

### **PART III: ESEA KEY PROGRAMMATIC REQUIREMENTS AND FISCAL INFORMATION**

*In preparing a reply to the Part III request for information, States may find it helpful to align responses to ESEA goals. Funds from some ESEA programs explicitly support all of the ESEA goals (e.g. Title V) while other program funds concentrate on a specific ESEA goal (e.g. Title IV, Part A). Instructions:*

*For items 1-14 and the two final questions on uses of funds, please provide brief narrative responses. Where applicable, the State may include Web site references, electronic files, or other existing documentation to comply with the requirements listed in the application. (All electronic references and hyperlinks should point explicitly to applicable content.)*

#### **1. Title I, Part A -- Improving Basic Programs Operated By LEAs [Goals 1,2,3,5]**

- a. *Identify the amount of the reservation in section 1003(a) for school improvement that the State will use for State-level activities and describe those activities.*

#### **RESPONSE:**

The reservation for school improvement that the State will use for state-level activities is approximately \$22,000.

Vermont Department of Education leaders and consultants have worked closely with the superintendents and principals of Title I schools identified as *in need of technical assistance* to create a statewide system of support, which will focus initially on Title I identified schools, then expand to non-Title I identified schools (schools identified under Vermont's School Quality Standards), and finally to all schools.

The purpose of the statewide system of support is to ensure that all schools, beginning with the Title I identified schools, have access to high-quality professional development in such content areas as reading/language arts, mathematics, and science. Professional development and technical assistance also will be provided in school leadership, mentoring, using assessment results to improve instruction, parental involvement, and more.

Our intent is to create regionally based services wherever possible, supplemented with support from such statewide organizations as the Vermont Mathematics Initiative, Vermont Reads Institute, Vermont Science Initiative, Vermont Institute for Science, Math and Technology (Vermont's NSF systemic change initiative), National Writing Project, and Vermont's Strategic Reading Initiative (grades 4-12). Professional development will include all those forms of teacher and principal support that have proven through scientific studies to result in significant improvements in academic achievement. These include classroom modeling, coaching, mentoring, school and grade-level focus groups, and more (*Adding It Up, 2001; Putting Reading First, 2001*).

- b. *For the 95 percent of the reservation in section 1003(a) that must be made available to LEAs, describe how the SEA will allocate funds to assist LEAs in complying with the school improvement, corrective action, and restructuring requirements of section 1116 and identify any SEA requirements for use of those funds.*

**RESPONSE:**

After several discussions among superintendents and principals of Title I identified schools and the Commissioner of Education and staff at the Vermont Department of Education, agreement was reached on creating a statewide system of support as described in III-1-a, which will be funded in part with the approximately \$444,000 available under §1003(a). Because of the small number of high-quality content and leadership specialists whose services can be purchased on a per-diem or part-time contractual basis to support teachers and principals, virtually all superintendents of Title I identified schools agree that the department is best suited to operate a statewide system of support which will have regional centers. This is considered a better option than having LEAs fend for themselves in attempting to find distinguished teachers and principals who have time to consult with schools in need of assistance.

Our intent is to create a system in which LEAs choose focus areas, with our guidance, in which student performance is low, yet staff readiness to focus systemically and deeply on improving performance is sufficiently high to merit the time and support of some of Vermont's strongest technical assistance and professional development providers. In this sense, we will be targeting the delivery of both "dollars" and "services" based on school need. Some schools will be sufficiently large to focus on multiple curriculum areas, say K-3 reading, 4-8 writing effectiveness, and K-8 mathematics problem solving. Such schools will receive more services through the statewide system of support than a very small school with a principal and four teachers whose greatest need and motivation is to focus on scientifically based reading programs and strategies, K-6 (e.g., instructional strategies, materials, and grouping strategies for teaching phonemic awareness, phonics, vocabulary development, fluency, and comprehension).

We will allocate §1003(a) funds by allocating the time and services of technical assistance and professional development providers based on school needs (performance data), school size, school capacity (prior professional development and technical assistance, current grants, etc.), and evidence of willingness to make sustained and substantial changes in leadership and instructional practices that are likely to result in improved academic achievement. A few LEAs have requested funds in lieu of services, an option that was extended to all LEAs. All districts, whether they request funds or services, will participate in the statewide system of support and benefit from what we learn through our collective effort to significantly improve students' academic achievement.

Many of our Title I identified schools are eligible to apply for Reading First grants, 21<sup>st</sup> Century Community Learning Center grants, and more. The department will strongly encourage these schools to apply for these resources and will assist them to the extent possible in developing plans for competitively strong proposals.

In addition, the Vermont Department of Education assigns each identified school (Title I and non-Title I) a school improvement coordinator to assist in brokering services, developing action plans (school improvement plans), and accessing such resources as IHE partnerships, Vermont Mathematics Institute fellowships, and Vermont Reads Institute Early Literacy Improvement Specialists. Assistance of this nature, funded primarily with state and other non-ESEA resources, will continue in a closely aligned manner.

Vermont is a comparatively small state in which state and local leaders have learned a great deal from each other about how to systemically improve student achievement. Our intent is to take full advantage of what we know about effective school change practices and infuse it into our efforts to use the requirements and resources of ESEA to further improve student academic achievement.

- c. Identify what part, if any, of State administrative funds the SEA will use for assessment development under section 1004 of the ESEA, and describe how those funds will be used.*

**RESPONSE:**

No state administration funds will be used.

- d. Describe how the State will inform LEAs of the procedures they must use to distribute funds for schools to use for supplemental services under section 1167(e)(7) and the procedures for determining the amount to be used for this purpose.*

**RESPONSE:**

On June 6, 2002, the Commissioner of Education, Deputy Commissioners for School Quality and Standards and Assessments along with department consultants and program leaders held a day-long orientation to the requirements of ESEA for Title I identified schools. One of the topics covered in depth was §1167(e) (6) and (7), supplemental educational services. The PowerPoint slides for this part of the orientation are available upon request. We also have developed a guidance paper entitled “Considerations for Parental Notification Letter,” which outlines the content that should be included in a LEA’s or school’s notice to parents about the availability of supplemental educational services under §1167(e) (6) and (7). The content and examples in the guidance paper cover such topics as identification, student performance data, parental involvement, supplemental services, and choice.

All districts have been informed that they must set aside five percent (5%) of their Title I funds so that parents with low incomes can choose supplemental educational services that are likely to contribute in substantive ways to their children’s achievement in reading/language arts, mathematics (the areas covered by state assessments) and other standards that contribute to students’ improved general knowledge. Guidance for determining the amount of funding for individual students who are eligible for supplemental educational services is being developed in keeping with the requirements outlined in ESEA. Guidance for informing and advising parents is also under development.

In addition to the face-to-face meetings, we will inform all districts in writing of their responsibilities to provide supplemental education services. We also will invite teachers and school leaders of Title I identified schools to serve on a statewide committee that is developing the list of approved supplemental educational services providers, together with recommending criteria for evaluating the effectiveness of services and other §1167(e) (6) and (7) requirements.

Finally, we have emphasized to Title I identified schools their opportunity to expand supplemental educational services beyond the mandatory five percent by applying for 21<sup>st</sup> CCLC funding.

- e. *Describe how the State will use the formula funds awarded under section 6113(b)(1) for the development and implementation of State assessments in accordance with section 6111.*

**RESPONSE:**

- \$ 700,000: Science Assessment Development  
\$ 250,000: MIS Development  
\$ 250,000: Grade Level Expectations Development  
\$ 200,000: Lifeskills and Limited English Proficiency Assessment Development and Evaluation  
\$1,800,000: In-State Development of Grades 3,5, 6 and 7 mathematics and reading/English language arts content and performance standards and assessments

**2. Title I, Part B, Subpart 3 -- Even Start Family Literacy [Goals 1,2,5]**

- a. *Describe how the SEA will use its indicators of program quality to monitor, evaluate, and improve its projects, and to decide whether to continue operating them.*

**RESPONSE:**

Vermont developed state performance indicators during the fall of 2000 in consultation with experts in adult education, early childhood education, parenting education, program evaluation and program management. These indicators addressed the requirements under section 1210 of the Even Start Statute and were submitted to the U. S. Department of Education by June 30, 2001.

Performance indicators serve as the foundation of accountability systems and program evaluation. With the performance indicators as the catalyst, Vermont initiated the development of an Even Start management information system known as the INVEST System or Information Nexus for Vermont's Even Start Teachers. This system will provide the capacity for state and local reporting of progress on the performance indicators and will provide information to meet the following state and local reporting, evaluation, and monitoring requirements:

- ❑ Providing an annual report for Title I, Part B
- ❑ Generating annual performance data regarding the Even Start population in relation to the performance indicators
- ❑ Generating annual performance data regarding program quality requirements and benchmarks for ES programs
- ❑ Monitoring of the program quality and participant status of individual programs in comparison to other programs
- ❑ Articulating program theories that clarify the relationship between program strategies and outcomes related to learner performance
- ❑ Identifying and tracking trends across time in Even Start programs
- ❑ Encouraging focus and utility in local evaluation/continuous program improvement processes

The INVEST system, expected to be completed in paper form by June 30, 2002, is being created as an adjunct system to the Adult Education and Information System. A state-level MIS Workgroup composed of adult education state and local program staff, Even Start state and local

program staff, and technical consultants develop the conceptual focus and draft documents for the INVEST system in these areas: registration, assessment, monitoring, and update and separation. Professional development is linked to the introduction of INVEST materials, including training in the use of assessment tools embedded in the performance indicators.

In July 2002, development of an Internet based, individually accessible system will begin, with the expectation that the INVEST system will be in place technologically by early 2003 when data related to the state performance indicators will become available for the program year FY 03.

*b. Describe what constitutes sufficient program progress when the SEA makes continuation awards*

**RESPONSE:**

In considering continuation applications, the following areas will be evaluated to determine whether the program has made sufficient progress to allow for continued Even Start funding:

- Progress in meeting program objectives as stated in the original grant application
- Progress on meeting the targets for learner outcomes as described in Vermont's performance indicators
- Local evaluation reports
- Program monitoring visits

Continuation applications will be scored utilizing the data related to these four areas. Scores will be compared across programs and statewide. Low performing programs will be targeted for technical assistance, both in regard to progress on state indicators as well as program quality. Sufficient progress will be evaluated using both the state learner outcomes performance indicators as well as the processes that focus on demonstrating quality Even Start programming.

*c. Explain how the State's Even Start projects will provide assistance to low-income families participating in the program to help children in those families to achieve to the applicable State content and student achievement standards.*

**RESPONSE:**

The mission of the Even Start Program is to serve as high performing, research based models for educating most-in-need families with young children. Even Start Family Literacy programs provide an equal focus on adult education, early childhood education and parenting education. Vermont's INVEST management information system for Even Start will focus Vermont's efforts on learner outcomes, adult and early childhood education as well as in parenting skills. The methods used to provide services will be based on effective, research-based practice in all three areas. The emphasis of the integrated service provision Even Start model is on literacy and education for the most educationally at-risk families in the communities being served.

