



STATE OF VERMONT

AGENCY OF EDUCATION

## **Methods of Administration Targeting Plan**

For School Years: 2016 – 2017 and 2017 – 2018

Submitted to:

U. S. Department of Education, Office for Civil Rights

Submitted by:

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Methods of Administration  
Targeting Plan  
for School Years  
2016-2017 and 2017-2018

The Vermont Agency of Education (AOE) has the responsibility for the minimum of two Methods of Administration (MOA) reviews each year. The MOA Targeting Plan is intended to address secondary and post-secondary sites whose date of last review is either unknown or occurred ten years ago or more. The attached ranking system is weighted to implement this goal. Vermont has decided to focus on makeup reviews of secondary and post-secondary sites in the first year of the plan and secondary and post-secondary sites in the second year of the plan. If the data had indicated other, more critical issues, the plan would have responded.

**A. Sub-Recipient Universe**

- Vermont's eighteen secondary technical centers including one school-district administered center and two private schools that serve public students
- Seventeen post-secondary campuses, which includes one virtual campus
- Four state-operated programs (correctional learning centers with CTE programs)

**B. Selection Criteria**

**1. Secondary Sub-Recipients:**

Factors analyzed for targeting include IEP and 504 enrollment, sex, date of last review, non-traditional participation and completion, and race. The sub-recipient(s) will be selected according to the order of rank from lowest to highest.

- IEP and 504 Student Enrollment: The statewide mean for combined enrollment of students on an IEP or 504 in secondary career technical education for the prior two years is 28.06%. A score of 0 to 4 is assigned based on percentage of deviation above or below the state average. To identify disproportionately high or low IEP and 504 enrollment, scoring is:

0 = same or similar up to 3.99% over or under



1 = 4% -5.99% over or under

2 = 6% - 7.99% over or under

3 = 8% - 9.99% over or under

4 = over 10% over or under the state average.

- Sex: The balance is assumed to be 50% female and 50% male. Using 50% female as the norm, points were assigned as follows:

0 = same or similar percentage up 9.99%

1 = a difference of between 10% and 19.99%

2 = a difference of between 20% and 29.99%

3 = a difference of between 30% and 39.99%

4 = a difference of over 40%

- Date of last visits was scored as follows:

10 = 10+ years or date unknown

5 = 8.1-10 years

*<4 skipped intentionally to provide greater differentiation>*

3 = 6.1-8 years

2 = 4.1-6 years

1 = 2.1-4 years

0 = last two years

*This weighted scoring is intended to address Vermont's goal of visiting sites that have not had a known Methods of Administration review or had not been reviewed in the past ten years.*

- Participation by Nontraditional Students: A score of 0 or 2 was assigned where a 0 was for sub-recipients that had met the criteria for each school year and a 2 was assigned to sub-recipients that had not met the criteria for (2013-'14 and 2014-'15). The state target for participation was 16.5% for both years.
- Program Completion by Nontraditional Students: A score of 0 or 2 was assigned where a 0 was for sub-recipients that had met the



criteria for each school year and a 2 was assigned to sub-recipients that had not met the criteria for (2013-'14 and 2014-'15). The state target was 16.00 % for both years.

- Race: Given the low percentage of racial and ethnic minorities (4.8%) together with Vermont's small population (626,562<sup>1</sup>), sub-recipients' racial diversity was analyzed on a school or institution basis. Each institution's racial composition was then compared to the racial composition of Vermont. Data was reviewed for a disproportionately low number or significantly higher than average number of racial minority students. The system used for ranking is 0 to 4 score based on deviation. Scores were averaged for both years by subrecipient.

Scoring is:

0	= 0% to .99%
1	= 1.0% to 1.99%
2	= 2.0% to 2.99%
3	= 3.0% to 3.99%
4	= 4.0% to 4.99%
5	= 5.0% to 5.99%
6	= 6.0% to 6.99%
7	= 7.0% or above

- Tie Breaker - in the event the rankings lead to a tie, the deciding factor will be average number of students served by the subrecipient in the last two years. This would mean that the subrecipient serving the largest number of students in the tie would be the one that is selected for a review over the smaller center.
- Unforeseen Circumstances – in the event a subrecipient cannot be visited due to some unforeseen circumstance, the next ranking subrecipient will be selected instead.



