



Vermont State Plan: Public Comment Summary

From January 10 until February 13, 2017, The VT AOE put a draft Vermont State Plan out for public comment. Public comment was advertised through a combination of channels, including the Agency's Weekly Field Memo, Twitter feed, and a statewide Front Porch Forum post.

Public comment was collected through a survey tool on the AOE's website, and, in several cases, by email. The Agency also provided narrated PowerPoint presentations accompanying each Plan section to help frame Plan content for the public.

The tables below represent a summary of the comments that were collected through this process. Included are the questions that were asked of the public, a summary of their responses, the AOE's response to the feedback, and, in some cases, the rationale for the responses.

A few important things to note:

- In many cases, feedback did not result in a change to the content of the AOE's proposal, but still led to a revision or expansion of plan text for the purpose of providing greater clarity.
- The public comment process was not the full extent of the public's involvement in Plan development. The AOE estimates that several thousand Vermonters provided input over the year of the Plan's development, with those comments playing a substantial role in shaping the content and messaging of the current draft.
- The topics put forward in the public comment surveys did not represent the full slate of topics considered by the AOE over the course of the plan's development process. All topics received public input over the course of the year, but the surveys emphasized topics that had generated more discussion and conflicting viewpoints during preliminary public input sessions.

Public Comment Summary: Accountability Sections

Survey Topic	Survey Question	Summary of Public Feedback	Changes	Rationale
Student Groups and N-size	Regarding the proposal to include two additional groups in our list of federally required student groups	<ul style="list-style-type: none"> • 11 support the proposal • 4 concerns related to 1) whether or not the terminology is appropriate 2) if the grouping would mask the needs of specific groups. • 1 additional comment lauded this measure • 1 comment expressed concern that “gifted children” not be counted as privileged as the author feels Vermont does not do an adequate job in supporting these students. 	No change in direction; revise text for clarification	The inclusion of a “super-group” will not hide the performance of student groups that meet the minimum N size- those groups will be visible in all reporting. The inclusion of a super group also doesn’t mean that the student groups comprising it will be permanently aggregated. Those groups will still be unpacked and discussed as a part of continuous improvement planning. Local level administrators will also have access to group data, even if the N for that group falls below 25.
Student Groups and N-size	Regarding the proposal to not count Students With Disabilities and English Learners as members of those subgroups, after they are no longer classified as members of those subgroups:	<ul style="list-style-type: none"> • 11 support the proposal • 2 comments felt that it was difficult to decide how they felt about the plan without understanding how the results of assessments and group membership would be used • 2 felt that a student’s disability and English learner status remain even if the students is no longer identified for specific services 	No change	
Student Groups and N-size	Regarding the proposal for an accountability student N-size of 25:	<ul style="list-style-type: none"> • 5 support the proposal • 6 felt the number was too high • 1 comment felt that we were increasing the N size for accountability from 11 to 25 and should be going lower • 3 Felt the number was too low 	A significant revision in text will follow. The Agency will use a rolling average of 25 for Accountability determinations (state	The current N for accountability is 40 in Vermont, the proposal is to lower to 25. Stakeholders are divided on the appropriate number and research is not able to name a specific number. The

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		<ul style="list-style-type: none"> • 1 additional comment felt that requests for a higher N have not been heard in the writing of the plan • 1 provided an alternate method of establishing reporting that would not provide numbers 	and local). The Agency will also continue to report with a minimum N of 11, as is current practice.	federal law requires the reporting of numbers and percentages.
Student Groups and N-size	Regarding the proposal for multiple tiers of school and LEA accountability:	<ul style="list-style-type: none"> • 12 support the proposal • 1 raised a concern that not all Supervisory Unions and Districts are currently organized in ways that support this level of analysis 	No change	
Academic Measures and Targets	Regarding the application of an ELA performance measure within this accountability system:	<ul style="list-style-type: none"> • 17 support the proposal • 1 commented registered concern that grade 3 is too early to begin assessing students. • 1 comment registered concern that a K-2 reading assessment should be adopted • 1 comment provide praise for the growth element included in the plan • 1 comment registered concern over how the growth element would be understood and communicated • 1 comment registered concern that gifted students were being discriminated against with a minimum proficiency standard 	No change	<p>Federal law requires assessment begin in grade 3.</p> <p>Earlier grades use local assessments, and rather than force all to conform to a single assessment, the AOE supports this as a local determination.</p>