In addition, Even Start Programs are based on strong connections and collaborations at the community level, with the mandate to provide the network of support that at-risk families need to maintain the duration and intensity of program participation necessary for families to meet their academic and economic goals. Referrals and brokering of support services are tracked by the INVEST system, so that each program can identify the level and types of supports that are in

place for Even Start families, including transportation and childcare services. In Vermont, we are also developing models of service delivery that integrate and coordinate other federal and state programs, including Even Start/Head Start, Even Start/Teen Parent Programs, Even Start/Getting Ready to Work Programs, and other models that provide enhanced academic and support services to low income families. Even Start Programs will also coordinate and build on programs such as Early Reading First, Title I Preschool programs, and 21<sup>st</sup> Century Community Learning Centers.

The key to tracking academic and support services provided to low income Even Start participants, and to tracking the learner outcomes that are incorporated into the Even Start State Indicators, is the development of the INVEST system (Information Nexus for Vermont's Even Start Teachers). This system will track the intensity of adult, early education, and parenting education provided to families, as well as the provision of support services, duration of participation and most importantly, the adult and child learner outcomes. Vermont should be able to identify the most effective service delivery models and instructional practices by linking existing models and practices to learner outcomes.

A copy of Vermont's State Indicators are included in [Appendix Part III - 2 - C -1](#)

A copy of the Even Start INVEST System End of the Year Report is included in [Appendix Part III - 2- C -2](#).

Even Start Programs must provide both instructional and enrichment services during the summer months and support a continuity of academic instruction. Staff qualifications have been evaluated and areas of need identified so that qualified instructors provide or supervise the provision of adult, early education, and parenting education for both institutional and home based instruction.

The Vermont State Even Start office is designing systems to support increased learner outcomes and program quality. In addition to the INVEST system, local evaluations are being redesigned to focus on data driven continuous program improvement that supports programs in meeting their objectives and increasing the learner outcomes achievements as measured by progress on the State Indicators. The SEA will set standards and benchmarks for learner and program performance, encourage focus and utility of local evaluations, create forums for sharing the results of local evaluations and train local evaluators in both the use of data and in the continuous program improvement process.

Ultimately, continued funding for Even Start Programs in Vermont will be dependent upon progress on the State Indicators which measure the academic achievements of both the adults and the children participating in Vermont's Even Start Programs.

*d. Identify the amount of the reservation under subsection 1233(a) that the State will use for each category of State-level activities listed in that section, and describe how the SEA will carry out those activities.*

**RESPONSE:**

Vermont will reserve 6 percent of the federal allocation for state administration and technical assistance/professional development activities. Half of the federal allocation will be directed to support state administrative functions.

Half of the remaining funds will be used to meet the requirements of section 1240 related to indicators of program quality. The funding will support the development and implementation of the Even Start MIS system. The INVEST system is designed to measure progress on state performance indicators as well as program quality, and to support continuous program improvement at the local and state levels. Training in assessment tools embedded in the INVEST system and the state indicators will be ongoing, including training in the use of data for local program management and continuous improvement.

The remaining technical assistance funding will support contracted or subgranted state evaluation services, including:

- ❑ INVEST system reporting summaries and analysis
- ❑ Review of local evaluations and the preparation of a annual state evaluation report
- ❑ Technical assistance to programs in regard to the use of data and program management
- ❑ Ongoing training and guidance for local evaluators
- ❑ Identification of state evaluation questions
- ❑ Identification of best practices/program strategies

### **3. Title I, Part C -- Education of Migrant Children [Goals 1,2,5]**

- a. *Describe the process the State will use to develop, implement, and document a comprehensive needs assessment that identifies the special educational and related needs of migrant children.*

#### **RESPONSE:**

Prior to the authorization of the No Child Left Behind Act, Vermont's Migrant Education Program's needs assessment was conducted informally. Vermont's program is small and as such it is easy to determine needs and prioritize services at the local level. Statewide, needs were assessed by information gathered by the Identification and Recruitment staff, input from community organizations, student assessment data, but mostly from local staff working with migrant students and their families on a daily basis.

These one-going needs assessments will be aligned with the comprehensive planning process of Vermont's implementation of ESEA to insure that specific performance targets are set for migrant students. In addition, a planning group will be formed to complete a needs assessment that focuses on the special educational needs of migratory children in Vermont.

The State Director of Migrant Education will be charged with the task of completing the comprehensive needs assessment. A planning group comprised of local program staff, representatives from Identification & Recruitment, state Title I staff, state & local family literacy staff, parents of migrant students, representatives from supervisory unions, and representatives from other community organizations interested in migrant workers will meet in September, 2002 to begin the process. The group will first identify what information exists and what information needs to be gathered. Key information will be the migrant student results from the statewide

assessments. That information will be organized by state results and local supervisory union results. Other information may include data collected from the past year's Certificates of Eligibility, parent and teacher surveys, and the availability of other state and local programs.

The planning group will then analyze all gathered data. The guiding questions will be, "Where are we now?" and "Where do we need to go?" Specific measurable goals and outcomes will be created as well as annual benchmarks. The group will also create a list of recommendations of tasks the SEA and the LEAs can do to assist in meeting the goals. Those tasks may include, but are not limited to, specific professional development for migrant education staff, the purchase of new resources, or the creation of committees to work on new initiatives. The overall goal of the planning group will be to ensure that the program services are the right fit for the identified migrant students in Vermont.

The planning group will complete its work by the end of November 2002. The State Director of Migrant Education will inform all funded programs of the results and ask for, if needed, modifications to the 2002-2003 LEA grants. The planning group will then meet annually to review current data and determine if any changes need to be made in order to keep on track in meeting the set goals and outcomes.

- b. Describe the State's priorities for the use of migrant education program funds in order to have migrant students meet the State's performance targets for indicators 1.1 and 1.2 in Part I (as well as 5.1 and 5.2 that expressly include migrant students), and how they relate to the State's assessment of needs for services.*

**RESPONSE:**

Vermont's priority for use of the migrant education funding will be for migrant students to meet the same challenging state standards as all other students and for migrant students to achieve proficiency in reading and mathematics by the school year 2013-2014. In Vermont, all migrant children participate in the state assessments regardless of how long they have been enrolled in the particular school. Therefore, at the SEA level, we will collect the data to measure our progress on Indicator 1.1 (the percentage of migrant students reaching proficiency in reading), Indicator 1.2 (the percentage of migrant students reaching proficiency in mathematics). State and local baseline data will be distributed in the fall of 2002 to the comprehensive needs assessment planning group and to the local grantees (LEAs) of migrant education funds. All local grantees will be required to set performance targets based on the indicators. The SEA will develop a plan to support LEAs in achieving their performance targets.

Indicator 5.1 (the percentage of migrant students who graduate from high school), and Indicator 5.2 (the number of migrant students who drop out of school after entering grades 7-12) will need additional work in order to establish baseline data. Specific performance targets cannot be set until the work is done to gather the baseline data that is part of the AYP timeline. However, each local grantee will be asked to create a goal of high school completion of all migrant students. They will be asked to track this locally until a state tracking system is in place. Initially, for the school year 2002-3, local grantees will be asked to track high school completion and to include in their local service delivery plan specific strategies to assist migrant students in completing high school. In subsequent years, after baseline data is created, local grantees will be asked to set performance targets related to high school completion.

- c. *Describe how the State will determine the amount of any subgrants the State will award to local operating agencies, taking into account the numbers and needs of migrant children, the statutory priority for service in section 1304(d), and the availability of funds from other federal, State, and local programs. (Applicable only if not previously addressed in Part II, #2.)*

**RESPONSE:**

Title I, Part C funds will be distributed by a formula to LEAs to provide all direct supplemental educational services to migrant children. The formula allocates funds to LEAs in Vermont based on the number of migrant children weighted by the following priority factors: number of preschool children, number of students who have moved during the regular school year, and number of students served during the summer. Every LEA (in Vermont, a LEA may include several school districts) with 10 or more identified migrant students is eligible for an allocation. With the allocation, the LEA may choose to provide services to students in their LEA alone or choose to form a consortium with other LEAs to provide services on a regional basis. Each May the allocation formula is run and counts every migrant student that has been in a LEA for even one day. This funding formula gives priority to districts with the most mobility as well as targets funds to areas that meet two of the state's priorities – provision of services to preschool migrant children and offering services during the summer months. Migrant children that are most at risk of not meeting the State's standards are given a priority for services at the local level.

If a migrant student has high needs not met by other programs and resides in a LEA that does not have 10 or more migrant students, the school district may apply to the VT-DOE for mini-grant funds to provide services to that student. The school district applies for those funds monthly; they are renewable as long as the student resides in the district and funds remain.

- d. *Describe how the State will promote continuity of education and the interstate and intrastate coordination of services for migrant children.*

**RESPONSE:**

The State Director of Migrant Education oversees all aspects of the Migrant Education Program in Vermont. Coordination of services in order to mitigate the results of educational disruption is given the highest priority. The first priority is to insure that as soon as migrant children move to a new school district within Vermont, they are identified and offered needed services. All Certificates of Eligibility (COEs) are sent to one main location – VT DOE. Every month, local supervisory unions receive a list of eligible migrant students in their district. They then return a copy of the list with any corrections and information as to where children have moved. The Identification & Recruitment staff will then verify the information given and notify the new district's Migrant Education teacher. Quarterly meetings are held for all Migrant Education staff to better coordinate the services within the state.

Currently, Vermont participates in the "Migrant Child Movement Notification System." The purpose of this system is to facilitate rapid transfers of movement information for migrant children between states. When a child moves to Vermont from another state, Vermont's data specialist calls the contact person from that state and receives the COE for the family. In turn, when a district notifies the data specialist that a child has moved to another state, she sends the

new state the COE with any pertinent comments. In addition, Vermont will participate in the development and implementation of the electronically linked migrant student record system that is mandated in the No Child Left Behind Act of 2001.

- e. Describe the State's plan to evaluate the effectiveness of its migrant education program and projects.*

**RESPONSE:**

Ultimately the State's Migrant Education program is judged on whether or not the State's migrant children are able to reach proficiency on the State's standards. Each year, migrant student test scores are disaggregated and reported to the State Director of Migrant Education. This year, those results will be reported as a whole and by LEAs (in those LEAs that have the number of migrant students to meet the minimum cell size). Those results will be compared against the measurable goals, outcomes, and performance targets established by the planning group. Each LEA that receives funds will receive the information and be able to judge the effectiveness of its programming. If needed, changes in programming will be made and the information will be considered in the annual comprehensive needs assessment.

Projects are also evaluated on the achievement of their own goals and the outcomes they set in their annual application for funds. In the application, they are required to set both measurable program goals and student performance goals. Annually, the State Director of Migrant Education visits the site of each project to receive a project update, evaluate the effectiveness of the project in meeting the needs of migrant children, and to assure that the project is in compliance with Federal and State requirements.

- f. Identify the amount of funds that the SEA will retain from its Migrant Education Program (MEP) allocation, under section 200.41 of the Title I regulations (34 CFR 200.41), to carry out administrative and program functions that are unique to the MEP, and describe how the SEA will use those funds.*

**RESPONSE:**

The Vermont Department of Education sets aside \$8,516 (based on preliminary figures for FY 2002-2003) of the Migrant Education allocation under section 200.41 of the Title I regulations. The SEA uses those funds to partially fund a .5 FTE State Director of Migrant Education.

