VERMONT
AGENCY OF EDUCATION

Continuous Improvement Section Summary

Executive Priorities

In addition to meeting the requirements of the Every Student Succeeds Act, the Continuous Improvement section of the Vermont State Plan reflects the education reform priorities of Vermont's governor, Phil Scott. This section of the plan 1) prioritizes support for the most vulnerable students in the state; 2) prepares students to be members of a healthy and growing Vermont economy, and; 3) frames proposals that will be affordable to implement and maintain. Agency proposals' reflection of executive priorities are described below, and recur throughout this section of the plan.

1. **This section of the Plan prioritizes support for the most vulnerable students in the state**
   The Continuous Improvement section of the Plan outlines how schools will be identified for Comprehensive and Targeted Supports, and describes the types of supports those schools will receive upon identification. Identification of schools will be based in part on how well a school is serving its most vulnerable students. If a school is identified, state and federal supports will be provided with the goal of supporting all of that schools' students, with an emphasis on supporting the vulnerable student population(s) that a school was identified as underserving. Schools and SU/SDs will be required to outline their strategies for supporting these students through their Continuous Improvement Plans, and for iteratively evaluating the efficacy of that work.

2. **This section of the Plan prepares students to be members of a healthy and growing Vermont economy**
   The Continuous Improvement Section of the Plan outlines approaches to supporting all of the state's schools, SU/SDs, and students. For schools serving secondary students, this includes examining school performance against multiple measures that correlate to economic strength, including graduation rate, student performance on college and career-ready assessments, and post-secondary outcomes for graduates.

3. **This section of the Plan promotes proposals that will be affordable to implement and maintain**
   As this section of the plan was developed, the affordability of AOE proposals (also described using the terms "efficiency" and "possibility") were central to the Agency's decision-making process. As a result, the proposals described in this section largely represent a continuation of practice, or a shift of existing resources from one set of current practices to a new set with an equivalent cost.

Within the Continuous Improvement section of the draft Vermont State Plan, some elements represent a continuation of practice, and others represent an evolution in practice. The proposals contained in this section are categorized accordingly below, and are described in more detail in the plan itself.

Continuation of Practice:

- CFP application submission, review, and approval processes
- Development and use of Education Quality Standards-mandated Continuous Improvement Plans

Evolution in Practice:

- Identification of schools for Comprehensive and Targeted Supports
- Need-based differentiation of supports for schools
- Revised processes for review, approval, and monitoring of Continuous Improvement Plans

VERMONT
AGENCY OF EDUCATION
219 North Main Street, Suite 402
Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

Identification of Schools for Comprehensive and Targeted Supports

Comprehensive Support

ESSA requires that Vermont identify the 5% of schools most in need of support; in Vermont, this will result in at least 12 Title I schools being identified for support. Stakeholders expressed a preference for considering both the "Current Score" and the "Year-to-Year Score" in making this determination.

Identification

Vermont will make its first identification for Comprehensive Support in Fall of 2018 based on student performance on indicators collected during the 2017-18 school year. Schools will remain in this cohort until the next identification cycle in 2021. Future identification cycles will begin in 2024 and then again in 2027.

Schools will be placed on the grid in Table 48 based on their performance against the state's accountability measures. Once schools are placed, we will begin building our set of 12 comprehensive schools by starting with Priority 1 schools, and adding schools from each subsequent priority category until we have identified at least 12 schools. For example, if there were 3 schools in Priority 1, 6 in Priority 2, and 8 in Priority 3, then all 15 would be identified for comprehensive support, and we would not look to Priority 4 schools.

