Overall	7.35%	7.35%
Math	B >=			
Math	C >=			
Math	D >=			
Math	E >=			
Math	F >=			
Math	G >=			
Math	H >=			
Math	I >=			
Math	J >=			
Math	K >=			
Math	L >=			

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

FFY 2018 Data Disaggregation from EDFacts

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

YES

Data Source:

SY 2018-19 Assessment Data Groups - Reading (EDFacts file spec FS178; Data Group: 584)

Date:

04/08/2020

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 2018-19 Assessment Data Groups - Math (EDFacts file spec FS175; Data Group: 583)

Date:

04/08/2020

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 proficient against grade level											
f. IEPs in alternate assessment against alternate standards scored at or above proficient against grade level											

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A	Overall			NVR	12.25%		N/A	N/A
B							N/A	N/A
C							N/A	N/A
D							N/A	N/A
E							N/A	N/A
F							N/A	N/A
G							N/A	N/A
H							N/A	N/A
I							N/A	N/A
J							N/A	N/A
K							N/A	N/A
L							N/A	N/A

Group	Group Name	Reasons for slippage, if applicable
A	Overall	XXX
B		XXX
C		XXX
D		XXX
E		XXX
F		
G		XXX
H		XXX
I		XXX
J		XXX
K		XXX
L		XXX

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A	Overall			NVR	7.35%		N/A	N/A
B							N/A	N/A
C							N/A	N/A
D							N/A	N/A
E							N/A	N/A
F							N/A	N/A
G							N/A	N/A
H							N/A	N/A

Group	Group Name	Children with IEPs who received a valid score and a proficiency was assigned	Number of Children with IEPs Proficient	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
I							N/A	N/A
J							N/A	N/A
K							N/A	N/A
L							N/A	N/A

Group	Group Name	Reasons for slippage, if applicable
A	Overall	XXX
B		XXX
C		XXX
D		XXX
E		XXX
F		XXX
G		XXX
H		XXX
I		XXX
J		XXX
K		XXX
L		XXX

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 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: as there are no comparable data for nondisabled students on assessment accommodations, Vermont will be adding this information at <https://education.vermont.gov/data-and-reporting/school-reports/special-education-reports>, under the “Assessment Report” heading. Online posting will be further delayed due to increased demands on the AOE’s communications team during the COVID-19 pandemic. Anticipated posting date May 30, 2020.

(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?” Online posting will be further delayed due to increased demands on the AOE’s communications team during the COVID-19 pandemic. Anticipated posting date May 15, 2020.

NB: For years prior to FFY17, the number of students participating in alternate assessments based on grade-level academic standards, as well as their performance on regular and alternate assessments, can be found at <https://education.vermont.gov/data-and-reporting/educational-performance>. Select ‘Historical NECAP, DLM and VTAAP Assessment Reports.’

NB: Vermont anticipates having FFY18 public reports of all of the above assessment results posted in the locations noted above by mid-June 2020.

Provide additional information about this indicator (optional)

Please see the attachments to this indicator.

Vermont is currently undergoing implementation of its SLDS. This change has been very challenging for many districts and despite Agency Of Education's support efforts, some continue to be late in making their required data submissions to the SEA. As such, the data required for this indicator were not ready for the December EdFacts due date. Agency Of Education staff are currently working intensively on data validation for the 2018-2019 school year. Agency Of Education is reporting in attachments to the FFY2018 SPP/APR preliminary data for those districts that have passed initial stages of data validation related to assessment eligibility, and has excluded 4 districts which have failed these initial validation checks. It is our goal that the data validation will be complete and the data to create the EdFacts files will be ready to post in Spring 2020 and updated during the APR Clarification period. Vermont's plans for 2020 include enhancing support for SLDS data submissions via regular recorded webinars and FAQ documents.

3C - Prior FFY Required Actions

The State did not provide data for FFY 2017. The State must provide the required data for FFY 2018 in the FFY 2018 SPP/APR.

Response to actions required in FFY 2017 SPP/APR

Please see the attachments to this indicator. Vermont continues to make progress with the implementation of its SLDS; however, late and incomplete data submissions continue from some LEAs. Vermont AOE was unable to post FFY2017 data within 90 days of receipt of OSEP's letter of determination due to this data being unavailable to the SEA; however, Vermont submitted EdFacts data for FFY2017 last summer on September 6, 2019. Additionally, FFY2017 information is included in an attachment to this report. Vermont AOE staff are currently working intensively on data validation for the 2018-2019 school year Vermont AOE is reporting in attachments to the FFY2018 SPP/APR preliminary data for those districts that have passed initial stages of data validation related to assessment eligibility, and has excluded 4 districts which have failed these initial validation checks. It is our goal that the data validation will be complete and the data to create the EdFacts files will be ready to post in Spring 2020 and updated during the APR Opportunity for Clarification.

3C - OSEP Response

The State provided targets for FFY 2019 for this indicator, and OSEP accepts those targets.

The State did not provide any data for this indicator. Because the State provided no data for this indicator, OSEP could not determine whether the State met its target.

The State did not provide a Web link demonstrating that the State reported publicly on the performance of children with disabilities on statewide assessments with the same frequency and in the same detail as it reports on the assessments of nondisabled children, as required by 34 C.F.R. § 300.160(f). Specifically, the State has not reported, compared with the achievement of all children, including children with disabilities, the performance results of children with disabilities on regular assessments, alternate assessments based on grade-level academic achievement standards, alternate assessments based on modified academic achievement standards, and alternate assessments based on alternate academic achievement standards, at the State, district and/or school levels. The failure to publicly report as required under 34 C.F.R. § 300.160(f) is noncompliance.

3C - 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.

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 2018 SPP/APR, use data from 2017-2018), 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 2018 SPP/APR, the data for 2017-2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

4A - Indicator Data

Historical Data

Baseline	2005	1.67%			
FFY	2013	2014	2015	2016	2017
Target <=	0.00%	0.00%	0.00%	0.00%	0.00%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2018	2019
Target <=	0.00%	0.00%

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

FFY 2018 SPP/APR Data

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

NO

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.

Number of districts that have a significant discrepancy	Number of districts in the State	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
0	57	0.00%	0.00%	0.00%	Met Target	No Slippage

Provide reasons for slippage, if applicable

XXX

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

A significant discrepancy for any individual LEA is defined as an LEA that has a rate of suspension/expulsions greater than ten days that is more than 3 percent of that LEAs total special education population. The suspension/expulsion rate is derived from the total number of suspension/expulsions >10 days for special education students in an LEA (numerator) divided by the total number of special education students in the LEA (denominator).