**4. Title I, Part D -- Children and Youth who are Neglected, Delinquent, or At-Risk [Goals 1,2,5]**

- a. Describe the program goals, performance indicators, performance objectives, and data sources that the State has established for its use in assessing the effectiveness of the program in improving the academic and vocational and technical skills of students participating in the program.*

**RESPONSE:**

The goals and performance indicators for participants who receive services funded under Title I, Part D, Children and Youth who are Neglected or Delinquent, or At-Risk are:

*Goal 1 – By 2013-2014, all students will reach high standards, at a minimum attaining proficiency or better in reading/language arts and mathematics. Performance indicators 1.1 and 1.2 will be used.*

*Goal 2 – All limited English proficient students will become proficient in English and reach high academic standards, at a minimum attaining proficiency or better in reading/language arts and mathematics. Performance indicators 2.1, 2.2, and 2.3 will be used.*

*Goal 5 – All students will graduate from high school. Performance indicators 5.1 and 5.2 will be used.*

The VT-DOE will gather and review baseline data in the fall. Based upon assessment results and other information gleaned from within these data, the VT-DOE will set annual performance objectives/targets that will allow the SEA to work with schools serving Neglected, Delinquent, or At-Risk students to ensure they reach the State targets set for school year 2013 – 2014. These data will be collected from schools and students served with funds from Title I, Part D, Subparts 1 and 2. Performance objectives/targets will be shared with the USDE by May 2003.

Specific data sources for student performance will be drawn primarily from appropriate State assessment instruments, which currently include the New Standards Reference Exams for English language arts and mathematics. However, each correctional facility or institution that receives Title I, Part D funds, either from Subpart 1 or Subpart 2, may administer to their student population served with Title I, Part D funds pre and post versions of the SAT 9, Woodcock-Johnson, or assessments that are comparable to the State assessments and are meaningful within the context of the facility or institution.

*b. Describe how the SEA is assisting projects funded under the program in facilitating the transition of youth from correctional facilities to locally operated programs.*

**RESPONSE:**

The SEA will work to assist projects funded with Title I, Part D, Subpart 1 to facilitate the transition of youth from correctional facilities to locally operated programs by:

- ❑ Identifying locally operated programs for the correctional facilities;
- ❑ Acting as a liaison and facilitator between the correctional facility and locally operated programs, as needed;
- ❑ Working with both entities to ensure the timely transfer of Learning plans, Graduation Plans, transcripts and the like to locally operated programs;
- ❑ Supporting the award of credits based upon the Vermont Standards and Learning Opportunities toward graduation for students who are unwilling to affiliate with a local program; and/or
- ❑ Supporting the administration of the GED for students who are unwilling to affiliate with a local program.

- c. *Describe how the funds reserved under section 1418 will be used for transition services for students leaving institutions for schools served by LEAs, or postsecondary institutions or vocational and technical training programs.*

**RESPONSE:**

The response to this item is more fully spelled out in [Appendix PART III – 4 – C](#). We have about 440 individuals between the ages of 16 or so and 21 whose educational services are provided by the Vermont Department of Corrections. Another 120 individuals are served in various detention facilities operated by the Vermont Department of Social and Rehabilitation Services. These agencies use funds made available under Title I, Part D, Subpart 1 §1418 to help individuals make successful transitions to schools or to specialized educational programs that have been created to help our most troubled youths obtain high school diplomas (or their equivalents) in settings that are more supportive and structured than the typical high school and that have proven track records of working successfully with formerly incarcerated youths. These programs do not exist to dissuade youths from returning to their “home” high schools. They are, instead, essential options within an array of service options.

The procedures for awarding funds under this subpart are outlined in the appendix referenced above.

**5. Title I, Part F -- Comprehensive School Reform [Goals 1,2 5]**

- a. *Describe the process the State educational agency will use to ensure that programs funded include and integrate all eleven required components of a comprehensive school reform program.*

**RESPONSE:**

Any school targeted as low performing (Vermont Priority Schools) is assigned a coordinator from the state's School Improvement Team. At the present time, 39 schools have been designated as priority schools or schools in need of technical assistance. Of these, 28 are Title I schools. A seven-member team of school improvement coordinators assists targeted schools in a variety of ways in coordinating technical assistance, such as analyzing student achievement data and developing action plans for the purpose of improving student performance. School improvement coordinators will be fully briefed about the opportunities for assisting school through the use of CSR funds. They will alert schools to the opportunity to apply for these competitive funds and will assist schools in preparing high quality applications. Coordinators will work with schools to ensure that all eleven components are included in a comprehensive reform program.

The VT-DOE will seek assistance from the Regional Educational Lab at Brown University and the Comprehensive Regional Assistance Center (EDC) in identifying tools and techniques for providing technical assistance to LEAs and schools in evaluation, selection, development and implementation of comprehensive school reform initiatives. It is anticipated that these will include both print-based materials and Internet links. The Vermont Department of Education will use the criteria as established by the USDE's Guidance to determine whether or not the strategies, programs, and models are based on scientifically based research.

The long-term evaluation of CSR programs will be based on an analysis of the degree to which the CSR schools demonstrate continuous growth in student performance as measured by the Vermont Comprehensive Assessment System. In addition, CSR schools will look at other indicators that relate to student performance such as attendance, availability of AP courses, improved course taking patterns, and reductions in dropout rates. The analyses of such data will be used to determine the degree to which the adoption of model programs adds value to local improvement efforts.

The Vermont Department of Education plans to award grants for 3 years to successful applicants. Materials developed by the VT-DOE to support the application process will emphasize the advantages of schools and LEAs collaborating on a regional basis in the implementation of systemic reform initiatives. Continued funding of model programs will be based on availability of funds and the demonstration of satisfactory progress. The VT-DOE will require an annual re-application process to determine whether or not a school is granted continued funding. CSR schools must complete an end of the year self-evaluation that describes the implementation level of each of the eleven components. These evaluations must also include a description of the quality of services received by external technical service providers and local assessment results. Vermont Department of Education staff will review the evaluations. Schools may be required to revise their programs in the following years in order to address changes or weaknesses.

The Vermont Department of Education also will conduct annual site visits to determine the success of implementation and effectiveness of the scientifically based research models that have been adopted.

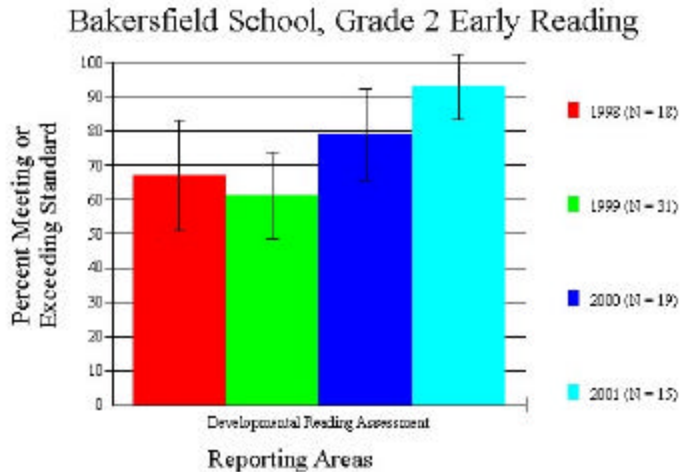
- b. Describe the process the State will use to determine the percentage of Comprehensive School Reform schools with increasing numbers of students meeting or exceeding the proficient level of performance on State assessments in reading/language arts and mathematics.*

**RESPONSE:**

Vermont has 12 schools that receive CSR grant money at this point. Vermont uses the Developmental Reading Assessment (VT-DRA) for grade 2 and the New Standards Reference Exams (NSRE) in math and language arts for grade 4, 8 and 10. Mathematics has three indicators of progress (skills, concepts, and problem solving) and language arts has two indicators for reading (basic and analysis & interpretation) and two for writing (writing effectiveness and writing conventions).

The Vermont Department of Education issues an annual report card of student performance data for all schools, which includes longitudinal data for each of the state assessments. It also maintains a School Improvement Support Guide, a Web site that graphically depicts longitudinal growth (or decline). This site is used for many purposes by department staff, reporters, school boards, educators, and members of the public. We will use the longitudinal data from the annual report cards and graphing Web site as the basis for determining the percentage of Comprehensive School Reform schools that have increasing numbers of students meeting or exceeding the proficient level of performance on State assessments in reading/language arts and mathematics.

We will establish baseline data for each CSR recipient, both current and future grantees, and chart progress annually for the lifetime of each grant. For an idea of the State's capacity to monitor progress over time of CSR recipients, we have included the longitudinal data for early reading for a school that three years ago adopted the Success for All reading and mathematics program as a comprehensive school reform model. This graph shows progress over time as a result of adopting and conscientiously implementing the SFA program.



**6. Title II, Part A -- Teacher and Principal Training and Recruiting Fund [Goals 1,2,3,5]**

- a. *If not fully addressed in the State's response to the information on performance goals, indicators, and targets in Part I describe the remainder of the State's annual measurable objectives under section 1119(a)(2).*

**RESPONSE:**

The Vermont State Board of Education adopted the performance goal of having all students taught by highly qualified teachers by 2005-2006. Three indicators were also adopted:

1. The percentage of classes taught by highly qualified teachers in the aggregate and in high-poverty schools
2. The percentage of teachers receiving high-quality professional development, and
3. The percentage of paraprofessionals (excluding those with sole duties as translators and parental involvement assistants) who are qualified.

Specific targets for achieving these goals will be established in the upcoming months and submitted to USDE in January 2003. The process we plan to follow in achieving these indicators is explained in following item (6-b).

- b. *Describe how the SEA will hold LEAs accountable both for (1) meeting the annual measurable objectives described in section 1119(a)(2) of the ESEA, and (2) ensuring that the professional development the LEAs offer their teachers and other instructional staff is consistent with the definition of "professional development" in section 9101(34).*

*Note: This program, and the financial support it provides to States, LEAs, and schools, is vitally important to ensure that all students have teachers who are highly qualified, and who can help students achieve to their maximum capabilities. The two items*

*identified above supplement other information States need to provide in response to items in Part I, Goal 3; Part II, item 5, and Part III, information on Title II, Part D (Enhancing Education Through Technology program) on how they plan to implement key teacher quality activities.*

**RESPONSE:**

During the first year of the ESEA funding, Vermont will collect information on all licensed and unlicensed teachers currently employed in our public schools. The Department will require each LEA to submit information regarding the areas in which their teachers are licensed and endorsed; the programs and services to which they are assigned; and their level of academic preparation. The Department will determine how many “highly qualified” teachers are currently employed in the state and will determine the number of requests for a waiver of licensing requirements the Licensing Office granted to school districts in the 2001-2002 school year for those people not meeting the licensing requirements. This process will point out the number of individuals working in our school systems who do not have the proper license to teach in the area to which they are assigned or who do not meet the definition of highly qualified as defined by ESEA. The information will provide the baseline information for the number of highly qualified teachers as required by ESEA. The Vermont Department of Education will require that this teacher information be updated annually.

The Department will implement a plan with measurable objectives to increase the number of highly qualified teachers in Vermont classrooms in order to meet the goal that all students are taught by highly qualified teachers as defined by section 9101(23) of ESEA by the 2005-2006 school year.

The Department will identify the number of teachers currently employed who do not satisfy the requirements for “highly qualified” as defined by Sec. 1119. The Department will develop indicators and targets for meeting the goal that all teachers teaching in core academic subjects are highly qualified by the end of the 2005-2006 school year.