It is possible that such a methodology could lead to the identification of more schools for comprehensive supports than could be adequately served. For example, if there were 6 schools in Priority 1; 5 in Priority 2 and 14 in Priority 3, this would result in 25 schools being identified for Comprehensive Supports- more than Vermont's available fiscal resources would effectively support. In such a case, the AOE would support all 11 Priority 1 and 2 schools. Priority 3 schools joining that cohort would be selected based on the number of priority points earned by each school, with those serving the greatest number of students being most likely to be selected. A breakdown of how priority points will be calculated in this scenario, follows:

1. Number of students in the Historically Marginalized Student group (each student counts at 1 point)
2. Does a school count as a School-Wide Title I? (yes=10 points)
3. Does a school has a reportable EL student group? (yes=10 points)
4. Is the school a member of an SU/SD with another school in Comprehensive Support? (yes=10 points)

Once these schools have been identified, we will add any as yet-unidentified high schools to the list that have an overall graduation rate of less than 67%.

Table 48:

Criteria Level Scores		Year to Year Change			
		Off Target <0.0	**Near Target 0.16-0.30**	**On Target 0.5-.99**	**Bull' Eye > 0.30**
Current Score	Off Target 1-1.88	Priority 1	Priority 3	Priority 6	
	Near Target 1.89-2.75	Priority 2	Priority 4		
	On Target 2.76-3.65	Priority 5			
	Bull's Eye 3.66-4.50				

Exit Criteria

Three years after receiving their initial Comprehensive identification, schools identified for Comprehensive supports can exit identification by "moving" two squares down, or one square diagonally and to the right, of their initial designation within Table 49 above. For example, a school that began as Priority 1 could exit Comprehensive Improvement if it falls in Priority 5 or Priority 4 in the subsequent year of review. However, while the schools in this scenario would be improving, it is also possible that other schools in Vermont would be improving at the same time, and that a school that would otherwise exit Comprehensive identification might still find itself in the bottom 5% of schools in the state. In this scenario, an SU/SD may opt to continue their identification status as a Comprehensive Support 1 school and participate in the state's financial support and technical assistance, or they may opt to exit identification entirely.

If a school does not meet the exit criteria, additional technical support and monitoring occurs. Please see the **Error! Reference source not found** section to review details of the differentiated support and technical assistance.

Targeted Support

ESSA requires that Vermont identify Title I schools with persistently underperforming student subgroups for Targeted support. Under current proposed regulations, the US Department of Education requires that the AOE identify the highest performing of the schools receiving Comprehensive Support to establish the level at which all student groups from other schools must be compared, for the purposes of identifying Targeted schools. For example, if the highest performing school in the Comprehensive set had a Current Score of 2.2, then every school with a student group at 2.2 or lower would be identified as targeted.

Identification

ESSA requires Vermont to identify schools with "consistently underperforming" subgroups of students §200.19(b)(1) and (c) §200.19(b)(2). Vermont will make its first identification for Targeted Support in Fall of 2018 based on student performance on indicators collected during the 2017-18 school year. These identifications will occur on an annual basis.

Vermont proposes an alternative method of identifying schools for targeted support that will ultimately achieve the goals set forward by US Department of Education while leveraging the internal supports and strengths that our school systems already possess.

Vermont's proposal is to replicate the assignment of schools based on the magnitude of their Equity Score, and the degree to which the gap between student groups is closing.

Schools will be categorized within the grid in Table 49. Once schools are categorized, we will apply the label of "Targeted Support" to all schools in Priority 1-4. These schools will be required to leverage federal dollars on activities that promote equity gap reductions.

Table 49: Identification of Targeted Status

Criteria Level Scores		Year-to-Year Change			
		Off Target <0.0	**Near Target 0.0-0.10**	**On Target 0.11-.20**	**Bull' Eye >.20**
Equity Gap	Off Target >.50	Targeted	Targeted		
	Near Target .24-.50	Targeted			
	On Target 0.10-.25				
	Bull's Eye <0.10				

Exit Criteria

Each year, schools will be re-assessed for targeted support. In any year where the school has moved to one of the yellow or green boxes, it is no longer deemed in need of Targeted Support for the next year. If a school does not move to one of the yellow or green boxes, it will be labeled as a "chronically underperforming school" with a designation as a Targeted 2 or Targeted 3 school. If following the Target 3 designation, the school remains in the red boxes, the school will become a Comprehensive Support 1 school as described above. Please see the **Error! Reference source not found** section to review details of the differentiated support and technical assistance required for schools receiving comprehensive supports.