The Special Education team used a document the IDEA Data Center published called "Measuring Significant Discrepancy: An Indicator B4 Technical Assistance Guide" to analyze the comparison of this data. 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 for SY2017-18", submitted to OSEP in July 2019. The source information for the denominator in the LEA calculations was the same as that used to populate the "Children with Disabilities (IDEA) Suspensions/Expulsions for SY2017-18", submitted to OSEP in July 2019.

Provide additional information about this indicator (optional)

Review of Policies, Procedures, and Practices (completed in FFY 2018 using FFY17- FFY18 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.

Any findings of significant discrepancy will generate an analysis of policies, procedures, and practices by Vermont's special education program monitoring team and notification is sent to LEAs consistent with CFR § 300.170(b). If appropriate, Vermont will require 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 Memorandum 09-02 dated October 17, 2008.

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

The State must report on the correction of noncompliance in next year's SPP/APR consistent with requirements in the Measurement Table and OSEP Memorandum 09-02, dated October 17, 2008. Please explain why the State did not ensure that policies, procedures, and practices were revised to comply with applicable requirements.

XXX

Describe how the State ensured that such policies, procedures, and practices were revised to comply with applicable requirements consistent with OSEP Memorandum 09-02, dated October 17, 2008.

XXX

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Correction of Findings of Noncompliance Identified Prior to FFY 2017

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of PFFY01 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*

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

4A - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

4A - OSEP Response

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

4A - Required Actions

Indicator 4B: Suspension/Expulsion

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results 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 2018 SPP/APR, use data from 2017-2018), 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 2018 SPP/APR, the data for 2017-2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

Targets must be 0% for 4B.

4B - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Provide an explanation of why it is not applicable below:

Historical Data

Baseline	2009	0.00%			
FFY	2013	2014	2015	2016	2017
Target	0%	0%	0%	0%	0%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2018	2019
Target	0%	0%

FFY 2018 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.

55

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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
0	0	2	0.00%	0%	0.00%	Met Target	No Slippage

Provide reasons for slippage, if not applicable

XXX

Were all races and ethnicities included in the review?

YES

State's definition of "significant discrepancy" and methodology

Vermont identifies LEAs with significant discrepancies in the rates of long-term suspensions and expulsions, by race or ethnicity, through the following steps:

Separately, for each race and ethnicity category, aggregate each LEA's total number of IEP students who were suspended or expelled for greater than 10 days, and divide by the total number of IEP students of that race or ethnicity in the LEA. This process produces the rate of long-term suspensions and expulsions by race and ethnicity for each LEA.

Separately, for each race and ethnicity category, identify LEAs which have a long-term suspension rate of greater than 3%. LEAs which had fewer than 4 long-term suspensions and expulsions in a given race or ethnicity category are excluded. The Special Education team used a document the IDEA Data Center published called "Measuring Significant Discrepancy: An Indicator B4 Technical Assistance Guide" to analyze the comparison of this data.

Provide additional information about this indicator (optional)

52 out of 54 LEAs had fewer than 4 (minimum n-size) long-term suspensions and expulsions in any given race or ethnicity category.

Review of Policies, Procedures, and Practices (completed in FFY 2018 using 2017-2018 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.

Consistent with CFR § 300.170(b), any findings of significant discrepancy will generate an analysis of policies, procedures, and practices by Vermont's special education program monitoring team and notification is sent to LEAs. If appropriate, Vermont will require 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 must be consistent with OSEP Memorandum 09-02 dated October 17, 2008.

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

If YES, select one of the following:

The State must report on the correction of noncompliance in next year's SPP/APR consistent with requirements in the Measurement Table and OSEP Memorandum 09-02, dated October 17, 2008. Please explain why the State did not ensure that policies, procedures, and practices were revised to comply with applicable requirements.

XXX

Describe how the State ensured that such policies, procedures, and practices were revised to comply with applicable requirements consistent with OSEP Memorandum 09-02, dated October 17, 2008.

XXX

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Correction of Findings of Noncompliance Identified Prior to FFY 2017

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of PFFY01 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*

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

4B - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

4B - OSEP Response

OSEP notes that the State reported that 55 districts did not meet the State established n size and were excluded from the calculation and two districts met the State established n size for a total of 57 districts. However, in the "Provide additional information about this indicator" section, the State reported that "52 out of 54 LEAs had fewer than 4 (minimum n-size) long-term suspensions and expulsions in any given race or ethnicity category".

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

	Baseline	FFY	2013	2014	2015	2016	2017
A	2005	Target >=	79.00%	79.00%	79.00%	79.00%	79.00%
A	77.89%	Data	74.15%	74.93%	75.76%	76.77%	77.82%
B	2005	Target <=	7.00%	7.00%	7.00%	7.00%	7.00%
B	8.59%	Data	6.61%	6.29%	5.72%	5.15%	4.61%
C	2005	Target <=	3.75%	3.75%	3.75%	3.75%	3.75%
C	5.81%	Data	6.24%	5.77%	5.94%	6.05%	6.03%

Targets

FFY	2018	2019
Target A >=	79.00%	79.00%
Target B <=	7.00%	7.00%
Target C <=	3.75%	3.75%

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

Prepopulated Data

Source	Date	Description	Data
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/11/2019	Total number of children with IEPs aged 6 through 21	12,861
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/11/2019	A. Number of children with IEPs aged 6 through 21 inside the regular class 80% or more of the day	10,014
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/11/2019	B. Number of children with IEPs aged 6 through 21 inside the regular class less than 40% of the day	586
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/11/2019	c1. Number of children with IEPs aged 6 through 21 in separate schools	654
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/11/2019	c2. Number of children with IEPs aged 6 through 21 in residential facilities	149
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS002; Data group 74)	07/11/2019	c3. Number of children with IEPs aged 6 through 21 in homebound/hospital placements	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

Provide an explanation below

FFY 2018 SPP/APR Data

	Number of children with IEPs aged 6 through 21 served	Total number of children with IEPs aged 6 through 21	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A. Number of children with IEPs aged 6 through 21 inside the regular class 80% or more of the day	10,014	12,861	77.82%	79.00%	77.86%	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	586	12,861	4.61%	7.00%	4.56%	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]	818	12,861	6.03%	3.75%	6.36%	Did Not Meet Target	Slippage

	Number of children with IEPs aged 6 through 21 served	Total number of children with IEPs aged 6 through 21	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A. Number of children with IEPs aged 6 through 21 inside the regular class 80% or more of the day	XXX	XXX	XXX	XXX	XXX	XXX	XXX
B. Number of children with IEPs aged 6 through 21	XXX	XXX	XXX	XXX	XXX	XXX	XXX

	Number of children with IEPs aged 6 through 21 served	Total number of children with IEPs aged 6 through 21	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
inside the regular class less than 40% of the day							
C. Number of children with IEPs aged 6 through 21 inside separate schools, residential facilities, or homebound/hospital placements [c1+c2+c3]	XXX	XXX	XXX	XXX	XXX	XXX	XXX

Use a different calculation methodology (yes/no)

NO

Please explain the methodology used to calculate the numbers entered above.