The Department of Education will require that each local educational agency increase its percentage of highly qualified teachers to ensure that all teachers teaching in core academic are highly qualified no later than the end of the 2005-2006 school year. In order for LEAs to receive an additional year of funding, they must demonstrate that they have met their established objectives. The Department will require that all LEAs applying for federal Title II funds submit a report stating how many additional teachers in the core academic areas meet the definition of “high quality” as defined by Sec. 1119.

The Vermont Department of Education will set targets for each LEA to increase the number of highly qualified teachers employed by the LEA. The targets will include annual increases in the percentage of teachers receiving high-quality professional development to enable such teachers to become highly qualified and successful classroom teachers.

Each LEA will be required as part of its application for funding to submit information about the professional development it plans to offer its faculty and staff during the fiscal year and to demonstrate how that professional development meets the criteria established by 9101(34). As LEAs amend their applications or resubmit for additional funding in the following fiscal year,

they will include information that aligns improvement in student performance measures or increases in the number of 'highly qualified teachers' with the professional development provided in the previous year.

The governor of Vermont and the commissioner of education have convened a Commission for Educator Quality in the state. The commission, which is composed of a broad group of educational stakeholders, has been charged with developing a 5-year plan to improve educator quality in Vermont. The areas of concentration include Teacher Preparation; Recruitment; Mentoring and Colleague Support; and Supervision and Evaluation. Vermont Department of Education staff provide technical support for the Vermont Commission on Educator Quality and will be working to align the Department's work to accomplish the recommendations of the Commission.

Vermont will use its statewide activities funds to implement strategies and develop programs and incentives to attract promising individuals to careers in education. We will establish pathways to enable mid-career professionals and paraprofessionals to become teachers and administrators.

This includes the creation of a Governor's Institute on education for high school students that will be offered during the summer months. The program, staffed by distinguished educators, will allow high school students to pursue their interests in education. Vermont has established an on-line educator placement service. Additionally, we are members of the Northern New England Consortium for the Troops to Teachers Program. We are revising our licensing regulations to attract more out-of-state educators to Vermont while retaining our high standards of quality. We are also revising our licensing endorsements to better prepare classroom teachers, and we will be providing high-quality professional development for practicing educators on standards-based instruction and assessment.

We have implemented a Strategic Reading Initiative to train content area teachers how to better teach students to comprehend the material they read and how to read efficiently. More than 150 teachers have participated in or are participating in a rigorous three-year, graduate degree program in elementary mathematics through the Vermont Mathematics Initiative. This program stresses deep content, effective pedagogy, focused inquiry (action research), and curriculum leadership. Seminars and coursework in reading K-3 and 4-12 are provided by the Vermont Reads Institute. VRI's focus, at this stage, has been on the five components of reading found in ESEA (phonemic awareness, phonics, vocabulary development, fluency, and comprehension). VRI also offers leadership seminars for principals on how to support high quality literacy programs. The Vermont Science Initiative, the Vermont Institute for Science, Math, and Technology, regional collaboratives (e.g., Lamoille Area Professional Development Academy, Northeast Kingdom School Development Center), and institutions of higher education provide similar content-rich professional development.

A challenge facing Vermont and other small states is that of finding high-quality staff developers who can provide on-site mentoring, modeling, and coaching with appropriate long-term follow-through. Another challenge is that of ensuring the high level of cooperation needed among school leaders, teachers, college professors, and classroom mentors in order to bring about

substantive changes in classroom practice. Vermont intends to take on such challenges in order to fulfill the requirements of ESEA.

- c. Describe the State Educational Agency and the State Agency for Higher Education's agreement on the amount each will retain under section 2113(d) of ESEA. Section 2113(d) allows for one percent of the State's program allocation for administration and planning costs.*

*In the absence of an agreement between the two agencies to apportion the one-percent in another way, of this amount the Department annually will award to the SAHE for administration and planning the greater of-*

- 1. The amount of FY 2001 funds it had received for administration under the predecessor Title II, ESEA Eisenhower Professional Development Program, or*
- 2. Five percent of the amount available each year for subgrants to partnerships under ESEA section 2113(a)(2).*

*The Department annually will award the remainder of the one-percent of the State allocation to the SEA for its costs of administration and planning. We will provide further guidance on within-State allocations of Title II, Part A funds reserved for administration in the guidance it is developing for the program.*

**RESPONSE:**

The Vermont Department of Education serves as both the State Education Agency and the State Agency for Higher Education. The combined funds for administration and technical assistance stay within the Vermont Department of Education

**7. Title II, Part D -- Enhanced Education Through Technology [Goals 1,2,3]**

- a. Describe the program goals, performance indicators, performance objectives, and data sources that the State has established for its use in assessing the effectiveness of the program in improving access to and use of educational technology by students and teachers in support of academic achievement.*

**RESPONSE:**

The updated state technology plan identifies six major areas of emphasis for educational technology initiatives: Standards for students, teachers, and school leaders; program support; professional development; access and infrastructure; program policies; and program assessment. Specific goals, performance objectives, indicators, and data sources for each of these priority areas follow. Most of the objectives described have been under way for some time so the accompanying indicators may already exist.

**Priority: Standards for students, teachers, and school leaders**

*Program Goal:* Ensure that LEAs use standards that have been identified by the International Society for Technology in Education (ISTE) and the *Vermont Framework of Standards and*

*Learning Opportunities* when designing and implementing educational technology initiatives for students, teachers, and school leaders.

*Performance objectives:*

- ❑ Distribute and support the use of the ISTE student standards and the publication “Connecting Curriculum and Technology.”
- ❑ Distribute and support the use of the ISTE teacher standards that are aligned with the ISTE student standards.
- ❑ Integrate the Technology Standards for School Administrators (TSSA from ISTE) into Vermont’s leadership initiatives.
- ❑ Incorporate educator standards for information technology in certification and licensure requirements.
- ❑ Distribute and support use of both the National Staff Development Council’s (NSDC) professional development standards and e-learning professional development standards.
- ❑ Implement a process that ties funding for professional development to the adoption and use of professional development standards in information technology.

*Performance Indicators:*

- ❑ Substantial adoption/incorporation of the ISTE student standards in local curriculum development processes.
- ❑ Substantial adoption/incorporation of the ISTE teacher standards at teacher preparation programs and for local professional development programs.
- ❑ Adoption of TSSA standards by the Vermont Educational Leadership Alliance and the Vermont Consortium for School Leadership.
- ❑ Incorporation of information technology standards into certification requirements for all newly licensed teachers and creation of endorsements for coordinators and technology resource teachers.
- ❑ Substantial adoption of NSDC standards by LEAs.
- ❑ Increased integration of professional development standards in responses to requests for proposals and increased adoption of professional development standards by LEAs.

*Data Sources:*

- ❑ Annual technology survey
- ❑ Licensing and endorsement products from Vermont Standards Board

**Priority: Program Support**

*Program Goal:* Provide resources and technical support for schools so they recognize the importance of and act to provide appropriate technology program supports.

*Performance Objectives:*

- ❑ Identify key research components that indicate the impact of technical and pedagogical support for educational technology.
- ❑ Identify model support structures that illustrate the benefits of a comprehensive approach to educational technology support.

- ❑ Integrate technology, based on TSSA standards into the state's leadership development programs.
- ❑ Initiate and support professional development programs for leaders, teachers, and support personnel that strengthen their background and skills in technology literacy.

*Performance Indicators:*

- ❑ Publication of a set of research sites that provide background information on the efficacy of technology support systems.
- ❑ Publication and regular update of a set of model structures based on Vermont school district's approaches to providing technical support.
- ❑ Incorporation of TSSA standards in leadership programs.
- ❑ Documentation indicating a variety of professional development opportunities for leaders, teachers, and support staff to understand the role of program support in the successful integration of technology.

*Data Sources:*

See above

**Priority: Professional Development**

*Program Goal:* To establish and support a statewide system for professional development that includes an integrated and essential role for educational technology.

*Performance Objectives:*

- ❑ Development of preservice and relicensure requirements based on ISTE standards for Vermont educators.
- ❑ Identification of local professional development needs.
- ❑ Coordination of a resource exchange for professional development.
- ❑ Establishment of standards that identify effective professional development programs in information technology.
- ❑ Development of local information technology plans with strong professional development components linked to comprehensive school improvement plan.

*Performance Indicators:*

- ❑ Adoption of preservice and relicensure requirements in technology.
- ❑ Presence of resource exchanges using web-based and other resource sharing systems.
- ❑ Adoption of standards for information technology professional development.

*Data Sources:*

The primary source of data will be Vermont's annual technology survey.

**Priority: Program Assessment**

*Program Goal:* To create and use a statewide system, based on research of exemplary or promising practices and supplemented by local systems, to determine the effectiveness of technology integration in improving student performance.

*Performance Objectives:*

- ❑ Dissemination of information regarding criteria that can be used to judge whether a particular technology program meets a definition of exemplary or promising practice.
- ❑ Development and dissemination of a catalog of Vermont-based exemplary and/or promising practices.
- ❑ Implementation of the Taglit tool as both a local and statewide source of data regarding the effectiveness of educational technology.
- ❑ Initiation and use of a statewide survey or review in order to gather information about educational technology.

*Performance Indicators:*

- ❑ Adoption of criteria that can be used to judge the effectiveness of any educational technology program.
- ❑ Establishment of statewide catalog of exemplary or promising practices.
- ❑ Accumulation of Taglit and statewide data.

*Data Sources:*

Taglit and annual technology survey

**Priority: Program Policies**

*Program Goal:* To support the adoption of local policies that meet any federal requirements (i.e. CIPA) and that provide local support for best use of educational technology programs.

*Performance Objectives:*

- ❑ Identification of the types of technology-related policies that will be most helpful to local districts.
- ❑ Distribution of models for each of those policies.
- ❑ Identification and dissemination of strong local examples of such policies.

*Performance Indicators:*

- ❑ Listing of policies with accompanying examples and identified strong models

*Data Sources:*

- ❑ Annual technology survey

**Priority: Access and Infrastructure**

*Program Goal:* To ensure all students have appropriate and equitable access to technologies that support their achievement of Vermont's Framework of Standards and Learning Opportunities

*Performance Objectives:*

- ❑ Design of funding mechanisms and support structures that include incentives for schools to provide access to technology for all students

- ❑ Identification and distribution of data that allow judgments to be made about equity of access to technology for all students.
- ❑ Distribution of information and resources that support the acquisition of high-speed networks by all schools

*Performance Indicators:*

- ❑ Increase in student access to technology and number of classrooms connected to the Internet
- ❑ Improvement in quality and quantity of school network infrastructure
- ❑ Increase in use of technology for parent-school communication

*Data Sources:*

- ❑ Annual technology survey
- ❑ Taglit survey

- b. Provide a brief summary of the SEA's long-term strategies for improving student academic achievement, including technology literacy, through the effective use of technology in the classroom, and the capacity of teachers to integrate technology effectively into curricula and instruction.*

**RESPONSE:**

Through the work of the state Educational Technology Coordinator and in collaboration with the Vermont Institute for Science, Math, and Technology (VISMT) and the Vermont Information Technology to Advance Learning organization (VITA-Learn), we have broadly and consistently disseminated the ISTE standards (for students, teachers, and administrators) and provided support for their implementation. Currently under development is a set of web-based resources that catalog exemplary and/or promising practices in technology and provide criteria that allow LEAs to judge such practices, including their own. This web development will also provide a wide assortment of assessment or measurement tools so that schools have a variety of appropriate options for measurement. We are currently supporting adoption of the Vermont Classroom Observation Tool (VCOT) that, through a formal two-day training process, gives objective observers skills to analyze technology integration. This observation tool will be a strong supplement to the extensive survey that is completed annually.