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Academic Measures and Targets	Regarding the application of a Mathematics performance measure within this accountability system:	<ul style="list-style-type: none"> • 15 support the proposal • No comments recorded 	No Change	
Academic Measures and Targets	Regarding the application of a Science performance measure within this accountability system:	<ul style="list-style-type: none"> • 13 support the proposal • 2 comments were registered about science assessment- 1) science being challenging to asses and 2) wanting to use a different assessment for NGSS than NECAP • 1 comment registered concern over adding more items to federal accountability than the minimum required 	No change	Federal law requires the test be administered and aligned to science content standards; we believe the test should be used for federal accountability after a new test aligned to the Next Generation Science Standards has been developed.
Academic Measures and Targets	Regarding the application of a Physical Education performance measure within this accountability system:	<ul style="list-style-type: none"> • 19 support the proposal • 4 comments registered concern over the measurement tool and advocated for care in selecting the measure • 1 comment registered concern over adding more items to federal accountability than the minimum required • 1 comment registered a concern that this measure should not be selected over other transferable skills 	No change	The AOE will work with experts in health and fitness to select a vendor that is sensitive to the issues raised regarding definitions, value of improvement and grade levels. It is possible that this measure could be administered only in elementary and middle schools to avoid duplication.

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Academic Measures and Targets	Regarding the identification of timelines for the acquisition of English Language Proficiency:	<ul style="list-style-type: none"> • 11 support the proposal • 3 comments were concerned that timelines for English proficiency were arbitrary and not linear • 1 comment was concerned with academic assessments beginning in grade 3 	No change	Federal law requires we set timelines for attainment of proficiency. These timelines have been set with the advice and consult of English language proficiency researchers in the field.
Academic Measures and Targets	Regarding the proposal for the calculation of English Language Proficiency benchmarks:	<ul style="list-style-type: none"> • 11 support the proposal • 2 comments felt the goals were too ambitious or abstract. • 1 comment encouraged the AOE to work with WIDA- a group that supports assessment for English Learners. 	No change	<p>The law requires that we set English Language Proficiency goals.</p> <p>The AOE has worked closely with our partners in WIDA to identify goals for this proposal.</p>
Academic Measures and Targets	Regarding the application of a graduation rate performance measure within this accountability system:	<ul style="list-style-type: none"> • 11 support the proposal • 2 comments reflected on whether or not graduation and proficiency were necessary for full participation in adult life. 	No change	
Academic Measures and Targets	Regarding the application of a career and college readiness performance measure within this accountability system:	<ul style="list-style-type: none"> • 11 support the proposal • 1 comment was concerned the measure would overly focus on college • 1 comment was concerned about the cost of assessments 	No change	<p>In addition to measuring college readiness, career interests are measured through CTE Certifications.</p> <p>Many assessment options are currently covered by schools/federal funds. Several are free for students eligible for the free lunch program.</p>
Academic Measures and Targets	Regarding the application of a post-secondary outcomes performance	<ul style="list-style-type: none"> • 11 support the proposal • 1 comment registered concern over adding more items to federal 	No change	The measure has multiple ways of counting positive post-secondary outcomes, not just education-related.

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Academic Measures and Targets	measure within this accountability system:	<p>accountability than the minimum required</p> <ul style="list-style-type: none"> • 1 comment worried this would become too focused on post-secondary education • 1 comment worried this held schools accountable for factors outside their control 		The concern over an additional measure has been voiced, and others have voiced in the opposite direction that understanding what happens to alumni is a critical component of understanding school quality.
Academic Measures and Targets	Additional Comments	<ul style="list-style-type: none"> • 1 comment asked for a Social Emotional Learning (SEL) assessment • 1 comment raised concerns related to “adverse effect” and that if a student with an IEP performed proficient on the test they would not qualify for services. • 1 comment raised concerns about if Smarter Balanced tests are aligned to proficiency based learning as well as the standards • 1 comment suggested assessing transferable skills over “content” skills 	No change	<p>We considered an SEL assessment and transferable skills assessments; at this time the instruments are not robust enough to use for accountability.</p> <p>We have measures related to school climate included in our state accountability, but not in the federal subset of measures within that system.</p>
Academic Measures and Targets	Regarding the proposed format of an LEA report card:	<ul style="list-style-type: none"> • 6 support the proposal • 1 comment is concerned about any accountability model that treats all schools the same way. • 1 comment feels that all assessments should be weighted less for older students and that tests of common knowledge are inappropriate for most topics after elementary school. • 1 comment felt the graphics were not effective 	No change	<p>By definition accountability systems are designed to apply the same expectations to all schools, to provide a shared basis for comparison.</p> <p>State and federal law require tests in the grade levels we are assessing.</p> <p>The graphics currently proposed are place holders rather than final</p>