Part	Reasons for slippage, if applicable
A	XXX
B	XXX
C	<p>The Special Education and Data Teams have disaggregated the data and have seen an increase in the number of students with disabilities placed in separate schools by LEAs. 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. In addition, Vermont notes a slight increase (less than 1%) in placements within a separate setting for children and youth with an eligibility determination of Emotional Disturbance. In FFY18 Vermont as a state had 835 students in Separate Schools, Residential Facility, Hospital/Homebound, 506 of those students with emotional disturbance.</p> <p>An LRE Workgroup will convene this year to review data and challenges with the goal of addressing slippage in this area. One area we are exploring as a Team is if the number of setting types changed. Or if the number of children and youth with complex needs increased while the number of children with IEPs decreased. A recent meeting with stakeholders regarding this increase revealed LEA concern and commitment to partner with the Agency of Education in identifying causes behind this trend. Further, the Agency of Education will turn to resources through the statewide Success Beyond Six initiative, which involves data and feedback collected and reported by DMH, DCF and AOE on the proportion of students qualifying for services with an ED identification.</p>

Provide additional information about this indicator (optional)

Vermont has been following OSEP guidance to submit and resubmit data on an ongoing basis as we are able. The Vermont Agency of Education has been engaging in continuous transparent communication with the US Dept of Education about challenges, including widespread delays caused by a difficult transition to Statewide Longitudinal Data System software, as we work to support the field in adapting to new processes. The data snapshot as of 7/11/2019 does not reflect Vermont's most up-to-date data. As such, Vermont is attaching our current EdFacts data, revised on 12/4/2019. There are also initiatives such as the Project AWARE effort (funded by a SAMHSA grant) which will hopefully help schools/districts better support students with complex needs (perhaps even reduce the number of students educated in separate settings) and therefore may ultimately impact this indicator.

5 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

5 - OSEP Response

The State provided targets for FFY 2019 for this indicator, and OSEP accepts those targets.

The State provided alternate data in an attachment for this indicator. These data are not consistent with the IDEA Part B Child Count and Environment data it submitted in ED Facts on July 10, 2019. The State submitted updated data in ED Facts on December 4, 2019. However, as noted in the ED Facts data instructions, updated data must be submitted prior to the resubmission period ending on July 10, 2019. Therefore, OSEP is unable to include data submitted after that date in the public release data files and products.

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

Provide an explanation of why it is not applicable below.

Historical Data

	Baseline	FFY	2013	2014	2015	2016	2017
A	2011	Target >=	71.78%	71.78%	71.78%	71.78%	71.78%
A	71.58%	Data	76.17%	76.58%	76.44%	75.81%	75.61%
B	2011	Target <=	6.19%	6.19%	6.19%	6.19%	6.19%
B	6.39%	Data	2.19%	2.53%	1.80%	1.00%	0.70%

Targets

FFY	2018	2019
Target A >=	71.78%	71.87%
Target B <=	6.19%	6.19%

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

Prepopulated Data

Source	Date	Description	Data
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/11/2019	Total number of children with IEPs aged 3 through 5	2,050
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/11/2019	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	1,499
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/11/2019	b1. Number of children attending separate special education class	7
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/11/2019	b2. Number of children attending separate school	6
SY 2018-19 Child Count/Educational Environment Data Groups (EDFacts file spec FS089; Data group 613)	07/11/2019	b3. Number of children attending residential facility	0

FFY 2018 SPP/APR Data

	Number of children with IEPs aged 3 through 5 served	Total number of children with IEPs aged 3 through 5	FFY 2017 Data	FFY 2018 Target	FFY 2018 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	1,499	2,050	75.61%	71.78%	73.12%	Met Target	No Slippage
B. Separate special education class, separate school or residential facility	13	2,050	0.70%	6.19%	0.63%	Met Target	No Slippage

Use a different calculation methodology (yes/no)

NO

Please explain the methodology used to calculate the numbers entered above.

Provide reasons for slippage for A

Part	Reasons for slippage, if applicable
A	XXX
B	XXX

Provide additional information about this indicator (optional)

Vermont has been following OSEP guidance to submit and resubmit data on an ongoing basis as we are able. The Vermont Agency of Education has been engaging in continuous transparent communication with the US Dept of Education about challenges, including widespread delays caused by a difficult transition to Statewide Longitudinal Data System software, as we work to support the field in adapting to new processes. The data snapshot as of 7/11/2019 does not reflect Vermont's most up-to-date data. As such, Vermont is attaching our current EdFacts data, revised on 12/4/2019

6 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

6 - OSEP Response

The State provided targets for FFY 2019 for this indicator, and OSEP accepts those targets.

The State provided alternate data in an attachment for this indicator. These data are not consistent with the IDEA Part B Child Count and Environment data it submitted in EDFacts on July 10, 2019. The State submitted updated data in EDFacts on December 4, 2019. However, as noted in the EDFacts

data instructions, updated data must be submitted prior to the resubmission period ending on July 10, 2019. Therefore, OSEP is unable to include data submitted after that date in the public release data files and products.

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

Provide an explanation of why it is not applicable below.