The criteria for competitive grants includes a scoring rubric that rewards proposals that clearly emphasize how funds will be used to integrate technologies that support attainment of challenging content standards and that support high-quality, on-going professional development based on the National Staff Development Council (NSDC) standards.

The Vermont Department of Education will use new (Taglit under the Gates program) and existing surveys to collect data as required by ESEA.

- c. Describe key activities that the SEA will conduct or sponsor with the funds it retains at the State level. These may include such activities as provision of distance learning in rigorous academic courses or curricula; the establishment or support of public-private initiatives for the acquisition of technology by high-need LEAs; and the development of*

*performance measurement systems to determine the effectiveness of educational technology programs.*

**RESPONSE:**

Vermont's share for technical assistance (\$40,000) will be used to develop web resources as delineated in Part III - 7 - a and b, to hold regular face-to-face and video conferences for the purpose of sharing effective measurement systems, and to provide limited district-level field-based support in the development and implementation of such systems.

*d. Provide a brief description of how –*

*i. The SEA will ensure that students and teachers, particularly those in the schools of high-need LEAs, have increased access to technology,*

**RESPONSE:**

Emphasis in the awarding of competitive funds will be placed on high needs LEAs (as it has been in the past) and the annual technology plan updates and performance reports will include data that inform this question.

*ii. The SEA will coordinate the application and award process for State discretionary grant and formula grant funds under this program.*

**RESPONSE:**

Since LEAs in Vermont are largely basing their funding requests for formula funds and competitive grants on their updated local technology plans, and because those plans are designed to align completely with the expectations of the No Child Left Behind legislation, we expect there will be close coordination at the LEA level. Additionally, the selection criteria for the competitive grants are based on the technology plan requirements.

**8. Title III, Part A -- English Language Acquisition and Language Enhancement [Goals 1,2,3,5]**

*a. Describe how the SEA will ensure that LEAs use program funds only to carry out activities that reflect scientifically based research on the education of limited English proficient children while allowing LEAs flexibility (to the extent permitted under State law) to select and implement such activities in a manner that the grantees determine best reflects local needs and circumstances.*

**RESPONSE:**

The Vermont DOE will refer LEA subgrantees to established sources of information regarding scientifically based research (web sites, journals, universities) on the available range of language and academic instruction educational programs that have proven to be effective for teaching students from linguistically and culturally diverse backgrounds.

Note: The U.S. Department of Education is in the process of developing an approved list of scientific based research in the area of English as a Second Language and Bilingual Education.

In their local plans, LEAs will be also be asked to briefly describe their rationale for choosing a particular programmatic approach and to cite scientifically based research which supports it. LEAs will be given the flexibility to implement programs of instruction which have a solid research base and which researchers and practitioners in the field consider most effective in helping LEP children and youth to develop a high level of language proficiency and academic skills.

LEAs will be required to document how activities are research-based in their local applications.

- b. Describe how the SEA will hold LEAs accountable for meeting all annual measurable achievement objectives for limited English proficient children, and making adequate yearly progress that raises the achievement of limited English proficient children.*

**RESPONSE:**

The Vermont Department of Education's formula for determining annual achievement measurement objectives for all students including subgroups such as LEP students and the Vermont Department of Education's process for determining adequate yearly progress for LEP will be available in January, 2003.

Disaggregated results for LEP students will be used in identifying districts and schools not making adequate yearly progress in accordance with Section 1111 of the law.

All Title III subgrantees will be required to collect individual student level performance data (longitudinal) that will be used to measure their progress in meeting the performance targets for LEP children, both in terms of language proficiency and academic achievement.

- c. Specify the percentage of the State's allotment that the State will reserve and the percentage of the reserved funds that the State will use for each of the following categories of State-level activities: professional development; planning, evaluation, administration, and interagency coordination; technical assistance; and providing recognition to subgrantees that have exceeded their annual measurable achievement objectives. A total amount not to exceed 5 percent of the State's allotment may be reserved by the State under section 3111(b)(2) to carry out one or more of these categories of State-level activities.*

**RESPONSE:**

The Vermont Department of Education expects to receive \$175,000 for state-level activities and will reserve the following percentages from its Title III allotment for each of the respective categories of state-level activities:

- 20% ± - Professional Development
- 50% ± - Planning, evaluation, administration, and interagency coordination
- 30% ± - Technical assistance
- 0 % - Recognition to subgrantees that exceed annual measurable achievement objectives

- d. Specify the percentage of the State's allotment that the State will reserve for subgrants to eligible entities that have experienced a significant increase in the percentage or number*

*of immigrant children and youth. A total amount not to exceed 15 percent of the State's allotment must be reserved by the State under section 3114(d)(1) to award this type of subgrant.*

**RESPONSE:**

After the Vermont Department of Education reserves \$175,000 of its \$500,000 state allotment under Title III for state-level activities, \$325,000 remains for making LEP and Immigrant subgrants to LEAs. The Vermont Department of Education will reserve between 10-15% of the funds for Immigrant subgrants. A final determination will be made this summer once the following pieces of information are known:

- ❑ Total number of LEAs intending to apply for LEP sub-grants either alone or as part of a consortium;
- ❑ Projected total allocations to all LEAs and Consortia qualifying for a grant of at least \$10,000;
- ❑ 2002-2002 data on numbers and locations of eligible immigrant students in order to figure out how many and which LEAs meet the criteria for 'significant increase'.

*e. Describe the process that the State will use in making subgrants under section 3114(d) to LEAs that have experienced a significant increase in the percentage or number of immigrant children and youth.*

**RESPONSE:**

Based on 2000-2001 LEP data, the VT DOE will first make tentative allocations to seven LEAs that pre-qualify for LEP sub-grants of more than \$10,000. These are estimated to total approximately \$217,046 of the anticipated \$325,000 of the Vermont State Allotment reserved for sub-grants to LEAs.

This leaves a remaining pool of \$107,954. During June-July, 2002, the VT DOE will determine if any of the remaining 55 LEAs intend to form consortia in order to qualify and apply for LEP sub-grants of at least \$10,000. Any sub-grants made to LEAs that form consortia would be based on the same formula of \$325.90 per pupil.

Depending on the number of LEAs indicating that they will apply for LEP sub-grants as a consortia, we will reserve between 10-15% of the \$325,000. To qualify for an Immigrant subgrant, LEAs must meet the following criteria:

- ❑ Currently enroll at least 30 eligible immigrant students; and
- ❑ Experience at least a 5% increase in the number of eligible immigrant students over the preceding two years.

In determining an award under the Immigrant sub-grant, the Vermont Department of Education will consider the quality of the LEA's local plan, the extent of need, and other Federal, State, and local resources available to the LEA for serving recently arrived immigrant students. Eligible LEA's will be ranked in order of 'significant increase' and need. The VT-DOE will only award as many subgrants (sufficient in scope and size) to LEAs as there are funds available to meet the purposes of Title III.

- f. *Specify the number of limited English proficient children in the State. (See definitions of "child" in section 3301(1), and "limited English proficient" in section 9101(25).)*

**RESPONSE:**

The final tabulations of the Vermont Department of Education's *Annual State Survey of LEP Students* for the 2000-2001 school year showed that there were 997 Limited English Proficient students identified by Vermont LEAs.

- g. *Provide the most recent data available on the number of immigrant children and youth in the State. (See definition of "immigrant children and youth" in section 3301(6).) (Note: Section 3111 of the ESEA requires that State allocations for the Language Acquisition State grants be calculated on the basis of the number of limited English proficient children in the State compared to the number of such children in all States (80 percent) and the number of immigrant children and youth in the State compared to the number of such children and youth in all States (20 percent). The Department plans to use data from the 2000 Census to calculate State shares of limited English proficient students. However, these data on limited English proficient students will not be available for all States until September 2002. To ensure that States have access to funds as soon as they are available, the Department proposes, for FY 2002 only, to provide an initial distribution of 50 percent of the funds under the limited English proficient portion of the formula based on State-reported data. As soon as Census data become available, the Department will recalculate and make final State allocations using 2000 Census data. For the 20 percent of formula funds distributed to States based on State shares of immigrant children and youth, the Department will use the most recent State-reported data year in allocating these funds. Census does not collect data that can be used to calculate State allocations for this part of the formula.)*

**RESPONSE:**

The most recent data available on the number of immigrant children and youth in Vermont is from the 2000-2001 school year. There were approximately 574 immigrant children and youth.

**9. Title IV, Part A -- Safe and Drug-Free Schools and Communities [Goal 4]**

- a. *Describe the key strategies in the State's comprehensive plan for the use of funds by the SEA and the Governor to provide safe, orderly, and drug-free schools and communities through programs and activities that –*
- i. *Complement and support activities of LEAs under section 4115(b) of the ESEA;*

**RESPONSE:**

Strategies that complement and support activities of LEAs

SEA and Governor's Program will use specific strategies including:

- Principles of effectiveness and research-based programs.  
Many Vermont schools have adopted a variety of research-based curricula such as Botvin's Life Skills Training, Second Step, Project Alert, Project Northland, Reconnecting Youth and others. The number of Vermont schools using the middle

grades Life Skills Training in the past four years increased from eight to over 100 schools. In this same time frame, eighth grade tobacco use declined by over 50%. The SEA and Governor's programs will continue to collaborate in the provision of technical assistance, training and monitoring to encourage the proliferation of such research-based curricula across the state of Vermont.

- ❑ Risk and protective factors  
The SEA and Governor's program encourage strategies based on the risk and protective work of Hawkins and Catalano, the resiliency work of Bonnie Bernard and Nan Henderson, et. al, and the asset-development work being done at the Search Institute with Dr. Peter Benson. Programs will be supported that build resiliency and show promise of effectiveness such as Student Assistance Programs, the Freemasons' CARE Student Assistance Model, peer leadership, home-school coordinators, and others. Governor's program initiatives such as the Discretionary and Mentoring Grants programs, and Community Youth Councils (see Part II, 2. Competitive Sub-grants, item 7 for a detailed description of these programs) will similarly help reduce risk factors and enhance protective factors for Vermont youth.

The SEA and Governor's grant programs and initiatives directly complement and support LEA activities. The majority of the Governor's SDFSCA funds will be used to serve populations who are not adequately served by educational institutions, either because they are not attending school or because adequate resources for these initiatives are not available through school programs.

Additionally, Governor's program funds will continue to support:

- ❑ The SDFSC Advisory Committee that will provide guidance to both the Governor's program and the SEA.
- ❑ The SDFSC Consultation Team to provide training and technical assistance to communities and LEAs.
- ❑ The annual Governor's Prevention Conference for community members and teachers to improve knowledge and skills in the area of prevention.