Continuous Improvement and Technical Assistance Overview

Under ESSA, each state is asked to describe how it provides technical assistance and supports to school systems in meeting its state academic standards and assessments, including how the AOE will:

1. Review and approve the Consolidated Federal Programs (CFP) plans submitted by Supervisory Union/Supervisory District,
2. Collect and use data,
3. Monitor implementation of the CFP Plans,
4. Support continuous improvement, and
5. Provide specific technical assistance to school systems relative to the state's approved Academic Standards.

Consolidated Federal Plans (CFP)

A critical tool for ensuring that our federal funds are used in pursuit of equity and ever improving outcomes for students is to utilize the Consolidated Federal Funds Grant process for thorough vetting of investments against documented needs.

CFP Application Preparation

A considerable amount of technical assistance and monitoring takes place through the State's efforts to help Supervisory Union/Supervisory District prepare effective CFP applications. Long ago, Vermont combined the many federal title programs into a consolidated application which allows funds to be dual purposed and used more flexibly. Under ESSA, we will continue this tradition.

Vermont's CFP application includes: Title I, Part A; Title II, Part A; Title I School Improvement; Title III and Title IV (if funded). Because of our small size and longstanding relationships, school leaders regularly call on VT Agency staff for assistance in writing CFP applications. This strong collaboration results in relatively few rejections of proposed investments, as staff in the school systems and the Agency have a shared understanding of what constitutes appropriate investments. Technical assistance is provided through regional grant information meetings, phone calls, emails, and on-site visits.

Perhaps the most critical aspect of CFP Application Preparation is supporting school systems in effective needs assessments. The federal contribution, while often substantial, will not cover the full breadth of services a school system may wish to offer in order to meet the wide array of services and experiences described. In Vermont, the focus of spending these dollars is to ensure that the students who belong to historically marginalized groups are the first students supported through the expenditures made. Some services will benefit all students: for example, professional development related to differentiation or better understanding of specific reading

and mathematics strategies. Others, such as access to a tutor or reading specialist may benefit a smaller number of students. These choices are not easy decisions to make, and it is through careful analysis of the school's needs, and specifically the needs of historically marginalized students' needs, that priorities can be set well.

CFP Reviews

Each CFP application undergoes a thorough review by AOE staff, including Title program consultants, the CFP Grant Manager, Education Quality Coordinators, and the CFP team administrative assistant. A member of the CFP team checks each application to ensure that all required components, signatures, and assurances have been submitted properly. Members of the AOE finance team complete a fiscal review of the applications against information they have on file about SU/SD carryover and audit information. Finally, Title program consultants and Education Quality Coordinators review the applications holistically noting any compliance issues, and alignment with the State-required Continuous Improvement Plan. Follow-up calls are made to CFP Team leaders in the Supervisory Union/Supervisory District, and changes are made as needed to achieve congruence between CFP applications, Continuous Improvement Plans, and applicable requirements.

CFP Application Approval

CFP team members spend a considerable amount of time each year reviewing CFP applications. The approval process includes crosswalks between needs and strategies stated in applications and the results of recent and longitudinal State assessments in early reading, English language arts, and mathematics as well as information from the Supervisory Union/Supervisory District's schools' improvement plans. When the review process is complete, approval is granted to an application that has met all requirements set forth by both the federal and state governments.

Data Collection and Use

The Agency of Education intends to continue the collection and use of information and data to inform our assessment of how well our students are achieving the array of outcomes described in Vermont's Education Quality Standards. First, all data is collected and examined at the State, Supervisory Union/Supervisory District and school level where available. We will track performance in improving efforts for our Comprehensive Support schools and Targeted Support schools. As part of our Integrated Field Review process, we will document the promising practices that arise in school systems where outstanding improvements are noted.