Historical Data

	Baseline	FFY	2013	2014	2015	2016	2017
A1	2014	Target >=	92.88%	86.63%	86.63%	86.63%	86.63%
A1	86.63%	Data	89.13%	86.63%	85.17%	76.67%	81.75%
A2	2014	Target >=	53.34%	40.91%	40.91%	40.91%	40.91%
A2	40.91%	Data	68.00%	40.91%	51.06%	68.75%	48.64%
B1	2014	Target >=	91.21%	87.30%	87.30%	87.30%	87.30%
B1	87.30%	Data	90.68%	87.30%	84.44%	80.65%	84.65%
B2	2014	Target >=	50.03%	32.49%	32.49%	32.49%	32.49%
B2	32.49%	Data	56.00%	32.49%	39.44%	58.33%	36.05%
C1	2014	Target >=	93.27%	86.00%	86.00%	86.00%	86.00%
C1	86.00%	Data	91.46%	86.00%	79.27%	75.00%	85.21%
C2	2014	Target >=	61.23%	54.71%	54.71%	54.71%	54.71%
C2	54.71%	Data	64.00%	54.71%	61.27%	76.04%	57.28%

Targets

FFY	2018	2019
Target A1 >=	87.13%	87.13%
Target A2 >=	41.41%	41.41%
Target B1 >=	87.80%	87.80%
Target B2 >=	32.99%	32.99%
Target C1 >=	86.50%	86.50%
Target C2 >=	55.21%	55.21%

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

FFY 2018 SPP/APR Data

Number of preschool children aged 3 through 5 with IEPs assessed

409

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

	Number of children	Percentage of Children
a. Preschool children who did not improve functioning	10	2.44%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	47	11.49%

	Number of children	Percentage of Children
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	139	33.99%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	119	29.10%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	94	22.98%

	Numerator	Denominator	FFY 2017 Data	FFY 2018 Target	FFY 2018 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>	258	315	81.75%	87.13%	81.90%	Did Not Meet Target	No Slippage
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>	213	409	48.64%	41.41%	52.08%	Met Target	No Slippage

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

	Number of Children	Percentage of Children
a. Preschool children who did not improve functioning	4	0.98%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	40	9.78%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	200	48.90%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	143	34.96%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	22	5.38%

	Numerator	Denominator	FFY 2017 Data	FFY 2018 Target	FFY 2018 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>	343	387	84.65%	87.80%	88.63%	Met Target	No Slippage
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>	165	409	36.05%	32.99%	40.34%	Met Target	No Slippage

Outcome C: Use of appropriate behaviors to meet their needs

	Number of Children	Percentage of Children
a. Preschool children who did not improve functioning	4	0.98%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	42	10.27%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	115	28.12%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	114	27.87%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	134	32.76%

	Numerator	Denominator	FFY 2017 Data	FFY 2018 Target	FFY 2018 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.	229	275	85.21%	86.50%	83.27%	Did Not Meet Target	Slippage
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.	248	409	57.28%	55.21%	60.64%	Met Target	No Slippage

Part	Reasons for slippage, if applicable
A1	XXX
A2	XXX
B1	XXX
B2	XXX
C1	8 Vermont school districts did not report ECO data in Vermont's end-of-year Child Count collection of exited students, which may have resulted in slippage for this indicator. Vermont AOE has been working with its districts on best practices for collecting and reporting this data.
C2	XXX

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

Please explain why the State did not 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
Was sampling used?	NO
If yes, has your previously-approved sampling plan changed?	
If the plan has changed, please provide sampling plan	

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

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

YES

If no, provide the criteria for defining "comparable to same-aged peers."

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

Early Childhood Outcome (ECO) entry, exit and progress data is determined and collected by school district IEP teams through the IEP process. In 2013, AOE began to implement the use of the integrated ECO IEP. Instruments used to gather ECO entry, exit and progress data is a local IEP decision, however Teaching Strategies Gold is the state approved universal PreK progress monitoring assessment that is required two times per year. Vermont does not use Teaching Strategies Gold 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 Child Count data collection two times per year. Vermont's ECO Practice and Procedures Manual provides guidance for IEP teams to make determinations and reporting.

Provide additional information about this indicator (optional)

7 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

7 - OSEP Response

The State provided targets for FFY 2019 for this indicator, and OSEP accepts those targets.

The State did not provide valid and reliable data for this indicator. These data are not valid and reliable because the State did not provide data for eight LEA's and the State has indicated that it is not using a sampling plan. Therefore, OSEP could not determine whether the State met its target.

7 - 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.

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

	Yes / No
Do you use a separate data collection methodology for preschool children?	NO
If yes, will you be providing the data for preschool children separately?	XXX

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

Historical Data

Baseline	2005	28.00%			
FFY	2013	2014	2015	2016	2017
Target >=	38.12%	38.12%	38.12%	38.12%	38.12%
Data	35.73%	37.04%	36.08%	36.75%	37.03%

Targets

FFY	2018	2019
Target >=	38.12%	38.12%

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
398	1,160	37.03%	38.12%	34.31%	Did Not Meet Target	Slippage

The number of parents to whom the surveys were distributed.

13,806

Percentage of respondent parents

8.40%

Provide reasons for slippage, if applicable

We have noted in our data that our most challenging areas are the same from FFY2017 to FFY2018. For example, parents rated items around staff proving support, training, and special assistance lower than staff availability and being treated as equal members of IEP teams. These data provide Vermont with a platform with which to work with our Parent Training and Information Center – the Vermont Family Network – in addressing parent concerns.

Although the response rate was higher compared to last year, Vermont will continue to work with our vendor for greater representation, and greater response rates. is continuing to look into a few possible reasons for slippage. There was a quick turnaround for responses as surveys were disseminated at the end of the summer rather than end of the school year; the summer gap as well as change in dissemination window may have impacted response rates. We also note that there is a specific age grouping that reflects poorer response rates, and will explore opportunities for better outreach and incentives to meet the needs of guardians parenting this age group.

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.3.91 software. The statistical summary of the 2019 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.”

PART B Preschool Special Education

Percent at or above: 600/550 51%/56% (SE of the mean = 2.7%)

Number of Valid Responses: 143 Measurement reliability: 0.89-0.94

Mean Measure: 613 Measurement SD 153

PART B Grades K - 12

Percent at or above: 600/550 31%/42% (SE of the mean = 1.2%)

Number of Valid Responses: 1017 Measurement reliability: 0.92-0.95

Mean Measure: 547 Measurement SD 148

PART B ALL

Percent at or above: 600/550 34%/44% (SE of the mean = 0.4%)

Number of Valid Responses: 1160 Measurement reliability: 0.92-0.95

Mean Measure: 555 Measurement SD 150

Historical Data

	Baseline	FFY	2013	2014	2015	2016	2017
Preschool	XXX	Target >=	XXX	XXX	XXX	XXX	XXX
Preschool	XXX	Data	XXX	XXX	XXX	XXX	XXX
School age	XXX	Target >=	XXX	XXX	XXX	XXX	XXX
School age	XXX	Data	XXX	XXX	XXX	XXX	XXX

Targets

FFY	2018	2019
Target A >=	XXX	XXX
Target B >=	XXX	XXX

FFY 2018 SPP/APR Data: Preschool Children Reported Separately

	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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
Preschool	XXX	XXX	XXX	XXX	XXX	XXX	XXX
School age	XXX	XXX	XXX	XXX	XXX	XXX	XXX

Provide reasons for slippage, if applicable

XXX

The number of School-Age parents to whom the surveys were distributed.