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		<ul style="list-style-type: none"> 1 comment thought the graphical display was informative and helpful to the public 		determined visuals, and may be revised in the months ahead.
Academic Measures and Targets	Regarding the AOE's approach to calculating school scores:	<ul style="list-style-type: none"> 4 support the proposal 1 comment is concerned about any accountability model that treats all schools the same way. 1 comment requests support to the field in explaining scale scores rather than proficiency. 1 comment expressed concern that math tests are too rigorous for what the real world demands 1 comment expressed concern over the weighting of tests too heavily. 1 person registered concern that a score system would lead to ranking by others even if the AOE didn't share the data in that way 1 person felt that accountability results in "hierarchical thinking" that discourages questioning the system and would result in penalizing and stigmatizing schools. 	No change	<p>Federal law requires that ELA and Math tests be "substantially weighted" as compared to other measures--we've balanced the measures' comparative weighted values as best as we believe that we can, given federal requirements.</p> <p>Additional field communication is planned;</p> <p>The AOE agrees that some individuals may use data to rank schools- we've attempted to build a system that makes this less frequent, but we do not believe that we will prevent it.</p>
Transition Plan	Regarding the AOE's Transition Plan from the current accountability model to the new, proposed accountability model:	<ul style="list-style-type: none"> 6 support the proposal 1 comment suggested delaying implementation until all measures are ready 1 comment suggest the transition plan would be too slow for useful data to communities 1 comment raised concerns about raising awareness in the field 	No change	Regarding the transition plan, those not supporting felt evenly that the planned transition was too fast and too slow. We believe that more effective communication and implementation of the transition plan would improve support. Plans for helping educators and the public to better understand

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		<ul style="list-style-type: none"> • 1 comment raised concerns about an SU being able to support improvement in its schools with a universal approach when local needs are important • 1 concern is that EL students may not gain proficiency in the time allotted (see measure section above) • 5 concerns related to the fitness test and the appropriateness of its use (see measure section above) • 1 concern was raised related to supporting new teachers • 1 concern was raised related to supporting a state-wide teacher evaluation system 		<p>ESSA will be put into action after the plan has been submitted to USED for review.</p>
Transition Plan	Additional comments	<ul style="list-style-type: none"> • 1 comment supportive of the model in general • 1 comment with questions related to EL students and need to clarify processes and procedures related to their assessment • 4 concerns about fitness testing (addressed above) • 1 concern about how the numbers are calculated (described in measures/weighting) • 1 concern about how the High School Completion Program might be included/leveraged • 1 comment related to the importance of educating the field on the plan 	<p>Revisions to the English Learner sections, both as a group of students and for assessment of proficiency will be made for clarity.</p>	

Public Comment Summary: Continuous Improvement Sections

Survey Topic	Survey Question	Summary of Public Feedback (bullet format, order by frequency of appearance of comment (most to least))	Changes	Rationale
Identification of Schools for Technical Assistance	Regarding the AOE's approach to identifying Comprehensive Schools:	<ul style="list-style-type: none"> • 5 people support the proposal • 1 person believes the proposal would double count some performance indicators 	Examine revisions to Plan language for clarification	
Identification of Schools for Technical Assistance	Regarding the AOE's approach to identifying Targeted Schools:	<ul style="list-style-type: none"> • 4 people support or have no strong feelings about this proposal • 1 person was unclear about the Targeted Identification process • 1 person was unclear about connections between this section and the accountability sections of the plan 	Examine revisions to Plan language for clarification	
Identification of Schools for Technical Assistance	Additional Comments	<ul style="list-style-type: none"> • 1 person pointed out a technical error in a citation • 1 person felt positively about proposed terminology • 1 person felt positively about the equity focus in identifying schools eligible for supports 	Correct technical error, no changes otherwise	
Continuous Improvement and Technical Assistance	Regarding the AOE's approach to structuring the Consolidated Federal Programs application and review process:	<ul style="list-style-type: none"> • 8 people supported the proposal or had no strong feelings • 1 person requested increased consolidation of plans by the AOE. 	No Change	