## 2. Post-secondary Sub-recipients:

Vermont must make up two post-secondary reviews from the previous biennium. Vermont will conduct two other reviews in the current biennium as identified by the previous period's ranking. The goal of our post-secondary reviews is to review all sub-recipients that have "unknown" as the date of last review and the selection criteria are weighted to ensure those sub-recipients appear at the top of the list. In the next biennium we expect to update the demographic data in order to reorder the list to better indicate any significant changes in the demographic profile of the sub-recipients. The goals of the selection criteria may change if the data indicate that a change of priority is needed. The subrecipient/location(s) will be determined by order of rank from lowest to highest.

Targeting procedures focused on the campuses and sites associated with the Community College of Vermont (CCV) and Vermont Technical College (VTC):

- Race: Given the low percentage of racial and ethnic minorities (4.7%) together with Vermont's small population (626,011), sub-recipient's racial diversity was analyzed by comparing the average non-white population of each site to the average non-white population for all sub-recipients (8.46%). Data was reviewed for either a disproportionately high or disproportionately low number of minority students at each site as it related to the overall non-white population. The system used for scoring is 0 to 4 based on deviation. Scoring is as follows:

0 = same or similar percentage

1 = 2 – 3.99%

2 = 4 – 5.99%

3 = 6 – 7.99%

4 = over 8%



- Disability: Post-secondary disability information is limited. The average percentage of students with a disability across both sub-recipients was 2.4%. Data from each site were evaluated and compared to the subrecipient average. The scoring allowed for deviation above and below average. Scoring is as follows:

Deviation	% Disability	Score
-4	0.00% - 0.3%	2
-2	.4% - 1.8%	1
BASE (2.4%)	1.9% - 2.9%	0
+2	3% - 4.3%	1
+4	4.4% - 6.3%	2
+6	6.4% - 8.3%	3
+8	8.4% and above	4

- Gender: Gender balance is assumed to be 50% female and 50% male. Scoring is as follows:

50%+	0
40 – 49.99%	1
30 – 39.99%	2
20 – 29.99%	3

- Date of last visit: was scored by assigning sites with unknown date of review with a 10 and sites that had been visited ten years ago or more with a 5. This weighted scoring is intended to address Vermont’s goal of selecting sites that had not had a known MOA review or had not been reviewed in ten years. This is the same criteria used for scoring secondary schools. However, many campus sites have not had a known review.
- Tie Breaker - in the event the rankings lead to a tie, the deciding factor will be average number of students served in the last two years. This would mean that the subrecipient serving the largest number of students in the tie would be the one that is selected for a review over the smaller center.



- Unforeseen Circumstances – in the event a subrecipient cannot be visited due to some unforeseen circumstance, the next ranking subrecipient will be selected instead.
3. **State Operated Programs:** (Correctional facilities with CTE programs). Vermont is using one means to rank the sites during this biennium – date of last review. The highest ranking sub-recipient/location(s) will be selected.
- Date of Last Review: The Correctional Learning Centers were recently included in the sub-recipient universe. Two were visited in 2006 and 2008; two have an unknown date for the last visit. 10 for never; 0 for any date.

### C. **Timeline for implementing On-Site Reviews:**

#### Make-up Reviews:

SECONDARY: The approved targeting plan for the previous period incorrectly identified a time frame of 2013-'14 and 2014-'15. The time frame for the previous targeting plan should have been 2014-'15 and 2015-'16. As a result, no reviews were identified to take place in the 2015-16 school year. Two make-up reviews will be needed to correct this error and will focus on secondary sub-recipients. The selection of sub-recipients for this set of make-up reviews will be determined by order of rank from lowest to highest. In this case, Burlington Technical Center and Green Mountain Technical Career Center will be reviewed. These reviews will be completed in the 2015-16 school year but as of the writing of this targeting plan have not been completed.