XXX

Percentage of respondent School-Age parents

XXX

	Yes / No
Was sampling used?	NO
If yes, has your previously-approved sampling plan changed?	
If yes, provide sampling plan.	

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

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

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

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.

To determine if the parents who responded to this survey were representative of the parents of all the children receiving special education services, race/ethnicity, disability, gender, and age demographics of the children whose parents responded to the survey were compared with the same demographics of all of the children whose parents were mailed a survey. The chart attached collapses several disability categories to comply with reporting requirements of the Agency of Education's privacy and data policies which require 11 students in any group where student identifiable information is shared.

The largest difference between population and respondents in a disability category is 2.60%, in the Emotional Disturbance group. In categories of race/ethnicity, disabilities other than Emotional Disturbance, and gender, the respondent group differs from the population proportion by less than 2.00%. By age group, the largest difference between population and respondents is in the 12 to 17 year old category, at 3.41%. All other age categories have differences of less than 2.10% between the population and the respondent group.

Vermont is seeking to strategize with our survey vendor: to analyze incoming responses by region, by district, by language etc.; to update contract of survey vendor with the goal of increasing representation from all groups; to verify documentation of attempts made for no response (wrong address /phone info); and to perhaps incentivize respondent participation. Vermont is enhancing it's technical assistance / professional development library, where resources will be made available to the field.

We have recently renewed a long-standing relationship with the Vermont Family Network as active collaborators.

Provide additional information about this indicator (optional)

Potsdam Institute for Applied Research at State University of New York – Potsdam administers this survey on the behalf of Vermont Agency of Education. The survey was completed in August and an analysis was completed in September 2019.

8 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

8 - OSEP Response

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

8 - Required Actions

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 2018 reporting period (i.e., after June 30, 2019).

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 2018 SPP/APR, the data for FFY 2017), 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

Provide an explanation of why it is not applicable below.

Historical Data

Baseline	2005	0.00%			
FFY	2013	2014	2015	2016	2017
Target	0%	0%	0%	0%	0%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2018	2019
Target	0%	0%

FFY 2018 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 and/or cell size	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
0	0	54	0.00%	0%	0.00%	Met Target	No Slippage

Provide reasons for slippage, if applicable

XXX

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).

Disproportionate representation seeks to measure whether any racial or ethnic group is identified for special education services at a higher rate than other groups. Vermont uses a combination of accepted risk ratio techniques to provide an analysis that account for our state’s small and largely homogeneous population. Weighted risk ratios are used when populations are large and diverse enough to support their accuracy; in other cases, alternate risk ratios are used. Vermont uses a minimum cell size of 11 for identification. Analysis is still done on every race/ethnicity category in every district. Vermont uses 1 year of data in these calculations, and to determine whether any districts ought to be identified for disproportionate representation.

Vermont has a 3-criterion system that works in combination to identify LEA’s with disproportionate representation in special education. A challenge for Vermont 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, Vermont created three criteria designed to provide a meaningful, valid and reliable methodology for identifying LEAs with disproportionate representation:

Criterion 1: LEA-level Weighted Risk Ratio greater than 3.0 or LEA-level Alternate Risk Ratio greater than 3.0. Weighted risk ratios are the preferred method of analysis, but when the comparison populations are very small, the weighted risk ratio can become volatile, with one additional student resulting in a large change in the result. Therefore, when the sum of the comparison groups equals 10 students or fewer, the simpler alternate risk ratio calculation is used. 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.

Criterion 2: Greater than 10 students receiving special education services in the race/ethnicity category of analysis in a given LEA. Vermont uses a minimum cell size because risk ratios can be substantively impacted by the addition of just one student in a race/ethnicity category containing fewer than 11 students. Calculations are unreliable in identifying disproportionate representation for such small groups. Furthermore, the Vermont Agency of Education “small ‘n’ rule” prohibits public reporting of student-related information for groups less than or equal to 10 students. For these reasons, any single cell used for either weighted or alternate risk ratio analysis must contain at least eleven students before a district is identified for overrepresentation.

Criterion 3: A difference greater than or equal to 10 between the actual count of special education students in a race/ethnicity category and the expected count of special education students in the race/ethnicity category. The expected count is calculated using the proportion of the LEA student population in a race/ethnicity category and total number of special education students in that LEA. This criterion prevents spurious identification of an LEA when a combination of “small ‘n’” sizes across race/ethnicity categories cause risk ratios to be difficult to interpret meaningfully. This criterion, in combination with the other two, provides a meaningful, valid and reliable methodology for identifying LEAs with disproportionate representation.

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.

Vermont used child count data and student census data to complete the calculations and apply the criteria described above. No LEA in the State was identified with disproportionate representation based on these criteria.

Provide additional information about this indicator (optional)

As part of Vermont’s commitment to developing methodology that will allow us to examine significant discrepancy and disproportionality within our small state, Vermont is dedicating resources to ensure we are collecting and analyzing data that are reflective of student needs, which will lead to reliable and valid decision-making in the years ahead regarding representation. We are working with our IDC and NCSI partners on our methodology and implementing best practices.

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Correction of Findings of Noncompliance Identified Prior to FFY 2017

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of PFFY01 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*

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

9 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

9 - OSEP Response

The State used the total number of districts in the State as the denominator in its FFY 2017 SPP/APR, and used the number of districts that meet the State-established minimum n and/or cell size as the denominator in its FFY 2018 SPP/APR, which is required by the Measurement Table if the State has established a minimum n and/or cell size requirement. However, the State appears to be using the same calculation methodology it used in its FFY 2017 SPP/APR. Therefore, it is unclear whether or not the State has a minimum n size requirement.

9 - 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.

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 2018, 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 2018 reporting period (i.e., after June 30, 2019).

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 2018 SPP/APR, the data for FFY 2017), 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

Provide an explanation of why it is not applicable below

Historical Data

Baseline	2005	0.00%			
FFY	2013	2014	2015	2016	2017
Target	0%	0%	0%	0%	0%
Data	0.00%		0.00%	0.00%	0.00%

Targets

FFY	2018	2019
Target	0%	0%

FFY 2018 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 and/or cell size	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
0	0	54	0.00%	0%	0.00%	Met Target	No Slippage

Provide reasons for slippage, if applicable

XXX

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).