*ii. Comply with Principles of Effectiveness*

**RESPONSE:**

The SEA and Governor's program will assist LEAs and community agencies to comply with the principles of effectiveness through providing regional trainings and technical assistance in the areas of needs assessment, use of scientific research based strategies, student performance measures, teacher and parental attitudes and behaviors and analyses of data relating to the prevalence of risk and protective factors. Efforts will include meaningful and ongoing consultation with parents, periodic evaluation of progress toward reducing violence and illegal drug use in schools and communities, and ways to refine and improve program performance measures.

The SEA and Governor's program will continue to support schools to implement the *Principles of Effectiveness* to ensure that high-quality NCBLA programs thrive. Programs will provide for safe, orderly, and drug-free schools and communities where students can improve academic achievement and lead healthy lives.

- iii. *Otherwise are in accordance with the purpose of Title IV, Part A. (Note: The reauthorized provisions of the Safe and Drug-Free Schools and Communities (SDFSC) Program clearly emphasize well-coordinated SEA and Governors Program activities. The statute requires that significant parts of the program application be developed for each State's program, not for the SEA and Governors Programs individually. For this reason, each State must submit a single application for SDFSC SEA and Governors Program funds. States may choose to apply for SDFSC funding through this consolidated application or through a program-specific application.)*

**RESPONSE:**

Staff from the Governor's Program and the SEA have met extensively to plan for increased collaboration and coordination between state agencies. This grant application reflects how successful planning meetings have been in achieving a unified and research-based approach to the prevention of youth drug use and violence in Vermont.

- b. *Describe the State's performance measures for drug and violence prevention programs and activities to be funded under Title IV, Part A, Subpart 1. These performance measures must focus on student behaviors and attitudes. They must consist of performance indicators for drug and violence prevention programs and activities and levels of performance for each performance indicator. The description must also include timelines for achieving the performance goals stated, details about what mechanism the State will use to collect data concerning the indicators, and provide baseline data for indicators (if available).*

**RESPONSE:**

The SEA and Governor's program will use the same performance measures to gauge the success of school and community programs as follows:

- Percent of persistently dangerous schools as defined by the state
- Percent of physical fights on school property
- Percent of students using alcohol grades 8-12
- Percent of student using Marijuana before age of 13
- Percent of students who perceive the harm that marijuana usage holds for them

Timeline for Performance Indicators\*

<b>Performance Indicator</b>	<b>Baseline data 2001</b>	<b>2003 objective</b>	<b>2007 objective</b>
Percent of persistently dangerous schools as defined by the state	NA	TBA	TBA
Percent of physical fights on school property	14%	12%	9%
Percent of students using alcohol grades 8-12	69%	66%	63%
Percent of student using Marijuana before age of 13	12%	10%	8%
Percent of students who perceive the harm that marijuana usage holds for them	46%	48%	51%

\*All base line figures are taken from the 2001 Youth Risk Behavior Survey for Vermont and can be found at [www.ahs.state.vt.us](http://www.ahs.state.vt.us). The Vermont Department of Health collaborates with the SEA and AHS to biannually administer the YRBS in nearly every high school in Vermont.

Additional data will be used to measure and publicly report program progress as follows:

#### Kids Count

The annual Kids Count Data Book uses the best available data to measure the educational, social economic, and physical well being of Vermont's children. Information on 20 indicators is broken down by county and is published and disseminated on a yearly basis. Publication of each current year's edition is announced through a major media event.

#### Healthy Vermonters 2010

The Vermont Department of Health publishes a report on the leading causes of death and poor health of Vermonters. The publication has measurable objectives and describes specific strategies for addressing each of the problems.

#### Community Profiles

Since 1995 Vermont has broken down available data on a number of indicators at county or community levels, so that community members can see what the condition of their specific community is. Yearly updates have allowed communities to see what progress on indicators is being made at the county/community level as well as at the state level.

#### Field Research

In addition to the above, the Agency of Human Services contracts with the University of Vermont to gather data on problem behaviors that may not be addressed in the above mentioned formats, as well as completing program evaluations on other activities that have been funded with SDFSCA monies. Programs are evaluated against the objectives stated in the logic models submitted in the grantee applications. Written reports are submitted and reviewed by program officers and the Advisory Committee of SDFSCA.

*c. Describe the steps the State will use to implement the Uniform Management Information and Reporting System (UMIRS) required by section 4112(c)(3). The description should include information about which agency(ies) will be responsible for implementing the UMIRS, a tentative schedule for implementing the UMIRS requirements, as well as preliminary plans for collecting required information.*

#### **RESPONSE:**

Agencies responsible and current data collection

The State of Vermont currently collects and analyses nearly all the data necessary for the SDFSC Title IV requirements. The SEA, Agency of Human Services and the Vermont Department of Health collaborate to biannually administer the Youth Risk Behavior Survey in nearly every School in Vermont. These data are readily accessible on the AHS website, [www.ahs.state.vt.us](http://www.ahs.state.vt.us).

The Safe and Healthy Schools Team within the SEA collects LEA level data annually as follows:

- Healthy Schools Data Collection

- ❑ Safe Schools Data Collection
- ❑ Hazing and Harassment Data Collection
- ❑ Gun Possession Report
- ❑ SDFSCA Performance Report

Schedule for UMIRS for Title IV Safe and Drug Free Schools:

July – October	Upgrade databases to better integrate data from current instruments
October-January	Enhance reporting format and disseminate reports

**10. Title IV, Part A, Subpart 1, section 4112(a) -- Safe and Drug-Free Schools and Communities: Reservation of State Funds for the Governor [Goal 4]**

- a. *The Governor may reserve up to 20 percent of the State’s allocation under this program to award competitive grants or contracts. Indicate the percentage of the State’s allocation that is to be reserved for the Governor’s program*

**RESPONSE:**

The Governor has requested 20% of the Title IV, Part A state allocation.

- b. *The Governor may administer these funds directly or designate an appropriate State agency to receive the funds and administer this allocation. Provide the name of the entity designated to receive these funds, contact information for that entity (the name of the head of the designated agency, address, telephone number) and the “DUNS” number that should be used to award these funds.*

**RESPONSE:**

Jane Kitchel  
 Secretary of the Agency of Human Services  
 103 South Main Street  
 Waterbury, VT 05617  
 802-241-2220

DUNS number is: 809800311

**11. Title IV, Part A, Subpart 2, section 4126 -- Safe and Drug-Free Schools and Communities: Community Service Grants [Goal 4]**

*Describe how the SEA, after it has consulted with the Governor, will use program funds to develop and implement a community service program for suspended and expelled students.*

**RESPONSE:**

For a complete description of this program, please see this document, Part II, 2-8.

**12. Title IV, Part B: 21<sup>st</sup> Century Community Learning Centers [Goals 1, 2, and 5]**

*Identify the percentage of students participating in 21<sup>st</sup> Century Community Learning Centers who meet or exceed the proficient level of performance on State assessments in reading and mathematics. The State must collect baseline data for the 2002-2003 school year, and submit all of these data to the Department no later than early September of 2003 by a date the Department will announce.*

**RESPONSE:**

The Vermont Department of Education will collect baseline data for reading and mathematics for the 2002-2003 school year and submit it to the USDE no later than early September of 2003. To date, we have developed an Excel file for CLC technical assistance purposes that identifies the percentage of students meeting or exceeding academic achievement standards in two categories of reading (Basic reading at Grades, 2, 4, 8, and 10; Analysis and Interpretation at Grades 4, 8, and 10) and three categories of mathematics (skills, concepts, and problem solving at Grades 4, 8, and 10). This information is available by school or LEA; hence we can readily analyze the “starting points” and year-to-year progress for schools, LEAs, or regional collaboratives that participate in CLC programs. The percentage of students meeting or exceeding the standards on Vermont’s assessments since 1998 can be seen at <http://data.ed.state.vt.us/apg/> or <http://crs.uvm.edu/schlprt/>

Current participants in the CLC program include:

Orleans Central Supervisory Union  
Whitingham School  
Washington Central Supervisory Union  
Orleans Southwest Supervisory Union  
Burlington School District  
Chittenden South Supervisory Union  
Barre City Elementary and Middle School  
Washington West Supervisory Union  
Putney Town School District  
Windsor Southwest Supervisory Union  
Rutland City Public Schools  
Barre Town Middle and Elementary School  
Twinfield Union School District

**13. Title V, Part A -- Innovative Programs [Any goal(s) selected by State]**

- a. *In accordance with section 5112(a)(1) of the ESEA, provide the SEA’s formula for distributing program funds to LEAs. Include information on how the SEA will adjust its formula to provide higher per-pupil allocations to LEAs that have the greatest numbers or percentages of children whose education imposes a higher-than-average cost per child, such as –*
  - i. *Children living in areas with concentrations of economically disadvantaged families;*
  - ii. *Children from economically disadvantaged families; and*

- iii. *Children living in sparsely populated areas*
- iv. *Identify the amount or percentage the State will reserve for each State-level activity under section 5121, and describe the activity*

**RESPONSE:**

The formula for allocating Title V monies to LEAs, adjusted to provide higher allocations to schools with higher percentages of children whose education imposes higher than average costs per child, is as follows:

- 75% of the funds are distributed on the basis of public and independent school enrollments of schools that participated in Title V activities in FY02.
- 25% of funds are earmarked to help districts with high concentrations of economically disadvantaged families, high numbers of children from economically disadvantaged families, and high numbers of children living in sparsely populated areas.

**Allocation Adjustment Formula**

- 10 % based on the Income Index used in the General State Aid formula. This is an indicator of those areas with high concentrations of low-income families based on Adjusted Gross Income per Exemption reported on state tax returns.
- 10% based on the Poverty index used in the General State Aid Formula. This is an indicator of the number of children from economically disadvantages families receiving food stamps. These data are collected twice a year and averaged over a two-year period.
- 5% on a Sparsity Index similar to that used in the General State Aid Formula. This is an indicator of the number of children living in sparsely populated areas based on the number of students enrolled, divided by the square miles in the district, resulting, in effect, in a measure of student enrollment per square mile.

**14. Title VI, Part A, Subpart 1, Section 6111 – State Assessments Formula Grants [Goals 1,2,3,5]**

*Describe how the State plans to use formula funds awarded under section 6113(b)(1) for the development and implementation of State assessments in accordance with section 6111(1) and (2).*

**RESPONSE:**

The use of formula funds for the development and implementation of objectives under this section will include activities that span the FY02 through FY04 time periods. Vermont’s use of the formula funds for the development and implementation of State assessments as described in PART II: Section 1, Standards, Assessment and Accountability, will include the following activities:

- The development of enhanced content and performance standards, expressed as grade-level expectations, consistent with the Vermont Framework of Standards and Learning Opportunities at each grade level and in each subject required by the ESEA

- ❑ The development of collaboration with the New England States' Compact and Vermont higher education institutions to enhance the technical quality of standards and assessments
- ❑ The review of content and performance standards by various stakeholder groups including the Policy Advisory Committee
- ❑ Adoption of enhanced content and performance standards by the Vermont State Board of Education
- ❑ The development of an enhanced management/administration system for the Comprehensive Assessment System with appropriate staffing for administration, reporting and analysis of data
- ❑ The development of science assessments at grade levels required by the ESEA
- ❑ The review of existing State assessments in reading, English/language arts, mathematics and science for their technical quality and alignment with emerging content and performance standards and grade-level expectations by the Technical Advisory Panel
- ❑ The development of training programs for the administration of assessments
- ❑ The development of training programs for LEA use of the statewide assessment data in action planning
- ❑ The development of enhanced systems of alternate assessment of students with special learning needs
- ❑ The development of enhanced systems of assessment for Limited English Proficient students
- ❑ The review and evaluation of existing alternate (including Lifeskills) and Limited English Proficient assessments
- ❑ The development of training activities for the implementation of alternate and Limited English Proficient assessments
- ❑ The development of training activities for the design and development of locally developed, state level assessments at grade levels not currently assessed by the Comprehensive Assessment System
- ❑ The development of state level assessments at grade levels and subject areas not currently assessed by the Comprehensive Assessment System
- ❑ The development of a student management information system (MIS) that links LEAs with the SEA for the secure and efficient transfer of student information required by the assessment and accountability systems
- ❑ The development of an enhanced capacity for the processing, analysis and reporting of assessment data that will increase in volume by 230 percent over the next three years.
- ❑ The development of an enhanced State Report Card including both print and web-based formats
- ❑ The development of training and technical assistance to LEAs that enable schools to make better use of assessment information in ways that significantly improve teaching and learning for all students.