POST-SECONDARY: The approved targeting plan for 2011-'12, 2012-'13, and 2013-'14 identified a review of four post-secondary sub-recipients. Only two of those reviews occurred. Vermont will need to conduct make-up reviews on two post-secondary sub-recipients. The selection process for the make-up reviews will be to conduct the reviews on the sub-recipients that should have been reviewed in the 2011-'12 & 2012-'13 biennium. In this case those sub-recipients



that should have been reviewed but where not are: Vermont Technical College – Bennington and Vermont Technical College – Brattleboro.

Current Reviews:

For the 2016-'17 and 2017-'18 biennium, Vermont will review two secondary and two post-secondary sub-recipients. The selection of sub-recipients for both make-up and regular reviews will be determined by order of rank from lowest to highest. In this case, Cold Hollow Career Center and Central Vermont Career Center, and CCV – Online and CCV – St. Johnsbury.

The schedule for reviews is as follows:

2016-17

- 1) Fall 2016:
  - a. Vermont Technical College Bennington (*make-up*)
  - b. Vermont Technical College Brattleboro (*make-up*)
- 2) Spring 2017:
  - a. Burlington Technical Center (*make-up*)
  - b. Green Mountain Technical Career Center (*make-up*)

2017-18

- 1) Fall 2017:
  - a. Cold Hollow Career Center
  - b. Central Vermont Career Center
- 2) Spring 2018:
  - a. CCV – Online Programs
  - b. CCV – St. Johnsbury



## D. RANKING TABLES

**Table I: Secondary Sub-Recipients**

Regional Technical Centers and One High School

Technical Centers	Total Score	Rank	Date of Last Visit
Burlington Technical Center	19.00	1	2003
Green Mtn Technical & Career Ctr.	18.50	2	2003
Cold Hollow Career Center	17.50	3	2005
Central Vermont Career Center*	16.00	4	2001
Windham Regional Career Ctr.	14.50	5	2003
Missisquoi Valley UHSD #7	13.50	6	2012
Stafford Technical Center	13.00	7	2001
SW VT Career Development Ctr.	13.00	8	2004
River Bend Career & Tech Ctr.	12.50	9	2008
Essex, Center for Technology Ed	12.50	10	2002
Lyndon Institute	11.50	11	2012
Hartford Career & Tech. Ctr.	10.50	12	2006
Applied Technology Ctr. at St. Johnsbury Academy	9.50	13	2006
Patricia Hannaford Career Ctr.	9.00	14	2005
Randolph Technical Career Ctr.	6.50	15	2011
Northwest Technical Center	6.00	16	2013
North Country Career Ctr.	4.00	17	2011
River Valley Technical Center	3.00	18	2014

\*Central Vermont Career Center changed its name from Barre Technical Center beginning July 2016.



**Table II: Post-Secondary Sub-Recipients**

Postsecondary Sub-Recipient	Total Score	Rank	Date of Last Visit
VTC - Bennington	--	--	Make-up
VTC - Brattleboro	--	--	Make-up
CCV – Online	13.0	1	Unknown
CCV – St. Johnsbury	12.0	2	Unknown
CCV – Upper Valley	12.0	3	Unknown
CCV - Montpelier	11.5	4	Unknown
CCV - Newport	11.0	5	Unknown
CCV - Brattleboro	10.5	6	Unknown
CCV - Morrisville	10.5	7	Unknown
CCV - Bennington	10.0	8	Unknown
CCV – St. Albans	10.0	9	Unknown
VTC - Randolph	7.5	10	2004
VTC - Williston	4.0	13	2004
CCV - Winooski	2.0	14	2007
CCV - Springfield	1.5	15	2012
CCV – Middlebury	1.0	16	2012
CCV - Rutland	0.5	17	2008



**Table III: State Operated Programs**

Vermont Department of Corrections Ranking

Correctional Facility	Total	Rank	Date of Last Visit
Southern State Correctional Facility	10	1	Unknown
Northern State Correctional Facility	10	2	Unknown
Southeast State Correctional Facility	0	3	2006
Northwest State Correctional Facility	0	4	2008