Survey Topic	Survey Question	Summary of Public Feedback (bullet format, order by frequency of appearance of comment (most to least))	Changes	Rationale
Continuous Improvement and Technical Assistance	Regarding the AOE's approach to data collection:	<ul style="list-style-type: none"> • 8 people supported the proposal or had no strong feelings • 1 person requested that more education technology be incorporated into learning environments 	No Change	
Continuous Improvement and Technical Assistance	Regarding the AOE's approach to Consolidated Federal Programs monitoring:	<ul style="list-style-type: none"> • 9 people supported this or had no strong feelings 	No Change	
Continuous Improvement and Technical Assistance	Regarding the AOE's approach to Continuous Improvement Plan development and review:	<ul style="list-style-type: none"> • 7 people support this or have no strong feelings • 1 person felt that the proposal was too "one size fits all" • 1 person requested flexibility in local level template selection accompanied by clear AOE-issued guidelines for content 	No Change	
Continuous Improvement and Technical Assistance	Regarding the AOE's approach to Continuous Improvement Plan monitoring:	<ul style="list-style-type: none"> • 8 people support this proposal or had no strong feelings • 1 person felt that the time it takes to monitor the implementation of practices and outcomes takes away unnecessarily from instructional time 	No Change	Monitoring and evaluating practices for efficacy is a critical part of the implementation process, and must be conducted as a part of local-level continuous improvement work.

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Continuous Improvement and Technical Assistance	Regarding the AOE's approach to providing supports for Comprehensive Schools:	<ul style="list-style-type: none"> • 7 people support this proposal or have no strong feelings • 1 believes the proposal is too punitive, but does not elaborate on how • 1 person agrees with the proposal but is concerned about the AOE's capacity for implementation 	The AOE will add language to emphasize the fact that this process is meant to focus on continuous improvement, and not punitive consequences.	
Continuous Improvement and Technical Assistance	Regarding the AOE's approach to providing supports for Targeted Schools:	<ul style="list-style-type: none"> • 7 people support this proposal or have no strong feelings • 1 believes the proposal is too punitive, but does not elaborate on how • 1 person agrees with the proposal but is concerned about the AOE's capacity for implementation 	The AOE will add language to emphasize the fact that this process is meant to focus on continuous improvement, and not punitive consequences.	
Continuous Improvement and Technical Assistance	Additional comments	<ul style="list-style-type: none"> • 2 person voiced additional support for the proposal • 1 person promoted the use of the VT Digital Learning Plan in continuous improvement efforts • 1 person requested that the High School Completion program be formally described as a Flexible Pathway • 1 person wanted increased support for EQS implementation 	The AOE will add language to emphasize the fact that this process is meant to focus on continuous improvement, and not punitive consequences.	

Public Comment Summary: Educator Quality Section

Survey Topic	Survey Question	Summary of Public Feedback	Changes	Rationale
Educator Quality	Using VSBPE to review and revise licensing standards	<ul style="list-style-type: none"> 15 people supported the proposal or had no strong feelings 1 person wanted the AOE to ensure that the board has proper time to review proposed changes 1 person wanted the state's licensing standards to consider the needs of students identified as gifted 	No change	Any changes made to the Licensing Rules is done through the Vermont State Rule Making Process which involves timelines related to public comment. Public Notice is provided by the Secretary of State's Office when rule changes are being considered as well as through the Agency's website.
Educator Quality	ROPA serving as the state accrediting body of educator preparation programs	<ul style="list-style-type: none"> 14 people supported the proposal or had no strong feelings 1 person felt that ROPA does not ensure that prospective teachers can meet the needs of students identified as gifted 	No change	
Educator Quality	VT AOE evaluating local educator evaluation systems	<ul style="list-style-type: none"> 13 people supported the proposal or had no strong feelings 1 person wanted evaluation systems to require educator knowledge of Act 77 	No change	The State does not require a Statewide Supervision and Evaluation Model. SU/SDs do provide for implementation of standards in their individual models/systems.
Educator Quality	Alignment of professional learning standards with existing educator standards	<ul style="list-style-type: none"> 11 people supported the proposal or had no strong feelings 2 people felt that the standards should address needs of students identified as gifted 1 person felt that the standards should better represent Act 77 	No change	
Educator Quality	Creation of a leadership academy	<ul style="list-style-type: none"> 10 people supported the proposal 4 people felt that too many questions remain on the details of the academy 	No change	This section provided an overview of the Academy, as we understand it today. It is in the process of being developed further;