**15. Title VI, Part B, Subpart 2 -- Rural and Low-Income School Program [Goals 1,2,3,5]**

- a. *Identify the SEA's specific measurable goals and objectives related to increasing student academic achievement; decreasing student dropout rates; or improvement in other*

*educational factors the SEA may elect to measure, and describe how Rural and Low-Income School program funds will help the SEA meet the goals and objectives identified.*

**RESPONSE:**

Altogether, seven LEAs or supervisory districts qualify for participation in the REAP program; no LEAs qualify for participation in the low-income school program. Three districts qualify to participate in the Small Rural Achievement Program and stand to benefit in the following amounts: \$18,807 (Battenkill); \$18,032 (Rivendell); and \$19,072 (Essex North) for a total statewide benefit of \$55,911. At this stage, the Federal Programs Administrator for the department plans to contact the three districts plus others that would not receive funding, but perhaps would benefit from the increased flexibility in spending authority that the program offers, to discuss the benefits of the Rural and Low-Income School Program over and above what they already receive as REAP-designated supervisory districts or LEAs.

The Vermont Department of Education's goals and objectives for increasing student performance are described throughout this application, most notably in Part I and Part II, 1. Standards, Assessments, and Accountability; 4. Statewide System of Support; and Part III, Teacher Training and Recruiting Fund. The districts eligible for additional funding under the Small Rural School Achievement Program would use their <\$20,000 supplements in a variety of ways, but hopefully to strengthen teachers' content knowledge in mathematics or reading/English language arts. The department will work with these districts to ensure that the funds, if sought, are well invested in scientifically based instructional programs or teacher training.

The SEA's specific measurable goals and objectives related to increasing student achievement, hiring and retaining highly qualified teachers and increasing graduation rates will be set by the VT-DOE in May 2003. Vermont will request Rural and Low Income School program recipient schools to submit a plan that describes how they will use the funds to increase student achievement, hire and retain highly qualified teachers, decrease student dropout rates, or improve other educational factors. The goals and objectives identified by the LEAs must assist the State in meeting the ESEA goals and indicators identified in Part I.

- b. *Describe how the State elects to make awards under the Rural and Low-Income School Program:*
  - i. *By formula proportionate to the numbers of students in eligible districts;*
  - ii. *Competitively (please explain any priorities for the competition); or*
  - iii. *By a State-designed formula that results in equal or greater assistance being awarded to school districts that serve higher concentrations of poor students.*

**RESPONSE:**

Given the small amount of funding available, it seems prudent to award it proportionately by formula based on the number of students in eligible districts.

**GEPA (General Education Provisions Act), Section 427**

*All applicants for new awards must include information in their applications to address GEPA, Section 427 in order to receive funding under this program. GEPA 427 requires a description of*

*the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted programs for students, teachers, and other program beneficiaries with special needs. For a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 to the State.*

*For further information about GEPA 427 and how to satisfy the requirement of this provision, please see “Notice to All Applicants” found at <http://www.ed.gov/offices/OPE/HEP/gepa.html>.*

**RESPONSE:**

The Vermont Department of Education will assure equitable access to and participation in all state-level activities related to ESEA programs. Attention will be given to barriers that can impede equitable access or participation on the basis of gender, race, national origin, color, disability, or age. The VT-DOE will address GEPA by requiring all local applicants that receive Federal assistance for students, teachers and other program beneficiaries with special needs to address how they will make accommodations for these needs. For state-funded activities, the State will ensure that translators and/or print accommodations will be available for participants in need at any function conducted as a State activity. The VT DOE will review civil rights procedures for hiring as well as licensure or certification requirements to make sure they are in compliance with ADA and civil rights regulations and will work with institutions of higher education that offer teacher preparation programs in designing courses of study focusing on accommodations for special needs, and civil rights issues in education, and access for students, teachers, and others with special needs.

Strategies to ensure equal access and participation in state-level activities will include:

- Making opportunities for training available to eligible participants;
- Providing access to materials and products by students, educators and parents;
- Reaching out to families in the community to encourage participation;
- Making use of distance learning technology;
- Publishing the names of offices and persons who can provide statewide assistance;
- Using newsletters to inform constituents;
- Sending out statewide mailings on training and resources;
- Making presentations at regional and statewide conferences;
- Using advisory groups and existing networks to disseminate information;
- Translating materials and providing forms in other than a written format when necessary;
- Providing open or closed captioning for all videos produced by the Department.

**Consolidated Administrative Funds**

1. *Does the SEA plan to consolidate State-level administrative funds? If yes, please provide information and analysis concerning Federal and other funding that demonstrate that Federal funds constitute less than half of the funds used to support the SEA. If yes, are there any programs whose funds are available for administration that the SEA will not consolidate?*

**RESPONSE:**

The Vermont Department of Education does not intend to consolidate State-level administrative funds.

1. *Please describe your plans for any additional uses of funds.*

**RESPONSE:**

Administrative funds will be used to cover salaries, benefits, and operating expenses for personnel who administer ESEA-related programs. In addition, funds will be used to conduct monitoring activities, provide technical assistance, and offer professional development on a school-by-school, regional, and statewide basis.

**Transferability**

*Does the State plan to transfer non-administrative State-level ESEA funds under the provisions of the State and Local Transferability Act (sections 6121 to 6123 of the ESEA)? If so, please list the funds and the amounts and percentages to be transferred, the program from which funds are to be transferred, and the program into which funds are to be transferred.*

*(Note: If the State elects to notify the Department of the transfer in this document, the State's responses to the application's requests for information should reflect the State's comprehensive plan after the transfer. If the State has not elected to transfer funds at this time, it may do so at a later date. To do so, the State must (1) establish an effective date for the transfer, (2) notify the Department (at least 30 days before the effective date of the transfer) of its intention to transfer funds, and (3) submit the resulting changes to the information previously submitted in the State's consolidated application by 30 days after the effective date of the transfer.)*

**RESPONSE:**

The Vermont Department of Education does not, at this time, plan to transfer non-administrative State-level funds.

## **ASSURANCES and CERTIFICATIONS**

The Consolidated State Application Signature Page, signed by Commissioner of Education, Ray McNulty, certifies the Vermont State Board of Education's agreement to the following sets of assurances, the crosscutting certification, and the requirements of GEPA, Section 427.

### **General and Cross-Cutting Assurances**

*Description:* Section 9304(a) requires Vermont to have on file with the Secretary a single set of assurances, applicable to each program included in the consolidated application, that provide that:

1. Each such program will be administered in accordance with all applicable statutes, regulations, program plans, and applications;
2. The control of funds provided under each such program and title to property acquired with program funds will be in a public agency, a nonprofit private agency, institution, or organization, or an Indian tribe, if the law authorizing the program provides for assistance to those entities; and
3. The public agency, nonprofit private agency, institution, or organization, or Indian tribe will administer those funds and property to the extent required by the authorizing law;
4. The State will adopt and use proper methods of administering each such program, including—
  - a. The enforcement of any obligations imposed by law on agencies, institutions, organizations, and other recipients responsible for carrying out each program;
  - b. The correction of deficiencies in program operations that are identified through audits, monitoring, or evaluation; and
  - c. The adoption of written procedures for the receipt and resolution of complaints alleging violations of law in the administration of the programs;
5. The State will cooperate in carrying out any evaluation of each such program conducted by or for the Secretary or other Federal officials;
6. The State will use such fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds paid to the State under each such program;
7. The State will—
  - a. Make reports to the Secretary as may be necessary to enable the Secretary to perform the Secretary's duties under each such program; and
  - b. Maintain such records, provide such information to the Secretary, and afford such access to the records as the Secretary may find necessary to carry out the Secretary's duties; and
  - c. Before the plan or application was submitted to the Secretary, the State afforded a reasonable opportunity for public comment on the plan or application and considered such comment.

### **Certification**

#### **Certification of compliance with Unsafe School Choice Option Requirements**

The Vermont State Board of Education certifies that it has established and implemented a statewide policy requiring that students attending persistently dangerous public elementary or secondary schools, as determined by the Vermont Department of Education (in consultation with

a representative sample of local educational agencies), or who become victims of violent criminal offenses, as determined by State law, while in or on the grounds of public elementary and secondary schools that the students attend, be allowed to attend safe public elementary or secondary schools within the local educational agency, including a public charter school.

*Note: There are no provisions in Vermont statute for establishing public charter schools.*

### **ESEA Program Specific Assurances**

The Vermont State Board of Education assures that it will comply with all requirements of the ESEA programs included in its consolidated application, whether or not the program statute identifies these requirements as a description or assurance that Vermont would address, absent this consolidated application, in a program-specific plan or application. Vermont understands that it is required to maintain records of compliance with each of those requirements. (Note: For the Safe and Drug-Free Schools programs, Vermont has all appropriate assurances from the Governor on record.)

Through the general assurance and assurance (1) in section 9304 (a), Vermont agrees to comply with all requirements of the ESEA and other applicable program statutes. Below are some key requirements of each program that the Vermont is agreeing to meet through this general assurance. This list of program-specific requirements Vermont is assuring is not exhaustive; Vermont is accountable for all program requirements.

#### **1. Title I, Part A – Improving Basic Programs Operated By LEAs**

Assurance that –

- a. The State plan for the implementation of Title I, Part A was developed in consultation with LEAs, teachers, principals, pupil services personnel, administrators, other staff and parents and that the plan for Title I, Part A coordinates with other programs under this Act, the Individuals with Disabilities Education Act, the Carl D. Perkins Vocational and Technical Education Act of 1998, the Head Start Act, the Adult Education and Family Literacy Act, and the McKinney-Vento Homeless Assistance Act.
- b. The SEA has a plan for assisting LEAs and schools to develop capacity to comply with program operation and for providing additional educational assistance to students needing help to achieve State standards, including:
  - i. the use of schoolwide programs;
  - ii. steps to ensure that both schoolwide program- and targeted assisted program schools have highly qualified staff (section 1111);
  - iii. ensuring that assessments results are used by LEAs, schools, and teachers to improve achievement (section 1111);
  - iv. use of curricula aligned with state standards (section 1111);
  - v. provision of supplemental services, including a list of approved service providers and standards and techniques for monitoring the quality and effectiveness of services (section 1116);
  - vi. choice and options (section 1116);
  - vii. the state support system under section 1117; and
  - viii. teacher and paraprofessional qualifications (section 1119).

- c. The State has a strategy for ensuring that children served by Title I, Part A will be taught the same knowledge and skills in other subjects and held to the same expectations as all children.
- d. The State will implement the accountability requirements of section 1116(f) regarding schools identified for improvement prior to the passage of ESEA.
- e. The State will implement the provisions of section 1116 regarding LEAs and schools in improvement and corrective action.
- f. The State will produce and disseminate an annual State Report Card in accordance with section 1111(h)(1) and will ensure that LEAs that receive Title I, Part A funds produce and disseminate annual local Report Cards in accordance with section 1111(h)(2).
- g. The SEA will ensure that LEAs will annually assess English skills for all limited-English proficient students.
- h. The SEA will coordinate with other agencies that provide services to children, youth and families to address factors that have significantly affected the achievement of students.
- i. The SEA will ensure that assessment results are promptly provided to LEAs, schools, and teachers.
- j. The State will participate in State academic assessments of 4<sup>th</sup> and 8<sup>th</sup> grade reading and mathematics under NAEP if the Secretary pays the cost of administering such assessments, and will ensure that schools drawn for the NAEP sample will participate in all phases of these assessments, including having results published.
- k. The SEA, in consultation with the Governor, will produce a plan for carrying out the responsibilities of the State under sections 1116 and 1117, and the SEA's statewide system for technical assistance and support of LEAs.
- l. The SEA will assist LEAs in developing or identifying high-quality curricula aligned with State academic achievement standards and will disseminate such curricula to each LEA and local school within the State.
- m. The State will carry out the assurances specified in section 1111(c).

### 1. Title I, Part B – Even Start Family Literacy

Assurance that –

- a. The SEA will meet its indicators of program quality developed in section 1240.
- b. The SEA will help each project under this part to fully implement the program elements described in section 1235, including the monitoring of the projects' compliance with staff qualification requirements and usage of instructional programs based on scientifically based reading research for children and adults.
- c. The SEA collaborated with early childhood specialists, adult education specialists, and others at the State and local level with interests in family literacy in the development and implementation of this plan.

### 2. Title I, Part C – Education of Migrant Children

Assurance that –

In addition to meeting the seven program assurances in Section 1304(c), the SEA will ensure that

–

- a. Special educational needs of migratory children, including preschool migratory children, are identified and addressed through – (a) the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs; (b) joint planning among local, State, and Federal educational programs serving migrant children, including language instruction educational programs under part A or B of title III; and (c) the integration of services available under this part with services provided by those other programs, a (d) measurable program goals and outcomes.
- b. State and its local operating agencies will identify and address the special educational needs of migratory children in accordance with a comprehensive State plan as specified in section 1306 (a).
- c. State will provide for educational continuity through the timely transfer of pertinent school records in a manner consistent with procedures the Secretary may require.

#### 4. Title I, Part D – Children and Youth Who Are Neglected, Delinquent or At-Risk

Assurance that the SEA –

- a. Will ensure that programs will be carried out in accordance with the State plan.
- b. Will carry out the evaluation requirements of section 1431.
- c. Has collaborated with parents, correctional facilities, local education agencies, public and private business and other state and federal technical and vocational programs in developing and implementing its plan to meet the educational needs of neglected, delinquent, and at-risk children and youth.
- d. Conducts a process to award Subpart 2 subgrants, to programs operated by local education agencies and correctional facilities.
- e. Will integrate programs and services for neglected, delinquent, and at-risk children and youth with other programs under this Act or other Acts.

#### 5. Title I, Part F – Comprehensive School Reform

Assurance that the SEA will --

- a. Fulfill all requirements relating to the competitive subgranting of program funds.
- b. Awards subgrants of not less than \$50,000 and of sufficient size and scope to support the initial costs of the program.
- c. Award subgrants renewable for 2 additional one year periods if the school is making substantial progress.
- d. Consider the equitable distribution of subgrants to different geographic regions in the State, including urban and rural areas and to schools serving elementary and secondary students.
- e. Reserve not more than five (5) percent of grant funds for administrative, evaluation, and technical assistance expenses.
- f. Use funds to supplement, and not supplant, any other funds that would otherwise be available to carry out these activities.
- g. Report subgrant information, including names of LEAs and schools, amount of award, and description of award.
- h. Provide a copy of the State's annual program evaluation.

## 6. Title II, Part A – Teacher and Principal Training and Recruiting Fund

Assurance that –

- a. The SEA will take steps to ensure compliance with the requirements for “professional development” as the term is defined in section 9101(34).
- b. All funded activities will be developed collaboratively and based on the input of teachers, principals, administrators, paraprofessionals, and other school personnel.
- c. The SEA will implement the provisions for technical assistance and accountability in section 2141 with regard to any LEA that has failed to make adequate yearly progress for two or more consecutive years.

## 7. Title II, Part D – Enhanced Education Through Technology

Assurance that the SEA --

- a. Will ensure that each subgrant awarded under section 2412 (a)(2)(B) is of sufficient size and duration, and that the program funded by the subgrant is of sufficient scope and quality, to carry out the purposes of this part effectively.
- b. Has in place a State Plan for Educational Technology that meets all of the provisions of section 2413 of ESEA.

## 8. Title III, Part A – English Language Acquisition, Language Enhancement, and Academic Achievement

Assurance that --

- a. Subgrantees will be required to use their subgrants to build their capacity to continue to provide high-quality language instruction educational programs for LEP students once the subgrants are no longer available.
- b. The State will consult with LEAs, education-related community groups and non-profit organizations, parents, teachers, school administrators, and researchers in developing annual measurable student achievement objectives for subgrantees.
- c. Each subgrantee will include in its plan a certification that all teachers in a Title III language instruction educational program for limited English proficient children are fluent in English and any other language used for instruction.
- d. In awarding subgrants to eligible entities that have experienced a recent significant increase in the percentage or number of immigrant students, the State will equally consider eligible entities that have limited or no experience in serving immigrant children and youth, and consider the quality of each local plan.
- e. Subgrants will be of sufficient size and scope to support high-quality programs.
- f. Subgrantees will be required to provide for an annual reading or language arts assessment in English of all children who have been in the United States for three or more consecutive years.
- g. Subgrantees will be required to assess annually the English proficiency of all LEP children.
- h. A subgrantee plan will not be in violation of any State law, including State constitutional law, regarding the education of LEP children.
- i. Subgrantee evaluations will be used to determine and improve the effectiveness of subgrantee programs and activities.

- j. Subgrantee evaluations will include a description of the progress made by children in meeting State academic content and student academic achievement standards for each of the two years after these children no longer participate in a Title III language instruction educational program.
- k. A subgrantee that fails to make progress toward meeting annual measurable achievement objectives for two consecutive years will be required to develop an improvement plan that will ensure the subgrantee meets those objectives.
- l. Subgrantees will be required to provide the following information to parents of LEP children selected for participation in a language instruction educational program:
  - 1) How the program will meet the educational needs of their children;
  - 2) Their options to decline to enroll their children in that program or to choose another program, if available;
  - 3) If applicable, the failure of the subgrantee to make progress on the annual measurable achievement objectives for their children.
- m. In awarding subgrants, the State will address the needs of school systems of all sizes and in all geographic areas within the State, including school systems with urban and rural schools.

#### 9. Title IV, Part A – Safe and Drug-Free Schools and Communities

Assurance that --

- a. The State has developed a comprehensive plan for the use of funds by the State educational agency and the chief executive officer of the State to provide safe, orderly, and drug-free schools and communities through programs and activities that complement and support activities of local educational agencies under section 4115(b), that comply with the principles of effectiveness under section 4115(a), and that otherwise are in accordance with the purpose of this part.
- b. Activities funded under this program will foster a safe and drug-free learning environment that supports academic achievement.
- c. The application was developed in consultation and coordination with appropriate State officials and others, including the chief executive officer, the chief State school officer, the head of the State alcohol and drug abuse agency, the heads of the State health and mental health agencies, the head of the State child welfare agency, the head of the State board of education, or their designees, and representatives of parents, students, and community-based organizations.
- d. Funds reserved under section 4112(a) will not duplicate the efforts of the State education agency and local educational agencies with regard to the provisions of school-based drug and violence prevention activities and that those funds will be used to serve populations not normally served by the State educational agencies and local educational agencies and populations that need special services, such as school dropouts, suspended and expelled students, youth in detention centers, runaway or homeless children and youth, and pregnant and parenting youth.
- e. The State will cooperate with, and assist, the Secretary in conducting data collection as required by section 4122.
- f. LEAs in the State will comply with the provisions of section 9501 pertaining to the participation of private school children and teachers in the programs and activities under this program.

- g. Funds under this program will be used to increase the level of State, local, and other non-Federal funds that would, in the absence of funds under this subpart, be made available for programs and activities authorized under this program, and in no case supplant such State, local, and other non-Federal funds.
- h. A needs assessment was conducted by the State for drug and violence prevention programs, which shall be based on ongoing State evaluation activities, including data on the incidence and prevalence of illegal drug use and violence among youth in schools and communities, including the age of onset, the perception of health risks, and the perception of social disapproval among such youth, the prevalence of protective factors, buffers, or assets and other variables in the school and community identified through scientifically based research.
- i. The State will develop and implement procedures for assessing and publicly reporting progress toward meeting the performance measures.
- j. The State application will be available for public review after submission of the application.
- k. Special outreach activities will be carried out by the SEA and the chief executive officer of the State to maximize the participation of community-based organizations of demonstrated effectiveness that provide services such as mentoring programs in low-income communities.
- l. Funds will be used by the SEA and the chief executive officer of the State to support, develop, and implement community-wide comprehensive drug and violence prevention planning and organizing activities.
- m. The State will develop a process for review of applications from local educational agencies that includes receiving input from parents.

#### 10. Title IV, Part B – 21<sup>st</sup> Century Community Learning Centers

Assure that the SEA will –

- a. Write the State application in consultation and coordination with appropriate State officials, including the chief State school officer, and other State agencies administering before and after school programs, the heads of the State health and mental health agencies or their designees, and representatives of teachers, parents, students, the business community, and community-based organizations.
- b. Award subgrants of not less than three years and not more than five years that are of not less than \$50,000 and of sufficient size and scope to support high quality, effective programs.
- c. Fund entities that propose to serve students who primarily attend schools eligible for schoolwide programs under section 1114 or schools that serve a high percentage of students from low-income families, and the families of such students.
- d. Require local applicants to submit a plan describing how community learning centers to be funded through this grant will continue after the grant period.
- e. Require local applicants to describe in their applications how the transportation needs of participating students will be addressed.

## 11. Title V, Part A – Innovative Programs

Assure that --

- a. The State has set forth the allocation of funds required to implement section 5142 (participation of children enrolled in private schools).
- b. The State has made provision for timely public notice and public dissemination of the information concerning allocations of funds required to implement provisions for assistance to students attending private schools.
- c. Apart from providing technical and advisory assistance and monitoring compliance with this part, the SEA has not exercised, and will not exercise, any influence in the decision making processes of LEAs as to the expenditure made pursuant to the LEAs' application for program funds submitted under section 5133.