Disproportionate representation seeks 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. Vermont uses a combination of accepted risk ratio techniques to provide an analysis that account for our state’s small and largely homogeneous population. Weighted risk ratios are used when populations are large and diverse enough to support their accuracy; in other cases, alternate risk ratios are used. Vermont uses a minimum cell size of 11 for identification. Analysis is still done on every race/ethnicity category in every district. Vermont uses 1 year of data in these calculations, and to determine whether any districts ought to be identified for disproportionate representation.

Vermont has a 3-criterion system that works in combination to identify LEA’s with disproportionate representation in particular special education disability categories. A challenge for Vermont 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, Vermont created three criteria designed to provide a meaningful, valid and reliable methodology for identifying LEAs with disproportionate representation:

Criterion 1: LEA-level Weighted Risk Ratio greater than 3.0 or LEA-level Alternate Risk Ratio greater than 3.0. Weighted risk ratios are the preferred method of analysis, but when the comparison populations are very small, the weighted risk ratio can become volatile, with one additional student resulting in a large change in the result. Therefore, when the sum of the comparison groups equals 10 students or fewer, the simpler alternate risk ratio calculation is used. 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.

Criterion 2: Greater than 10 students receiving special education services for the specified disability in the race/ethnicity category of analysis in a given LEA. Vermont uses a minimum cell size because risk ratios can be substantively impacted by the addition of just one student in a race/ethnicity and disability category containing fewer than 11 students. Calculations are unreliable in identifying disproportionate representation for such small groups. Furthermore, the Vermont Agency of Education (VERMONT AOE) “small ‘n’ rule” prohibits public reporting of student-related information for groups less than or equal to 10 students. For these reasons, any single cell used for either weighted or alternate risk ratio analysis must contain at least eleven students before a district is identified for overrepresentation.

Criterion 3: A difference greater than or equal to 10 between the actual count of special education students with a specific disability in a race/ethnicity category and the expected count of special education students with that disability in the race/ethnicity category. The expected count is calculated using the proportion of the LEA student population in a race/ethnicity category and total number of students with the disability being examined in that LEA. This criterion prevents spurious identification of an LEA when a combination of “small ‘n’” sizes across race/ethnicity and disability categories cause risk ratios to be difficult to interpret meaningfully. This criterion, in combination with the other two, provides a meaningful, valid and reliable methodology for identifying LEAs with disproportionate representation.

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 AOE used child count data and student census data to complete the calculations and apply the criteria described above. No LEA in the State was identified with disproportionate representation in any disability category based on these criteria.

Provide additional information about this indicator (optional)

As part of Vermont’s commitment to developing methodology that will allow us to examine significant discrepancy and disproportionality within our small state, Vermont is dedicating resources to ensure we are collecting and analyzing data that are reflective of student needs, which will lead to reliable and valid decision-making in the years ahead regarding representation. We are working with our IDC and NCSI partners on our methodology and implementing best practices.

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Correction of Findings of Noncompliance Identified Prior to FFY 2017

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of PFFY01 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*

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

10 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

10 - OSEP Response

The State used the total number of districts in the State as the denominator in its FFY 2017 SPP/APR, and used the number of districts that meet the State-established minimum n and/or cell size as the denominator in its FFY 2018 SPP/APR, which is required by the Measurement Table if the State has established a minimum n and/or cell size requirement. However, the State appears to be using the same calculation methodology it used in its FFY 2017 SPP/APR. Therefore, it is unclear whether or not the State has a minimum n size requirement.

10 - 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.

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 2018 SPP/APR, the data for FFY 2017), 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	2005	69.74%			
FFY	2013	2014	2015	2016	2017
Target	100%	100%	100%	100%	100%
Data	97.71%	98.48%	97.89%	97.74%	97.58%

Targets

FFY	2018	2019
Target	100%	100%

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
349	339	97.58%	100%	97.13%	Did Not Meet Target	No Slippage

Provide reasons for slippage

XXX

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

10

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.

There were ten (10) students from three (3) LEAs who received evaluations beyond the 60-day timeline. The range of dates beyond the 60-day timeline were 61 – 84 days. Reasons for the delays included miscalculation of due dates, parent scheduling conflicts, delay in cognitive evaluation results from psychologist, and difficulty with obtaining translation or interpreter services.

Indicate the evaluation timeline used:

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

What is the State’s timeline for initial evaluations? If the State-established timeframe provides for exceptions through State regulation or policy, describe cases falling within those exceptions and include in (b).

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.

Monitoring was completed on a 6-year cycle through the end of SY2018-2019. Using a state developed spreadsheet, LEAs submit self-reported data related to initial evaluations on NOV 1, FEB 1 APR 1 and JUN 1. After Vermont reviews each quarterly submission for compliance, each LEA receives written feedback identifying student-level issues of noncompliance and offers differentiated technical assistance to enable the LEA to meet 100% compliance for each subsequent submission. At the end of the monitoring cycle, Vermont notifies each LEA of final compliance standings in a summary or close-out letter. Districts who do not meet 100% compliance are included in the following year’s monitoring cycle. Beginning in SY2019-2020, this cycle has been compressed to 3-years for all Vermont school districts.

Provide additional information about this indicator (optional)

Correction of Findings of Noncompliance Identified in FFY 2017

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	5	0	0

FFY 2017 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 from the four (4) LEAs who had late initial evaluations in FFY2017, Vermont has determined that each LEA is now meeting 100% compliance with federal regulations related to indicator 11. Vermont also verified that the LEA area of non-compliance was corrected within one year from identification and that this is not a systemic issue.

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

Based on an updated review of data, Vermont has determined that although late, each of the five (5) students reported in FFY2017 received an initial evaluation and the LEA is now compliant for federal regulations related to indicator 11.

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Correction of Findings of Noncompliance Identified Prior to FFY 2017

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of PFFY01 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*

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

11 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

11 - OSEP Response

Because the State reported less than 100% compliance for FFY 2018, the State must report on the status of correction of noncompliance identified in FFY 2018 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2019 SPP/APR, that it has verified that each LEA with noncompliance identified in FFY 2018 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 2019 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 2018, although its FFY 2018 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2018.

11 - Required Actions

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

- # of children who have been served in Part C and referred to Part B for Part B eligibility determination.
- # of those referred determined to be NOT eligible and whose eligibility was determined prior to their third birthdays.
- # of those found eligible who have an IEP developed and implemented by their third birthdays.
- # 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.
- # of children determined to be eligible for early intervention services under Part C less than 90 days before their third birthdays.
- # 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 2018 SPP/APR, the data for FFY 2017), 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

Provide an explanation of why it is not applicable below.