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		<ul style="list-style-type: none"> 1 person asked that teacher leaders be included for eligibility in the academy; don't limit to administration 		more details will be shared about the academy in the future.
Educator Quality	Effective hiring practice as a strategy to reduce the prevalence of inexperienced and out-of-field teachers	<ul style="list-style-type: none"> 12 people supported this proposal or had no strong feelings 	No change	
Educator Quality	Improving the working conditions in high-poverty schools as a strategy to reduce the prevalence of inexperienced and out-of-field teachers	<ul style="list-style-type: none"> 15 people supported this proposal 	No change	
Educator Quality	Additional Comments	<ul style="list-style-type: none"> 5 people wanted the AOE to ensure that educators are aware of innovative practice to facilitate learning for all students 1 person wanted the AOE to ensure that educators are prepared to meet the needs of all students, including students identified as gifted. 		Identification and implementation of need-specific effective practice will be a part of continuous improvement conversations at the local level.

Public Comment Summary: Supporting All Students Sections

Survey Topic	Survey Question	Summary of Public Feedback	Changes	Rationale
Supporting All Students	Alignment of CIPs with EQS and Act 77	<ul style="list-style-type: none"> 8 people supported the proposal 2 people said that the plan does not include services for gifted students 1 person thought that the CFP portion of the plan was unrealistic 1 person wanted to see stronger alignment with EQS and out-of-school time learning (after-school and summer learning). 	No change	A heavier priority in the language of the VT plan is given to our most vulnerable students. Gifted students are mentioned in ESSA, and are one of the possible student groups that can be supported through federal funding.
Supporting All Students	Submission of consolidated funds application	<ul style="list-style-type: none"> 10 people supported or had no strong feelings about this proposal. 1 person supports the braiding of funds but wants the plan to address how VT will address the Digital use divide. 1 person wants to update plan language to include expanded learning opportunities (after-school & summer learning). 1 person is worried that braiding funding will lead to underserving gifted students 	Examine revisions to Plan language for clarification	
Supporting All Students	Use of 7% of Vermont's Title IV set aside to provide technical support	<ul style="list-style-type: none"> 9 people supported or had no strong feelings about this proposal 1 person advocated for direct service (human to human) as the best technical assistance method. 1 person wanted technical assistance and mentoring to recognize afterschool and summer learning as an evidence-based support. 	No Change	Stakeholders consulted in development felt that there were not enough funds for extensive statewide technical support activities, but felt that the need was for a person to help LEAs determine the best use of these limited funds.

Survey Topic	Survey Question	Summary of Public Feedback	Changes	Rationale
Supporting All Students	Waiver to operate as schoolwide Title program if below 40% poverty threshold	<ul style="list-style-type: none"> 11 people generally supported or had no strong feelings about this proposal 	No change	
Supporting All Students	Identification, education, and support of migratory children	<ul style="list-style-type: none"> 11 people generally supported or had no strong feelings about this proposal 	No change	
Supporting All Students	Entrance and exit procedures for English Learners	<ul style="list-style-type: none"> 11 people generally supported or had no strong feelings about this proposal 	No change	
Supporting All Students	Identification, education, and support for homeless children and youth	<ul style="list-style-type: none"> 10 people generally supported or had no strong feelings about this proposal 1 person was concerned that the issue of supporting homeless children falls on schools, and wanted to see increased support from other agencies. 	No change	Other agencies are involved in supporting homeless children, but these connections are not represented in our draft state plan, which is rooted in education supports.
Supporting All Students	Additional Comments	<ul style="list-style-type: none"> 1 person wanted to strengthen plan with inclusion of language of equality of student use of technology devices. 1 person had concerns about the pre-screening process for external organizations under Title IV, Part B (21C programs). The comment went on too long and the end of it was not captured so it is difficult to determine the specific concern being raised. 	Examine revisions to Plan language for clarification	