We will present our annual review of progress to the Board of Education, legislative bodies and the Committee of Practitioners. These reviews will provide opportunities to re-calibrate every three years, if modifications to the proposals put forth in this plan are warranted. In addition, the annual review of this data by the Agency of Education will be used to re-allocate funding streams, and to identify potential activities for supporting schools.

In addition to state-level reviews, Vermont has a long history of including communities in reviewing our local school performance. Prior to Vermont's annual Town Meeting Day, a state holiday where citizens vote on critical municipal and educational issues, all communities are provided information by their school systems describing their school report cards. This data is used to make determinations around applications of funding, and to inform the identification of priority initiatives for the following year.

Finally, schools complete a state-approved needs assessment to identify school needs, and areas for improvement. They then are required to write a Continuous Improvement Plan to address identified needs based on evidence-based practices. Reviews of plans, and AOE and peer-provided technical assistance in the development, implementation and revision of plans supports schools in implementing their improvement strategies in alignment with state and federal rule and policy.

State Level Data

In Vermont, we collect additional accountability data to assess how well school systems are meeting the expectations set out in the Education Quality Standards. These data include reference points on the implementation of personalized learning and flexible pathways, promotion of safe, healthy schools, high quality staffing and financial resources. These metrics help schools and school systems to identify their relative strengths that can be leveraged to promote improvement, and to identify challenges that may need to be addressed if academic gains are to be realized.

Resource Equity Data

ESSA also compels analysis of data in four areas in order to determine if all students are being well served:

- per-pupil expenditures of Federal, State, and local funds;
- educator qualifications as described in §200.37;
- access to advanced coursework; and
- the statewide availability of preschool services.

Per-Pupil Expenditures

In Vermont, all expenditures come from Federal and State funds- there are no local funds. Due to the Brigham Decision, Vermont has long implemented an equalized student funding formula which drives additional state money to the communities with the greatest need. However, because many of our communities are quite small, the per-student costs can vary a great deal. For example, one school may have 9 students in grades K-2 and hire a single teacher at $50,000 a year while another school may have 14 students in K and hire a single teacher at $50,000. The per-pupil expenditure in this case is more expressive of the small number of students than of the spending or price point for services.

Educator Qualifications

A school identified for continuous or targeted improvement may determine that addressing high-quality staffing is essential to its Continuous Improvement Plan. There are two complementary sets of standards that a SU/SD might choose to reference; the first enumerates quality criteria consistent with the Educator Quality Standards, the second references findings from the Educator Equity Report the AOE completed for the US Department of Education in 2015.

Educator Quality Standards

The Educator Quality Standards high-quality staffing indicators consider school leadership, Appropriate Licensed Staffing, Professional Learning, and Staff Evaluation. Specifically, a school could choose to address any of the following educator quality criteria in their Continuous Improvement Plan:

- Internal accountability for effective teaching and student achievement
- Staff articulation of school vision and mission
- Deep understanding of the curriculum and the pedagogy needed to implement it
- Dedication to professional learning aligned to demonstrated school needs
- Dedication to on-going professional learning informed by data and research
- Dedication to using data to inform instructional and programmatic decisions
- Coordinated system for evaluating teachers and administrators
- Assurance that all educators are licensed and qualified for their content areas

Educator Equity Report

The Educator Equity Report is the result of an in-depth consideration of the factors that could contribute to inequitable access to high quality teachers. To increase the quality of the educational faculty, a school might consider the following strategies:

- Promoting Effective Hiring Practices by addressing limited housing and social amenities in rural towns to improve the rates of retention among newly hired teachers.
- Improving Professional Opportunities in rural setting to increasing access to professional learning opportunities and increase rates of retention.
- Improving Working Conditions in High-Poverty Schools to reduce “burn-out” and increasing rates of retention among newly hired teachers.

Access to Advanced Coursework

Vermont has made significant gains in implementing Act 77, a 2013 law requiring that a set of Flexible Pathways to graduation be made consistently available to students, statewide. At the same time, we know that we still have progress to make in the equitable provision and use of Flexible Pathways, statewide, and we are committed to examining and expanding Flexible Pathways opportunities as a part of accountability and continuous improvement-related initiatives.

The narratives below describe the current status of the state’s Flexible Pathways programs.

Early College

Vermont has two options for students to access advanced coursework. The first option is the Early College Program. The purpose of the statewide Early College Program is to be a potential component of a student's flexible pathway. Colleges and Universities may develop an early admission program that allows high school seniors to take a full year of college-level classes while completing their high school degree. The Early College Program (ECP) simultaneously serves as a student's senior year of high school and full year of college credit. Students may take a year-long course of study in any discipline.

In determining Early College Student eligibility, the State requires for each 12th grade student in Vermont that the Principal of the high school must approve that the student is ready for the Early College Program and must sign off; the student is enrolled as a full time student in the higher education institution receiving the payment for the academic year for which payment is made; and the student is not enrolled concurrently in a secondary school operated by the student's district of residence or to which the district pays tuition on the student's behalf.

i. Findings for Early College

Seven colleges and universities (Burlington College, Goddard College, Norwich University, Castleton State College, Johnson State College, Lyndon State College, and CCV), as well as the Vermont Academy of Science and Technology (VAST), offer the Early College Program. In FY15, a total of 277 Vermont secondary students participated in this program. FY16 saw a significant increase in participation in this program with a combined participation of 348 students – a 26% increase.

Dual Enrollment

As a second option, students also can access advanced coursework through the Dual Enrollment Program. As a potential component of a student's flexible pathway, the Dual Enrollment Program includes college courses offered on the campus of an accredited postsecondary institution as well as college courses offered by an accredited postsecondary institution on the campus of a secondary school. The Program may also include online college courses or components, such as blended and virtual learning.

A Vermont resident who has completed grade 10 but has not received a high school diploma is eligible to participate in the Dual Enrollment Program if:

- dual enrollment is an element included within the student's personalized learning plan;
- the secondary school and the postsecondary institution have determined that the student is sufficiently prepared to succeed in a dual enrollment course, which can be determined in part by the assessment tool(s) identified by the partnering postsecondary institution; and
- the student is enrolled in either a Vermont public school, including a Vermont career technical center; a public school in another state or an approved independent school that is designated as the public secondary school for the student's district of residence; an

approved independent school in Vermont to which the student's district of residence pays publically funded tuition on behalf of the student; or is assigned to a public school through the High School Completion Program or is a home study student

i. Findings for Dual Enrollment

FY16 was the third year of expanded dual enrollment opportunities under Act 77. We are now able to compare the number of dual enrollment vouchers used last fiscal year (FY15) with the number for the current year (FY16). This historical information provides preliminary data on the impact of the program. For instance, the total number of vouchers used increased 5.9% from FY15 to FY16, an increase from 2165 vouchers (individual courses) to 2287 vouchers used.

Dual Enrollment Participation by High Schools and Institutions of Higher Education

FY16 also saw an increase in the number of high schools participating. In FY16, there were a total of 77 high schools (including home study) participating in the program as compared to 72 in FY15.

The number of colleges, universities and other institutions of higher education (IHEs) participating in dual enrollment remained the same over the past year (i.e., 20 in FY15 as compared to FY16). This continues to show the broad range of learning opportunities for students as well as expanded geographic reach for the Dual Enrollment Program. The large majority of vouchers were used for dual enrollment courses at Community College of Vermont, followed by the University of Vermont, and the Vermont State Colleges. FY16 also showed an increase in voucher use by institutions of higher education in FY16 with 2287 vouchers used versus 2165 in FY 15.

In FY16, several high schools partnered with colleges to offer on-site dual enrollment opportunities. When a college course is offered on the high school campus, the public postsecondary institution retains authority to determine course content and works with the high school to select, monitor, support, and evaluate instructors. On-site dual enrollment increased in FY16 with eight colleges and 27 high schools (as compared to FY15 with four colleges and 22 high schools) offering college courses at the high school.

Access to PreSchool

In Vermont, we offer universal preschool services to all 3 and 4 year olds. The state began offering 10 hours per week over 35 weeks through a fully financed tuition voucher for use at the parent's location of choice. We are in the first full year of implementing this State law. Some Supervisory Union/Supervisory Districts have opted to use their consolidated federal program funds to offer additional preschool beyond the state's 10 hours.

Monitor CFP Implementation

The AOE is committed to ensuring that our limited federal dollars are well used for our most vulnerable youth. Towards that end, comprehensive monitoring is an important component of all programs.

Annual Risk Assessment on Program Management and Delivery

The CFP team conducts an annual risk assessment each September that provides the information needed to target available administrative resources on factors that pose the greatest risk to the integrity of the CFP programs. The CFP team will rate each SU/SD against multiple risk factors and indicators, record the risk level for each SU/SD, and rank them from highest to lowest risk. Risk factors may include:

Table 50: Risk Factor Indicators

Risk Factor	Indicators
Fiscal	§ Amount of award § Past history of high level of carryover
School Improvement	§ Number of schools identified for comprehensive or targeted support reason for identification
Grants Management	§ CFP Team Leader and other key staff turnover § Number of application submissions before approval
Past Monitoring and/or Auditing	§ Number and nature of past programmatic and fiscal monitoring or audit findings § Date and scope of previous monitoring
Special Circumstances	§ Number of independent schools § Local N or D sites § McKinney Vento grantee

Formal Program Monitoring

Comprehensive On-Site Program Reviews

The CFP team performs comprehensive on-site program reviews of at least three SU/SDs per year. The selected SU/SDs are identified through the annual risk assessment as posing the highest risk of not being in compliance. The process is not intended to be an exhaustive review or to ensure compliance with each and every legal requirement. Rather, it is designed to verify compliance with major items of the law as well as to assist the SU/SD in improving student

outcomes using federal dollars. Areas of the comprehensive program review include, but are not limited to:

- Needs assessment
- SU/SD administrative responsibilities
- Qualified Teachers and Paraprofessionals
- Services to independent schools
- Services to homeless students
- Requirements for school improvement
- Parental involvement
- Schoolwide schools
- Targeted Assistance schools
- Evaluation of the effectiveness of program investments
- Fiduciary requirements

Focused Reviews

The CFP team reviews application data, email requests from SU/SDs, issues identified by the agency's Federal Fiscal monitoring team, and issues identified from past programmatic reviews to identify key single issues. The CFP team decides each September what issues will be reviewed and in what manner the review will take place – on-site or desk audit. The team chooses a minimum of two issues each year and a minimum of ten SU/SDs for focused reviews. Single issues may include:

- Review of schoolwide plans
- Early childhood programs
- Evaluation of effectiveness
- Use of evidenced-based strategies
- Independent school equitable services
- Services for homeless students
- Professional learning

Single Audit Act Reviews

Private audit firms are contracted by the SU/SDs to conduct audits in all SU/SDs and schools that expend more than $750,000 in state or federal funds, including lunch program commodities. The agency's audit managers maintain an extensive database of audit information and review the outcomes of these audits. When audit findings are made, the information is forwarded to the appropriate program consultants and coordinators for follow-up.

Continuous Improvement Overview

Under Vermont's Education Quality Standards, all of the state's schools and school systems are in an iterative cycle of continuous improvement. In meeting the requirements of ESSA, we have built upon this longtime practice, and upon our longstanding commitment to the differentiation of school and SU/SD supports to reflect the identified needs of those institutions' most vulnerable student populations.

The AOE's Education Quality Assurance Team has developed an Education Quality and Continuous Improvement Framework containing resources for identifying and selecting evidence-based interventions. Additionally, this team will coach SU/SDs, who will in turn coach schools, through the Continuous Improvement Plan (CIP) development, implementation, and review and revision process, and will follow AOE-established CIP monitoring and evaluation protocols for all interim and long-term goals.

Overview of Comprehensive and Targeted School Supports

Vermont's Education Quality and Continuous Improvement Framework is designed to ensure equitable opportunities for high-quality education, first and foremost. With this goal in mind, the state has chosen to prioritize work with schools identified as being in need of Comprehensive supports, and schools consistently identified as being in need of Targeted supports for four consecutive years. School and SU/SD-specific goals for this work will be identified by data-rich comprehensive needs assessments, and will reflect, in part, the requirements of Vermont's Education Quality Standards. This work will also be done in partnership with our local-level colleagues; by assisting SU/SDs with needs assessments, helping them to seize opportunities for high leverage interventions, and building these collaborations within efficient improvement science cycles, Vermont seeks to build capacity at the local level, and to empower schools to improve in ways that are specific to the needs reflected through their identifications.

The table of school supports described below aligns with current Vermont policy and practice by bolstering a continuous improvement cycle with AOE technical assistance. In response to the requirements of ESSA and the Education Quality Standards, the proposed model now includes a more involved approach to aiding schools through their continuous improvement processes, with levels of support increasing over cumulative years of identification. This model also describes increasing levels of accountability for improvement, with Agency staff conducting both remote and onsite monitoring of CIP implementation.

Table 51: AOE Improvement Supports for Vermont Schools, Including Comprehensive and Targeted Schools

Strategy	Requirements
Support for Vermont Schools not Identified as Comprehensive or Targeted	All school systems not identified as Comprehensive or Targeted must complete ***bi-annual*** Continuous Improvement Plans (EQS 2126.1) in a manner that conforms to the procedures set forth in the Education Quality and Continuous Improvement Framework.
Support for Comprehensive 1 (C1) Schools (Years 1, 2, and 3 of consecutive Comprehensive Identification)	1. **CIP development:** Supervisory Union/Supervisory Districts and schools complete ***annual*** Continuous Improvement Plans or amendments with assistance from AOE. 2. **Application of federal funding:** When using federal funds for school improvement efforts, SU/SDs and schools will choose, with the support of AOE staff, from a State-identified menu of research-based practices designed to impact their area(s) of identification. When complete, this menu will be embedded in the Education Quality and Continuous Improvement Framework. 3. **Monitoring:** AOE monitoring of Comprehensive 1 schools will happen twice annually, with ongoing monitoring by the schools' SU/SDs.
Support for Comprehensive 2 (C2) Schools (Years 4, 5, and 6 of consecutive Comprehensive Identification)	1. **CIP Development:** Supervisory Union/Supervisory Districts and schools complete ***annual*** Continuous Improvement Plans or amendments with more rigorous technical assistance from AOE. 2. **Application of federal funding:** The AOE will limit the menu of state-approved research-based strategies that the SU/SD and school can choose from when using federal funding for continuous improvement, and will participate in the strategy-selection process. • Continuous Improvement Plans must be reviewed and approved by a panel of educators composed of members recognized for outstanding practice in education. • Plan approval will be based on the perceived impact of the Plan on the challenges leading to the school's identification. 3. **Monitoring:** AOE monitoring of Comprehensive 2 schools will happen quarterly, with ongoing monitoring by the schools' SU/SDs.
Support for Comprehensive 3 (C3) Schools	Schools not exiting Comprehensive status after their second three-year identification period will face state-determined action(s) drawn from the list cited in 16 V.S.A. 165(b). 1. Continue technical assistance;

Strategy	Requirements
(Years 7, 8, and 9 of consecutive Comprehensive Identification)	2. Adjust Supervisory Union/Supervisory District boundaries or responsibilities of the superintendency; 3. Assume administrative control only to the extent necessary to correct deficiencies; or 4. Close the school and require that the school district pay tuition to another public school or an approved independent school pursuant to chapter 21 of this title.
Supports for Targeted Schools in their first (TI), second (T2), and third (T3) years of identification	1. **CIP Development:** Supervisory Union/Supervisory Districts and schools complete ***annual*** Continuous Improvement Plans or amendments 2. **Application of federal funding:** When using federal funds for school improvement efforts, schools must explicitly link investments to the equity gaps that placed them in Targeted status. 3. **Monitoring:** T2 and T3 schools will have additional monitoring of their implementation of their plans, with ongoing monitoring by the schools' SU/SDs.

Continuous Improvement Plans

Preparation and Development

An essential early AOE role in CIP development is supporting schools and SU/SDs in completing a Comprehensive Needs Assessment. This needs assessment serve to inform the allocation of resources at the local level—fiscal and human. These are not easy decisions to make, and it is only through careful analysis of the school's needs, and specifically the needs of historically marginalized students, that priorities can be set effectively.

Initial assessments of an identified school's needs will be performed using one of the needs assessment tools described in the Education Quality and Continuous Improvement Framework. The AOE staff coordinating technical assistance around this needs assessment will be the Education Quality Assurance team.

Through the efforts of this team, the Agency and a group of educators and community members will perform comprehensive on-site school reviews: the Integrated Field Review (IFR) process. IFRs are the site-reexitview component of the Education Quality Review process, with every school and SU/SDin the state receiving one IFR every three years. The process is not intended to be an exhaustive review or to ensure compliance with each and every legal requirement. Rather, it is designed to verify compliance with major items of the law, and to assist the SU/SD in improving student outcomes using federal dollars.

Areas of the IFR include, but are not limited to:

- High quality instruction as a function of supporting student attainment of academic proficiency
- Strategies to support personalized learning, including:
  - The existence and implementation of rigorous Proficiency-based Graduation Requirements
  - Personalized Learning Plans
  - The availability of Vermont Act 77-required Flexible Pathways
- Evidence of a safe and healthy school climate
- School and SU/SD educator quality
- Fiscal efficiencies

A considerable amount of AOE technical assistance and monitoring takes place to help Supervisory Union/Supervisory Districts and schools to prepare effective CIPs. Because of our small size and long standing relationships with our colleagues in the field, SU/SD and school leaders regularly call on VT Agency staff for CIP development assistance. Technical assistance has been historically provided through regional grant information meetings, phone calls, emails, webinars and modules, and on-site visits.

Reviews and Approval

All CIPs will be reviewed thoroughly before being approved. That review will include AOE staff from the Education Quality Assurance team (for C1, C2, and Targeted schools), with the additional involvement of the school's professional peers for C2 schools. Review protocols will follow those articulated by the AOE. The review process will include crosswalks between the needs identified through the school's needs assessment process and as a result of the school's accountability identification, and the research-based improvement strategies identified in the CIP. School plan content will also be considered in the context of its Supervisory Union/Supervisory District's improvement plan, with reviewers seeking cohesion across those documents. The school's unique needs and circumstances will also be considered in the review process, with the understanding that differentiation in approaches to addressing similar identifications across schools is to be expected.

When the review process is complete, approval will be granted to plans that have met all of the requirements set forth:

- Within state rules and policy, including the Education Quality and Continuous Improvement Framework
- Within Federal law and policy, including ESSA and guidelines related to Title Plan requirements.

Monitoring

The AOE is committed to ensuring that our limited resources are used to support our most vulnerable youth. Towards that end, monitoring of schools' and SU/SDs' implementation of state policy, with a focus on implementation of the Education Quality Standards, will be coordinated by the Education Quality Review team. Frequency of monitoring will vary by the school's level of identification, as described in the table above. The monitoring process will follow protocols articulated by the VTAOE, and will focus on reviewing the efficacy of implementation, as measured against the goals for progress and school outcomes articulated in the approved CIP.

Evidence Based

Vermont utilizes the federal definition for "evidence-based" from section 8101(21)(A) of the ESEA) "…the term 'evidence-based,' when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that –

- demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on –
    - strong evidence from at least one well-designed and well-implemented experimental study;
    - moderate evidence from at least one well-designed and well-implemented quasi-experimental study; or
    - promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias; or
- demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; **and**
    - includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

To maintain consistency across the Agency, both the Education Quality and Consolidated Federal Programs teams use the same definition in supporting our school systems.