Historical Data

Baseline	2005	86.44%			
FFY	2013	2014	2015	2016	2017
Target	100%	100%	100%	100%	100%
Data	100.00%	100.00%	100.00%	100.00%	100.00%

Targets

FFY	2018	2019
Target	100%	100%

FFY 2018 SPP/APR Data

a. Number of children who have been served in Part C and referred to Part B for Part B eligibility determination.	88
b. Number of those referred determined to be NOT eligible and whose eligibility was determined prior to third birthday.	5
c. Number of those found eligible who have an IEP developed and implemented by their third birthdays.	79

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.	4
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

	Numerator (c)	Denominator (a-b-d-e-f)	FFY 2017 Data	FFY 2018 Target	FFY 2018 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.	79	79	100.00%	100%	100.00%	Met Target	No Slippage

Provide reasons for slippage, if applicable

XXX

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.

Notification letters were sent to the eight (8) LEAs slated for FFY2018 Compliance Monitoring which for this indicator involves the LEA completion of an state-developed spreadsheet. Vermont requested from each LEA the child's name, date birth, the date of referral to Part B, date of the transition meeting, as well as the date an IEP was developed and the date of parental consent for the provision of the IEP services. This spreadsheet was submitted at four time periods over the course of the school year and were specifically due on NOV 1, FEB 1, APR 1 and JUN 1. For LEAs in the FFY2018 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 compliant by Vermont.

Provide additional information about this indicator (optional)

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Correction of Findings of Noncompliance Identified Prior to FFY 2017

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of PFFY01 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 PFFY01 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*

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

12 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

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 2018 SPP/APR, the data for FFY 2017), 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	2009	22.60%			
FFY	2013	2014	2015	2016	2017
Target	100%	100%	100%	100%	100%
Data	74.04%	74.34%	91.49%	88.03%	100.00%

Targets

FFY	2018	2019
Target	100%	100%

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
57	80	100.00%	100%	71.25%	Did Not Meet Target	Slippage

Provide reasons for slippage, if applicable

Vermont is aligning reporting practices with OSEP expectations according to the December 16, 2019 webinar that requires all incidences of non-compliance to be reported.

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.

Monitoring was completed on a 6-year cycle through the end of SY2018-2019. LEAs self-select and submit a minimum of (10) students with post-secondary transition plans and complete a self-review using a the NTACT Indicator 13 checklist. Submissions are required quarterly on NOV 1, FEB 1 APR 1 and JUN 1. After Vermont reviews quarterly submissions for compliance, each LEA receives written feedback identifying student-level issues of non-compliance and offers differentiated technical assistance to enable the LEA to meet 100% compliance for subsequent submissions. FFY2018 data were from the November 1st submission as Vermont did not collect a new data pull prior to the end of the school year. At the end of the school year, Vermont notifies each LEA of final compliance standings in a summary or close-out letter. Districts who do not meet 100% compliance are included in the following year's monitoring cycle. Beginning in SY2019-2020, this cycle has been compressed to 3-years for all Vermont LEAs to allow for a bigger n-size. As Vermont is using data from a sampling of LEAs, there is always the potential that LEA capacity issues could impact Vermont's results. In order to ensure that all LEAs in a monitoring cycle are able to submit valid and reliable data, Vermont will begin using early data sampling(s) to provide differentiated technical assistance. The final sampling will be an additional data set collected late in the monitoring cycle and will be used as the official monitoring results in future submissions to OSEP.

	Yes / No
Do the State's policies and procedures provide that public agencies must meet these requirements at an age younger than 16?	NO
If yes, did the State choose to include youth at an age younger than 16 in its data for this indicator and ensure that its baseline data are based on youth beginning at that younger age?	
If yes, at what age are youth included in the data for this indicator	

If no, please explain

Provide additional information about this indicator (optional)

The FFY2018 monitoring cycle consisted of eight (8) LEAs, with only three (3) meeting 100% compliance at the initial data submission. After the initial submission, and with immediate differentiated technical assistance, four (4) of the remaining LEAs were able to correct issues of non-compliance to meet 100% compliance for federal regulations related to this indicator. One (1) LEA was provided with intensive technical assistance and despite this was not able to exceed 80% compliance by the end of the school year. This LEA was sanctioned with a 15% set aside of their IDEA B grant funds to address non-compliance for this indicator and was scheduled for an on-site visit in SY2019-2020.

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Correction of Findings of Noncompliance Identified Prior to FFY 2017

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of PFFY01 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*

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

Findings of Noncompliance Verified as Corrected

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

XXX

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

XXX

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

XXX

13 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

13 - OSEP Response

Because the State reported less than 100% compliance for FFY 2018, the State must report on the status of correction of noncompliance identified in FFY 2018 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2019 SPP/APR, that it has verified that each LEA with noncompliance identified in FFY 2018 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 2019 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 2018, although its FFY 2018 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2018.

13 - Required Actions

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 2019 on students who left school during 2017-2018, timing the data collection so that at least one year has passed since the students left school. Include students who dropped out during 2017-2018 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 2018 SPP/APR, due February 2020:

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

	Baseline	FFY	2013	2014	2015	2016	2017
A	2009	Target >=	24.25%	24.25%	24.25%	24.25%	24.25%
A	24.22%	Data	50.38%	48.89%	38.79%	22.22%	21.94%
B	2009	Target >=	56.50%	56.50%	56.50%	56.50%	56.50%
B	56.40%	Data	70.61%	62.22%	69.63%	64.81%	62.58%
C	2009	Target >=	72.00%	72.00%	72.00%	72.00%	72.00%
C	71.97%	Data	77.48%	73.33%	80.84%	74.07%	78.71%

FFY 2018 Targets

FFY	2018	2019
Target A >=	24.25%	24.25%
Target B >=	56.50%	56.50%
Target C >=	72.00%	72.00%

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

FFY 2018 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	144
1. Number of respondent youth who enrolled in higher education within one year of leaving high school	33
2. Number of respondent youth who competitively employed within one year of leaving high school	72
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)	12

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).	11
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	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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A. Enrolled in higher education (1)	33	144	21.94%	24.25%	22.92%	Did Not Meet Target	No Slippage
B. Enrolled in higher education or competitively employed within one year of leaving high school (1 +2)	105	144	62.58%	56.50%	72.92%	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)	128	144	78.71%	72.00%	88.89%	Met Target	No Slippage

Part	Reasons for slippage, if applicable
A	XXX
B	XXX
C	XXX

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.

	Yes / No
Was sampling used?	NO
If yes, has your previously-approved sampling plan changed?	
If yes, provide sampling plan.	

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

	Yes / No
Was a survey used?	YES
If yes, is it a new or revised survey?	NO
If yes, attach a copy of the survey	XXX

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 Vermont's Post-Secondary Outcomes Survey were mostly representative of the children with IEPs who exited high school during the 2017-2018 school year by race/ethnicity, disability, and gender demographics. 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. The chart below, in the additional information section, suppresses race and ethnicity information and collapses several disability categories to comply with reporting requirements of the Vermont Agency of Education's small "n" rule (11). Although Vermont's data suppression rule, designed to protect student-identifiable information, prohibits publishing the number of non-white survey respondents, the percent of non-white respondents was within 3.00% of the percent of non-white survey recipients. The corresponding difference in the gender category is approximately 3.00%.

With the exception of Emotional Disturbance, the largest difference between the survey recipient population and respondents in a disability category is 2.83%(Specific Learning Disability). However, children with Emotional Disturbance and their parents represented at an 8.89% smaller subset of the respondent population than the survey recipient population.

Those who exited high school special education at younger ages or by dropping out were also less likely to respond to the survey. High schoolers with IEPs who exited at ages 14-18 (or the parents of those who were still under age 18 at the time of the survey notice) represented a 13.25% smaller portion of the respondent group than of all survey recipients. Those who dropped out (or their parents) represented 12.22% less of the respondent group than of the group who received surveys. The 14 to 18 age group contained 85.61% of all dropouts.

	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.

Vermont analyzed the representativeness of its survey respondents in both FFY2017 and FFY 2018. Efforts are underway to work with the vendor to improve our response rates and representativeness overall for future data collections, analyses, and submissions.

Provide additional information about this indicator (optional)

Potsdam Institute for Applied Research at State University of New York – Potsdam administers this survey on the the behalf of Vermont Agency of Education. The survey was completed in October and data were received in November 2019.

14 - Prior FFY Required Actions

In the FFY 2018 SPP/APR, the State must report whether the FFY 2018 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 2017 SPP/APR

Vermont analyzed the representativeness of its survey respondents in both FFY2017 and FFY2018. Efforts are underway to work with the vendor to improve our response rates and representativeness overall for future data collections, analyses, and submissions.

14 - OSEP Response

The State provided targets for FFY 2019 for this indicator, and OSEP accepts those targets.

14 - 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.

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 2018-19 EMAPS IDEA Part B Dispute Resolution Survey; Section C: Due Process Complaints	11/11/2019	3.1 Number of resolution sessions	6
SY 2018-19 EMAPS IDEA Part B Dispute Resolution Survey; Section C: Due Process Complaints	11/11/2019	3.1(a) Number resolution sessions resolved through settlement agreements	1

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

Provide an explanation below.

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

Historical Data

Baseline	2005	55.00%			
FFY	2013	2014	2015	2016	2017
Target >=	60.00%	60.00%	60.00%	60.00%	60.00%
Data	100.00%	100.00%	100.00%	0.00%	11.11%

Targets

FFY	2018	2019
Target >=	60.00%	60.00%

FFY 2018 SPP/APR Data

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
1	6	11.11%	60.00%	16.67%	Did Not Meet Target	No Slippage

Targets

FFY	2018 (low)	2018 (high)	2019 (low)	2019 (high)
Target	XXX	XXX	XXX	XXX

FFY 2018 SPP/APR Data

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2017 Data	FFY 2018 Target (low)	FFY 2018 Target (high)	FFY 2018 Data	Status	Slippage
XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX

Provide reasons for slippage, if applicable

XXX

Provide additional information about this indicator (optional)

Due to small numbers, Vermont does not meet target. Of the 5 resolutions not resolved through settlement: 3 were dismissed and 2 were withdrawn.

The State reported fewer than ten resolution sessions held in FFY 2017. The State is not required to meet its targets until any fiscal year in which ten or more resolution sessions were held. Vermont is not required to meet this target because there were a total of 6 resolution sessions held.

15 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

15 - OSEP Response

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

The State reported fewer than ten resolution sessions held in FFY 2018. 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 2018-19 EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/11/2019	2.1 Mediations held	28
SY 2018-19 EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/11/2019	2.1.a.i Mediations agreements related to due process complaints	2
SY 2018-19 EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/11/2019	2.1.b.i Mediations agreements not related to due process complaints	16

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

Provide an explanation below

Targets: Description of Stakeholder Input

Vermont will extend targets through federal fiscal year (FFY) 2019 with improvements over baseline. New targets for results indicators were set after presenting data to stakeholder groups and receiving their feedback and advisement. The aim was to have targets which were rigorous yet achievable. Key stakeholder input was obtained through the Special Education Advisory Council, the Vermont Special Education Administrators Council Executive Board, and through a live call-in webinar hosted by the State Director of Special Education. The webinar was a call in opportunity for special education directors to listen in, hear updates on the SPP/APR, and comment on FFY2019 targets being proposed by the Agency of Education.

Vermont is taking a new approach to its SPP/APR reporting and has assigned indicators across the Special Education Programming Team. Stewards of these indicators will be working with representative stakeholders, including parents, 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. The State Director will also be working with the five different regional groups of special education administrators.

Vermont anticipates forming a Special Education Youth Council with the intent of engaging individuals with disabilities in a dialogue about the indicators, measures, and patterns/trends in data. This perspective is necessary in ensuring we are getting our targets set correctly and understanding from the student perspective how we can improve practices.

Historical Data

Baseline	2005	63.00%			
FFY	2013	2014	2015	2016	2017
Target >=	82.00%	82.00%	82.00%	82.00%	82.00%

Data	76.00%	83.33%	70.00%	91.67%	70.83%
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Targets

FFY	2018	2019
Target >=	82.00%	82.00%

FFY 2018 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 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
2	16	28	70.83%	82.00%	64.29%	Did Not Meet Target	Slippage

Targets

FFY	2018 (low)	2018 (high)	2019 (low)	2019 (high)
Target	XXX	XXX	XXX	XXX

FFY 2018 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 2017 Data	FFY 2018 Target (low)	FFY 2018 Target (high)	FFY 2018 Data	Status	Slippage
XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX

Provide reasons for slippage, if applicable

Our panel of experienced mediators has not changed, neither has our process of assigning mediators. We looked at the 10 cases that did not reach an agreement during mediation. Considering this analysis, we do not think this is a systemic issue. The 2 cases related to due process were dismissed; of the 8 others, 3 reached agreement after mediation session ended, 1 was dismissed, 2 went to administrative complaint, and 2 reached no agreement.

Provide additional information about this indicator (optional)

16 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

16 - OSEP Response

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

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: