Revised State Template for the Consolidated State Plan

The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act

U.S. Department of Education
Issued: March 2017

OMB Number: XX
Expiration Date:

Introduction

Section 8302 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA),[1] requires the Secretary to establish procedures and criteria under which, after consultation with the Governor, a State educational agency (SEA) may submit a consolidated State plan designed to simplify the application requirements and reduce burden for SEAs. ESEA section 8302 also requires the Secretary to establish the descriptions, information, assurances, and other material required to be included in a consolidated State plan. Even though an SEA submits only the required information in its consolidated State plan, an SEA must still meet all ESEA requirements for each included program. In its consolidated State plan, each SEA may, but is not required to, include supplemental information such as its overall vision for improving outcomes for all students and its efforts to consult with and engage stakeholders when developing its consolidated State plan.

Completing and Submitting a Consolidated State Plan

Each SEA must address all of the requirements identified below for the programs that it chooses to include in its consolidated State plan. An SEA must use this template or a format that includes the required elements and that the State has developed working with the Council of Chief State School Officers (CCSSO).

Each SEA must submit to the U.S. Department of Education (Department) its consolidated State plan by one of the following two deadlines of the SEA's choice:

- **April 3, 2017**; or
- **September 18, 2017**.

Any plan that is received after April 3, but on or before September 18, 2017, will be considered to be submitted on September 18, 2017.

Alternative Template

If an SEA does not use this template, it must:

1) Include the information on the Cover Sheet;
2) Include a table of contents or guide that clearly indicates where the SEA has addressed each requirement in its consolidated State plan;
3) Indicate that the SEA worked through CCSSO in developing its own template; and
4) Include the required information regarding equitable access to, and participation in, the programs included in its consolidated State plan as required by section 427 of the General Education Provisions Act. See Appendix B.

Individual Program State Plan

An SEA may submit an individual program State plan that meets all applicable statutory and regulatory requirements for any program that it chooses not to include in a consolidated State plan. If an SEA intends to submit an individual program plan for any program, the SEA must submit the individual program plan by one of the dates above, in concert with its consolidated State plan, if applicable.

Consultation

Under ESEA section 8540, each SEA must consult in a timely and meaningful manner with the Governor, or appropriate officials from the Governor's office, including during the development and prior to submission of its consolidated State plan to the Department. A Governor shall have 30 days prior to the

[1] Unless otherwise indicated, citations to the ESEA refer to the ESEA, as amended by ESSA.

SEA submitting the consolidated State plan to the Secretary to sign the consolidated State plan. If the Governor has not signed the plan within 30 days of delivery by the SEA, the SEA shall submit the plan to the Department without such signature.

Assurances

In order to receive fiscal year (FY) 2017 ESEA funds on July 1, 2017, for the programs that may be included in a consolidated State plan, and consistent with ESEA section 8302, each SEA must also submit a comprehensive set of assurances to the Department at a date and time established by the Secretary. In the near future, the Department will publish an information collection request that details these assurances.

For Further Information: If you have any questions, please contact your Program Officer at OSS.[State]@ed.gov (e.g., OSS.Alabama@ed.gov).

Cover Page

Contact Information and Signatures	
SEA Contact (Name and Position): Rebecca Holcombe Secretary, Vermont Agency of Education	Telephone: 802-479-1030
Mailing Address: 219 North Main Street, Suite 402 Barre. VT 05641	Email Address: rebecca.holcombe@vermont.gov
By signing this document, I assure that: To the best of my knowledge and belief, all information and data included in this plan are true and correct. The SEA will submit a comprehensive set of assurances at a date and time established by the Secretary, including the assurances in ESEA section 8304. Consistent with ESEA section 8302(b)(3), the SEA will meet the requirements of ESEA sections 1117 and 8501 regarding the participation of private school children and teachers.	
Authorized SEA Representative (Printed Name)	Telephone:
Signature of Authorized SEA Representative	Date:
Governor (Printed Name) Phil Scott	Date SEA provided plan to the Governor under ESEA section 8540: 1 March 2017
Signature of Governor	Date:

Programs Included in the Consolidated State Plan

Instructions: Indicate below by checking the appropriate box(es) which programs the SEA included in its consolidated State plan. If an SEA elected not to include one or more of the programs below in its consolidated State plan, but is eligible and wishes to receive funds under the program(s), it must submit individual program plans for those programs that meet all statutory and regulatory requirements with its consolidated State plan in a single submission.

☒ Check this box if the SEA has included all of the following programs in its consolidated State plan.

or

If all programs are not included, check each program listed below that the SEA includes in its consolidated State plan:

☐ Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies

☐ Title I, Part C: Education of Migratory Children

☐ Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk

☐ Title II, Part A: Supporting Effective Instruction

☐ Title III, Part A: English Language Acquisition, Language Enhancement, and Academic Achievement

☐ Title IV, Part A: Student Support and Academic Enrichment Grants

☐ Title IV, Part B: 21st Century Community Learning Centers

☐ Title V, Part B, Subpart 2: Rural and Low-Income School Program

☐ Title VII, Subpart B of the McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youth Program (McKinney-Vento Act)

Instructions

Each SEA must provide descriptions and other information that address each requirement listed below for the programs included in its consolidated State plan. Consistent with ESEA section 8302, the Secretary has determined that the following requirements are absolutely necessary for consideration of a consolidated State plan. An SEA may add descriptions or other information, but may not omit any of the required descriptions or information for each included program.

The Vermont Agency of Education has reordered our state plan to accommodate and facilitate ease of review. The Vermont State Plan as presented to the public is available be following this link.

A. Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)

1. Challenging State Academic Standards and Assessments *(ESEA section 1111(b)(1) and (2) and 34 CFR §§ 200.1−200.8.)*[2]

Standards

Vermont's Education Quality Standards specify seven Curriculum Content Areas and the Transferable Skills that are critical for student success (2120.5). The Vermont Agency of Education (VT-AOE) considered whether or not an assessment was necessary for each of these areas. Stakeholder input expressed a strong preference for focusing on fewer areas to reduce the need for additional state testing. The result is that four of seven areas have assessment measures designed to satisfy ESSA requirements, with the remaining areas being assessed through the qualitative component of our Education Quality Reviews. English language arts, math and science are described below; physical education is addressed later in our description of a 5th indicator.

1) English Language Arts (ELA)

Adopted Standards:

ESSA requires that states select challenging career and college ready standards in English-Language Arts/Reading. In 2010, the Vermont State Board of Education adopted the Common Core State Standards as our definition of what students in each grade level should know and be able to do in the Education Quality Standards (EQS) curriculum area of literacy. These standards have been used to satisfy federal expectations under *No Child Left Behind,* and maintaining these as Vermont's standards provides for continuity in schools.

Under section 1111(b)(1)(B) of ESSA, the state has the option to select alternate standards for students with significant disabilities. Vermont has opted not to pursue this option, as we seek to provide all students with access to a rich educational experience. Individual determinations for how best to meet these students' specific learning needs is delegated to local IEP teams, which collaboratively set learning targets that are aligned to the grade-level general education curriculum. This process includes students (where appropriate) and their families, in consultation with school-based educators. This decision is supported by past practice in Vermont.

[2] The Secretary anticipates collecting relevant information consistent with the assessment peer review process in 34 CFR § 200.2(d). An SEA need not submit any information regarding challenging State academic standards and assessments at this time.

Assessment:
ESSA requires that states select assessments that measure the full breadth of adopted standards and meet technical requirements for validity and reliability for students in grades 3-8 and in grades 9-12.

Vermont intends to meet this requirement for 99% of students by using the computer adaptive Smarter Balanced Assessment for reading in grades 3 through 9. This test has been used for two years in Vermont and has been submitted to the federal peer review process. All studies of the Smarter Balanced Assessment have demonstrated that it is a valid and reliable tool for assessing the Common Core State Standards. The assessment includes reports to parents and schools that clearly articulate student performance on the assessment. Data can be disaggregated and used for accountability purposes.

For the 1% of students with the most severe cognitive disabilities, Vermont will continue using the Dynamic Learning Map (DLM) that is developed and used by a multi-state consortium. The assessment is given in reading/language arts and mathematics. The DLM assessment has been created to align with the state's common core standards in reading/language arts and mathematics. It has been peer reviewed and has been shown to meet the technical qualities of assessment.

2) Mathematics

Adopted Standards:
ESSA requires that states select challenging career and college ready standards in Mathematics. In 2010, the Vermont State Board of Education adopted the Common Core State Standards as our definition of what students in each grade level should know and be able to do in the Education Quality Standards curriculum area of mathematical content and practices. These standards have been used to satisfy federal expectations under *No Child Left Behind,* and maintaining these as Vermont's standards provides for continuity in schools.

Under section 1111(b)(1)(B) of ESSA, the state has the option to select alternate standards for students with significant disabilities. Vermont has opted not to pursue this option, as we seek to provide all students with access to a rich educational experience. Individual determinations for how best to meet these students' specific learning needs is delegated to local IEP teams to collaboratively set learning targets that are aligned to the grade level general education curriculum. This process includes students (where appropriate) and their families, in consultation with school-based educators. This decision is supported by past practice in Vermont.

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Vermont intends to meet this requirement by using the computer adaptive Smarter Balanced Assessment for reading in grades 3 through 9. This test has been used for two years in Vermont and has been submitted to the federal peer review process. All studies of Smarter Balanced Assessment have demonstrated that it is a valid and reliable tool for assessing the Common Core State Standards.

Under section 1111(b)(2)(C)(iii) of ESSA, the state has the option to allow students in grade 8 to take the end of course exam for the advanced mathematics course they are taking, rather than taking the 8th grade assessment. As Vermont has opted to only assess mathematics once in high school, no end of course assessments exist; therefore, this option is not available in Vermont.

The assessment includes reports to parents and schools that clearly articulate student performance on the assessment. Data can be disaggregated and used for accountability purposes.

3) Science

Adopted Standards:

ESSA requires that states select challenging career and college ready standards in science. In 2013, the Vermont State Board of Education adopted the Next Generation Science Standards (NGSS) as our definition of what students in each grade level should know and be able to do in the Education Quality Standards curriculum area of scientific inquiry and content knowledge. These standards have been used to satisfy federal expectations under *No Child Left Behind* and maintaining these as Vermont's standards provides for continuity in schools.

Under section 1111(b)(1)(B) of ESSA, the state has the option to select alternate standards for students with significant disabilities. Vermont has opted not to pursue this option, as we seek to provide all students with access to a rich educational experience. Individual determinations for how best to meet these students' specific learning needs are delegated to local IEP teams to collaboratively set learning targets that are aligned to the grade level general education curriculum. This process includes students (where appropriate) and their families, in consultation with school-based educators. This decision is supported by past practice in Vermont.

Assessment:

ESSA requires that states select assessments that measure the full breadth of adopted standards and meet technical requirements for validity and reliability for students in three grade levels- elementary, middle, and high school.

For at least 99% of students, Vermont intends to meet this requirement by using a new science assessment that is under development with a consortium of other states. We intend for this test to be administered via computer to students in 5th, 8th, and 11th grades and eventually include simulations or performance tasks that will allow for the assessment of the full breadth of the NGSS standards. We have released a Request for Proposals (RFP) to identify the vendor who will be our partner in this work and are assessing proposals that have been submitted. As the

assessment is developed, it will be peer-reviewed to ensure it meets standards of technical quality. The assessment includes reports to parents and schools that clearly articulate student performance. Data can be disaggregated and used for accountability purposes.

For the less than 1% of students who require an alternate assessment due to extreme cognitive disabilities, Vermont will use the New England Common Assessment Program (NECAP) alternate assessment until the state moves to an NGSS aligned assessment for science. The current peer-reviewed assessment is aligned to state science standards and has been shown to meet the technical qualities of assessment. In seeking a new vendor for this assessment, the state intends to make its determination based on the same criteria.

2. Eighth Grade Math Exception (*ESEA section 1111(b)(2)(C) and 34 CFR § 200.5(b)(4)*):
   i. Does the State administer an end-of-course mathematics assessment to meet the requirements under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA?
      - □ Yes
      - ☒ No

   ii. If a State responds "yes" to question 2(i), does the State wish to exempt an eighth-grade student who takes the high school mathematics course associated with the end-of-course assessment from the mathematics assessment typically administered in eighth grade under section 1111(b)(2)(B)(v)(I)(aa) of the ESEA and ensure that:
      a. The student instead takes the end-of-course mathematics assessment the State administers to high school students under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA;
      b. The student's performance on the high school assessment is used in the year in which the student takes the assessment for purposes of measuring academic achievement under section 1111(c)(4)(B)(i) of the ESEA and participation in assessments under section 1111(c)(4)(E) of the ESEA;
      c. In high school:
         1. The student takes a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA;
         2. The State provides for appropriate accommodations consistent with 34 CFR § 200.6(b) and (f); and
         3. The student's performance on the more advanced mathematics assessment is used for purposes of measuring academic achievement under section 1111(c)(4)(B)(i) of the ESEA and participation in assessments under section 1111(c)(4)(E) of the ESEA.

      - □ Yes
      - □ No

   iii. If a State responds "yes" to question 2(ii), consistent with 34 CFR § 200.5(b)(4), describe, with regard to this exception, its strategies to provide all students in the State the opportunity to be prepared for and to take advanced mathematics coursework in middle school.

Click here to enter text.

3. Native Language Assessments *(ESEA section 1111(b)(2)(F) and 34 CFR § 200.6(f)(2)(ii))*:
   i. Provide its definition for "languages other than English that are present to a significant extent in the participating student population," and identify the specific languages that meet that definition.
   Click here to enter text.

Vermont has a very small population of English Learners, less than 1% of the student population which tested in 2016. Of these, no language is represented with greater than 0.2% frequency of all students assessed.

While the numbers of students are low, Vermont believes that whenever possible students should be afforded opportunities to assess or be supported in their native language. As a result, we define the minimum threshold for a required assessment in a language other than English at 10% of the testing population, significantly lower than the 30% threshold recommended by the Center on Standards and Assessment Implementation[3]. Currently, no language meets Vermont's threshold; the most common language other than English is Portuguese at 0.20% of the overall student population. Likewise, no languages other than English are present to a significant extent in the student population.

Table 1: Most common home languages and the percent of all test takers in 2016.

Language	Percent of Test Takers
Portuguese	0.20%
Spanish	0.10%
Nepali	0.10%
Russian	0.10%
Norwegian	0.07%

   ii. Identify any existing assessments in languages other than English, and specify for which grades and content areas those assessments are available.
   Click here to enter text.

Fortunately, Vermont is part of the Smarter Balanced Consortium. As a result, we are able to offer stacked Spanish assessments for English language arts and mathematics in all tested grades. We also provide single-language glossaries in 11 languages and 10 English-Language translation glossaries for all SBAC tests and subjects, including:

[3] (http://www.csai-online.org/sites/default/files/Updated%20Inclusion%20of%20ELL%20in%20Assessment%20201604.pdf)

Table 2: Single-Language and English-Language Translation Glossaries Available in Vermont

Single-language Glossaries	**English-Language Translation Glossaries**
1. Spanish Glossary	1. English & Spanish Glossary
2. Arabic Glossary	2. English & Arabic Glossary
3. Cantonese Glossary	3. English & Cantonese Glossary
4. Mandarin Glossary	4. English & Mandarin Glossary
5. Filipino Glossary (Ilokano & Tagalog)	5. English & Filipino Glossary (Ilokano & Tagalog)
6. Korean Glossary	6. English & Korean Glossary
7. Punjabi Glossary (Eastern & Western)	7. English & Punjabi Glossary (Eastern & Western)
8. Russian Glossary	8. English & Russian Glossary
9. Ukrainian Glossary	9. English & Ukrainian Glossary
10. Vietnamese Glossary	10. English & Vietnamese Glossary

Our testing procedures allow for additional accommodations for English learners. Individual schools may choose to provide glossaries in languages in addition to those listed in Table 2 or use a human interpreter for those additional languages. These additional supports are available at all test grade levels.

iii. Indicate the languages identified in question 3(i) for which yearly student academic assessments are not available and are needed.
Click here to enter text.

Currently, no language meets Vermont's threshold recommended by the Center on Standards and Assessment Implementation and no additional assessments are needed. See Section A.3.i for more information.

iv. Describe how it will make every effort to develop assessments, at a minimum, in languages other than English that are present to a significant extent in the participating student population including by providing

a. The State's plan and timeline for developing such assessments, including a description of how it met the requirements of 34 CFR § 200.6(f)(4);
b. A description of the process the State used to gather meaningful input on the need for assessments in languages other than English, collect and respond to public comment, and consult with educators; parents and families of English learners; students, as appropriate; and other stakeholders; and
c. As applicable, an explanation of the reasons the State has not been able to complete the development of such assessments despite making every effort.
Click here to enter text..

Currently, no language meets Vermont's threshold recommended by the Center on Standards and Assessment Implementation and no additional assessments are needed. As a result, no assessments in languages other than English need to be developed. Should the percent of students speaking a language other than English exceed 10% and be a language for which we do not already have an assessment, VT-AOE will work with our assessment vendors to produce assessments in students' native language as expeditiously as possible.

4. Statewide Accountability System and School Support and Improvement Activities *(ESEA section 1111(c) and (d))*:
    i. Subgroups *(ESEA section 1111(c)(2))*:
        a. List each major racial and ethnic group the State includes as a subgroup of students, consistent with ESEA section 1111(c)(2)(B). Click here to enter text.

Student Groups

ESSA requires that Vermont track the performance of several student groups. In some cases, the information on the performance of these student groups must be used for reporting. In other cases, the data must be used for reporting and to make accountability determinations about schools.

A cornerstone of Vermont education has long been a commitment to equitable outcomes for all students. By disaggregating the data for different student groups, we better understand if all students are experiencing school in the same way or if some students are not being served as well as others. It is the examination of this data which helps us to guide and shape our improvement efforts as we seek ever more equitable outcomes.

Table 3: Student groups, data source, and number of students in Vermont for each group and whether or not those student groups will be measured for reporting, accountability, or both purposes (preK-12 enrollment in 2015-16).

Student Group	Number	Percent	Data Used in Reporting	Data used in Accountability
All Students	77,130		X	X
Accountability Categories				
Ethnic and Racial Categories:				
American Indian or Alaskan Native	195	0.3%	X	X
Asian	1,549	2.0%	X	X
Black	1,584	2.1%	X	X
Hispanic	1,408	1.8%	X	X
Native Hawaiian or other Pacific Islander	49	0.1%	X	X
White	69,933	90.7%	X	X
English Learners	1,298	1.7%	X	X
Students with Free and Reduced Lunch	30,118	39.1%	X	X
Students with Disabilities	11,553	15.0%	X	X
Historically Marginalized Students	37,861	49.1%	X	X
Historically Privileged Students	39,269	50.9%	X	X
Additional Reporting Categories				
Female	37,333	48.4%	X	
Male	39,797	51.6%	X	
Migrant Students*	346	0.5%	X	
Military-Affiliated Students	*	*	X	
Homeless Students	*	*	X	
Students in Foster Care	*	*	X	

b. If applicable, describe any additional subgroups of students other than the statutorily required subgroups (*i.e.*, economically disadvantaged students, students from major racial and ethnic groups, children with disabilities, and English learners) used in the Statewide accountability system.
Click here to enter text.

Vermont has opted to include two additional groups to the required student groups: Historically Marginalized Students and Historically Privileged Students. Historically Marginalized Students are those students who have been historically underserved by educational institutions for any one, or more than one, characteristic including ethnic and racial minorities, English Learners, students with Free and Reduced Lunch, students with disabilities, and students who are migrant, foster, or homeless. Historically Privileged Students are those students who have none of the characteristics that are associated with being underserved.

We have opted to include these two additional groups primarily to increase transparency around student performance. Vermont's small schools and relatively low levels of diversity often mean that student groups are too small to show data which might point to inequities in experience. By creating a larger group that accounts for many characteristics, we will be able to share with the public more information about equitable learning experiences in Vermont.

The Historically Marginalized Student group will not take the place of any single disaggregated group. For example, if a school had sufficient numbers of students who receive free and reduced lunch, have disabilities, and are Black, the school would receive data for each of the specific student groups and the Historically Marginalized Student group. However, if a school had students of the same groups in numbers too small to be individually reported, there is higher likelihood that taken together these students could be represented in publically reported data for the aggregated group. As with all data, school systems would have access to their unsuppressed data for planning purposes.

c. Does the State intend to include in the English learner subgroup the results of students previously identified as English learners on the State assessments required under ESEA section 1111(b)(2)(B)(v)(I) for purposes of State accountability (ESEA section 1111(b)(3)(B))? Note that a student's results may be included in the English learner subgroup for not more than four years after the student ceases to be identified as an English learner.
   ☐ Yes
   ☒ No

d. If applicable, choose one of the following options for recently arrived English learners in the State:
   ☒ Applying the exception under ESEA section 1111(b)(3)(A)(i); or
   ☐ Applying the exception under ESEA section 1111(b)(3)(A)(ii); or
   ☐ Applying the exception under ESEA section 1111(b)(3)(A)(i) or under ESEA section 1111(b)(3)(A)(ii). If this option is selected, describe how the State will choose which exception applies to a recently arrived English learner.
   Click here to enter text.

ii. Minimum N-Size *(ESEA section 1111(c)(3)(A))*:

a. Provide the minimum number of students that the State determines are necessary to be included to carry out the requirements of any provisions under Title I, Part A of the ESEA that require

disaggregation of information by each subgroup of students for accountability purposes.
Click here to enter text.

Vermont is a very small state with very small schools. As a result, data suppression to protect student privacy and to ensure reliability of results is a frequent issue.

Virtually none of the student characteristics of concern under ESSA can be reported at the school level. In fact, we are not able to report data for the vast majority of our schools in any disaggregated field (highest is male/female and then students qualifying for free and reduced lunch (FRL)). As a state, we can see that the persistent achievement gaps reported nationally occur in Vermont as well. However, unlike larger schools in other parts of the nation, the small size of our school units prohibits the release of data to hold schools accountable for results.

Likewise, we are troubled by producing accountability determinations on a number deemed too small to be reliable. As a result, Vermont has set the "minimum-N" to 25 unique students, identified over three consecutive years, for ***accountability purposes***. This would likely mean that schools would need to have roughly 8 students per year in any given group of students being analyzed to produce accountability data. The minimum N of 25 will be applied to all students and student groups in a consistent manner.

A Second Tier of Accountability

In order to bring more schools into the state's accountability system, Vermont proposes to initiate additional school accountability at the Supervisory Union/Supervisory District (SU/SD) level. Vermont's Supervisory Union/Supervisory District are akin to school districts in other states. They have superintendents and central office staff who support the principals and teachers in their jurisdictions. However, it is important to note that even our SU/SDs are small: the smallest includes a single school with 183 students, the largest has just over 4,000 students and 5 schools. Vermont has none of the larger urban or county districts typical of many states. Our largest Supervisory Union/Supervisory District would be considered a moderate-sized high school in most states.

While the size of our schools is a factor in this decision, it is not the sole reason for this determination. Vermont prides itself on local control and the ability of local groups to identify, name, and solve the problems which face their communities. As a state, we have been moving to explicitly build preK-12 pathways that support student learning at all levels. By examining the systemic student achievement for the entire Supervisory Union/Supervisory District, we seek to build a deep commitment to support efforts on behalf of all of our students in a manner that showcases the strong commitment to community and neighbors that Vermonters are rightfully proud of.

By examining at the Supervisory Union/Supervisory District level, we will be able to produce accountability results for 98% of communities in Vermont in the first year of accountability for the "all student group." More importantly, by initiating analysis at the SU/SD level, we will be able to see the performance of student groups where they would have otherwise been

suppressed. At the Supervisory Union/Supervisory District, we will be able to report and hold systems accountable for students on free and reduced lunch (73%), students with disabilities (17%), students learning English (<1%). We will still rarely report data for students of racial minority groups including students who are American Indian (0%), Asian (<1%), Black (<1%), Hispanic, (<1%), Native Hawaiian or Pacific Islander <1%, and white (98%). However, by including the previously discussed Historically Marginalized Student group, we are able to hold 81% of school systems accountable for students who have one or more characteristic commonly associated with negative educational outcomes.

b. Describe how the minimum number of students is statistically sound.
Click here to enter text.

We weighed the relative benefits of a larger or smaller N-size, understanding that a higher N would allow for greater statistical reliability while limiting the number of schools in Vermont that were able to report out their accountability data. Conversely, a smaller N-size would allow for greater accountability at the school level, at the cost of statistical reliability.

Ultimately, we are proposing an N-size that allows for a high level of reliability, while maintaining some ability to report out accountability data in a single year. We believe that an N-size smaller than 25 as proposed would lead to misinterpretations of the data caused by a small number of outlier results.

An N size of 25 is sufficiently statistically sound for making accountability determinations at the school and LEA level. In all statistical analysis, the larger the sample size the greater the reliability. By selecting a minimum of N, Vermont has done so to increase the likelihood that differences between schools are due to actual difference in school quality rather than differences in cohorts or individual teachers. In most cases, a minimum N will be achieved by a single school over multiple years thereby reducing the effect of any particular cohort of students. In larger schools, the larger cohorts will also have multiple teachers as our teacher-to-student ratio is currently 1:7.

Current school configurations suggest that with an N-size of 25, the vast majority of Vermont's schools will not have large enough student enrollment to produce data for accountability in a single year. In the first year of accountability, only 42% percent of elementary schools and 67% of our secondary schools will have sufficient numbers of students to be held accountable for results for the "***all students***" group. In looking at student groups, almost no schools will be held accountable for any of the ethnic and racial categories at either the elementary or secondary level in the first year. Only one school (secondary) will be held accountable for English Learners. For students qualifying for free and reduced lunch, approximately 10% of elementary schools will be held accountable, while 37% of secondary schools will. For students with disabilities, approximately 1% of elementary schools will be held accountable for student results compared to 12.5% of secondary schools. Racial and ethnic groups are not large in Vermont

(≈10%) and less than 1% of elementary and secondary schools will be held accountable for the performance of any non-white student group.

c. Describe how the minimum number of students was determined by the State, including how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number.
Click here to enter text.

The additional information below focuses on public involvement in this discussion.

Table 4: Number and percent of schools with grades 3-6 able to annually report data and participate in the accountability system with a minimum N of 25.

Grades 3-6	**Schools with No Accountability Determination N<25**		**Schools with Accountability Determination N≥25**	
	#	%	#	%
All Students	121	57.9%	89	42.1%
Accountability Categories				
Ethnic and Racial Categories:				
American Indian or Alaskan Native	210	100.0%	0	0.0%
Asian	210	100.0%	0	0.0%
Black	210	99.9%	0	0.1%
Hispanic	210	100.0%	0	0.0%
Native Hawaiian or other Pacific Islander	210	100.0%	0	0.0%
White	129	61.4%	82	38.6%
English Learners	210	100.0%	0	0.0%
Students with Free and Reduced Lunch	187	89.1%	23	10.9%
Students with Disabilities	208	99.1%	2	0.9%
Historically Marginalized Students	177	84.1%	33	15.9%
Historically Privileged Students	180	85.7%	30	14.3%
Additional Reporting Categories				
Female	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A
Migrant Students	N/A	N/A	N/A	N/A
Military-Affiliated Students	N/A	N/A	N/A	N/A
Homeless Students	N/A	N/A	N/A	N/A
Students in Foster Care	N/A	N/A	N/A	N/A

* These student classifications have not been previously reported and we do not have data to present at this time.

Table 5: Number and percent of schools with grades 7-9 able to annually report data and participate in the accountability system with a minimum N of 25

Grades 7-9	**Schools with No Accountability Determination N<25**		**Schools with Accountability Determination N≥25**	
	#	%	#	%
All Students	37	33.4%	63	66.6%
Accountability Categories				
Ethnic and Racial Categories:				
American Indian or Alaskan Native	101	100.0%	0	0.0%
Asian	100	99.4%	1	0.6%
Black	100	99.4%	1	0.5%
Hispanic	101	100.0%	0	0.0%
Native Hawaiian or other Pacific Islander	101	100.0%	0	0.0%
White	39	35.0%	61	65.0%
English Learners	100	99.4%	1	0.6%
Students with Free and Reduced Lunch	69	63.5%	32	36.5%
Students with Disabilities	92	88.5%	8	11.5%
Historically Marginalized Students	61	55.7%	40	44.3%
Historically Privileged Students	58	53.3%	43	46.7%
Additional Reporting Categories				
Female	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A
Migrant Students	N/A	N/A	N/A	N/A
Military-Affiliated Students	N/A	N/A	N/A	N/A
Homeless Students	N/A	N/A	N/A	N/A
Students in Foster Care	N/A	N/A	N/A	N/A

* These student classifications have not been previously reported and we do not have data to present at this time.

Table 6: Number and percent of Supervisory Union/Supervisory Districts able to annually report data and participate in the accountability system with a minimum N of 25.

Student Subgroup	Schools with No Accountability Determination N<25		Schools with Accountability Determination N≥25	
	#	%	#	%
All Students	1	1.7%	58	98.3%
Accountability Categories				
Ethnic and Racial Categories:				
American Indian or Alaskan Native	59	100.0%	0	0.0%
Asian	58	98.3%	1	1.7%
Black	58	98.3%	1	1.7%
Hispanic	59	100.0%	0	0.0%
Native Hawaiian or other Pacific Islander	59	100.0%	0	0.0%
White	1	1.7%	58	98.3%
English Learners	58	98.3%	1	0.7%
Students with Free and Reduced Lunch	16	27.1%	43	72.9%
Students with Disabilities	49	83.1%	10	16.9%
Historically Marginalized Students	11	18.6%	48	81.4%
Historically Privileged Students	14	23.7%	45	76.3%
Additional Reporting Categories				
Female	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A
Migrant Students	N/A	N/A	N/A	N/A
Military-Affiliated Students	N/A	N/A	N/A	N/A

* These student classifications have not been previously reported and we do not have data to present at this time.

Three Year Accountability

After three years, Vermont will be able to provide accountability data at the school level for 86.5% of elementary and nearly 100% of secondary communities.

Table 7: Number and percent of schools with grades 3-6 able to triennially report data and participate in the accountability system with a minimum N of 25.

Grades 3-6	Schools with No Accountability Determination N<25		Schools with Accountability Determination N≥25	
	#	%	#	%
All Students	29	13.5%	186	86.5%
Accountability Categories				
Ethnic and Racial Categories:				
American Indian or Alaskan Native	15	100.0%	0	0.0%
Asian	68	96.1%	3	3.9%
Black	79	97.5%	2	2.5%
Hispanic	106	100.0%	0	0.0%
Native Hawaiian or other Pacific Islander	10	100.0%	0	0.0%
White	10	14.0%	184	86.0%
English Learners	61	94.9%	3	5.1%
Students with Free and Reduced Lunch	106	49.7%	107	50.3%
Students with Disabilities	184	87.4%	27	12.6%
Historically Marginalized Students	88	41.1%	126	58.9%
Historically Privileged Students	97	45.3%	117	54.7%
Additional Reporting Categories				
Female	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A
Migrant Students	N/A	N/A	N/A	N/A
Military-Affiliated Students	N/A	N/A	N/A	N/A
Homeless Students	N/A	N/A	N/A	N/A
Students in Foster Care	N/A	N/A	N/A	N/A

* These student classifications have not been previously reported and we do not have data to present at this time.

Table 8: Number and percent of schools with grades 7-9 able to triennially report data and participate in the accountability system with a minimum N of 25.

Grade 7-9	**Schools with No Accountability Determination N<25**		**Schools with Accountability Determination N≥25**	
	#	**%**	**#**	**%**
All Students	4	0.1%	100	99.9%
Accountability Categories				
Ethnic and Racial Categories:				
American Indian or Alaskan Native	16	93.9%	1	6.1%
Asian	46	90.1%	5	9.9%
Black	54	94.7%	3	5.3%
Hispanic	64	99.0%	1	1.0%
Native Hawaiian or other Pacific Islander	8	100.0%	0	0.0%
White	4	3.9%	102	96.1%
English Learners	38	93.4%	3	6.6%
Students with Free and Reduced Lunch	30	28.8%	73	71.2%
Students with Disabilities	58	57.0%	44	43.0%
Historically Marginalized Students	22	21.0%	81	79.0%
Historically Privileged Students	28	27.2%	75	72.8%
Additional Reporting Categories				
Female	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A
Migrant Students	N/A	N/A	N/A	N/A
Military-Affiliated Students	N/A	N/A	N/A	N/A
Homeless Students	N/A	N/A	N/A	N/A
Students in Foster Care	N/A	N/A	N/A	N/A

* These student classifications have not been previously reported and we do not have data to present at this time.

Table 9: Number and percent of Supervisory Union/Supervisory Districts able to triennially report data and participate in the accountability system with a minimum N of 25.

Student Subgroup	Schools with No Accountability Determination N<25		Schools with Accountability Determination N≥25	
	#	%	#	%
All Students	0	0.0%	59	100.0%
Accountability Categories				
Ethnic and Racial Categories:				
American Indian or Alaskan Native	58	98.3%	1	1.7%
Asian	54	92.0%	5	8.5%
Black	58	98.3%	1	1.7%
Hispanic	58	98.3%	1	1.7%
Native Hawaiian or other Pacific Islander	59	100.0%	0	0.0%
White	0	0.0%	59	100.0%
English Learners	47	79.7%	12	20.3%
Students with Free and Reduced Lunch	2	3.4%	57	96.6%
Students with Disabilities	12	20.3%	47	79.7%
Historically Marginalized Students	2	3.4%	57	96.6%
Historically Privileged Students	2	3.4%	57	96.6%
Additional Reporting Categories				
Female	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A
Migrant Students	N/A	N/A	N/A	N/A
Military-Affiliated Students	N/A	N/A	N/A	N/A

* These student classifications have not been previously reported and we do not have data to present at this time.

Stakeholder Engagement

Throughout 2016, Vermont engaged stakeholders in the development of the Vermont State Plan, with opportunities for public input occurring monthly—often multiple times each month—through November of 2016.

Public Involvement in the minimum N conversation began with the Field Input Team (FIT), a standing and diverse team of roughly 20 public stakeholders who met every six weeks throughout 2016 to discuss the plan's development and the role of the public in that work. FIT

recommendations led to further public input that included additional stakeholders suggested by FIT members, and confirmed (and often expanded upon) by the VT-AOE.

FIT members included, but were not limited to, participants representing the following groups:

- Title Community of Practitioners
- Community leaders and advocates
- English Learner educators
- Institutions of higher education
- Vermont Association for School Business Officials
- Vermont Curriculum Leaders' Association
- Vermont National Education Association (including Special Educators)
- Vermont Principals' Association
- Vermont State Board of Education
- Vermont State Legislature
- Vermont Superintendents' Association

FIT meetings were held on February 29, April 18, May 31, July 11, August 22, and November 14, all in 2016.

On May 31, the question of Vermont's minimum N-size, for accountability purposes, was presented to FIT. FIT recommended that the Agency take this question out for additional public input.

On June 16, the Agency convened an input session specifically around the topic of N size. It was attended by roughly 20 people consisting of a mix of educators and non-educators, including teachers, administrators, policy-makers, and community stakeholders. The group members split their recommendations between high to low N sizes, but consistently expressed a desire for the VT-AOE to adopt a solution that would protect student privacy while ensuring that Vermont's exceptionally small minority student groups wouldn't slip through our accountability system unnoticed.

Based on this input, the VT-AOE developed the proposal described above. It was shared with the public for additional input, in draft form, at the following events and meetings:

- Public Input Retreat at Jay Peak Resort (10-11 August 2016—roughly 135 attendees)
- NAACP Rutland chapter meeting (February 1, 2017—roughly 20 attendees)

Input from these meetings was used to revise the proposal, and to clarify the text framing this proposal in the public comment version of the Vermont State Plan.

The public comment version of the plan was published on the VT-AOE's website on January 11, 2017. The plan was divided up into sections allowing readers to comment on each section individually. N-size was featured in a dedicated plan section. 16 people responded

anonymously with comments, with input being relatively evenly split between people supporting the proposal, people who felt that the proposed N-size was too high, and people who felt that it was too low. And, again, the driving desire expressed in the comments was that Vermont's N-size solution allow historically underserved students in the state to be represented in the accountability system. Vermont used this feedback to help frame a communications plan for this proposal that will be a part of the implementation phase of this plan, upon approval.

d. Describe how the State ensures that the minimum number is sufficient to not reveal any personally identifiable information.[4]
Click here to enter text.

As a small state with small schools, Vermont has always had a challenge when balancing the need to protect student privacy with the need to be transparent and support public accountability efforts.

Vermont has long recognized its responsibility to protect individual students' data privacy within an accountability framework when disseminating information to the public about Vermont schools and students. In 2008, the Vermont State Board of Education approved a policy (The Data Suppression Policy for Student Information) that formalized the VT-AOE practices of suppressing data when cell values linked to sensitive data (e.g. FRL, IEP status or Assessment outcome data) fell below 11.

This policy has evolved over time and reflects guidance issued by Institute of Educational Sciences (IES) (https://nces.ed.gov/pubs2017/2017147.pdf) and is currently practiced as follows:

- Cell suppression is applied whenever cell values reflecting sensitive data (e.g. FRL or IEP status or Assessment outcome data) fall below 11 or, when cross-tabulated or cross-referenced with other publicly reported data, could be used to back-calculate the suppressed cell value.
- Additional complementary suppression is also applied if the data product which contains the sensitive data include column or row totals which would facilitate back-calculation of a single suppressed cell. Complementary suppression is a practice by which the second and or third lowest cell values (until the threshold of 11 is met) must also be suppressed so as to prevent back calculation and reidentification of a suppressed cell value

[4] Consistent with ESEA section1111(i), information collected or disseminated under ESEA section 1111 shall be collected and disseminated in a manner that protects the privacy of individuals consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g, commonly known as the "Family Educational Rights and Privacy Act of 1974"). When selecting a minimum n-size for reporting, States should consult the Institute for Education Sciences report "Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information" to identify appropriate statistical disclosure limitation strategies for protecting student privacy.

These data protection practices apply to all reports which are generated by the Vermont Agency of Education and/or by VT-AOE's contractors and/or by third parties working on VT-AOE's behalf.

For the purposes of this policy

- **"Personally identifiable information"** is information which alone or in combination with other information is linked, or is linkable, to a specific student and which would thereby allow a reasonable person in the school or its community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.
- **"Sensitive information"** is any information which is protected under federal and/or state statute.
- **"Suppression"** is a disclosure limitation method which involves removing data (e.g., from a cell or a row in a table) to prevent the identification of individuals in small groups or those with unique characteristics. See pages 6-7 of this document: http://ptac.ed.gov/sites/default/files/data_deidentification_terms.pdf
- **"Confidential information"** is any information which is both "sensitive information" and "personally identifiable information."

e. If the State's minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes, provide the State's minimum number of students for purposes of reporting.
Click here to enter text.

For the purposes of annually reporting, the state's minimum number of students is 11. This number for reporting is reflects guidelines issued by IES and referenced in Section A.4.ii.d.

iii. Establishment of Long-Term Goals *(ESEA section 1111(c)(4)(A))*:

Long Term Goals Overview
ESSA requires that states establish long term goals for each measure. Vermont has selected long-term goals based on input from stakeholders and our aspirations for our students. Vermont stands behind high standards and expectations for students. We want all students to achieve the same level of proficiency, the same positive outcomes, and the greatest opportunities for success. Setting high standards and then failing to meet them is not equivalent to being a failing school. Rather, schools that have yet to meet the extremely high standards we have set for our students simply have room to grow. The Agency of Education, our school systems, and our public are committed to moving from a language that focuses on schools as "failing to meet" targets to one that focuses on continuous improvement for all.

Long Term Goals

Long term goals are set in relation to the standards we hold for ourselves and our students. Generally, the long-term goal is a "Bull's Eye." These goals are intended to be aspirational, and we hope to achieve them within 3 accountability cycles or 9 years.

a. Academic Achievement. *(ESEA section 1111(c)(4)(A)(i)(I)(aa))*
   1. Describe the long-term goals for improved academic achievement, as measured by proficiency on the annual statewide reading/language arts and mathematics assessments, for all students and for each subgroup of students, including: (1) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State, and (2) how the long-term goals are ambitious.
      Click here to enter text.

In describing our long term goals, we begin first by providing a picture of where our school level performance is currently and, then, describing our long term goal.

Vermont intends to meet this requirement for 99% of students by using the computer adaptive Smarter Balanced Assessment for English language arts and mathematics in grades 3 through 9. This test has been used for two years in Vermont and has been submitted to the federal Peer Review process. All studies of Smarter Balanced Assessment have demonstrated that it is a valid and reliable tool for assessing the Common Core State Standards. The assessment includes reports to parents and schools that clearly articulate student performance on the assessment. Data can be disaggregated and used for accountability purposes.

For the 1% of students with the most severe cognitive disabilities, Vermont will continue using the Dynamic Learning Map (DLM) that is developed and used by a multi-state consortium. The assessment is given in reading/language arts and mathematics. The DLM assessment has been created to align with the state's common core standards in reading/language arts and mathematics. It has been peer reviewed, and has been shown to meet the technical qualities of assessment.

In 2015, current ELA and mathematics performance levels for all students in the State of Vermont on the Smarter Balanced Assessment are as follows:

Table 10: Current ELA SBAC Performance Levels

English Language Arts	Number of Test Takers	State Average Scale Score	State Performance Level	Number of Schools in Each Level			
Grade 03	6,089	2,438		19	44	58	43
Grade 04	5,867	2,477		27	51	47	43
Grade 05	6,043	2,515		14	40	71	40
Grade 06	5,953	2,539		11	49	59	25
Grade 07	5,834	2,562		9	36	39	13
Grade 08	5,916	2,580		11	26	45	24
Grade 09	*5,950*	*2,608*		*15*	*41*	*53*	*31*

*There is currently no SBAC ELA testing at ninth grade. The numbers for ninth grade are based on average performance for third though with grades.

Table 11: Current Mathematics SBAC Performance Levels

Mathematics	Number of Test Takers	State Average Scale Score	State Performance Level	Number of Schools in Each Level			
Grade 03	6,106	2,443		22	42	69	31
Grade 04	5,867	2,482		23	70	49	26
Grade 05	6,065	2,509		50	66	34	15
Grade 06	5,969	2,522		54	58	20	13
Grade 07	5,844	2,548		31	39	25	9
Grade 08	5,914	2,564		36	32	25	13
Grade 09	*5,961*	*2,589*		*36*	*51*	*37*	*18*

*There is currently no SBAC mathematics testing at ninth grade. The numbers for ninth grade are based on average performance for third though with grades.

Vermont's long-term goal is that by 2025, 100% of our schools will show an average scale score that is at the mid-point of the proficiency range for each grade level they serve for both English language arts and mathematics (Bull's Eye). This goal applies to all subgroups of students in

both ELA and mathematics. Such a goal establishes high expectations for all students and unites the community behind all students improving their performance.

There is no current ELA or mathematics assessment data for ninth grade. We have engaged with our contractor to establish the benchmark scores for each level of performance in ninth grade. Once we receive those scores, the midpoint of the proficient scale will become the long-term goal for ninth grade and interim goals will be based upon that goal in a manner consistent with determinations for all other grades, with 100% of Vermont's students being expected to reach this goal by 2025.

As yet, however, we do not have benchmark scores; therefore, in tables 38 and 39 of Appendix A, we have included preliminary estimates for the current ninth grade performance level for all students and all subgroups on the ELA and mathematics SBAC assessments. To determine the estimates, we found the differences in growth from one grade level to the next on each assessment. We then found the average of those differences to approximate the performance for ninth graders. We repeated this process for all students and for each student subgroup.

Allow us to use the "All Students" group on the SBAC ELA assessment as an explanatory example. Please note all numbers bracketed by asterisks are approximations only.

Table 11a: Determination of Predicted Ninth Grade Current Performance

Accountability Question	**Grade**	**Current Performance (2016)**	**Difference in Current Performance from the previous grade**
How well are students performing in ELA/ reading in 3rd-9th grade? SCALE	All Students		
	3rd	2438	N/A
	4th	2477	39 (2477-2438)
	5th	2515	38 (2515-2477)
	6th	2539	24 (2539-2515)
	7th	2562	23 (2562-2539)
	8th	2580	18 (2580-2562)
	9th	*2608*	*28*

The predicted difference in performance for ninth grade represents the average of the differences in performance for the previous grade levels, or (39+38+24+23+18)/5=28.4. The average of the differences was added to the eighth grade current performance to approximate ninth grade current performance, or 2580+28=2608. The current performance score for the Historically Marginalized Student subgroup represents the averages of current performance for all students included in this group.

We followed a similar method to approximate the mid-point of the proficiency range for ninth graders on each assessment, first finding the differences between the mid-point of the proficiency range from one grade level to the next and, then, averaging those differences. The mid-point of the proficiency range will become the ambitious target for all students and all subgroups of students.

Again, allow us to return to the example of the SBAC assessment for "All Students."

Table 11b: Determination of Predicted Ninth Grade Mid-Point of Proficient Scale

Accountability Question	**Grade**	**Long term Goal** *Mid Point of Proficient Scale*	**Difference in Mid-point of Proficient scale from the previous grade**
How well are students performing in ELA/ reading in 3rd-9th grade? SCALE	All Students		
	3rd	2460	N/A
	4th	2502	42 (2502-2460)
	5th	2541	39 (2541-2502)
	6th	2574	33 (2574-2541)
	7th	2600	26 (2600-2574)
	8th	2617	17 (2617-2600)
	9th	*2648*	*31*

Following the method outlined in the current performance estimation above, we determined the predicted difference in the mid-point of the proficient scale moving from eighth to ninth grade, or (42+39+33+26+17)/5=31.4. The average of the differences was then added to the eighth grade mid-point of proficient scale to derive the approximate ninth grade mid-point of proficient scale, or 2617+31=2648.

The same process will be used to determine the ambitious target for ninth grade Mathematics, with 100% of Vermont's students being expected to reach this goal by 2025.

Additional tables, including tables for student groups, can be found in Tables 38 and 39 of Appendix A. At this time, the vast majority of schools are not performing at this level, making this an ambitious and important goal.

2. Provide the measurements of interim progress toward meeting the long-term goals for academic achievement in Appendix A.

Tables showing the measurements of interim progress towards meeting the long-term goals are provided in Table 38 and 39 of Appendix A.

As we do not yet have data for ninth grade SBAC ELA or mathematics scores. To approximate the interim targets for ninth grade we found the difference between the predicted ninth grade current performance and the predicted ninth grade mid-point of the proficiency range. As we are setting interim targets every three years, we divided that difference by three. We added the quotient to the expected level of current student performance to achieve the first interim goal for year 2019. We added the quotient a second time to achieve the second interim goal for year 2022. We added the quotient a third time to derive the final long-term goal for year 2025.

Again, we will return to "All Students" on the SBAC ELA assessment as an example.

Table 11c: Determination of Predicted Ninth Grade Interim Goals

Accountability Question	**Grade**	**Current Performance (2016)**	**Long term Goal** *Mid Point of Proficient Scale*	**Difference between Mid-point of proficient scale and current progress**	**Interim Targets**		
					2019 1	**2022 2**	**2025 3**
How well are students performing in ELA/ reading in 3rd-9th grade? SCALE	All Students						
	9th	*2608*	*2648*	*40*	*2621*	*2634*	*2648*

As the difference between the long term goal and the current performance was 40 (2648-2608), we divided the 40-point improvement needed to achieve the mid-point of the proficient scale across three the interim targets. Therefore, we predicted a 13-point growth for each interim period so that all students arrive at the mid-point of the proficient scale by 2025.

3. Describe how the long-term goals and measurements of interim progress toward the long-term goals for academic achievement take into account the improvement necessary to make significant progress in closing statewide proficiency gaps.
   Click here to enter text.

Similar to other states, Vermont has struggled to meet the needs of vulnerable populations. We have set interim targets for all students and for each sub-group that allow for meaningful growth and improvement in reducing achievement gaps.

The state-identified goals and targets represent the growth that the state is asking each school to make to achieve our shared goals. School systems will examine their local data to determine

their annual interim targets and will be report these targets to the state. Local systems will identify their commitments to:

1. **Exceed the state-specified goal**: based on local commitments and efforts, school systems may seek to exceed the state specified goal.
2. **Meet the state specified goal**: meet but not exceed the goal.
3. **Maintenance of the state-specified goal**: for any school currently performing above the long-term goal, that school may establish a unique improvement goal to maintain its current performance level.

Establishing a series of state-specified goals as a common point of reference gives local education systems a shared reference point in establishing local continuous improvement goals. The VT-AOE is then able to support LEAs in implementing their continuous improvement plans through specific technical assistance and networking of schools and LEAs with similar goals. Schools identified for Comprehensive and Targeted Supports will receive more state assistance, but all schools will receive cyclical evaluations within Vermont's Education Quality Review framework to ensure that continuous improvement efforts are aligned with state and locally-identified goals and targets.

b. Graduation Rate. *(ESEA section 1111(c)(4)(A)(i)(I)(bb))*

1. Describe the long-term goals for the four-year adjusted cohort graduation rate for all students and for each subgroup of students, including: (1) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State, and (2) how the long-term goals are ambitious.
   Click here to enter text.

ESSA requires that States hold schools accountable for the graduation rate using the federal definition of a 4-year cohort calculation. Vermont will meet this objective, but we also want to measure the percentage of students graduating within a 6-year extended graduation rate. In 2014, the Vermont State Board of Education adopted the Education Quality Standards, which requires a proficiency-based graduation requirement that emphasizes mastery rather than time as the critical factor in determining if a student has met career and college ready expectations. As such, students are encouraged to pursue flexible pathways that allow them to take full advantage of work-based learning, early college opportunities, and personalized learning experiences that enrich their learning and better prepare them for positive post-secondary outcomes. Consistent with this legislation, Vermont places greater value on completion of high school with mastery of critical skills than completion within a traditional time frame.

Table 12: 2015 4-year graduation rate for all Vermont students

Graduation Rate (4 year)	Number of Students in Cohort	State Average Grad Rate	State Performance Level	Number of Schools in Each Level			
All Students	6,172	87.6%		2	4	44	11

(Data for student groups is found in Appendix A.)

It is our goal that by 2025, 100% of our schools will have 90% of their students graduate within 4 years. This goal applies to all subgroups of students. Baseline data and a timeline for each subgroup are included in Table 40 of Appendix A. The interim goals vary by subgroups in order to ensure that all subgroups will reach the overall graduation goal at the same time.

As part of the New England Secondary School Consortium (NESSC), Vermont has joined with other New England states in aspiring to a 90% 4-year adjusted cohort graduation rate. In the current economy, it is critical that each young person graduate high school with a diploma that signals career and college readiness if they are to obtain sufficient financial security, and fully participate in their communities.

We considered setting a more ambitious target given that many of our student groups are currently graduating at this rate. However, in consultation with our stakeholders we learned that as school systems switch to a proficiency based graduation system where students must fully demonstrate their skill in key learning areas this would create a disincentive to insuring that students are not artificially promoted if their skills have not met standards.

2. If applicable, describe the long-term goals for each extended-year adjusted cohort graduation rate, including (1) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State; (2) how the long-term goals are ambitious; and (3) how the long-term goals are more rigorous than the long-term goal set for the four-year adjusted cohort graduation rate.

Table 13: 2015 6-year graduation rate for all Vermont students

Graduation Rate (6 year)	Number of Students in Cohort	State Average Grad Rate	State Performance Level	Number of Schools in Each Level			
All Students	6,538	90.7%		2	3	40	16

It is our goal that by 2025, 100% of our schools will have 100% of their students meet graduation proficiencies within 6 years and Vermont opts to include an additional measure for the

percentage of students graduating within a 6-year extended graduation rate. The higher target of 100% is set above the target for the 4-year rate to provide a more rigorous standard.

This goal applies to all subgroups of students. Baseline data and a timeline for each subgroup are included in Table 41 of Appendix A. The interim goals vary by subgroups in order to ensure that all subgroups will reach the overall graduation goal at the same time.

3. Provide the measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate in Appendix A.

Please see Tables 40 and 41 of Appendix A.

4. Describe how the long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate take into account the improvement necessary to make significant progress in closing statewide graduation rate gaps.
   Click here to enter text.

Establishing a series of state-specified goals as a common point of reference gives local education systems a shared reference point in establishing local continuous improvement goals. The VT-AOE is then able to support LEAs in implementing their continuous improvement plans through specific technical assistance and networking of schools and LEAs with similar goals. Schools identified for Comprehensive and Targeted Supports will receive more state assistance, but all schools will receive cyclical evaluations within Vermont's Education Quality Review framework to ensure that continuous improvement efforts are aligned with state and locally-identified goals and targets.

The interim goals vary by subgroups in order to ensure that all subgroups will reach the overall graduation goal at the same time.

c. English Language Proficiency. *(ESEA section 1111(c)(4)(A)(ii))*
   1. Describe the long-term goals for English learners for increases in the percentage of such students making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment, including: (1) the State-determined timeline for such students to achieve English language proficiency and (2) how the long-term goals are ambitious.
      Click here to enter text.

All other assessments and accountability measures are administered to every student in the same grade level, regardless of the student groups to which they belong. This measure is different. Beginning with ESSA, schools are required to examine both the rate at which students who are English learners gain proficiency and whether or not they have met progress targets

along the way to proficiency. This used to be done under the Title III accountability system, but is now embedded within the Title I accountability system.

Long Term Goal and Interim Target:

Vermont's ambitious long-term goal is that by 2025, 100% of our schools will have 100% of students attain English Proficiency within the time frame defined when they are first identified as learners of English.

Gaining English Proficiency:
ESSA allows states to identify specific student characteristics to associate with the length of time students have to gain proficiency. Vermont considered several characteristics with our stakeholder groups and ultimately determined that the most significant determinant of how long it takes to learn English is the students initial level of English proficiency. As a result, students who enter school with the lowest level of proficiency in English will have the most time to become proficient. This measure seeks to determine if students are gaining proficiency as measured by the ACCESS 2.0 assessment in time to enjoy the full benefits of their educational experience.

The timeline for students to gain proficiency is as follows:

- Students identified as Level 1 using ACCESS would have 5-years to attain proficiency;
- Students identified as Level 2 using ACCESS would have 4-years to attain proficiency;
- Students identified as Level 3 using ACCESS would have 3-years to attain proficiency;
- Students identified as Level 4 using ACCESS would have 2-years to attain proficiency;
- Students identified as Level 5 and 6 using ACCESS have already demonstrated proficiency in their use of the English language and are considered English Proficient.

Current Performance:
The current Vermont framework in place during NCLB does not mandate a minimum or maximum number of years for students to become proficient. We expect that this new proposal, which accounts for entry level proficiency in determining goals for attaining full proficiency as measured by ACCESS, will provide a better scaffolding for the provision of ELP supports and will lead to improved student and SU/SD performance on this measure.

Because Vermont does not currently assign time frames associated with ELP acquisition, baseline data was calculated by examining the percentage of Vermont students taking the ACCESS in 2009-10 and attaining proficiency within the number of years associated with that ACCESS score, using the proposed timeline described above. We used 2009-10 data, as it was the most recent year that would allow us to fully use the proposed timeline. According to this data, 55% of Vermont's English Learners attained ELP within this state-proposed timeline. Vermont used this percentage when describing current state performance and when describing interim targets in the next section of this proposal.

When calculating this percentage, the state did not include:

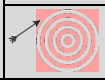
- Students who graduated before the expiration of their state-allotted time to attain English proficiency;
- Students who transferred out of state before the expiration of their state-allotted time to attain proficiency;
- Students who were misidentified as English Learners in 2009-10 (example: students identified as English Learners and as Students With Disabilities, who were later identified as solely being Students With Disabilities) and whose English Learner identification was changed before the expiration of their state-allotted time to attain proficiency.

When assigning values to school performance levels relative to student English Proficiency, Vermont looked at the state's current performance, our long term goal of 100% of students achieving ELP within a state-determined time frame, and the number of schools that had data to report with a minimum N of 4. Vermont will not be using a minimum N of 4 for any accountability or reporting calculations; they were only used to help determine percentages associated with ELP performance levels. Using this value for N, there were 48 schools in Vermont that had data for the 2009-10 academic year.

With this in mind:

- Level 1: Schools with 0%-49% of their English Learners attaining English Proficiency on time
- Level 2: Schools with 50%-74% of their English Learners attaining English Proficiency on time
- Level 3: Schools with 75%-94% of their English Learners attaining English Proficiency on time
- Level 4: Schools with 95%-100% of their English Learners attaining English Proficiency on time

Table 14: Current School Performance: English Learners Attaining Proficiency Within a State-Identified Time Frame

Percent Proficient	Number of Test Takers	State Average Percent Proficient	State Performance Level	Number of Schools in Each Level			
							
All grade levels	1140	55%	Level 2	16	16	16	0

2. Provide the measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency in Appendix A.

Vermont has used its limited data to identify interim targets for ELP performance. To calculate interim goals, Vermont took its current performance data (55% of students attaining ELP on time, statewide) and split the gap between our current performance and long term goals into three bands to identify interim goals for 2019 (70%), and 2022 (85%), with 2025 being the year that we intend to meet our long term proficiency goal of 100% of EL students attaining ELP on time. A table illustrating these goals can be found in table 42 of Appendix A.

iv. Indicators *(ESEA section 1111(c)(4)(B))*

a. Academic Achievement Indicator. Describe the Academic Achievement indicator, including a description of how the indicator (i) is based on the long-term goals; (ii) is measured by proficiency on the annual Statewide reading/language arts and mathematics assessments; (iii) annually measures academic achievement for all students and separately for each subgroup of students; and (iv) at the State's discretion, for each public high school in the State, includes a measure of student growth, as measured by the annual Statewide reading/language arts and mathematics assessments.
Click here to enter text.

In all cases, unless specifically mentioned, scores are averaged using a simple mean. When combining multiple grade levels, the scores are averaged with equivalent weights. When required to merge data over three years, we follow the same process of simple averages.

Levels of Performance Overview

This Levels of Performance overview applies to all of Vermont's identified performance indicators, within our accountability model.

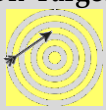
VT-AOE has opted to leverage language consistent with our commitment to proficiency-based learning. For each measure and for the school as a whole, a scale is generated which describes the degree to which the school is meeting the "target." Our current terms and iconography are best thought of as place holders while the formal reporting tool is developed.

Table 15: Levels of Performance

Level	Proposed Term	Proposed Iconography
1	Off-Target	
2	Near Target	
3	On-Target	
4	Bull's Eye	

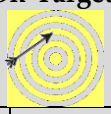
Both the ELA and mathematics indicator scores are determined through a combination of scale scores and growth. Generally—and it depends upon the grades taught at school (see weighting in section A.4.v.b for a full discussion)—the ELA and mathematics SBAC assessments each count as 20% of the total accountability score, or 40% in total. Using the ELA SBAC as an example, of that 20%, half (or 10% of the total accountability score) is determined by student scale scores and half is determined by student growth. Below is a discussion on the 10% deriving from scale scores. Please see the next section for a full discussion on the growth determination.

Table 16: Proposed Scale Score Cuts for ELA Performance Levels

Accountability Question	**Grade**	**4 Levels of Performance**					
		Off-Target	**Near Target**		**On-Target** 		**Bull's Eye**
			Lower Bound	**Upper Bound**	**Lower Bound**	**Upper Bound**	
How well are students performing in ELA/reading in 3rd-9th grade? SCALE	All	***Below lower bound***	***Mid Point of Basic Score***	***Proficient Scale Score-1***	***Proficient Scale Score***	***Mid Point of Proficient Scale***	***Above upper bound***
	3rd	*<2399*	*2399*	*2431*	*2432*	*2460*	*>2460*
	4th	*<2444*	*2444*	*2472*	*2473*	*2502*	*>2502*
	5th	*<2471*	*2471*	*2501*	*2502*	*2541*	*>2541*
	6th	*<2493*	*2493*	*2530*	*2531*	*2574*	*>2574*
	7th	*<2515*	*2515*	*2551*	*2552*	*2600*	*>2600*
	8th	*<2526*	*2526*	*2566*	*2567*	*2617*	*>2617*
	9th	*<*2551**	**2551**	**2593**	**2594**	**2648**	*>*2648**

*The cut scores for SBAC ELA are projects only. They were calculated in the same manner as described in section A.4.iii.a.1 above. We will update the ninth grade numbers after we receive cut scores from our contractor.

Table 17: Proposed Scale Score Cuts for Mathematics Performance Levels

Accountability Question	Grade	4 Levels of Performance					
		Off-Target	Near Target		On-Target 		Bull's Eye
			Lower Bound	Upper Bound	Lower Bound	Upper Bound	
How well are students performing in mathematics in 3rd-9th grade? SCALE	All	Below lower bound	Mid Point of Basic Score	Proficient Scale Score-1	Proficient Scale Score	Mid Point of Proficient Scale	Above upper bound
	3rd	<2408	2408	2435	2436	2468	>2468
	4th	<2447	2447	2484	2485	2516	>2516
	5th	<2491	2491	2527	2528	2553	>2553
	6th	<2512	2512	2551	2552	2580	>2580
	7th	<2525	2525	2566	2567	2600	>2600
	8th	<2544	2544	2585	2586	2619	>2619
	9th	<*2571*	*2571*	*2616*	*2617*	*2649*	>*2649*

*The cut scores for SBAC mathematics are projects only. They were calculated in the same manner as described in section A.4.iii.a.1 above. We will update the ninth grade numbers after we receive cut scores from our contractor.

As these scores are determined by the Smarter Balanced Assessment Consortium (SBAC) performance, they are valid and reliable, can meaningfully differentiate between schools, and can be disaggregated for all student groups. Additionally, the indicators are used consistently across schools and LEAs by grade level.

Vermont will inform communities of school performance in English Language arts and mathematics using scale scores rather than the "percent proficient" previously used under No Child Left Behind. We have made this determination due for two reasons. First, in 2015, the results of our Smarter Balanced administration resulted in data suppression 178 times (8% of all data), because the suppressed school or sub group attained either 0% proficiency or 100% proficiency (neither of which can be reported without violating student privacy protections). This data suppression was disproportionately applied to sub group populations, effectively removing the transparency that ESSA seeks to provide. We can neither celebrate the victory of 100% proficiency nor shine a light on places with 0% proficiency in these circumstances.

Second, we have found that a state-level focus on achieving proficiency has had the unintended consequence of narrowing school-level focus to support the students most near the proficiency-cut score, in hopes of pushing those students over the threshold. In a landscape of scarce resources, this strategy has made sense to many well-meaning educators, but it is not the desired goal of the accountability efforts.

Vermont will use scale scores with a reference to the proficiency cut score to communicate school level performance to parents. By choosing this approach we will be able to report all scores for all groups meeting the minimum N without fear of revealing personally identifiable information. In addition, it will rightfully focus schools on improving the educational outcomes of all students, so that gains made by students will be "counted" whether or not they cross an arbitrary line of proficiency

Vermont agrees that full participation in assessments is critical for making informed decisions. We will hold all schools to a 95% participation rate for all students and student groups. Please see Section A.4.vii.

This proposal reinforces expectations established in the Education Quality Standards and state law requiring that students are assessed annually. Vermont is also currently adopting proficiency based learning, which emphasizes that scores are for the learning demonstrated and not ancillary behaviors. By having participation named as a key variable and not hidden within a larger equation or weighting conversation we operate in parallel to that effort.

b. Indicator for Public Elementary and Secondary Schools that are Not High Schools (Other Academic Indicator). Describe the Other Academic indicator, including how it annually measures the performance for all students and separately for each subgroup of students. If the Other Academic indicator is not a measure of student growth, the description must include a demonstration that the indicator is a valid and reliable statewide academic indicator that allows for meaningful differentiation in school performance.
Click here to enter text.

Growth Score:
Vermont intends to measure student growth in both English language arts and mathematics using the Student Growth Percentile (SGP) method. This method requires three consecutive years of data, making it a valid measurement for 5th-9th grades. We plan to use the baseline data from Spring 2016 as the first year of data for determining the growth calculation, so that the first year of growth scores will be available following assessments administered in Spring 2018.

We have selected this model because it is capable of providing a measure of individual student growth as well as capturing movement toward a particular criterion-based attainment level, while avoiding erroneous causal inferences that other models (e.g. value added models) have

made in the past (Betebenner, 2009[5]). SGPs provide a means of illustrating a student's change in performance over time compared with students who share similar characteristics and who have performed in similar ways in the past (i.e. a student's academic peer group). They can be used with criterion-based reference points to predict the amount of growth students would need to attain in order to reach particular criteria levels in the future while still providing room for recognizing the growth students have made relative to their academic peers. In general, SGPs work as follows:

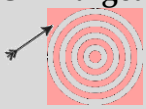
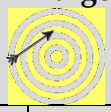
A student's current level of achievement is compared to that student's previous level of achievement in order to normatively determine the rate of achievement growth. The resultant percentile reflects the likelihood of a student achieving a certain outcome, given the student's prior achievement. The relationship between prior and current achievement scores for cohorts of students in the norm group can be used to generate growth trajectories based on historical and anticipated rates of growth to predict the likelihood of future achievement for students statewide (Betebenner, 2008, 2009) and may thereby enable assumptions regarding growth over time. (Kannan, 2016, p. 106)

Our intention is to model growth rates for Vermont and all of our schools, including high schools, using data gleaned in three assessments (2015, 2016, and 2017) to model the data. Following the analysis, we will convene stakeholders to review the data and assist in identifying the cut scores for the four levels of performance. We anticipate having this accomplished by December of 2017 and will provide an update to USED and stakeholders regarding the determination made at that point.

[5] Betebenner, D. W. (2009). Norm- and Criterion-Referenced Student Growth. Educational Measurement: Issues and Practice, 28(4), 42–51. https://doi.org/10.1111/j.1745-3992.2009.00161.x

[6] Kannan, P. (2016). Vertical Articulation of Cut Scores Across the Grades: Current Practices and Methodological Implications in the Light of the Next Generation of K–12 Assessments (ETS Research Report Series). DOI: 10.1002/ets2.12115: Educational Testing Service. Retrieved from http://onlinelibrary.wiley.com/doi/10.1002/ets2.12115/abstract

Table 18: Proposed Levels of Performance for Growth in ELA and Mathematics Assessments

Accountability Question	Grade	4 Levels of Performance					
		Off-Target 	Near Target		On-Target 		Bull's Eye
			Lower Bound	Upper Bound	Lower Bound	Upper Bound	
How well are students performing in ELA/reading in 5th-9th grade? GROWTH	All	**Below lower bound**	**25th**	**49th**	**50th**	**75th**	**Above upper bound**
How well are students performing in mathematics in 5th-9th grade? GROWTH	All	**Below lower bound**	**25th**	**49th**	**50th**	**75th**	**Above upper bound**

As with the scale scores, these scores are determined by SBAC performance, they are valid and reliable, can meaningfully differentiate between schools, and can be disaggregated. Additionally, the indicators are determined consistently across all schools and LEAs with grades 5-9.

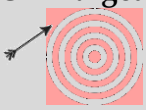
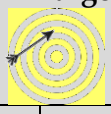
c. Graduation Rate. Describe the Graduation Rate indicator, including a description of (i) how the indicator is based on the long-term goals; (ii) ``how the indicator annually measures graduation rate for all students and separately for each subgroup of students; (iii) how the indicator is based on the four-year adjusted cohort graduation rate; (iv) if the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator; and (v) if applicable, how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25).

Click here to enter text.

Vermont has selected as its graduation indicator for all schools with twelfth grade a simple average of the 4-year adjusted and 6-year adjusted cohort graduation rates. It is based on our long-term goal such that schools receive the highest rating when they near the goal. The indicator is calculated for all students and then disaggregated for each of the student groups in our accountability system.

Vermont uses the federal definition of a 4-year cohort calculation. This calculation will be the same for all schools and all LEAs in Vermont with a twelfth grade.

Table 19: Proposed Graduation Rate Levels of Performance Based on Long-Term Goals

Accountability Question	**Grade**	**4 Levels of Performance**					
		Off-Target 	**Near Target**		**On-Target** 		**Bull's Eye**
			Lower Bound	**Upper Bound**	**Lower Bound**	**Upper Bound**	
Are students staying in school until they *graduate*?	4-year	***Below lower bound***	***67%***	***79%***	***80%***	***90%***	***Above upper bound***
	6-year	***Below lower bound***	***67%***	***79%***	***80%***	***94%***	***Above upper bound***

The 4- and 6-year graduation rates for a given school will then be averaged to determine the overall graduation rate indicator score. For example, if a school is "near target" (a 2 on a 4-level scale) with its 4-year indicator and "on-target" (a 3 on a 4-level scale) with its 6-year indicator, the combined final score for graduation rate would be a 2.5. It is this final score that would be weighted under the formula outlined in Section A.4.v.b.

The graduation rate indicators are valid and reliable, can meaningfully differentiate between schools, and can be disaggregated. Additionally, the indicators are determined in a consistent manner for all high schools in Vermont.

Vermont does not have an alternative diploma for students with the most significant cognitive disabilities.

d. Progress in Achieving English Language Proficiency (ELP) Indicator. Describe the Progress in Achieving ELP indicator, including the State's definition of ELP, as measured by the State ELP assessment.
Click here to enter text.

English Language Proficiency

There are two dimensions to describing how well students are gaining English language proficiency. First, is how well schools are supporting students in becoming proficient within the time frame allotted. Second, is how well schools are supporting students in meeting annual proficiency benchmarks towards proficiency.

Gaining Proficiency

ESSA allows states to identify specific student characteristics to associate with the length of time students have to gain proficiency. Vermont considered several characteristics with our stakeholder groups and ultimately determined that the most significant determinant of how long it takes to learn English is the starting level of the student. As a result, students who enter school with the lowest level of proficiency in English will have the most time to become proficient. This indicator seeks to determine if students are gaining proficiency as measured by the ACCESS assessment in time to enjoy the full benefits of their educational experience.

- Students identified as Level 1 using ACCESS would have 6-years to attain proficiency;
- Students identified as Level 2 using ACCESS would have 5-years to attain proficiency;
- Students identified as Level 3 using ACCESS would have 4-years to attain proficiency;
- Students identified as Level 4 using ACCESS would have 3-years to attain proficiency;
- Students identified as Level 5 using ACCESS would have 2 years to attain proficiency.
- Students identified as Level 6 using ACCESS have already demonstrated proficiency in their use of the English language

Annual Proficiency Benchmarks

This indicator seeks to determine if students are gaining fluency at an annual rate that allows them to gain proficiency in English "in time."

Proficiency Benchmarks specific to EL students' ACCESS Level 1-5 categories will be calculated annually, and will serve as targets for educators supporting students in attaining English language proficiency**.** Benchmarks will be calculated using a combination of initial proficiency levels (identified using ACCESS), the state-determined number of years that students associated with that level have to attain proficiency, and the ACCESS proficiency cut scores associated with each student's grade level.

In order to determine whether an English Learner makes acceptable progress in achieving English language proficiency for each year (grade) tested, the following **Annual Growth to Target** formula would apply:

Target score - Current Score / # years = Observed scale score gain

- **Target Score** = overall proficient scale score for attainment in X years, based on initial proficiency level
- **Current Score** = overall scale score
- **Years** = # years that remain to attain proficiency in pre-determined time frame.

The **expected growth target(s)** would be reset every year until proficiency is attained and would be unique to each student. If a student does not attain proficiency within the time frame identified for them, based on their initial performance on the ACCESS assessment, the "Years" variable in the above equation would be set as "1".

As these scores are determined by ACCESS performance, they are valid and reliable, can meaningfully differentiate between schools, and can be disaggregated. Additionally, the indicators are determined consistently across schools and LEAs.

e. School Quality or Student Success Indicator(s). Describe each School Quality or Student Success Indicator, including, for each such indicator: (i) how it allows for meaningful differentiation in school performance; (ii) that it is valid, reliable, comparable, and statewide (for the grade span(s) to which it applies); and (iii) of how each such indicator annually measures performance for all students and separately for each subgroup of students. For any School Quality or Student Success indicator that does not apply to all grade spans, the description must include the grade spans to which it does apply.
Click here to enter text.

To reflect a broad range of measures of school performance, Vermont has elected to propose four "fifth" indicators for inclusion in our accountability system:

- Science
- Physical Education
- Career and college readiness
- Post-secondary outcomes

Each of these proposed indicators will be used for all schools in the grade span for which they apply and are calculated consistently across these schools.

"Fifth" Indicator 1: How well are student performing in science?

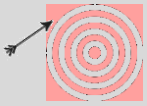
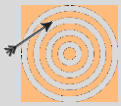
ESSA does not require that schools be held accountable for student outcomes in science. Vermont has elected to include science performance in our accountability plan. We have made this determination in response to stakeholder input which asked that if students are required to sit for assessments, those assessments ought to provide data that informs the assessment of school quality. Additionally, by including more indicators than are required to assess standards implementation under Education Quality Standards, we remind all schools of the value that we

place on all subjects and hope to avoid an over-narrowing of instruction to only literacy and mathematics.

Average Scale Score:
Consistent with our assessment of English-Language Arts and Mathematics, we intend to measure performance against scale scores.

Levels of Performance:
As previously stated, all indicators will be linked to a 4-level label to describe performance. The currently proposed scale score cuts link directly to the current NECAP performance levels. While the new science test is not yet created, the Agency is providing data, in Table 17, reflecting continued use of the current New England Common Assessment Program assessment (NECAP-Science). This table will be replaced to reflect the new, NGSS-aligned assessment and submitted to USED and stakeholders prior to the field-test in 2018.

Table 20: Proposed Scale Score Cuts for Science Performance Levels

Accountability Question	**Grade**	**4 Levels of Performance**					
		Off-Target 1 	**Near Target 2** 		**On-Target 3**		**Bull's Eye 4**
			Lower Bound	**Upper Bound**	**Lower Bound**	**Upper Bound**	
How well are students performing in Science?	All	**Below lower bound**	**Mid Point of Basic Score**	**Proficient Scale Score-1**	**Proficient Scale Score**	**Mid Point of Proficient Scale**	**Above upper bound**
SCALE	4th	**<433**	**433**	**439**	**440**	**471**	**>471**
	8th	**<834**	**834**	**839**	**840**	**867**	**>867**
	11th	**<1134**	**1134**	**1139**	**1140**	**1166**	**>1166**

Current Performance:
In 2015, current performance levels for all students in the State of Vermont on the NECAP Science assessment are as follows:

Table 21: Current Science NECAP Performance Levels

Science	Number of Test Takers	State Average Scale Score	State Performance Level	Number of Schools in Each Level			
Grade 04	5898	439	2	9	87	88	0
Grade 08	5926	834	2	42	65	2	0
Grade 11	5853	1135	2	30	34	2	0

Long Term Goal and Interim Target:
Vermont's long-term goal is that by 2025, 100% of our schools will show an average scale score that is at the mid-point of the proficiency range for each grade level they serve. Such a goal establishes high expectations for all students and unites the community behind all students improving their performance.

As these scores will be determined by performance on the NGSS assessment under creation, they are valid and reliable, can meaningfully differentiate between schools, and can be disaggregated. Additionally, the indicator is used consistently across schools.

"Fifth" Indicator 2: How well are students performing in physical education?

ESSA does not require that schools be held accountable for student outcomes in physical education; however, this measure satisfies ESSA requirement for a 5th indicator.

Vermont has elected to include the physical fitness indicator in our accountability system in response to stakeholder input. Specifically, stakeholders value the idea of including an assessment of fitness because they believe it will provide incentives to maintain required time for activity, physical education, and health education as required by the Education Quality Standards. They also felt that including the physical fitness assessment would support schools in attending to the whole child and supporting school nutrition programs and instruction that will promote a life time of healthy living.

Adopted Standards:
Health and Physical Education are identified as two of Vermont's seven required Education Quality Standards Curriculum Content Areas (2120.5). In 2015, the Vermont State Board of Education adopted the National Health Education Standards (NHES) and 2014 SHAPE America National Standards and Grade-Level Outcomes for Physical Education to frame what Vermont students should know and be able to do in health and physical education.

Assessment:
We have begun the process of identifying a vendor for a physical fitness assessment that meets technical requirements for validity and reliability. We are not yet clear as to which grade levels we will assess, as this will largely depend on the cost of the assessment that we select. We prefer

to select a better assessment and administer to fewer grade levels, if given the option. In addition, we expect to select one elementary, middle, and high school grade. We hope to avoid assessment at the 5th, 8th and 11th grade levels as these grades are also participating in the science assessment.

The assessment will include reports to parents and schools that clearly articulate student performance, in alignment with policies that provide sufficient protection for privacy related to health information. Data can be disaggregated and used for accountability purposes.

a. <u>Healthy or Becoming Healthy:</u>

The specifics of the measure will depend on the vendor which we select through the procurement process. However, stakeholders have expressed a clear preference for including two specific measures:

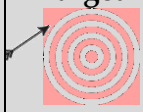
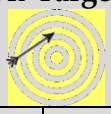
a. The percentage of students who are assessed as being within a Presidential Youth Fitness Program-aligned "healthy zone" and
b. The percentage of students who are assessed as making sufficient progress towards that "healthy zone"

These measures will be further defined in summer 2017 following the successful award of a contract to a specific vendor.

Levels of Performance:

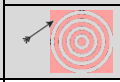
As previously stated, all indicators will be linked to a 4-level label to describe performance. The currently proposed scale score cuts are shown below.

Table 22: Proposed Scale Score Cuts for Heath Assessment Performance Levels

Accountability Question	**Grade**	**4 Levels of Performance**					
		Off-Target 	**Near Target**		**On-Target** 		**Bull's Eye**
			Lower Bound	**Upper Bound**	**Lower Bound**	**Upper Bound**	
How well are students performing in physical education? SCALE	All	**Below lower bound**	**Mid Point level 2 score**	**Healthy Zone Scale Score-1**	**Healthy Zone Scale Score**	**Mid Point of Healthy Zone Scale Score**	**Above upper bound**
Progress		To be determined when assessment is selected					

Current Performance:

Table 23: Current Health Assessment Performance Levels

Physical Education	Number of Test Takers	State Average Scale Score	State Performance Level	Number of Schools in Each Level			
							
TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD

Long Term Goal and Interim Target:

Vermont's long-term goal is that by 2025, 100% of our schools will have 100% of students in the healthy zone, or making progress towards the healthy zone.

Table 24: Proposed Heath Assessment Long Term Goals and Interim Targets

Accountability Question	Grade	Current Performance (2016)	Long term Goal Mid Point of Healthy Zone	Interim Targets		
				2019 1	2022 2	2025 3
How well are students performing in physical education? SCALE	All	To be determined when new assessment is available using the same procedures as used for Smarter Balanced Assessments.				

Central to the selection of the PE assessment is an assurance that the performance results are valid and reliable, can meaningfully differentiate between schools, and can be disaggregated. Additionally, the indicator will be used consistently across schools and LEAs.

Career and College Readiness:

We are proposing two indicators of Career and College Readiness that are averaged to create a single indicator of performance. The first looks at how students are performing while still in school and the second examines the experiences of alumni.

"Fifth" Indicator 3: Are students career and college ready prior to graduation?

Consistent with Vermont's Act 77 and the Education Quality Standards, stakeholders were interested in a summative measure that could capture the broad range of outcomes we work to prepare our graduates for. Building on our commitment to flexible pathways, we leveraged students personalized learning plans to identify the assessments students could take in order to demonstrate that they are career and college ready prior to graduation.

This indicator also meets ESSA goal for a unique indicator not used in other measures.

Assessment:
In establishing whether or not students are college and career ready, the Agency of Education has opted to include a broad measure that allows for flexibility depending on students' differing life goals and educational pathways. In this indicator, each year we will count the number of graduates in each school that have met an externally validated assessment of career and college readiness and divide by the total number of graduates. Assessments currently acceptable for meeting this requirement include:

Table 25: Acceptable Assessments of College and Career Readiness

Assessment	Link	Cut score for Career and College Readiness
College Course Completion	N/A	C or better in any accredited college course
SAT	https://collegereadiness.collegeboard.org/sat	R/W:480 Math 530
ACT	https://www.act.org/content/act/en.html	Composite 21
Advanced Placement Test	https://apstudent.collegeboard.org/home	Score of 3 or higher
IB Assessments	http://www.ibo.org/programmes/diploma-programme/assessment-and-exams/	Score of 24 points or higher
CLEP Assessments	https://clep.collegeboard.org/	Score of 50 or higher
ASVAB (military)	http://official-asvab.com/index.htm	Depending on branch minimum scores range from 31 to 36
Industry Recognized Credential (IRC)	http://education.vermont.gov/documents/career-tech-approved-industry-recognized-credentials	No Standardized Cut Score across certifications

This indicator is new for the state but based on analysis of variation in school level performance on SAT and ACT, we believe this indicator will meaningfully differentiate across schools and supervisory unions. The indicator is a valid assessment of career and college readiness as the component assessments developed by external entities have been found to correlate with student readiness for career and college pursuits. These externally developed assessments have met the technical standards associated with their administration and are widely accepted as reliable tools for measuring performance. Finally, all assessments can be disaggregated by all student groups. Additionally, the indicator will be used consistently across Vermont high schools.

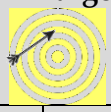
"Fifth" Indicator 4: Post-Secondary Outcomes: Are alumni participating in career and college outcomes within 16 months of graduation?
Consistent with Vermont's Act 77 and Education Quality Standards, stakeholders were interested in a summative measure that could capture the broad range of outcomes we want our graduates to pursue. We treat all college and career-related outcomes as being equal within this performance indicator.

Assessment:
In establishing whether or not students are participating in college and career ready outcomes, the Agency will be reviewing data from several sources, including the National Clearinghouse data set which provides student level information for college enrollment, data from the Department of Labor related to enrollment in trade schools and the work force, and data from the military for enlistments. In this indicator, we will count the number of graduates who have met the make and divide by the number of graduates at 16 months after graduation.

Accountability:

Levels of Performance:
As previously stated, all indicators will be linked to a 4-level label to describe performance.

Table 26: Proposed Post-secondary Outcomes Performance Levels

Accountability Question	Grade	4 Levels of Performance					
		Off-Target	Near Target		On-Target 		Bull's Eye
			Lower Bound	Upper Bound	Lower Bound	Upper Bound	
How well did seniors perform on career and college ready assessments?	12th	**Below lower bound**	**45%**	**59%**	**60%**	**75%**	**Above upper bound**
Are alumni pursuing a career and college ready outcome within 16 months of graduation?	Alumni	**Below lower bound**	**45%**	**59%**	**60%**	**75%**	**Above upper bound**

Current Performance:
We anticipate having baseline data for review by August 1, 2017.

This indicator is also new for the state but based on analysis of variation in school level performance in graduation and college-going, we believe this indicator will meaningfully differentiate across schools and supervisory unions. The indicator is a valid assessment of career and college readiness as the employment and educational options alumni pursue are strong indicators of their readiness for those endeavors. As this indicator is a count of students,

reliability in a technical sense does not apply. Finally, this indicator can be disaggregated by all student groups and will be used consistently across high schools.

v. Annual Meaningful Differentiation *(ESEA section 1111(c)(4)(C))*

a. Describe the State's system of annual meaningful differentiation of all public schools in the State, consistent with the requirements of section 1111(c)(4)(C) of the ESEA, including a description of (i) how the system is based on all indicators in the State's accountability system, (ii) for all students and for each subgroup of students. Note that each state must comply with the requirements in 1111(c)(5) of the ESEA with respect to accountability for charter schools.
Click here to enter text.

Vermont's accountability system includes all indicators in our calculations for determining overall school and LEA performance. The indicators are weighted (see next section) depending on the grade span of the school and whether or not the specific indicator is present in the school. The formula is applied to "all students" and to each of the student groups identified for accountability in the same manner.

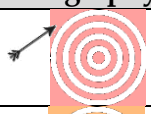
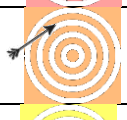
At this time, Vermont does not have charter schools.

The results of the calculation (described in the weighting section) are used to place schools and LEAs on the grid below taking into consideration both their current level of performance and the change over time.

The school report card will show four indicators. The first two will assess the performance of the school in total; the second two will look at the indicator we will use to focus Targeted Support. The report card will allow the public to drill down to each performance indicator and to access data for all student groups.

		All Students		Equity Index	
	Criteria	Current	Year-to-Year Change	Current	Year-to-Year Change
	Academic Proficiency				

Table 27: Proposed Point Distribution for Summative Scores of School Performance

Level	Proposed Term	Proposed Iconography	Current Score Range	Year-to-Year Change Range
1	Off-Target		1-1.88	>0.50
2	Near Target		1.89-2.75	0.25-0.50
3	On-Target		2.76-3.65	0.10-0.24
4	Bull's Eye		3.66-4.5	<0.10

b. Describe the weighting of each indicator in the State's system of annual meaningful differentiation, including how the Academic Achievement, Other Academic, Graduation Rate, and Progress in ELP indicators each receive substantial weight individually and, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate.
Click here to enter text.

Weighting Overview
ESSA requires that states identify a summative evaluation for each school that is easily understood to the public and educators.

Weights
The following weights have been created to provide valid estimates across the numerous school configurations in Vermont.

In determining the distribution of weight, the Agency has signaled priorities. Literacy and mathematics performance and graduation rates each account for 20% of a school's overall performance rating, together accounting for 60% of the total score. We have opted for this weighting because all three indicators are critical for success in civic and economic life. It is the rare individual who finds a path out of poverty if they neither read, write, do math well, nor graduate from high school. A commitment to equity requires prioritizing these measures.

The remaining 40% of the summative rating is distributed to English language proficiency (10%) and the 5th indicators. ESSA stipulates that English language proficiency be of relatively substantial weight, however given that only 3% of schools in Vermont have English Learners in sufficient numbers for the indicator to count, the weight will frequently be distributed to other indicators. Vermont has determined that a 10% weight for the English proficiency indicator is substantial in setting the overall scope of assessment. At the same time, very few of our schools

have sufficient numbers of English Learners to give this indicator value; in 97% of cases, this value will not be populated and the weight will be distributed to other indicators.

Missing Measures

Because of the many school configurations and the relative scarcity of English Learners, the Agency of Education has described how weights will be shifted for schools with different grade configurations and the relative scarcity of English learners. In general, when an indicator is not available (e.g. a school with no high school grades would not have Career and College Readiness indicators), the resulting weight will be redistributed to the remaining indicators to maintain the remaining indicators' relative comparative value.

Table 28: Proposed Weighting of Academic Proficiency Measures

Criteria	Category	Accountability Question (Indicators)	School-Level Weights					
			High School Present		No High School Present			
			EL Present	No EL Present	EL Present		No EL Present	
					Science	No Sci.	Science	No Sci.
Academic Proficiency	Content Standards	How well are students performing in ELA/reading?	***20%***	***22%***	***35%***	***37.5%***	***37.5%***	***40%***
		How well are students performing in mathematics?	***20%***	***22%***	***35%***	***37.5%***	***37.5%***	***40%***
		How well are students performing in science?	***5%***	***6%***	***10%***	***0%***	***12.5%***	***0%***
		How well are students performing in physical education?	***5%***	***6%***	***10%***	***12.5%***	***12.5%***	***20%***
	English Language Proficiency	How well are English Learners gaining English proficiency?	***10%***	***0%***	***10%***	***12.5%***	***0%***	***0%***
	Graduation Rate	Are students staying in school until they *graduate*?	***20%***	***22%***	***0%***	***0%***	***0%***	***0%***
	College and Career Readiness	How well did seniors perform on career and college ready assessments?	***10%***	***11%***	***0%***	***0%***	***0%***	***0%***
		Are alumni pursuing a career and college ready outcome within 16 months of graduation?	***10%***	***11%***	***0%***	***0%***	***0%***	***0%***
		Organizational Examples	**PK-12, 6-12, 9-12**		**PK-5, PK-8, 6-8**	**PK-4**	**PK-5, PK-8, 6-8**	**PK-4**
		FY '16 Count by Structure*	**61**		**217**	**14**	**217**	**14**

*For seven schools, second grade is the highest student grade. For these schools their accountability will be determined through our second layer of accountability at the Supervisory Union/Supervisory District level.

Because not all indicators are available in each year, the weights used to make accountability determinations will vary in the first year of implementation. Table 46 shows the weights that will be used in 2017-18 to make initial determinations.

Table 29: Proposed 2017-18 Weights

Criteria	Category	Accountability Question (Indicators)	School-Level Weights			
			High School Present e.g., PK-12; 6-12; 9-12 N=61		**No High School Present e.g., PK-4, PK-8, PK-5 N=231**	
			EL Present	**No EL Present**	**EL Present**	**No EL Present**
Academic Proficiency	Content Standards	How well are students performing in ELA/reading?	***30%***	***35%***	***40%***	***50%***
		How well are students performing in mathematics?	***30%***	***35%***	***40%***	***50%***
		How well are students performing in science?	***Piloting***			
		How well are students performing in physical education?	***Piloting***			
	English Language Proficiency	How well are English Learners gaining English proficiency?	***15%***	***0%***	***20%***	***0%***
	Graduation Rate	Are students staying in school until they *graduate*?	***25%***	***30%***	***0%***	***0%***
	College and Career Readiness	How well did seniors perform on career and college ready assessments?	***Piloting***			
		Are alumni pursuing a career and college ready outcome within 16 months of graduation?	***Piloting***			

c. If the States uses a different methodology for annual meaningful differentiation than the one described in 4.v.a. above for schools for which an accountability determination cannot be made (*e.g.*, P-2 schools), describe the different methodology, indicating the type(s) of schools to which it applies.
Click here to enter text.

Small Schools

ESSA requires that states establish alternative protocols for assessing student performance when the number of students falls below minimum numbers required for assessment. This describes many schools in Vermont. By introducing our second tier of accountability at the Supervisory Union/Supervisory District level, we will be able to work with these leadership teams to identify which schools, including those too small to display through the previously-described model, are contributing to the overall performance of the system and which require Comprehensive or Target Supports.

Special Populations Schools

ESSA requires that states establish alternative protocols for assessing student performance when a public school exists for a specific population: for example, students receiving programming in non-traditional educational settings, students attending juvenile rehabilitation centers, students enrolled in state public schools for the blind, or schools exclusively serving recently arrived English learners. Currently Vermont does not have schools that meet these descriptions; however, all Vermont students who attend these types of independent institutions outside of Vermont must take Vermont's state assessments, and their data is linked back to the Supervisory Union/Supervisory District that pays their educational tuition. By creating the second tier of accountability at the SU/SD level, Vermont is able to include a larger number of these students when making accountability determinations.

Newly Opened Schools

ESSA requires that states establish alternative protocols for assessing student performance when a new public school opens. Currently, Vermont is experiencing declining enrollment in virtually all of our communities; opening large numbers of new schools due to increasing student enrollment is not a situation that we anticipate facing. A more likely experience in Vermont will be the merging of two existing schools into a new school with combined populations. In these circumstances, the standing of a new school within an accountability system is based on a weighted formula. For example, if 56% of the new school's students had attended a Priority 1 school, and 44% had attended a Priority 2 school, the new school would be a Priority 1 school. (Please see the following section for a full discussion on priority schools)

vi. Identification of Schools *(ESEA section 1111(c)(4)(D))*

a. Comprehensive Support and Improvement Schools. Describe the State's methodology for identifying not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in

the State for comprehensive support and improvement.
Click here to enter text.

Calculating Scores

"All Students"

To calculate the overall score for all students, the Agency of Education will perform the process described below. A worked example is provided in Appendix B.

1. Each indicator's actual performance level will be converted into the corresponding conversion point value that aligns with the previously described 4 performance-level score.
2. If the indicator includes multiple entries for different grade levels, these performance-level scores will be averaged (mean) with equivalent weights to produce a value for the Accountability Question score.
3. Each Current Score will then be calculated using a weighted average of the Accountability Question Scores.
4. Each overall Current Score will then be converted to a range that describes overall performance. The table below defines the point distribution for each summative score.

Table 30: Proposed Point Distribution for Summative Scores of School Performance

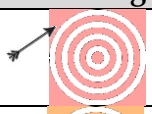
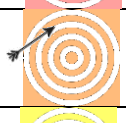
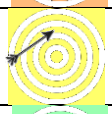
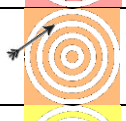
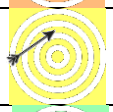
Level	Proposed Term	Proposed Iconography	Current Score Proposed Range
1	Off-Target		1-1.88
2	Near Target		1.89-2.75
3	On-Target		2.76-3.65
4	Bull's Eye		3.66-4.5

Table 31 (below) illustrates the annual overall change in a school's performance. It represents the difference in the summative score between the current year and the previous year. A positive score represents an improvement over the previous year's performance.

Table 31: Proposed Year-to-year score to Performance Level Conversion Scale

Level	Proposed Term	Proposed Iconography	Year-to-Year Proposed Range
1	Off-Target		≤0
2	Near Target		.01-.15
3	On-Target		0.16-0.3
4	Bull's Eye		≥0.30

Identification

Vermont had 234 Title I schools as of November 2016. Based on that number, we expect about 12 schools to attain Comprehensive Support status. After the scores have been calculated, schools will be placed on the grid in Table 32 (below) based on their performance against the state's accountability indicators. 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.

Table 32: Identification of School Priority for Comprehensive Supports

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				

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 VT-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)

Schools will be identified for Comprehensive Support and improvement beginning in the 2018-19 academic year.

b. Comprehensive Support and Improvement Schools. Describe the State's methodology for identifying all public high schools in the State

failing to graduate one third or more of their students for comprehensive support and improvement.
Click here to enter text.

Once Vermont's 5% lowest performing schools have been identified using the process described above, we will add any as yet-unidentified high schools to the list that have an overall 4-year adjusted cohort graduation rate of less than 67%. Schools will first be identified for Comprehensive Supports and improvements in the 2018-19 school year.

c. Comprehensive Support and Improvement Schools. Describe the methodology by which the State identifies public schools in the State receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (based on identification as a school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D)) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years.
Click here to enter text.

Section A.4.vi.f describes the process by which schools are identified as eligible for Targeted Supports, with Table 33 illustrating how schools can exit Targeted status. If a school continues to consistently underperform related to the same student group for over three consecutive years, in the fourth consecutive year that school will attain comprehensive status, and will be eligible to receive Comprehensive Supports. Targeted determinations are made annually, while Comprehensive determinations are made every three years; a school entering Comprehensive status through the Targeted school track would move through Targeted and Comprehensive status as described below:

Table 33: Number of Years and Related Identification Status for Schools Entering Comprehensive Status as Targeted Schools

Number of Years of Identification	Status
1	Targeted 1
2	Targeted 2—"Consistently Underperforming"
3	Targeted 3—"Consistently Underperforming"
4-6	Comprehensive 1
7-9	Comprehensive 2
10-12	Comprehensive 3

Schools will first be identified for Targeted Support and Improvements in the 2018-19 school year. As a result, the soonest that a school would be identified as requiring Comprehensive Support as a result of being a Targeted Support School would be the 2021-2022 academic year.

d. Year of Identification. Provide, for each type of schools identified for comprehensive support and improvement, the year in which the State will first identify such schools and the frequency with which the State will, thereafter, identify such schools. Note that these schools must be identified at least once every three years.
Click here to enter text.

Vermont will make its first identification of schools requiring 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.

e. Targeted Support and Improvement. Describe the State's methodology for annually identifying any school with one or more "consistently underperforming" subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including the definition used by the State to determine consistent underperformance. *(ESEA section 1111(c)(4)(C)(iii))*
Click here to enter text.

ESSA requires Vermont to identify schools with "consistently underperforming" subgroups of students. 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. As a result, the soonest that a school would be identified as "consistently underperforming" would be the 2019-2020 academic year. These identifications will occur on an annual basis. As with all calculations, the summative scores will be based on all indicators through a formula consistently applied across all schools and LEAs.

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 in Table 34 (below), 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 after a single year in targeted status, it will be labeled as a "chronically underperforming school" with a designation as a Targeted 2 school in its second Targeted year, and a Targeted 3 school in its third. Schools not exiting Targeted status after three consecutive years of chronically underperforming for the same student group will enter Comprehensive Supports.

f. Additional Targeted Support. Describe the State's methodology, for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D), including the year in which the State will first identify such schools and the frequency with which the State will, thereafter, identify such schools. *(ESEA section 1111(d)(2)(C)-(D))*
Click here to enter text.

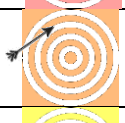
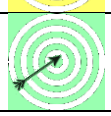
"Equity Index"

A high priority for the Vermont Board of Education and our community is ensuring equitable outcomes for all of our students. As such, an important piece of information to display for each school is the degree to which it is contributing to the state goal of eliminating gaps in educational opportunities for historically marginalized students.

To calculate the Equity Index, a similar process is followed for each student group in order to identify schools with consistently underperforming subgroups. The "equity index" applies the same weights for all indicators as is used in the summative score, but disaggregated by student group. The calculation is conducted for all student groups and is consistent across all schools and LEAs. That process is described below. An example of the application of this process is provided in Appendix C.

1. The "Current Score" for each reporting group is calculated in the same manner as the previously described "All Students" score (See Page 21).
2. The "Current Score" for each historically marginalized subgroup is subtracted from the corresponding "Current Score" for the historically advantaged subgroup. This number becomes the "Subgroup Performance Gap" for each subgroup. (Students with disabilities, English learners, students in poverty, students from a racial or ethnic group other than white are identified as historically marginalized students.)
3. The "Current Scores" for each historically marginalized student subgroup are weighted to reflect their prevalence in the school.
4. The "Current Score" for historically advantaged students is determined in the same manner.
5. The "Current Score" for historically marginalized students is subtracted from the "Current Score" of historically marginalized students.
6. The difference is the school "Equity Index."

Table 34: Proposed Equity Index Performance Levels

Level	Proposed Term	Proposed Iconography	Equity Index Proposed Range
1	Off-Target		>0.50
2	Near Target		0.25-0.50
3	On-Target		0.10-0.24
4	Bull's Eye		<0.10

Year-to-Year Score
The "Year-to-Year Score" is simply the aggregate change this year from last year for either the current score earned by "All Students" or as part of the Equity Index. It is our hope that all schools will show improvement each and every year; however, we recognize that this may not always be possible.

Calculating Scores
Year-to-Year scores will be calculated by subtracting last year's score from the corresponding score for this year. A negative number will appear when the performance in the more recent year is lower than the prior year.

Table 35: 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 1	Targeted 3		
	Near Target .24-.50	Targeted 2			
	On Target 0.10-.25				
	Bull's Eye <0.10				

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 35 (above). Once schools are categorized, we will apply the label of "Targeted Support" to all schools in Targeted 1-3. These schools will be required to leverage federal dollars on activities that promote equity gap reductions.

g. Additional Statewide Categories of Schools. If the State chooses, at its discretion, to include additional statewide categories of schools, describe those categories.
Click here to enter text.

Vermont is not electing to include additional statewide categories of schools at this time.

vii. Annual Measurement of Achievement *(ESEA section 1111(c)(4)(E)(iii))*: Describe how the State factors the requirement for 95 percent student

participation in statewide mathematics and reading/language arts assessments into the statewide accountability system.
Click here to enter text.

Vermont schools' participation rates on the ELA and mathematics assessments currently consistently exceed the 95% threshold established by US ED.

If a school has lower than 95% participation, the school's preliminary summative score will be multiplied by the percentage of eligible students participating in the assessment. As a result, the score will be lowered if fewer than 95% of students tested.

• Example 1:
- School A Preliminary Summative Score= 3.7
- 82% of eligible students participating
- Final Score= 3.03 (3.7 x 0.82=3.03)

• Example 2:
- School B Preliminary Summative Score= 3.3
- 94% of eligible students participating
- Score= 3.10 (3.3 x 0.94=3.10)

The percent of students tested will be an average of all reportable student groups. For example, if a school had 97% of all students test, 93% of students with Free and Reduced Lunch test and 100% of students with disabilities test the average of these three groups would be 96.7% which is above the 95% threshold.

This proposal reinforces expectations established in Vermont policy (the Education Quality Standards) and state law requiring that students are assessed annually. Vermont is also currently adopting proficiency based learning, which emphasizes that scores are for the learning demonstrated and not ancillary behaviors. By having participation named as a key variable, and not hidden within a larger equation or weighting conversation, we operate in parallel to that effort.

viii. Continued Support for School and LEA Improvement *(ESEA section 1111(d)(3)(A))*

a. Exit Criteria for Comprehensive Support and Improvement Schools. Describe the statewide exit criteria, established by the State, for schools identified for comprehensive support and improvement, including the number of years (not to exceed four) over which schools are expected to meet such criteria.
Click here to enter text.

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 32 above. In other words,

their annual performance has improved by two level or their performance has improved by one level and they also have significant positive improvement in scores over time. For example, a school that began as Priority 1 could exit Comprehensive Supports 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 Supports 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.

This model ensures that a school exists Comprehensive Supports and improvements based on demonstrating improved student performance, as measured by the year-to-year change in the matrix in section A.4.vi.a above.

If a school does not meet the exit criteria, additional technical support and monitoring occurs.

b. Exit Criteria for Schools Receiving Additional Targeted Support. Describe the statewide exit criteria, established by the State, for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), including the number of years over which schools are expected to meet such criteria.
Click here to enter text.

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 exits targeted status related to one subgroup, but retains targeted status for others, its targeted label will continue to scale up (Targeted 2, Targeted 3, Comprehensive). If a school exits Targeted Supports for all student groups and then is identified for targeted status the following year for a new student group, it will enter Targeted Supports again as a Targeted 1 school. If a school exits targeted status for some subgroups and retains Targeted Supports for other subgroups that were identified after the school first acquired targeted status, its label will reflect the greatest number of years that it has been identified for underserving any remaining student group. An example is provided below:

- Year 1: School is identified for underserving Students with Disabilities
    a. Status: Targeted 1 School (SWD)
- Year 2: School is identified for underserving Students with Disabilities and English Learners
    a. Status: Targeted 2 School (SWD, EL)
- Year 3: School is identified for underserving English Learners
    a. Status: Targeted 2 School (EL)

This model ensures that a school exits target supports and improvements based on demonstrating narrowed equity gaps and improved overall student performance, as measured by the year-to-year change in the matrix in section A.4.vi.e above.

c. More Rigorous Interventions. Describe the more rigorous interventions required for schools identified for comprehensive support and improvement that fail to meet the State's exit criteria within a State-determined number of years consistent with section 1111(d)(3)(A)(i)(I) of the ESEA.
Click here to enter text.

The most rigorous interventions, required for schools in years 7, 8, and 9 of Comprehensive Supports are drawn from current Vermont statute and reflect Vermont's interest in tailoring a solution to the needs of the challenge at hand while also having several intensive intervention options available to implement as is necessary.

Schools not exiting Comprehensive Support 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;
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.

d. Resource Allocation Review. Describe how the State will periodically review resource allocation to support school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement.

Vermont is currently developing a Uniform Chart of Accounts and financial data reporting/collection system for use by all LEAs. When completed, this system will standardize the process for collecting and disaggregating per pupil expenditure data in compliance with the data collection requirements associated with ESSA. The project was started in 2014 in response to Vermont's Act 153; this ESSA requirement also reflects Vermont statutory requirements and our state's understanding of high quality practice around data collection and reporting.

Although the Uniform Chart of Accounts is currently under development, progress towards completion has been complicated by the implementation of Vermont's Act 46, an Act providing Vermont's LEAs with several merger options in the interest of reducing the expenses associated with our smallest education systems. Vermont's LEAs are currently in the process of weighing their consolidation options, proposing consolidations, and making the transition into new, merged systems. This merger activity will mean that many currently existing LEAs will no longer exist post-consolidation. Any new districts forming through this process will not have

per pupil expenditures to report until they begin operating. Additionally, there is usually a one-year transition for the former district to dissolve and the new district to be fully operational.

The number of transitions occurring at this time are making launching an LEA-level data collection system highly impractical. Vermont does not have the resources to create and then overhaul a data collection system over a short period of time, given that the content of the data collection system is dependent on the finalization of LEA structures post Act-46 implementation. Because of this, the VT-AOE needs to implement its Uniform Chart of Accounts beginning in Academic Year 2019-20, after the LEA consolidation process described in Act 46 is anticipated to have concluded.

Having said this, the unique nature of Vermont schools renders the likelihood of usable data to be quite small. In analyzing our data, we find that approximately 150 of 305 schools will have data to analyze. This is because 65 schools are smaller than the 100 student threshold and another 70 are the only school of their configuration in their grade span which excludes them from the requirement. In fact, 11 of our roughly 60 LEAs will have no schools with data and on the other end of the spectrum only 4 of the LEAs would have every school included in the data. Vermont applauds the goal of insuring that all students have equitable funding; this has long been our value. We support the effort to wisely allocate resources and given the current constraints we are prepared to meet this requirement in the future.

e. Technical Assistance. Describe the technical assistance the State will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement.
Click here to enter text.

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 our longstanding practice and commitment to the differentiation of school and SU/SD supports to reflect the identified needs of those institutions' most vulnerable student populations.

The VT-AOE 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 support SU/SDs—who will in turn support schools—through the Continuous Improvement Plan (CIP) development, implementation, and review and revision process and will follow VT-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, first and foremost, to ensure equitable opportunities for high-quality education. With this goal in mind,

the state has chosen to prioritize work with schools identified as being in need of Comprehensive Supports. 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 VT-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 36: 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 VT-AOE. 2. **Application of federal funding:** When using federal funds for school improvement efforts, SU/SDs and schools will choose, with the support of VT-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:** VT-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 VT-AOE. 2. **Application of federal funding:** The VT-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:** VT-AOE monitoring of Comprehensive 2 schools will happen quarterly, with ongoing monitoring by the schools' SU/SDs.
Support for Comprehensive 3 (C3) Schools (Years 7, 8, and 9 of consecutive Comprehensive Identification)	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). 5. Continue technical assistance; 6. Adjust Supervisory Union/Supervisory District boundaries or responsibilities of the superintendency; 7. Assume administrative control only to the extent necessary to correct deficiencies; or 8. 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.

f. Additional Optional Action. If applicable, describe the action the State will take to initiate additional improvement in any LEA with a significant number or percentage of schools that are consistently identified by the State for comprehensive support and improvement and are not meeting exit criteria established by the State or in any LEA with a significant number or percentage of schools implementing targeted support and improvement plans.
Click here to enter text.

VT-AOE anticipates that due to regional differences within the state, certain LEAs are more likely to have multiple schools in need of Comprehensive and Targeted Supports. As we expect schools to be concentrated in a few LEAs, this will allow the VT-AOE to invest in capacity building at the LEA level to a greater extent than if school are dispersed across the state. Unlike other states, the LEAs we are referencing frequently only have a single school at each grade span. As a result, we anticipate a focused investment across the LEA to have a substantive impact across the entire LEA.

5. Disproportionate Rates of Access to Educators (*ESEA section 1111(g)(1)(B)):* Describe how low-income and minority children enrolled in schools assisted under Title I, Part A are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, and the measures the SEA agency will use to evaluate and publicly report the progress of the State educational agency with respect to such description.[7]
Click here to enter text.

As indicated in Table 37, low income and minority students in Vermont schools are currently not being disproportionately served by ineffective, out-of-field, or inexperienced teachers:

[7] Consistent with ESEA section 1111(g)(1)(B), this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system.

Table 37: Rates at which Low Income and Minority Students Are Being Served by Ineffective Teachers.

		Vermont	Poverty Comparisons			Minority Comparisons		
			High-poverty Quartile	Low Poverty Quartile	Dis - advantage ?	High Minority Quartile	Low Minority Quartile	Dis - advantage ?
		Mean	Mean	Mean		Mean	Mean	
Teacher Data	**Percent of 1st Year Teachers**	4.7%	5.9%	3.0%	High-poverty	3.5%	6.3%	Low Minority
	Percent of Teachers Not HQT	4.5%	5.2%	4.7%	High-poverty	2.7%	4.9%	Low Minority
	Percent of Teachers with Provisional	1.7%	1.6%	2.0%	Low Poverty	0.2%	0.8%	Low Minority
	Adjusted Average Salary	$47,821	$47,446	$48,638	High-poverty	$49,886	$46,578	Low Minority
	Student: Teacher Adjusted Average Salary	$4,664	$4,460	$4,813	High-poverty	$4,919	$4,551	Low Minority
Principal Data	**Number of Principals in last 5 years**	1.93	2.00	1.95	High-poverty	1.80	2.00	Low Minority
	Adjusted Average Principal Salary	$80,483	$78,244	$85,034	High-poverty	$84,154	$75,955	Low Minority
	Student: Principal Adjusted Average Salary	$551	$524	$475	Low Poverty	$429	$808	High Minority
	FTE:P Adjusted Average Salary	$5621	$5033	$5870	High-poverty	$5,097	$7,406	High Minority

Superintendent Data	**Number of Superintendents in last 5 years**	1.85	1.88	1.82	High-poverty	1.80	1.83	Low Minority
	Adjusted Average Salary	$101,975	$105,412	$99,131	Low Poverty	$106,029	$98,272	Low Minority
	Student: Superintendent Adjusted Average Salary	$88	$100	$65	Low Poverty	$64	$103	High Minority

As such, Vermont does not currently need to intervene to correct problems of disproportionate access to ineffective teachers, but we will continue to review a number of measures to ensure that this does not become an issue in our state.

The VT-AOE used the Educator Equity plan as an opportunity to ensure that historically marginalized students are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers.

Definitions

We use several terms to describe conditions which might contribute to inequities in the teaching force across the state. These terms are employed throughout the Educator Equity Report to investigate whether there are schools where students may be receiving less effective instruction based upon teacher characteristics.

- **Ineffective teacher**—Teachers who are teaching out-of-field on an emergency or temporary license
- **Out-of-field teacher**—An educator currently assigned to teach a subject and/or grade that is outside the field specified by their full license, or those who hold a provisional, apprentice, or emergency license for a placement where they have been assigned students.
- **Inexperienced teacher**—An educator in his or her first year of teaching.
- **Low-income student**—Students who participate in the Free and Reduced Price Lunch program.
- **Minority student**—Students who have identified with any race or ethnicity that is not white/Caucasian (e.g., African American, Hispanic, Asian, Native American, and Pacific Islander/Alaskan Native)

Rates and Disproportionalities

In Vermont, like other rural states, the expected patterns of disadvantage do not always appear readily, and the solutions which work in urban contexts are not easily transferable. In Vermont, instructional practices supporting low-income and minority students are not necessarily correlated to teaching strategies associated with low performance. Many of our schools with

high percentages of minority students relative to state averages enjoy teachers with proportionally higher experience who are not teaching out-of-field. Only in schools that are both rural and poor do teaching characteristics associated with limited effectiveness begin to surface and, then, only marginally.

The educator characteristics Vermont is proposing to report are:

- Percentage of teachers in a school in their first year of teaching (experience indicator)
- Percentage of teachers in a school on a provisional or emergency license (out-of-field indicator)
- Percentage of teachers in a school new to their Supervisory Union/Supervisory District

These data are attempts to ensure that disadvantaged students are not taught disproportionately by teachers on a provisional or emergency license or who are new to the profession or the school. Research suggests that new educators and those teaching outside of their endorsement area lead to less effective student outcomes. If these characteristics cluster around individual schools, that would be evidence of educator inequity. These are data already being collected at the State as part of the educator equity plan. Additionally, rule 2121.2 of the Education Quality Standards requires staff to be properly licensed and prepared for their teaching assignment.

Though the data suggest that educator equity and mobility is a limited challenge across the state, our goal is the reduction of disproportionate rates by ineffective, out-of-field, or inexperienced teachers compared to non-low-income and non-minority students enrolled in schools not receiving funds under Title I, Part A.

6. School Conditions (*ESEA section 1111(g)(1)(C)):* Describe how the SEA agency will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning, including through reducing: (i) incidences of bullying and harassment; (ii) the overuse of discipline practices that remove students from the classroom; and (iii) the use of aversive behavioral interventions that compromise student health and safety. Click here to enter text.

The academic indicators proposed in this plan—indicators tied to ELA and Math performance, Science, PE, Career and College Readiness, Post-Secondary Outcomes, and Graduation Rate—are a critical part of Vermont's larger accountability system. But Vermont will also include other categories of performance measures its accountability framework—measures that would be challenging to use as a differentiation tool, but which represent ideas and goals that the state feels a need to support.

One of those categories of performance measures, Safe and Healthy Schools, will include school climate data. Local education systems who can link improved student academic outcomes to addressing bullying and harassment challenges will be encouraged to invest Title I, Part A

funding in interventions that will correct those problems, with school climate as a focus of that federally-funded work.

Vermont has long been actively working to reduce hazing, harassment and bullying in schools. EQS 2122.1 requires that each school maintain a safe, orderly, civil, flexible, and positive learning environment, which is free from hazing, harassment, and bullying and based on sound instructional and classroom management practices and clear discipline and attendance policies that are consistently and effectively enforced. Towards that end, we have established a statewide advisory council to address matters related to hazing, harassment, and bullying and required that each local LEA designate individuals in schools that respond to complaints made by victims, bystanders or advocates when incidents occur. Most schools participate in formal school climate programs like PBiS, SWIFT, or other programs to reduce negative school interactions and promote positive learning for all.

Another Safe and Healthy Schools indicator will examine the rate of exclusionary discipline in education systems. This measure is specifically designed to frame data-supported conversations about exclusionary discipline, as applied to all students, with an emphasis on their disproportionate application to Historically Disadvantaged Students. Within Vermont's continuous improvement framework, the VT-AOE will support LEAs and schools in identifying alternatives to these disciplinary measures, with an emphasis on ensuring that students stay on a school campus and have access to classroom supports, even when disciplinary action is warranted.

Vermont does not support the use of aversive behavioral interventions that compromise student health and safety in schools. The state has two ways to address this through its school improvement work—examining underlying causes contributing to any reported cases of aversive behavioral interventions and utilizing widespread preventative programs (like Positive Behavioral Interventions and Supports—or PBIS) to minimize the risk of these interventions occurring. If the need for preventing or finding alternatives to aversive behavioral interventions doesn't arise through examining data on reported incidents, it may come through as a result of reviewing school climate survey data. In that case, addressing this problem would become a part of a school or LEA's continuous improvement work and could be supported with Title funding and related VT-AOE monitoring supports, if it could be linked to improving students' academic outcomes.

7. School Transitions *(ESEA section 1111(g)(1)(D))*: Describe how the State will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school), including how the State will work with such LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out.
   Click here to enter text.

Vermont has a relatively small number of public schools, compared to other states, but there's a lot of organizational variety within those schools, including the grades that various Vermont schools serve. Examples include schools serving K-12 students, K-2, K-8, 6-8, 5-8, and 7-12, with schools serving different but overlapping grades (K-2, K-6) sometimes being housed within the same LEA.

Because of the organizational complexity that this creates, conversations about student transitions and graduation and dropout rates between schools have to be specifically tailored to the needs and circumstances of each LEA. Fortunately, Vermont has a continuous improvement framework that supports customized supports for LEAs and which specifically incorporates performance measures that would inform this conversation.

The current continuous improvement framework in Vermont revolves around examining systemic efficacy at every level: LEA, school, and classroom. It was developed on the back of a longstanding MTSS framework that included numerous culture and climate indicators, graduation indicators, and an indicator about supporting students transitioning from school to school within an LEA. Vermont's current continuous improvement model, which is framed by the Education Quality Review (EQR) process, feeds similar data sets into school and LEA-level conversations related to transitions and dropout: it currently includes data around graduation rates and will include climate data once Vermont identifies a statewide climate survey (a project that is currently in progress, with an anticipated 2017-18 pilot date).

These data would be discussed and drilled into as a part of the local-level conversations that make EQRs such an effective school improvement tool. Those conversations begin with a data-driven comprehensive needs assessment of the LEA under review and its schools, and include VT-AOE staff, as well as local-level school and LEA staff, community members, and students. Through these conversations, the graduation rate data that will be a part of our federally-required school accountability work will be examined more closely—if dropout rate and supporting student transitions are identified through the needs assessment and subsequent conversations as high-priority challenges, then LEAs and schools will address those challenges through their state-mandated improvement plans. Implementation of those plans would be monitored over time by VT-AOE staff.

Local education systems who can link improved student academic outcomes to addressing challenges stemming from school transitions will be encouraged to invest Title I, Part A funding in evidence based interventions that will correct those problems. The VT-AOE will review the use of that funding through its continuous improvement model, which includes monitoring and evaluation of the use of Title funds within local-level continuous improvement efforts.

Vermont State Board Rule 4500, The Use of Restraint and Seclusion in Vermont Schools, has been in effect since August, 2011. The purposes of Rule 4500 are to (a) create and maintain a positive and safe learning environment in schools, (b) promote positive behavioral interventions and supports in schools, and (c) ensure that students are not subjected to inappropriate use of restraint or seclusion. Rule 4500 is based upon Federal guidance and

Vermont has consistently ranked among the states receiving the highest ratings for the breadth and depth to which this rule provides safeguards for Vermont students. The report "How Safe is the Schoolhouse? An Analysis of State Seclusion and Restraint Laws and Policies," published by Jessica Butler (jessica@jnba.net) in July 2015 includes Vermont as one of 23 states that provide meaningful protection by law for all children regarding restraint and seclusion. The report also indicates that Vermont is one of 18 states that limits the use of restraint to emergency threats of physical harm for all children.

Under Rule 4500, the superintendent of a LEA must report the use of a restraint or seclusion to the **Secretary of the Agency of Education** within 3 school days of receipt of a report that includes any of the following:

- (a) The intervention results in death or injury (to the student or staff) that requires outside medical attention
- (b) The intervention was administered in violation of Rule 4500
- (c) The intervention lasted for a duration of more than 30 minutes

Relatively few instances occur each year, but all are investigated and VT AOE track data to ensure that LEAs with repetitive reports receive technical assistance and training in de-escalation strategies.

B. Title I, Part C: Education of Migratory Children

1. Supporting Needs of Migratory Children *(ESEA section 1304(b)(1))*: Describe how, in planning, implementing, and evaluating programs and projects assisted under Title I, Part C, the State and its local operating agencies will ensure that the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, are identified and addressed through:
    i. The full range of services that are available for migratory children from appropriate local, State, and Federal educational programs;
    ii. Joint planning among local, State, and Federal educational programs serving migratory children, including language instruction educational programs under Title III, Part A;
    iii. The integration of services available under Title I, Part C with services provided by those other programs; and
    iv. Measurable program objectives and outcomes.

    Click here to enter text.

Consistent with Vermont's overall commitment to equity for all students, Vermont takes meeting the needs of migratory children seriously. Essential to this process is collaboration with other agencies supporting Vermont's migrant population. The process of identification, enrollment, and determination of "priority for services" is outlined below. This process is a continuation of current practice.

The primary goal of the Vermont Migrant Education Program (VMEP) Identification and Recruitment is to find and enroll every migratory child and youth in the state under the age of

22 who has moved with a family member, a guardian, or independently in order to seek or obtain temporary or seasonal work in qualifying agricultural activities. To achieve this goal, VT-AOE partners with the University of Vermont Extension Program.

The Vermont Migrant Education Program recognizes that positive relationships between parents, students, and schools are essential to the success of every child's academic life. Furthermore, the VMEP recognizes that youth who are not formally enrolled in an academic institution yet lack a high school diploma or its equivalent are also entitled to receive quality educational opportunities. UVM Extension MEP Recruitment staff support this philosophy and recognize that without an efficient, comprehensive, and multi-tiered statewide recruitment plan, necessary educational services will not reach eligible migratory students. UVM Extension MEP Recruitment staff form the essential bridge of the program by locating eligible migrant families and individuals so they can receive the supplemental educational support and services VMEP offers.

UVM Extension MEP Recruitment staff works closely with Supervisory Union/Supervisory Districts, local schools, teachers, Vermont Adult Learning, parents, social service agencies, and the agricultural community to identify and recruit eligible migratory children and youth following the requirements in MEP legislation, regulations, and guidance. Statewide recruitment is carried out by a creative combination of staff arrangements; part-time seasonal staff, part-time year round staff, and a part-time State Identification and Recruitment Program Coordinator. The state is divided into five designated recruitment areas: the 3 higher density farming regions (Franklin and Addison County and the Northeast Kingdom) are covered by part-time year round staff while the 2 remaining regions are covered by part-time seasonal staff. Recruiters are expected to visit each school and farm in their regions at least annually. Farms that have an historically high turnover rate will be visited by recruiters more frequently. In addition, all schools disseminate an agricultural employment survey with school registration packets and those are then sent to UVM Extension to follow up on students potentially eligible for VMEP. The goal of Vermont's identification & recruitment program is to assure timely and accurate identification and recruitment of all eligible migratory students.

The recruiter completes a Certificate of Eligibility (COE) for the student once identified. The COE is checked for accuracy and eligibility by the State Identification & Recruitment Program Coordinator, reviewed by the VMEP Data Technician, and, finally, reviewed and signed by the State Director of VMEP. VMEP enters student information into the MIS2000 data system. Student COE information is checked against current information in that system and also in the national Migrant Student Records Exchange Initiative (MSIX) database. To ensure the accuracy of student data, each year a residency check is completed and a minimum of 10% of new COEs are selected for prospective re-interviews. Every 3 years, the State completes an intensive re-interview process to determine the accuracy of our recruitment system.

Assessing migrant student needs begins at identification and recruitment when the recruiters complete either an *Out-of-School Youth Profile* or an *In-School Youth Profile*. Both profiles are

modeled after the profile developed by the Out of School Youth (OSY) Consortium – a multi-state consortium funded to identify the needs of migrant out-of-school youth and to develop appropriate services for that population. The profiles contain information such as last grade completed, health issues, social issues, home language, and other data informing staff of the unique needs of each student. In addition, families and school staff are interviewed to determine needs and barriers that must be addressed so that each student can succeed academically. When available, state and local assessment data is used to further pinpoint students' academic needs.

The state needs assessment is a formal process directed by the Office of Migrant Education guidance that includes a committee comprised of people familiar with the migrant population in Vermont. The needs assessment includes an examination of efficacy in meeting individual student progress to determine effective programming, along with an analysis of various demographic data.

Vermont's service delivery plan focuses on our three groups of students with unique needs: migrant pre-school students, migrant in-school students, and migrant out-of-school youth. Pre-school students benefit from Vermont's newly implemented law, Act 166, subsidizing high-quality pre-school program to all 3 and 4 year olds and 5 year olds not yet in kindergarten. Our first goal is to enroll migrant preschoolers into those programs. Program mentors and teachers work with the families and schools to eliminate barriers to attendance. For our migrant families those barriers most commonly involve addressing transportation and home language barriers. For our migrant children under 3 years old, mentors and teachers work with the families using a research-based family literacy program.

Vermont's in-school migrant students benefit from a comprehensive continuum of services offered in the school and community. VMEP's first goal with in-school students is to assure that they are accessing all the services the school has to offer. Those services include Title I support, Title III and federally required ELL services, afterschool and summer learning programs, extracurricular activities, and other academic and social supports. VMEP's mentor/teachers work with both the families and schools to meet individual student needs and to enable the students to meet State academic achievement goals, including assisting secondary students in accruing credit towards high school graduation. If needed, the program will provide additional tutoring to assure student success. All enrolled preschool and in-school students receive all the benefits of federal child nutrition programs as a directly certified student.

Vermont's out-of-school migrant population presents the hardest challenges. Most have left school to work and many were disengaged from school when they did attend. VMEP hires tutors to assess the student's academic and English language acquisition needs. They then create and implement an educational plan. Some students receive individual tutoring each week while others attend classes jointly offered by VMEP and Vermont Adult Learning. Resources and tools developed by Vermont participation in the OSY Consortium are used to meet previously identified student needs.

VMEP is currently engaged in completing the work on our comprehensive needs assessment and service delivery plan. The plan will identify measurable program objectives and strategies to be adopted based on the needs summarized above.

Please see Appendix D. This is a draft of the assessment and plan; the final version will be completed in late spring 2017, with objectives incorporated into the final version of the Vermont state plan.

2. Promote Coordination of Services (*ESEA section 1304(b)(3))*: Describe how the State will use Title I, Part C funds received under this part to promote interstate and intrastate coordination of services for migratory children, including how the State will provide for educational continuity through the timely transfer of pertinent school records, including information on health, when children move from one school to another, whether or not such move occurs during the regular school year.
   Click here to enter text.

Educational continuity is the highest priority for Vermont's migratory students. Once a student or family is located, the first goal is to ensure that the family's children are enrolled in school. If needed, migrant staff will accompany the family to the appropriate school to register the children. Record transfer, health information including immunization records, and other requests from the school registrar is of secondary importance to enrollment. VMEP staff work with schools within the state to ensure all records are transferred in a timely manner. This is especially important for students experiencing homelessness, those in the process of or have been identified for special education services, and English learners. VMEP staff meet regionally each month to discuss common students following a case study design.

Through Vermont's participation in two Migrant Education Program consortia, staff have developed strong relationships with state leadership and program staff from other states. This is especially true within the New England region where students tend to be transitory across state lines. As soon as VMEP staff identify where a student resided previously, that state is contacted for all appropriate student information.

VMEP uses the MSIX to determine where a student previously attended school as well as other pertinent information. That information is passed along to the current school to make sure the student records are transferred in a timely manner. If leaving Vermont, a student or his or her family can inform VMEP of an impending move, allowing the VMEP staff to expedite the transition to the new school and minimize a student's time out of school.

VMEP recognizes that parents play a central role in the academic success of their children. As such, parent input into the design and implementation of the program is extremely important. Mentor/teachers are in frequent contact with parents to ascertain both a student's needs and to determine if the supports provided are helpful to the student's success. Parents are asked to

complete a parent survey (currently available in English and Spanish) annually, in which they are able to comment on the services they received and suggest improvements to the program.

Additionally, VMEP has implemented regional, day-long, family events at least twice a year. These events include family learning activities, student activities, and time reserved for a parent meeting. The parents select a topic of interest (that typically originates with a parent suggestion) and then spend time in a facilitated discussion on the planning and implementation of the VMEP. From the participating parents, representatives are nominated to represent the region in the annual statewide parent advisory meeting.

The agenda for the state-wide meeting includes team building activities and, most importantly, an opportunity for parents to register their thoughts on strengths and limitations of the VMEP's services for students. For example, the measureable program objectives and strategies will be presented to parents at the advisory council. Parents provide feedback. The feedback guides modifications to program objectives and strategies.

The VMEP In-School Coordinator's job description includes organizing the regional meetings, the annual meeting, and the responsibility for meeting the parent advisory council requirements of MEP under ESSA.

3. Use of Funds *(ESEA section 1304(b)(4))*: Describe the State's priorities for the use of Title I, Part C funds, and how such priorities relate to the State's assessment of needs for services in the State.
   Click here to enter text.

VMEP is currently engaged in completing a comprehensive needs assessment and service delivery plan. In the summer of 2016, VMEP contracted with META Associates to facilitate the comprehensive needs assessment following the guidance set forth by the Office of Migrant Education. A needs assessment committee was chosen, met, and reviewed the following data:

- Student demographics including recent changes
- State assessment data for participating migrant students
- Parent survey results
- Staff survey results
- Out of school youth performance and survey data
- Concerns expressed from committee members

The needs assessment process initially identified the following challenges for migrant students in Vermont.

- A low percentage of migratory students is proficient in reading and English language arts as measured by the State assessment. Additionally, there is a significant achievement gap between the performance of migratory students and non-migratory students in Vermont.

- A low percentage of migratory students is proficient in mathematics as measured by the State assessment. Additionally, there is a significant achievement gap between the performance of migratory students and non-migratory students in Vermont.
- VMEP is not currently assessing the ELA and mathematics skills of out-of-school youth.
- Migrant children under age 5 do not have consistent and sufficient early education due to lack of transportation, parental work schedules, limited of English proficiency, and limited access to available and appropriate PK programs.
- Parents who are migratory lack abundant strategies to support their pre-school and in-school children's academic success.
- Secondary students who are both migratory and OSY struggle to attain their educational goals.
- OSY who have limited English proficiency have commensurate limited access to education and other associated services, resources, and opportunities.

Under ESSA, students are identified as "priority for service" if they have made a qualifying move within the previous one-year period and are failing—or most at-risk of failing—to meet the challenging State academic standards or who have dropped out of school. To identify these students, a monthly list of all students who have a qualifying move within the previous twelve months is created from our MIS2000 database. All students who are currently out-of-school will be priority for service students. From the remaining names on the list, mentor/teachers are asked to identify which students are failing or at risk of failing by one or more of the following criteria:

- Scoring below proficient on the ELA, mathematics, or science state assessments
- Scoring below proficient on a valid local assessment in literacy or math
- Retention at any time in the last 3 years
- Previously dropped out of school
- Performing below grade level in literacy or math according to the classroom teacher
- Receiving one or more "D's" or below on the last student report card
- Missing 10 or more days of school since the beginning of the school year.

The responsibility of documenting priority for services determination ultimately falls to the State Director of Migrant Education, who uses the monthly list to prioritize services, beginning with out-of-school youth. The remainder of the list is sent to the mentor/teachers to make determinations based on the criteria listed above. After the initial determination is made, the VMEP program manager makes a final determination of priority status.

Priority for Service (PFS) students receive services immediately. Currently, VMEP has sufficient funds to serve all students, but PFS receive further support—more time, more services, more supplies—as needed to succeed academically or, in the case of a secondary student, to stay in school and progress to graduation.

VMEP is a year-round program. Each month, the State Director sends the Program Coordinator and the regional mentor/teachers the list of eligible students, the list of students needing PFS

determinations, and the list of students currently designated as PFS. The reports are run at the beginning of every month and made available to the Program Coordinator at that time. As Vermont moves to the MIS2000 web-based platform, field staff will receive training on how to create and run a report themselves, allowing a timely list of all currently eligible students with the PFS determination. VMEP's goal is to move to a system where information about our students is available immediately to all full and part-time staff that work with our students.

C. Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk

1. Transitions Between Correctional Facilities and Local Programs *(ESEA section 1414(a)(1)(B))*: Provide a plan for assisting in the transition of children and youth between correctional facilities and locally operated programs.
   Click here to enter text.

Vermont has only two correctional facilities that serve eligible delinquent youth. Our adult correctional system has one educational program – the Community High School of Vermont serving students aged 18 and up who do not yet have a high school diploma. There is one facility for delinquent youth under the age of 18. This program maintains the student's enrollment in their home high school and offers a full range of classes so that students may continue their progression toward a high school diploma. The numbers of eligible students in both programs are low and has been declining over time, especially in the adult correctional facility. Both facilities offer transition counseling as part of the educational services offered to students. The counseling focuses on successful transition to their home high school, post-secondary courses, appropriate vocational programs, job-training, other educational programs, and employment.

2. Program Objectives and Outcomes *(ESEA section 1414(a)(2)(A))*: Describe the program objectives and outcomes established by the State that will be used to assess the effectiveness of the Title I, Part D program in improving the academic, career, and technical skills of children in the program.
   Click here to enter text.

Vermont Agency of Education's Title I, Part D program has two goals for youth in neglected or delinquent facilities:

1. Provide educational and support services for youth in neglected or delinquent programs so that they will achieve proficiency on the state assessments and progress towards a high school diploma.
2. Provide youth in institutions for neglected or delinquent programs with services to make a successful transition from institutionalization to further schooling or employment.

These goals will be achieved by:

1. Each student will be evaluated upon entry using student's records and a range of assessment designed to determine proficiency in math and literacy including their current status on progress towards a high school diploma.
2. Each student will have an individual educational plan based on their needs that includes both educational and other needed supports.
3. While in the institutions, students will achieve the goals of their plans and work towards a high school diploma (including if appropriate, successfully transitioning back to their home school).

D. Title II, Part A: Supporting Effective Instruction

1. Use of Funds *(ESEA section 2101(d)(2)(A) and (D))*: Describe how the State educational agency will use Title II, Part A funds received under Title II, Part A for State-level activities described in section 2101(c), including how the activities are expected to improve student achievement.
   Click here to enter text.

The Education Quality Standards are built on the premise of continuous improvement for all schools. It follows, then, that we should expect the same for our educators. As required by statute, four percent of the Title IIA monies will be used to fulfill the VT-AOE's responsibility to provide proper and efficient administration and monitoring of the programs carried out under the Title. Vermont is fortunate to have an experienced Title IIA administrator who will continue to guide and support SU/SDs on how to most effectively use local funds, with evidence-based approaches to improving teacher effectiveness. To ensure that SU/SDs are developing, implementing, and evaluating investment plans that meet the academic and non-academic needs of all students, Vermont will utilize a continuous improvement planning cycle to provide differentiated technical assistance, progress monitoring, compliance review, and corrective action in support of evidence-based practice.

Consistent with our dedication to equity for all students, the State will employ SU/SD level funding to provide ongoing support for teachers on identifying and providing high quality instruction to students with specific learning needs. The supports will include, but not be limited to:

- Alignment of efforts to standards including the Vermont Professional Learning Standards, Education Quality Standards, and the Core Teaching and Leadership Standards for Vermont Educators.
- Collaborative (cross-agency) collection of data to inform continuous improvement, starting with a comprehensive needs assessment to determine the specific and contextual needs within an SU/SD. Data will be used to determine the most effective path to narrowing gaps in achievement.
- A determination of which evidence-based activities, strategies, and interventions are most likely to have a measurable impact on student achievement. Funding decisions will be determined by the SU/SD's identified needs, and the presence of evidence-based actionable plans likely to have a positive impact on student learning.
- Collection, analysis, and presentation of evidence to support requests for the continuation of funding of subsequent investments.
- Institution of a systemic process for the collection of evidentiary practices across the state to extend, expand, and refine state-wide use of the evidence-based levels
- Development of a state-wide Community of Practice (in alignment with other state-wide professional learning networks such as the VT-Professional Learning Network) to support the dissemination of information about teaching strategies and interventions that are having a measurable impact on students.

2. Use of Funds to Improve Equitable Access to Teachers in Title I, Part A Schools *(ESEA section 2101(d)(2)(E))*: If an SEA plans to use Title II, Part A funds to improve equitable

access to effective teachers, consistent with ESEA section 1111(g)(1)(B), describe how such funds will be used for this purpose.
Click here to enter text.

We do not intend to use our Title II, Part A funds for equitable access to effective teachers. In Vermont, access to effective teachers is not correlated to student characteristics. For further information, please refer to the Vermont Educator Equity Report or Section A.5 of this plan.

3. System of Certification and Licensing *(ESEA section 2101(d)(2)(B))*: Describe the State's system of certification and licensing of teachers, principals, or other school leaders.
Click here to enter text.

The Vermont Agency of Education (VT-AOE) is proud of the relationship it has developed with the field to coordinate teacher licensing. Initial licensing is largely the result of alignment between the VT-AOE and state-accredited teacher education programs. Licensing renewal involves collaboration between the VT-AOE, the Vermont Standards Board for Professional Educators (VSBPE), and local and regional standards boards across the state. While this cooperation is essential to the quality and success of the licensure program, the responsibility for validation of educators' credentials rests solely with the VT-AOE.

The VT-AOE ensures that all teachers and paraprofessionals working in a program supported with funds under part 1111(g)(2)(J) meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes. Vermont will continue to follow the licensing pathways established and defined by VSBPE under Rule 5300. Educators can earn a license through a traditional educator preparation program, the NASDTEC Interstate Agreement, or alternate routes.

Current Licensing requirements reflect the importance of providing a quality education for all of Vermont's students. The Vermont Standards Board of Professional Educators has the statutory responsibility for the development of rules regarding the licensure of Vermont educators. In 2016, the VSBPE went through the Legislative Committee on Administrative Rules for revisions of current rules. This process includes stakeholder input/comment. The VSBPE will continue with rule revisions based on changing educational landscape and research on educator effectiveness. This dedication to reflecting current high quality practice affirms Vermont's commitment to the quality education of all students in the state and reflects a continuation of current practice.

4. Improving Skills of Educators *(ESEA section 2101(d)(2)(J))*: Describe how the SEA will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs, particularly children with disabilities, English learners, students who are gifted and talented, and students with low literacy levels, and provide instruction based on the needs of such students.
Click here to enter text.

As provided by the statute, Vermont will reserve an additional three percent of Title IIA funds to provide high quality, professional learning for principals and other school leaders through the creation and implementation of a Vermont Leader's Professional Learning

Academy/Institute. By supporting the use of robust and actionable data to provide professional learning for principals and other school leaders, the Vermont Agency of Education will build state-wide communities of practice to engage in high quality professional learning with clearly articulated and measurable outcomes.

The Academy will be aimed at improving student outcomes in low-performing schools. Consistent with research on the impact of highly effective school leaders on student performance, the Academy will aim to increase the capacity of school leaders to recruit, retain, and support effective educators. Specifically, the Academy will:

- Concentrate on improving the capacity of school leaders, primarily those leading schools identified for Comprehensive or Targeted Supports.
- Employ a curriculum informed by input from stakeholders (state accountability data and evidence collected from the Education Quality Review process) and aligned with Standards including Vermont's Professional Learning Standards, Education Quality Standards, and the Core Teaching and Leadership Standards for Vermont Educators.
- Develop outcome-oriented performance metrics that will be utilized to measure the impact of the professional learning in areas such as standards-based, data-driven, and differentiated instruction, equitable access to high quality instruction, cultural competence, subject and content-specific issues, and the effective leveraging of resources to address equity and excellence.
- Utilize the VT-AOE Leadership Team model as the foundational forum for ongoing conversation and review of the initiative to support evidence gathering.
- Minimize duplication of effort by collaborating with other professional learning providers in the development and implementation stages of the professional learning.

5. Data and Consultation *(ESEA section 2101(d)(2)(K))*: Describe how the State will use data and ongoing consultation as described in ESEA section 2102(d)(3) to continually update and improve the activities supported under Title II, Part A.
   Click here to enter text.

The Vermont VT-AOE will use our continuous improvement model to gather and evaluate data to update and improve activities supported under Title II, Part A. For a thorough examination of our continuous improvement model, please see Section A.4.viii.e above.

In addition to the continuous improvement process, VT-AOE convenes the Committee of Practitioners quarterly to consider the efficacy of the activities supported under Title II, Part A.

6. Teacher Preparation *(ESEA section 2101(d)(2)(M))*: Describe the actions the State may take to improve preparation programs and strengthen support for teachers, principals, or other school leaders based on the needs of the State, as identified by the SEA.
   Click here to enter text.

On behalf of VSBPE, the Vermont Agency of Education operates the Results Oriented Program Approval (ROPA) process to facilitate the recommendation of Level I licensure to Vermont–based educator preparation programs. Preparation programs must demonstrate that their

candidates meet the requisite standards for professional practice and that the institution allocates sufficient resources and support to ensure the long-term success of the program. Among these standards is the educator preparation program requirement of demonstrating that candidates for licensure understand individual differences and diverse cultures, providing a variety of high-quality field experiences with a diverse population of students and educators, and recruiting, admitting, supporting, and retaining candidates, faculty, and cooperating teachers from diverse backgrounds.

These standards provide ROPA review teams with a mechanism to evaluate institutional commitment to preparing candidates to meet the needs of diverse learners and cultures, and to ensure that our most disadvantaged students have educational professionals who are trained to meet their personalized needs. Continued use of the ROPA standards and review process will constitute a continuation of practice. Improving preparation programs with a focus on addressing the needs of all students, including Historically Marginalized Students will ensure that all students are taught by qualified teachers according to accepted standards of practice.

The ROPA process is reviewed annually and revised based on changes in Vermont policy and practice for Teacher Preparation. This will largely be a continuation of current strategy, with the addition of an evaluation process beginning in 2017. Vermont will continue to use Title IIA funds to support part of the work of the pre-service education quality coordinator. This position works with the field to establish professional standards and competencies for all educational endorsement areas offered in the State, and works with the educator preparation programs in the state to align their coursework with these competencies. The position also aides in the five-year review of educator preparation programs. Through this position, we can align educator standards, student learning goals, and policy decisions, ensuring that graduates are familiar with state priorities and well-prepared to teach in Vermont schools.

E. Title III, Part A, Subpart 1: English Language Acquisition and Language Enhancement

1. Entrance and Exit Procedures *(ESEA section 3113(b)(2)):* Describe how the SEA will establish and implement, with timely and meaningful consultation with LEAs representing the geographic diversity of the State, standardized, statewide entrance and exit procedures, including an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State.
   Click here to enter text.

Students who are English Learners are an expanding population in Vermont. They are among the most vulnerable students, a valuable cultural and linguistic asset, and an important source of population growth to meet Vermont's economic challenges. This section of the state plan addresses the identification, entrance, and exit procedures for English Learners in Vermont. How English learners fit into the broader school accountability system is addressed in greater detail in the Accountability section of the state plan. Though there are some updates to the assessments being used for identification and exiting of services, conceptually, this is a continuation of current practice.

Vermont is a member of the WIDA state assessment consortium that has been actively involved in the collaborative work to develop a "common definition of English learner." This work, encapsulated in CCSSO's *Moving Toward a More Common Definition of English Learner*, has guided the standardization and strengthening of Vermont's entrance and exit procedures. The VT-AOE also met with roughly 15 representatives from across the state's EL educator community during a public input session on August 11, 2017. The subject of entrance and exit criteria was raised then, and the outcome of that discussion—that entrance criteria should be relatively simple and standardized, and that exit criteria should be simple, and should possibly include locally-identified data points—informed the decision that the VT-AOE is proposing. The VT-AOE plans to host additional consultations with SU/SDs to share the guidance learned through WIDA collaboration.

Vermont's standardized entrance procedures

Vermont's standardized entrance procedure includes two parts, identification and classification. For identification, the VT-AOE requires all schools in Vermont use the home language survey form to determine potential English Learners. Typically, SU/SDs administer the survey to parents/guardians at the time of a student's initial school enrollment; in any case, all students who may be English Learners will be assessed to determine their EL status within 30 days of enrollment in a Vermont public school. Based on survey responses and, when additional clarification is needed, a follow-up parent interview, an English learner professional evaluates whether further screening/assessment of the student's English language proficiency is required.

After a student has been identified as a potential English learner, Vermont uses a screener to confirm whether a student should be classified as an EL and, if so, to determine the student's current level of English proficiency. Previously there were multiple screeners used by SU/SDs

across the state; however, beginning in the 2017-18 school year, all Vermont schools will begin using the WIDA Screener for initial classification/placement purposes. The screener was developed through an enhanced assessment grant to the WIDA "*ASSETS*" project and is more valid and reliable for classifying initial listening, speaking, reading, and writing skills than the screeners currently allowed. Moving to a single screener will also create consistency in eligibility determinations across Supervisory Union/Supervisory Districts.

Description of Vermont's standardized exit procedures

Once identified, English learners take an English language proficiency assessment annually to gauge their progress toward achieving proficiency. Proficient scores in numerous domains are required to exit services. For a more in-depth discussion of the how targets are set for English learners, please see the Accountability section of the state plan. Starting in school year 2015-2016, Vermont transitioned to the ACCESS 2.0 online assessment of English language proficiency for ELs in Grades 1-12. Kindergarten students still take a paper form of the ACCESS test. Students with severe cognitive disabilities take the ACCESS Alternate Assessment.

Consistent with guidance from WIDA, Vermont requires a composite proficiency level score of 5.0 on the ACCESS 2.0 assessment, plus a minimum score of 4.0 or higher on the reading and writing domains of the test to exit supports. Kindergarten students are required to be assessed again in Grade 1 before they can exit.

Currently, Vermont uses only the state English language proficiency assessment for purposes of exit from EL status. The State does *not* include performance on an academic content assessment as an exit criterion from EL status. The legislation allows for consideration of other measures, and the WIDA Consortium is helping states calibrate EL proficiency scores with scores on state content assessments, including the SBAC. In the future, we will monitor these developments and consult to the field to see if pursuit of a multiple measure determination of proficiency is desired and possible. If the field and data trend in this direction, we would consider a revision of our state plan. For now, however, we will continue to use only ACCESS to make determinations of English language proficiency.

With these resources and supports, the VT-AOE will share proposed changes to state-wide entrance procedures and exit criteria with Title III Directors, EL teachers, and other stakeholders. Additionally, we intend to seek input during face-to-face meetings and explore formation of continued communities of practice.

2. <u>SEA Support for English Learner Progress</u> *(ESEA section 3113(b)(6))*: Describe how the SEA will assist eligible entities in meeting:
    i. The State-designed long-term goals established under ESEA section 1111(c)(4)(A)(ii), including measurements of interim progress towards meeting such goals, based on the State's English language proficiency assessments under ESEA section 1111(b)(2)(G); and

ii. The challenging State academic standards.

Click here to enter text.

The VT-AOE will follow the continuous improvement process outlined in Section A.4.viii.e to help eligible entities meet state long-term and interim targets and challenging academic standards. In this process, a VT-AOE developed needed assessment, and federal accountability data (including ELP data and the performance of ELs against statewide assessments and other measures of academic performance described in this plan) will drive continuous improvement planning. Equity gaps identified with the help of this data will result in the development of action plan components supporting ELs. These plan components will be required to include tangible goals, measures, and improvement strategies related to their identified problems of practice.

The VT-AOE will support these efforts through some combination of monitoring, evaluation, and the provision of technical assistance, with the specific supports varying from school to school and LEA to LEA, in accordance with each educational systems' needs. LEAs receiving Comprehensive or Targeted Supports will garner greater support to meet their goals. However, the VT-AOE will monitor the progress of all LEAs in meeting their goals.

3. Monitoring and Technical Assistance *(ESEA section 3113(b)(8))*: Describe:
   i. How the SEA will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English proficiency; and
   ii. The steps the SEA will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as providing technical assistance and modifying such strategies.

   Click here to enter text.

Since accountability for English Learners' performance on English language proficiency assessments has shifted from Title III to Title I under ESSA, the VT-AOE is developing a more integrated, collaborative approach to monitoring the progress of Title III subgrantees in helping ELs achieve proficiency. Title III and Title I staff are working together to plan and better coordinate protocols used to monitor LEAs' progress, including:

- Design of Consolidated Federal Program application as basis for review and approval of grants
- Use of State-level indicators for progress in achieving ELP and proficiency on academic content assessments
- Local collection and reporting of EL longitudinal student performance data as part of continuous improvement
- Desk audits and on-site program reviews of LEA Title III plans, implementation, and evaluation of evidence-based strategies, LIEPs, and participation of ELs in academic programs

As outlined in the continuous improvement section, the VT-AOE will monitor LEAs progress in meeting their continuous improvement goals. Those LEAs not making progress or showing improvement in targeted areas will receive tiered supports determined by their vicinity to their goals. Those schools with greater needs will be eligible for greater supports. Schools not meeting their goals for multiple years might be eligible for supports that include more coordination with the VT-AOE in the construction of the continuous improvement plans, more technical assistance in determining and enacting interventions, and more monitoring of an LEAs success in meeting their goals. Tiered supports include technical assistance in conducting needs assessments or developing continuous improvement plans and participation in networked improvement communities with other schools in need of similar Targeted Supports.

When VT-AOE individual staff members and/or teams monitor and find evidence that Title III-funded LEAs are not meeting long-term goals for ELs' progress in achieving proficiency, they will provide evidence-based, differentiated technical assistance, resources, and professional learning opportunities based on a continuous improvement framework. The VT-AOE's efforts to better connect and coordinate the work of the teams that monitor, lead continuous improvement planning, and provide technical assistance should ultimately lead to stronger support for LEAs in improving language instruction educational programs and academic outcomes for English Learners.

F. Title IV, Part A: Student Support and Academic Enrichment Grants

1. Use of Funds *(ESEA section 4103(c)(2)(A)):* Describe how the SEA will use funds received under Title IV, Part A, Subpart 1 for State-level activities.
   Click here to enter text.

Title IV provides states with funds for well-rounded educational opportunities. ESSA outlines numerous permitted activities for the funds. The vast majority of the funds must be used for allocations to SU/SDs; however, the state can reserve limited funds for monitoring, training, and technical assistance with the grants. As these are an expansion of funds, this constitutes a proposed change in practice.

Vermont is planning to use its limited state level funds for Title IV to support Supervisory Union/Supervisory District Title IV Coordinators. The VT-AOE will reserve funds at the state level to ensure there is support and appropriate allocation of local funds before engaging in other statewide activities. These funds will be used to hire a full-time employee to monitor and provide technical assistance to Supervisory Union/Supervisory Districts receiving Title IV, Part A money through the formula grant, as well as institute an in-house advisory group of VT-AOE staff whose work intersects with Title IV, Part A. This group of staff members will ensure that school systems know the different agency and state level programs available to them to support the goals of Title IV at the local level. Housing coordination with one individual streamlines communication within the VT-AOE and creates transparency and confidence for Supervisory Union/Supervisory Districts.

The Title IV, Part A coordinator will continue to engage with the consolidated federal programs team and the Education Quality staff. This coordinator will have a greater focus on Comprehensive School Supports allowing 21st Century Learning grants to provide wrap-around services for those receiving schools, while augmenting existing implementation of comprehensive improvement plans.

Title IV, Part A will be used to grant funds to schools eligible for Comprehensive Support in accordance with their continuous improvement plans and in coordination with the Education Quality team. The Title IV, Part A coordinator will continue working closely with the Education Quality staff in order to ensure efficient use of funds at the SU/SD and school level.

Ninety-five percent of the funds must be used for allocations to LEAs; however, the state can reserve one percent for administration and an additional 4% of the funds for state activities including monitoring, training, and technical assistance. As these are an expansion of funds, this constitutes a proposed change in practice for LEAs.

The Title IV, Part A coordinator will be a member of the Consolidated Federal Programs team and work closely with the Education Quality staff. The funds will be part of the Consolidated Federal Program application in order to make it easier to braid Title IV, Part A funds with the other ESSA funds to achieve local and state goals.

2. Awarding Subgrants *(ESEA section 4103(c)(2)(B))*: Describe how the SEA will ensure that awards made to LEAs under Title IV, Part A, Subpart 1 are in amounts that are consistent with ESEA section 4105(a)(2).
   Click here to enter text.

The VT-AOE has determined the Title IV, Part A funds will be distributed as a formula grant to allow access to all LEAs seeking these funds. The VT-AOE's Fiscal Team creates spreadsheets with the allocation formulas built in for all formula grants. A preliminary spreadsheet with the Title IV, Part A formula detailed in ESSA (section 4105) has been created and tested using a sample allocation. The formula used includes the SEA portion for administration and state activities and then follows section 4105 for allocations to each LEA (none receiving less than the $10,000 minimum).

G. Title IV, Part B: 21st Century Community Learning Centers

A. Use of Funds *(ESEA section 4203(a)(2))*: Describe how the SEA will use funds received under the 21st Century Community Learning Centers program, including funds reserved for State-level activities.
Click here to enter text.

Vermont's Title IV part B program (21CCLC) is designed to align and support the state level strategies for all students articulated in this state plan and in Vermont's Education Quality Standards. Funds are intentionally integrated into local level needs assessment planning, continuous improvement activity, and school-wide strategies. Program access and design in funded programs include services that support the state, school, and community goals for youth including those designated as migrant, homeschooled, homeless, those in Title I caseloads, and English Language Learners including meaningful and equitable consultation for private school students in individually funded communities.

At the Vermont Agency of Education, the Title IV part B 21CCLC program is part of team focused on personalized learning and flexible pathways and works with program managers across the Agency including, but not limited to, School Improvement, Title I, Title IIA, Title II, Title III, Title IV Part A, Special Education, and the fiscal monitoring team. Regular communication and collaboration occurs among these state programs which results in strategic and programmatic cohesion around planning, goals, technical assistance, and professional development. Systemic inter-agency collaborative strategies achieved that support state goals include:

- Significant annual use of Title I funds for academic tutoring and academic afterschool and summer programming
- Use of federal child nutrition programs in all funded sites, including snack and meal programs
- Use of the PBIS and other evidence based behavior systems in afterschool programs
- Aligned monitoring and cross team membership on site-visit teams
- Supporting technical assistance around inclusion (there is parity for percentages of afterschool regular attendees on an IEP)
- Funding integration and RFP alignment around personalization, proficiency based learning, and the Vermont Educator Quality Standards
- Fiscal and programmatic monitoring alignment to support compliance and healthy financial structures at the 21c grantee level

The 21CCLC program will continuously improve each year in its efforts to support all students in communities where funds are awarded. Based on a system and evaluation design created around principles of access, equity, and quality, in particular for communities with the most need, current 21CCLC systems' components will improve learning from the last thirteen years of operation. The items below all support state goals and at the same time are targeted to the particular needs of Title IV part B funds:

- The current statewide evaluation plan has four major goal areas, fifteen indicators, and fifty-one measures that are tracked. This plan drives all activity and action and is used for continuous improvement and as a driver for change system-wide. Grantees may adopt the statewide plan and merge it with locally designed evaluation activities. Statewide Evaluation will be improved to continually assess not only baseline program, academic and social indicators tied to need, but over time may embed emerging indicators related to items including personalization, transferable skills, and proficiency based models when these systems come to fuller fruition in Vermont, in particular for youth in secondary schools that receive 21c funding.
- Technical Assistance and Professional Development systems will continue to support the evaluation areas as well, with an on-going analysis if more expansive readiness and support activities are needed for identified stages of program development. The program's current practice of focusing resources on supporting quality and effective leadership at the project and site level will guide action with considerations analyzed for investments in more intensive, embedded and sustained methodologies.
- Vermont's robust monitoring, and reporting system will be continued and enhanced annually. Multiple monitoring activities will occur during the performance period for each grantee, based on a risk assessment of need, and covering a broad spectrum of inquiry. The current process is intentionally aligned to the statewide evaluation plan components and additional legal requirements covering nineteen areas, (e.g. evaluation, safety, facilities, programming, staffing, sustainability and budgeting). State follow-up occurs and is documented until all defined areas of concern are addressed. Annual reporting and tracking follows a similar design and framework.

Administrative and statewide activity funds will be allocated and used for the activities above as allowable by statute.

B. Awarding Subgrants *(ESEA section 4203(a)(4)):* Describe the procedures and criteria the SEA will use for reviewing applications and awarding 21st Century Community Learning Centers funds to eligible entities on a competitive basis, which shall include procedures and criteria that take into consideration the likelihood that a proposed community learning center will help participating students meet the challenging State academic standards and any local academic standards.

The 21st Century Community Learning Center program annually or semi-annually releases applications six months prior to the applicant due date. The grant application is produced and reviewed annually including where statewide goals are articulated as well as addressing all of the areas required within the 21st Century Community Learning Center program statute. Awards are awarded for 5 years for no less than $50,000 provided that funds are available and performance objectives met. The applicant 'bidder' meetings and the technical assistance period starts four months before the due date. The consistency with system level expectations noted above is intentionally embedded in the meetings, technical assistance, and resources for both

applicants and panelists. A letter of intent is due three months before the due date. After the applications are received, a team of independent panelists are trained, who then independently review the applications and provide scores and comments, which at the end of the process are shared with all applicants. This panel may consist of individuals with diverse expertise including educational and non-educational organizations, experts in non-profit management, including principals, retired 21st Century directors, site coordinators, private-sector individuals involved in education, and state agency personnel with relevant experience. Conditions for funding and scores are fully documented.

Panelist responsibilities include:

- Participation in a panelist training to understand roles, expectations, and rules
- Reading, scoring, and commenting on individual applications
- Participation in face to face full panel day(s) to make final applicant decisions
- Making decisions on whether to fund, fund with conditions, or do not fund applications
- Setting conditions for funding
- Providing process feedback to the Agency of Education

Eligibility will guide initial priority as articulated in the Title IV Part B legislation in section 4203(a) (3). Competitive priority will include but not be limited to indicators of need including high poverty and will compliment but not duplicate the indicators used to determine comprehensive and targeted schools. Regular and on-going objective assessments of the application process will take place to ascertain if substantial progress towards state goals is being met and if any adaptations need to be made. The application process as a whole is designed to assure that grantees can meet and be held accountable to both local and statewide goals.

H. Title V, Part B, Subpart 2: Rural and Low-Income School Program

a. Outcomes and Objectives *(ESEA section 5223(b)(1))*: Provide information on program objectives and outcomes for activities under Title V, Part B, Subpart 2, including how the SEA will use funds to help all students meet the challenging State academic standards.
Click here to enter text.

Vermont will use the Rural and Low-Income School Program grants to assist rural districts in meeting the goals of increased student academic achievement and to reduce the achievement gap. The eligible districts will be encouraged to braid the RLIS funds with other ESEA funds to address the needs identified through their comprehensive needs assessment. Each application will be granted and monitored based on the range of allowable activities and the extent that the activity is likely to meet the identified needs and meet the stated goals.

b. Technical Assistance *(ESEA section 5223(b)(3))*: Describe how the SEA will provide technical assistance to eligible LEAs to help such agencies implement the activities described in ESEA section 5222.
Click here to enter text.

Once the list of eligible districts is identified, the VT-AOE will provide a training—in person or by webinar—to those districts. This program is new to Vermont in the 2017-18 school year and, as such, the districts will be unfamiliar with the allowable uses, how to effectively braid the funds with other sources, and reporting requirements. The VT-AOE will work with the eligible districts on their application and then provide ongoing technical assistance throughout the year. The Title V Coordinator is part of the Agency's Consolidated Federal Programs team, allowing full access to the expertise of the team regarding use of funds. The coordinator will use that expertise to train the eligible districts.

I. Education for Homeless Children and Youth program, McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B

a. Student Identification *(722(g)(1)(B) of the McKinney-Vento Act)*: Describe the procedures the SEA will use to identify homeless children and youth in the State and to assess their needs.

Click here to enter text.

Title IX outlines the supports Vermont is responsible to meet to support children and youth experiencing homelessness. Consistent with Vermont's overall commitment to equity for all students, Vermont takes meeting this responsibility seriously. Essential to this process is collaboration with other agencies supporting Vermont's homeless population.

McKinney-Vento exists to ensure school entrance and supports for students experiencing homelessness. SU/SD-level liaisons receive training in identification of students potentially experiencing homelessness.

Under the Vermont process, each SU/SD must name a Homeless Liaison in the SU/SD's Consolidated Federal Program application. Once identified, the liaison participates in trainings that are staggered throughout the year (in person and via the National Association for the Education of Homeless Children and Youth's (NCHE) webinars). These trainings are intended to assist Homeless Liaisons in understanding the McKinney-Vento definition of homelessness and how to assess students' needs. There are numerous ways in which children who are experiencing homelessness can be identified in Vermont. The redundancies are intentional to minimize the chances that students would be missed. Identification strategies include:

- Homeless families and unaccompanied youth self-identify as homeless to school staff.
- Schools identify potential homeless families through their registration process and make a referral to the SU/SD's Homeless Liaison.
- Teachers, counselors, after-school providers, school nutrition, and other school staff identify potential homeless families and unaccompanied youth and make a referral to the SU/SD's Homeless Liaison.
- Community partners (housing providers, social service agencies, pediatricians, faith-based organizations, etc.) refer homeless families and unaccompanied youth to the SU/SD's Homeless Liaison.
- Liaisons post informational posters in places where homeless families and unaccompanied youth will likely see them. The posters include the Homeless Liaison's contact information.

Once a student is identified and is enrolled in school, a needs assessment closely follows. Parents/guardians and unaccompanied youth are informed of supports available to them under McKinney-Vento and school staff assess academic and social/emotional needs and arrange additional supports for students when needed. Homeless liaisons identify individual student needs to determine the services the SU/SD will provide to homeless students. Those identified services are then used to create investments in the CFP application.

b. Dispute Resolution *(722(g)(1)(C) of the McKinney-Vento Act)*: Describe procedures for the prompt resolution of disputes regarding the educational placement of homeless

children and youth.
Click here to enter text.

The VT-AOE has established an SU/SD-level dispute resolution process so all SU/SDs are consistent and timely with their response to disputes. The process begins with the State Director informing and training SU/SD Homeless Liaisons of their responsibility to inform homeless families and unaccompanied youth of their right to appeal decisions related to eligibility and school placement.

Students and their families are given information regarding their rights based on their homeless status. The State Director's contact information is given to parents/guardians and unaccompanied youth; they are encouraged to call if they have questions or concerns about the dispute process. If the family or unaccompanied youth is not satisfied with the outcome of the SU/SD-level dispute process, they can make an appeal to the VT-AOE. In the event of an appeal, the VT-AOE employs an established appeal procedure that clearly defines the process and timelines for each step. See Appendix E for a more detailed discussion of the appeals process. The State Director, the Vermont Secretary of Education or designee, and the VT-AOE legal staff work as a team to resolve McKinney-Vento disputes in a timely manner.

Homeless families and unaccompanied youth are enrolled (or stay enrolled) in the school where placement is desired and provided the services they are entitled to under the McKinney-Vento Act until the dispute process on the SU/SD or VT-AOE (if applicable) level is complete.

c. Support for School Personnel *(722(g)(1)(D) of the McKinney-Vento Act)*: Describe programs for school personnel (including the LEA liaisons for homeless children and youth, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such school personnel of the specific needs of homeless children and youth, including runaway and homeless children and youth.
Click here to enter text.

In addition to the regular trainings referenced above, there are several additional supports available to SU/SD homeless liaisons. Liaisons have both the responsibility to work with the homeless population in the SU/SD and to work with other educators to create a supportive environment where students experiencing homelessness have access to a high quality education.

- Homeless liaisons regularly receive technical assistance from the State Director of Homeless Education via email and phone.
- Homeless liaisons can access the National Center for Homeless Education (NCHE) helpline if there is an immediate need for technical assistance and the State Director is not available.
- The VT-AOE maintains a listserv for the SU/SD Homeless Liaisons and the State Director sends out reminders and resources on a regular basis.
    - The State Director provides targeted technical assistance during the McKinney-Vento grantee and Consolidated Federal Programs monitoring processes.

- The State Director notifies the SU/SD Homeless Liaisons of the requirement to train school staff, especially registrars, on the McKinney-Vento Act, and ensures SU/SD Homeless Liaisons have the resources they need to do so.
- The VT-AOE offers in-person training to the SU/SD Homeless Liaisons at least once a year (more if time and resources allow). Topics are chosen by the liaisons based on perceived need.
- All SU/SD Homeless Liaisons are trained in the process to direct certify students experiencing homelessness for programs covered under the Child Nutrition Act.
- The State Director and SU/SD Homeless Liaisons participate in the NCHE webinars and other state and local training opportunities focused on supporting homeless children and youth. Liaisons also use these webinars and other NCHE resources when they train school staff.
- The State Director encourages the Homeless Liaisons to attend the NCHE's annual conference and provides technical assistance on the sources of funds that may be used to attend.

In addition to those supports provided to the homeless liaisons, SU/SD Title I coordinators also have access to trainings offered by the State Director on the homeless education set-aside requirement.

It is an absolute requirement in the CFP application to set aside Title I funds for the needs of homeless students. An application will not be approved without at least a minimum set-aside. The CFP application includes a set of McKinney-Vento assurances for SU/SDs and participating schools that they agree to upon submission of the application.

d. Access to Services *(722(g)(1)(F) of the McKinney-Vento Act)*: Describe procedures that ensure that:
    i. Homeless children have access to public preschool programs, administered by the SEA or LEA, as provided to other children in the State;
    ii. Homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youth described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies; and
    iii. Homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels.

    Click here to enter text.

By State law, Vermont's public education system includes universal preschool for all 3 and 4 year olds and 5 year olds not yet enrolled in kindergarten. If a family loses their housing, the homeless liaison follows the same process for preschool students as they would for K-12 students. Preschool students are immediately enrolled in the school determined to be in their

best interest to attend and SU/SD Homeless Liaisons ensure that preschool students have access to the supports they are entitled to under McKinney-Vento. The VT-AOE will provide technical assistance on how best to serve homeless preschoolers.

The SU/SD Homeless Liaison and appropriate school staff have the responsibility to ensure homeless students have equal access to academic programs and extracurricular activities by assessing and then addressing the individual student's needs. They work closely with other federally funded programs like Title I, 21st Century, and locally supported academic and extracurricular program staff to enroll homeless students. If extracurricular activities include fee, uniform, or other requirements, the Homeless Liaison or designated staff person ensures the student has access to financial and other supports needed to meet the enrollment/registration requirements. Often community programs provide students the supports they require for full participation and to remove barriers.

The SU/SD Homeless Liaisons also work closely with the school nutrition staff to ensure that homeless students have access to free meals upon enrollment. Homeless students are automatically eligible (directly certified) for free meals and are not required to complete paperwork or produce income documentation. Some schools are food pantry satellite locations and will ensure homeless students and their families have access to food to take home with them. The State Director works closely with the VT-AOE child nutrition staff to ensure the programs they coordinate are aware of this entitlement.
Secondary youth experiencing homelessness are identified in the same manner as described above; however, for youth separated from the public school system there are additional considerations in the identification process, including:

- The VT-AOE actively partners with statewide community organizations serving youth experiencing or at risk of experiencing homelessness. These include the Runaway and Homeless Youth Act and the U.S. Department of Housing and Urban Development funded programs. Other statewide partners include the Vermont Department of Children and Families, Vermont Coalition to End Homelessness, the Vermont Migrant Education Program, and the Vermont Network against Domestic and Sexual Violence.
- The State Director ensures that SU/SD Homeless Liaisons are familiar with locally affiliated programs.
- The SU/SD Homeless Liaisons partner with the locally affiliated programs mentioned above and other local programs: pediatricians, law enforcement, faith-based organizations and food shelves, and other programs serving children and youth who may be disenfranchised from school. These local social service programs encourage youth to re-enroll in school and the Homeless Liaisons make sure they have the support they need to attend and participate in school.

The SU/SD Homeless Liaison works closely with the appropriate school system staff to make sure secondary students experiencing homelessness have equal access to education and support services. They support each student individually to meet their unique needs and make sure there are no barriers to full participation in school, credit accrual, or graduation. If needed, Title

I set-aside funds are used to remove barriers. For homeless students who have been enrolled in multiple high schools, tracking credit accumulation can be a major impediment to graduation. As outlined in Vermont's Education Quality Standards and supported by Act 77, Vermont high schools have moved toward a proficiency model for high school graduation. Students in schools need to demonstrate proficiency in order to complete individual classes and, ultimately, earn a diploma. As such, schools do not issue Carnegie credits and the accumulation of such credits do not lead to graduation; instead, schools acknowledge the proficiencies a student has demonstrated at previous schools in the accumulation of proficiencies leading to graduation. Ultimately, the school granting the diploma determines that a student has met sufficient proficiencies for graduation.

e. Strategies to Address Other Problems *(722(g)(1)(H) of the McKinney-Vento Act)*: Provide strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by—
   i. requirements of immunization and other required health records;
   ii. residency requirements;
   iii. lack of birth certificates, school records, or other documentation;
   iv. guardianship issues; or
   v. uniform or dress code requirements.

   Click here to enter text.

The policy in Vermont is that students will be enrolled immediately. After enrollment, the LEA Homeless Liaison and/or the school social worker or registrar will work with the family on obtaining enrollment requirements/documents. They are empowered to take the steps necessary to ensure a student experiencing homelessness receives the support necessary to fully participate in school. When needed, technical assistance is available from the VT-AOE.

f. Policies to Remove Barriers (*722(g)(1)(I) of the McKinney-Vento Act)*: Demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences.

   Click here to enter text.

It is the State's priority to ensure that homeless children and youth are enrolled in school immediately and that enrollment delays are minimized. To achieve this goal, the VT-AOE assists SU/SD Homeless Liaisons. Homeless Liaisons are proactive and try to reduce the number of problems by ensuring staff are regularly trained on McKinney-Vento requirements. Most schools provide registration materials that include housing questions that cue the registrars and school secretaries that the family or unaccompanied youth is experiencing homelessness. If the family or unaccompanied youth indicates on the paperwork or verbally that they may be homeless, the registrar immediately enrolls the family and makes a referral to the Homeless Liaison. The VT-AOE works closely with the State Department for Children and Families (DCF). If DCF suspects that a family is homeless and not attending school, they will notify the SU/SD Homeless Liaison or the State Director and the family will be contacted.

When problems arise, the Homeless Liaison works quickly to resolve them. If there is an issue of enrollment, the liaison works with the school administrator and registrar to enroll the student as quickly as possible. If transportation is an issue, the Homeless Liaison works with the previous SU/SD attended to ensure that transportation or the cost of transportation is not as barrier to school attendance. If homeless families or unaccompanied youth lack typical enrollment documentation requirements such as health records, guardianship paperwork, birth certificates, and other required documents, the Homeless Liaison or other designated staff determine what is absolutely necessary and works with the family or unaccompanied youth to help obtain them. These activities occur after the student is enrolled and attending school. If the family or unaccompanied youth need financial support to obtain the required documents, school staff work with the Title I Coordinator or use other funding to help pay those fees.

If a homeless child or youth needs academic support, they are enrolled in Title I or other academic supports including afterschool and summer programming. If social-emotional support is needed, the school counselor and/or nurse is connected to work with the student. Homeless Liaisons and other key staff check in regularly on homeless students and touch base with teachers and families about supports needed to attend and participate in school. Supports may include transportation, school supplies, tutoring, afterschool programming, credit accrual support, and social services referrals. If a student disengages with the school, the Homeless Liaison and school staff contact the family or unaccompanied youth to offer supports to get the student back in school. School staff also partner with community organizations who provide the supports the family or unaccompanied youth might need reengage in school.

g. Assistance from Counselors *(722(g)(1)(K))*: A description of how youths described in section 725(2) will receive assistance from counselors to advise such youths, and prepare and improve the readiness of such youths for college.
Click here to enter text.

Secondary youth that are McKinney-Vento eligible work with school guidance counselors on post-secondary options – including college. Whenever possible, students will be enrolled in college readiness programs like Gear-Up and Talent Search.

Appendix A: Measurements of interim progress

Instructions: Each SEA must include the measurements of interim progress toward meeting the long-term goals for academic achievement, graduation rates, and English language proficiency, set forth in the State's response to Title I, Part A question 4.iii, for all students and separately for each subgroup of students, including those listed in response to question 4.i.a. of this document. For academic achievement and graduation rates, the State's measurements of interim progress must take into account the improvement necessary on such measures to make significant progress in closing statewide proficiency and graduation rate gaps.

Interim Targets Overview

ESSA requires that states establish interim targets for each measure. Interim targets are set locally and at the state level in a staged approach. First, the state establishes a statewide interim target in relation to the accountability cycles we have established for the Comprehensive Support cycles. This state-wide target is designed to track our performance towards the long-term goal and to hold ourselves responsible for making strategic efforts today. The process for setting the interim target for each measure and student group is the same:

1. Calculate the difference between current school performance and the long-term target
2. Divide the difference by the number of accountability cycles remaining until the goal needs to be met.
3. Establish the school's next interim target by adding the value of #2 to the value of the school's current performance.

A. Academic Achievement

Table 38: ELA Performance Charts for Student Groups

*Please note that all numbers with an asterisk are approximations only. For a full explanation of how they were derived, please see section A.4.iii.a.1 above.

Accountability Question	Grade	Current Performance (2016)	Long term Goal *Mid Point of Proficient Scale*	Interim Targets		
				2019 1	2022 2	2025 3
How well are students performing in ELA/ reading in 3rd-9th grade? SCALE	All Students					
	3rd	2438	2460	2445	2453	2460
	4th	2477	2502	2485	2494	2502
	5th	2515	2541	2524	2532	2541
	6th	2539	2574	2551	2562	2574
	7th	2562	2600	2575	2587	2600
	8th	2580	2617	2592	2605	2617
	9th	*2608*	*2648*	*2621*	*2634*	*2648*
	American Indian or Alaskan Native					
	3rd	2415	2460	2430	2445	2460
	4th	2432	2502	2455	2479	2502
	5th	2496	2541	2511	2526	2541
	6th	2526	2574	2542	2558	2574
	7th	2530	2600	2553	2577	2600
	8th	2535	2617	2562	2590	2617
	9th	*2559*	*2648*	*2588*	*2618*	*2648*
	Asian					
	3rd	2453	2460	2455	2458	2460
	4th	2496	2502	2498	2500	2502
	5th	2528	2541	2532	2537	2541
	6th	2553	2574	2560	2567	2574
	7th	2577	2600	2585	2592	2600
	8th	2597	2617	2604	2610	2617
	9th	*2626*	*2648*	*2633*	*2640*	*2648*
	African-American					
	3rd	2407	2460	2425	2442	2460
	4th	2445	2502	2464	2483	2502
	5th	2475	2541	2497	2519	2541
	6th	2495	2574	2521	2548	2574
	7th	2512	2600	2541	2571	2600
	8th	2545	2617	2569	2593	2617
	9th	*2573*	*2648*	*2598*	*2623*	*2648*
	Hispanic					
	3rd	2425	2460	2437	2448	2460
	4th	2456	2502	2471	2487	2502
	5th	2510	2541	2520	2531	2541
	6th	2548	2574	2557	2565	2574
	7th	2548	2600	2565	2583	2600
	8th	2596	2617	2603	2610	2617

Accountability Question	Grade	Current Performance (2016)	Long term Goal *Mid Point of Proficient Scale*	Interim Targets		
				2019 1	2022 2	2025 3
	9th	*2630*	*2648*	*2636*	*2642*	*2648*
	Native Hawaiian or Pacific Islander					
	3rd	2453	2460	2455	2458	2460
	4th	2504	2502	2503	2503	2502
	5th	2528	2541	2532	2537	2541
	6th	2571	2574	2572	2573	2574
	7th	2561	2600	2574	2587	2600
	8th	2549	2617	2572	2594	2617
	9th	*2568*	*2648*	*2595*	*2622*	*2648*
	White					
	3rd	2438	2460	2445	2453	2460
	4th	2478	2502	2486	2494	2502
	5th	2517	2541	2525	2533	2541
	6th	2540	2574	2551	2563	2574
	7th	2563	2600	2575	2588	2600
	8th	2581	2617	2593	2605	2617
	9th	*2610*	*2648*	*2622*	*2635*	*2648*
	English Learner					
	3rd	2410	2460	2427	2443	2460
	4th	2383	2502	2423	2462	2502
	5th	2406	2541	2451	2496	2541
	6th	2408	2574	2463	2519	2574
	7th	2437	2600	2491	2546	2600
	8th	2464	2617	2515	2566	2617
	9th	*2475*	*2648*	*2532*	*2590*	*2648*
	Students with Free and Reduced Lunch					
	3rd	2406	2460	2424	2442	2460
	4th	2441	2502	2461	2482	2502
	5th	2480	2541	2500	2521	2541
	6th	2502	2574	2526	2550	2574
	7th	2520	2600	2547	2573	2600
	8th	2541	2617	2566	2592	2617
	9th	*2568*	*2648*	*2595*	*2622*	*2648*
	Students With Disabilities					
	3rd	2353	2460	2389	2424	2460
	4th	2385	2502	2424	2463	2502
	5th	2416	2541	2458	2499	2541
	6th	2431	2574	2479	2526	2574
	7th	2448	2600	2499	2549	2600
	8th	2465	2617	2516	2566	2617
	9th	*2485*	*2648*	*2539*	*2593*	*2648*
	Male					

Accountability Question	Grade	Current Performance (2016)	Long term Goal *Mid Point of Proficient Scale*	Interim Targets		
				2019 1	2022 2	2025 3
	3rd	2427	2460	2438	2449	2460
	4th	2465	2502	2477	2490	2502
	5th	2499	2541	2513	2527	2541
	6th	2523	2574	2540	2557	2574
	7th	2543	2600	2562	2581	2600
	8th	2561	2617	2580	2598	2617
	9th	*2588*	*2648*	*2608*	*2628*	*2648*
	Female					
	3rd	2449	2460	2453	2456	2460
	4th	2490	2502	2494	2498	2502
	5th	2533	2541	2536	2538	2541
	6th	2556	2574	2562	2568	2574
	7th	2582	2600	2588	2594	2600
	8th	2600	2617	2606	2611	2617
	9th	*2630*	*2648*	*2636*	*2642*	*2648*
	Migrant					
	3rd	2363	2460	2395	2428	2460
	4th	N<11	2502			2502
	5th	N<11	2541			2541
	6th	N<11	2574			2574
	7th	N<11	2600			2600
	8th	N<11	2617			2617
	9th	N<11	*2648*			
	Historically Marginalized Students					
	3rd	*2415*	2460	*2430*	*2445*	2460
	4th	*2443*	2502	*2462*	*2482*	2502
	5th	*2480*	2541	*2500*	*2520*	2541
	6th	*2504*	2574	*2527*	*2550*	2574
	7th	*2516*	2600	*2544*	*2572*	2600
	8th	*2537	2617	*2563*	*2590*	2617
	9th	*2561*	*2648*	*2590*	*2619*	*2648*

Table 39: Math Performance Charts for Student Groups

*Please note that all numbers with an asterisk are approximations only. For a full explanation of how they were derived, please see section A.4.iii.a.1 above.

Accountability Question	Grade	Current Performance (2016)	Long term Goal *Mid Point of Proficient Scale*	Interim Targets		
				2019 1	2022 2	2025 3
How well are students performing in mathematics in 3rd-9th grade? SCALE	All Students					
	3rd	2443	2468	2468	2493	2468
	4th	2482	2516	2493	2504	2516
	5th	2509	2553	2523	2538	2553
	6th	2522	2580	2541	2560	2580
	7th	2548	2600	2565	2582	2600
	8th	2564	2619	2582	2600	2619
	9th	*2589*	*2649*	*2609*	*2629*	*2649*
	American Indian or Alaskan Native					
	3rd	2428	2468	2441	2454	2468
	4th	2440	2516	2465	2490	2516
	5th	2487	2553	2509	2541	2553
	6th	2498	2580	2525	2552	2580
	7th	2512	2600	2541	2570	2600
	8th	2511	2619	2547	2583	2619
	9th	*2527*	*2649*	*2567*	*2607*	*2649*
	Asian					
	3rd	2459	2468	2462	2465	2468
	4th	2498	2516	2504	2510	2516
	5th	2523	2553	2533	2543	2553
	6th	2545	2580	2556	2568	2580
	7th	2569	2600	2579	2589	2600
	8th	2598	2619	2605	2612	2619
	9th	*2626*	*2649*	*2633*	*2641*	*2649*
	African-American					
	3rd	2402	2468	2424	2444	2468
	4th	2446	2516	2469	2492	2516
	5th	2465	2553	2494	2513	2553
	6th	2466	2580	2504	2542	2580
	7th	2487	2600	2524	2562	2600
	8th	2506	2619	2543	2581	2619
	9th	*2523*	*2649*	*2565*	*2607*	*2649*
	Hispanic					
	3rd	2427	2468	2440	2454	2468
	4th	2464	2516	2481	2498	2516
	5th	2496	2553	2515	2534	2553
	6th	2520	2580	2540	2560	2580
	7th	2537	2600	2558	2579	2600
	8th	2569	2619	2585	2602	2619

Accountability Question	Grade	Current Performance (2016)	Long term Goal *Mid Point of Proficient Scale*	Interim Targets		
				2019 1	2022 2	2025 3
	9th	*2616*	*2649*	*2627*	*2638*	*2649*
	Native Hawaiian or Pacific Islander					
	3rd	2450	2468	2456	2462	2468
	4th	2513	2516	2514	2515	2516
	5th	2500	2553	2517	2535	2553
	6th	2558	2580	2565	2572	2580
	7th	2551	2600	2567	2583	2600
	8th	2513	2619	2548	2583	2619
	9th	*2524*	*2649*	*2565*	*2607*	*2649*
	White					
	3rd	2442	2468	2450	2459	2468
	4th	2483	2516	2494	2505	2516
	5th	2510	2553	2524	2538	2553
	6th	2523	2580	2542	2561	2580
	7th	2549	2600	2566	2583	2600
	8th	2565	2619	2583	2601	2619
	9th	*2590*	*2649*	*2609*	*2629*	*2649*
	English Learner					
	3rd	2426	2468	2440	2454	2468
	4th	2411	2516	2446	2471	2516
	5th	2423	2553	2466	2509	2553
	6th	2382	2580	2448	2514	2580
	7th	2431	2600	2487	2543	2600
	8th	2421	2619	2487	2553	2619
	9th	*2420*	*2649*	*2496*	*2572*	*2649*
	Students with Free and Reduced Lunch					
	3rd	2414	2468	2432	2440	2468
	4th	2452	2516	2473	2494	2516
	5th	2477	2553	2402	2527	2553
	6th	2485	2580	2516	2548	2580
	7th	2506	2600	2537	2568	2600
	8th	2518	2619	2551	2585	2619
	9th	*2539*	*2649*	*2575*	*2612*	*2649*
	Students With Disabilities					
	3rd	2354	2468	2392	2430	2468
	4th	2406	2516	2442	2479	2516
	5th	2421	2553	2465	2509	2553
	6th	2408	2580	2465	2522	2580
	7th	2424	2600	2482	2541	2600
	8th	2435	2619	2496	2557	2619
	9th	*2451*	*2649*	*2517*	*2583*	*2649*
	Male					

Accountability Question	Grade	Current Performance (2016)	Long term Goal *Mid Point of Proficient Scale*	Interim Targets		
				2019 1	2022 2	2025 3
	3rd	2442	2468	2450	2459	2468
	4th	2485	2516	2495	2505	2516
	5th	2507	2553	2522	2537	2553
	6th	2519	2580	2539	2559	2580
	7th	2541	2600	2560	2580	2600
	8th	2557	2619	2577	2598	2619
	9th	*2579*	*2649*	*2602*	*2625*	*2649*
	Female					
	3rd	2442	2468	2450	2459	2468
	4th	2480	2516	2492	2504	2516
	5th	2510	2553	2524	2538	2553
	6th	2525	2580	2543	2561	2580
	7th	2555	2600	2570	2585	2600
	8th	2570	2619	2586	2602	2619
	9th	*2596*	*2649*	*2613*	*2631*	*2649*
	Migrant					
	3rd	2377	2468	2407	2437	2468
	4th	N<11	2516			2516
	5th	N<11	2553			2553
	6th	N<11	2580			2580
	7th	N<11	2600			2600
	8th	N<11	2619			2619
	9th	N<11	*2649*			*2649*
	Historically Marginalized Students					
	3rd	*2420*	2468	*2436*	*2452*	2468
	4th	*2454*	2516	*2474*	*2495*	2516
	5th	*2474*	2553	*2500*	*2526*	2553
	6th	*2483*	2580	*2514*	*2546*	2580
	7th	*2502*	2600	*2534*	*2567*	2600
	8th	*2508*	2619	*2545*	*2582*	2619
	9th	*2528*	*2649*	*2568*	*2608*	*2649*

Table 40: Proposed Graduation Rate Long-term Goals and Interim Targets

Graduation Rate (4 year)	Number of Students in Cohort	Current Performance	Long Term Goal	Interim Goals		
				2019 1	2022 2	2025 3
All Students	6,172	87.6%	90%	88.4%	89.2%	90%
Accountability Categories						
Ethnic and Racial Categories:						
American Indian or Alaskan Native	97	80.4%	90%	83.6%	86.8%	90%
Asian	168	80.0%	90%	83.3%	86.7%	90%
Black	193	79.8%	90%	83.2%	86.6%	90%
Hispanic	115	80.9%	90%	83.9%	87.0%	90%
Native Hawaiian or other Pacific Islander	20	100.0%	90%	90.0%	90.0%	90%
White	5,892	88.8%	90%	89.2%	89.6%	90%
English Learners	141	68.1%	90%	75.4%	82.7%	90%
Students with Free and Reduced Lunch	2,733	78.0%	90%	82.0%	86.0%	90%
Students with Disabilities	1,009	71.9%	90%	77.9%	84.0%	90%
Historically Marginalized Students						90%
Historically Privileged Students						
Additional Reporting Categories						
Female	3,021	89.6%	90%	89.7%	89.9%	90%
Male	3,151	85.8%	90%	87.2%	88.6%	90%
Migrant Students	6	16.7%	90%	41.1%	65.6%	90%
Military-Affiliated Students	*	*				90%
Homeless Students	*	*				90%
Students in Foster Care	*	*				90%

* Data is not currently available.

Table 41: Current 6-year Graduation Rate Levels of Performance

Graduation Rate (6 year)	Number of Students in Cohort	State Average Grad Rate	Long Term Goals	Interim Goals		
				2019 1	2019 2	2019 3
All Students	6,538	90.7%	100%	93.8%	96.9%	100%
Accountability Categories						
Ethnic and Racial Categories:						
American Indian or Alaskan Native	99	80.8%	100%	87.2%	93.6%	100%
Asian	161	93.2%	100%	95.5%	97.7%	100%
Black	194	84.0%	100%	89.3%	94.7%	100%
Hispanic	101	86.1%	100%	90.7%	95.4%	100%
Native Hawaiian or other Pacific Islander	19	100.0%	100%	100.0%	100.0%	100%
White	6,307	90.7%	100%	93.8%	96.9%	100%
English Learners	130	82.3%	100%	88.2%	94.1%	100%
Students with Free and Reduced Lunch	2,685	82.3%	100%	88.2%	94.1%	100%
Students with Disabilities	1,063	79.3%	100%	86.2%	93.1%	100%
Historically Marginalized Students						100%
Historically Privileged Students						100%
Additional Reporting Categories						
Female	3,219	91.1%	100%	94.1%	97.0%	100%
Male	3,319	90.2%	100%	93.5%	96.7%	100%
Migrant Students	*	*				100%
Military-Affiliated Students	*	*				100%
Homeless Students	*	*				100%
Students in Foster Care	*	*				100%

* Data is not currently available.

Table 42: Proposed English Language Proficiency Baseline Data and Interim Targets

Accountability Question	Grade	Baseline Data (2016)	Long term Goal	Interim Targets		
				2019	2022	2025
How well are students gaining English Proficiency? Percent Proficient in "time"	All	55%	100%	70%	85%	100%

Appendix B

A school and/or SU/SD summary composite score for each Criteria is calculated by first converting the actual school-level performance (F) into the 4-Level Performance score. These Indicator 4-Level Performance Scores are then averaged to create an Indicator Summary (H). Indicator Summary Scores are then averaged again to create an Accountability Question Summary Score (I). The Accountability Question Summary Scores are then combined with a weighted average to produce the Criteria Current Score (K). Finally, the prior year's Current Score is subtracted from the current year current score to calculate the change from year-to-year.

Table 43: Worked Example of Calculating Score

Criteria	Category	Accountability Question	Indicators					Accountability		Criteria	
			Indicators	Grades	(F) Actual Score	(G) 4-Level Performance	(H) Indicator Summary	(I) Summary	(J) Weight	(K) Current Score	(L) Change Y-Y
Academic Proficiency	Content Standards	How well are students performing in ELA/reading? (3-9)	*Scale*	**6 7 8**	**2557 2548 2610**	***3.6 2.8 3.8***	***3.40***	***3.10***	***35%***	***2.9875***	***N/A until 2018, for illustrative purposes, assume last year was 2.850 +.1375***
			Growth	**All**	**45.2 %**	***2.8***	***2.80***				
		How well are students performing in mathematics? (3-9)	*Scale*	**6 7 8**	**2533 2532 2569**	***2.5 2.1 2.6***	***2.40***	***2.85***	***35%***		
			Growth	**All**	**57.8 %**	***3.3***	***3.30***				
		How well are students performing in science? (5,8,11)	*Scale*	**8**	**833**	***2.9***	***2.90***	***2.90***	***10%***		
		How well are students performing in PE	*Scale*	**6-8**	**TBD**	***3.1***	***3.10***	***3.10***	***10%***		
	English Language Proficiency	How well are English Learners gaining English proficiency?	*% Progress*	**6-8**	***64%***	***3.3***	***3.05***	***3.05***	***10%***		
			% Proficient	**6-8**	***58%***	***2.8***					
	Graduation Rate	Are students staying in school until they *graduate*?	*4-year Grad. Rate 6-year Grad. Rate*	**N/A N/A**	***N/A***	***N/A***	***N/A***	***N/A***	***0%***		
	College and Career Readiness	How well did seniors perform on career and college ready assessments?	*% CCR on tests*	**N/A**	***N/A***	***N/A***	***N/A***	***N/A***	***0%***		
		Are alumni pursuing a career and college ready outcome within 16 months of graduation?	% CCR as Alums	N/A	***N/A***	***N/A***	***N/A***	***N/A***	***0%***		

Appendix C

After the Current (K) and Change in Year-to-Year performance scores are calculated the gaps are calculated. To determine the Equity Index Gap (M) the performance of the historically marginalized group is subtracted from the historically advantaged group. The higher the number the more problematic as the gap between student groups is large. These Gaps are then averaged to calculate the overall Equity Index (N).

To determine the Equity Gap Reduction, the difference in current performance this year from the performance last year. The change for each student group is compared and the historically marginalized group is subtracted from the historically advantaged group. In this case, a large positive number means that the historically marginalized group is improving at a rate that is faster than that of the historically advantaged group.

Table 44: Worked Example of "Equity Index"

Criteria	Student Group	(K) Current	(M) Gap (HM-HA Perform Gap)	(N) Equity Index	(L) Change Year-to- Year	(()) Gap Reduction (HA-HM Perform Group)	(P) Equity Gap Reduction Year-to-Year
Academic Proficiency	**All Students**	2.988			+0.225		
	*FRL**	2.513	0.987	1.114	+0.325	+.175	+0.155
	Non-FRL	3.500			+0.150		
	*SPED**	***	***		***	***	
	Non-SPED	***			***		
	*EL**	2.343	1.368		+0.295	+.160	
	Non-EL	3.711			+0.135		
	White	3.108	N/A		+0.195	N/A	
	Asian	***	***		***	***	
	*Black**	***	***		***	***	
	*Hispanic**	***	***		***	***	
	*Native American**	***	***		***	***	
	*Pacific Islander**	***	***		***	***	
	Historically Marginalized (HM) Students*	2.513	0.987		+0.320	+.130	
	Historically Advantaged (HA) Students	3.500			+0.190		

Appendix D: MPO Planning Chart

MPO Planning Chart

GOAL AREA 1: English Language Arts/Literacy Achievement

***CONCERNS:* 1.1)** We are concerned that less than 30% of migrant students in school are proficient in ELA and we have no comparable measurable data on OSY.

1.2) We are concerned that MEP staff do not have access to ELA/Literacy data in a timely way to identify needs and deliver appropriate ELA/literacy instruction to students who are migrant. **1.3)** We are concerned that parents who are migrant do not have sufficient strategies to support their children with ELA/literacy homework.

Solution strategy identified in the CNA	**Performance Target/AMO**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
1.1a) Provide full access to the variety of high quality intervention programs in schools 1.1b) Work with schools to share data on students' ELA progress quarterly and problem solve around student needs (sharing results, info, etc.) 1.1c) Identify appropriate ways to assess the literacy level of OSY in English and/or home language 1.2a) Collaborate with the Vermont Principal's Association to emphasize the importance of data and obtain their assistance with	**100% proficient on the state assessment in English Language Arts**	1.1 Provide individualized year-round coordination and mentoring services for students in grades K-12 in collaboration with schools to increase grade-appropriate ELA skills.	1a) Each year, 80% of children enrolled in grades K-12 and participating in MEP services will be promoted to the next grade or graduate as reported by the children' school.	· In-school Coordinator Report (new)
			1b) Each year, MEP students receiving services for at least five months will increase ELA skills as reported on the	· Classroom Teacher Rubric (new)

Solution strategy identified in the CNA	**Performance Target/AMO**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
the timely sharing of progress reports 1.2b) Establish communication structures and identify individuals responsible for specific actions to address barriers identified 1.2c) Conduct independent math assessments and/or internal ELA/literacy assessments to establish baseline with post assessment after migrant students receive services 1.2d) Provide training for schools on sensitivity to migrancy and mobility, the importance of making communications accessible, and resources for migrant families to assist with interpretation and translation 1.2e) Inform schools of their legal responsibilities to provide appropriate language services and share lists of translators/interpreters 1.3a) Continue family field days to increase family learning/development of ELA/literacy skills			Classroom Teacher Rubric.	

Solution strategy identified in the CNA	**Performance Target/AMO**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
1.3b) Provide two or more age/grade appropriate ELA/literacy resources, games, activities, and other ELA/literacy materials to parents 1.3c) Offer parent workshops covering strategies for helping with ELA/literacy homework, school-readiness pre-literacy, and how to set up homework space in the home				

GOAL AREA 2: Mathematics Achievement

NEED/CONCERN: **2.1)** We are concerned that MEP staff do not have access to data in a timely way to identify needs and deliver appropriate math instruction to students who are migrant. **2.2)** We are concerned that students who are migrant do not have the fundamental math skills to be successful in later grades and their adult lives.

2.3) We are concerned that parents who are migrant do not have sufficient strategies to support their children with math homework.

Solution identified in the CNA	**Performance Target (Goal)**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
2.1a) Collaborate with the VT Principal's Association to emphasize the importance of data and obtain their assistance with the timely sharing of progress reports 2.1b) Establish communication structures and identify individuals responsible for specific actions to address barriers identified 2.1c) Conduct independent math assessments and/or internal math assessments to establish baseline with post assessment after migrant students receive services 2.2a) Contract tutors for migrant students who are behind their non-migrant peers in math 2.2b) Enroll migrant students with needs in math in existing after-school academic/homework support programs 2.2c) Provide activities/technology applications/resources in the home to increase evidence-based math skills through apps, games, etc.	**100% proficient on the state assessment in mathematics**	2.1 Provide individualized year-round coordination and mentoring services for students in grades K-12 in collaboration with schools to increase grade-appropriate math skills.	2a) Each year, MEP students receiving services for at least five months will increase math skills as reported on the Classroom Teacher Rubric.	· Classroom Teacher Rubric (new)

Solution identified in the CNA	**Performance Target (Goal)**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
2.3a) Provide two or more age/grade appropriate math resources to parents to support their child's math achievement 2.3b) Offer parent workshops covering strategies for helping with math homework, school-readiness pre-math, homework space, doing routine math games 2.3c) Provide math activities, games, manipulatives, and resources to help parents assist their children in the home with math homework and studies				

GOAL AREA 3: School Readiness

***NEED/CONCERN:* 3.1)** We are concerned that children who are ages 0-5 and migrant do not have consistent and sufficient early education due to lack of transportation, parents' work schedules, lack of English proficiency, and lack of available and appropriate PK programs. **3.2)** We are concerned that parents of children who are ages 0-5 do not know how or do not have enough resources/time to support their children's social, emotional, and academic development to prepare them for kindergarten.

3.3) We are concerned that preschool students who are migrant do not have access to high quality preschool (minimum of 10 hours/ week).

3.4) We are concerned that preschool students who are migrant do not have a home supported literacy-rich environment.

Solution identified in the CNA	**Performance Target (Goal)**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
3.1a) Support parents/schools in identifying local transportation options when needed. 3.1b) Promote networking to help provide transportation to early education and preschool programs for children ages 0-5. 3.1c) Provide professional development for staff and providers on how to overcome barriers that impede full participation in early education by children ages 0-5 who are migrant. 3.2a) Provide instructional home visits to model school readiness strategies 3.2b) Establish networks within the school and community to which parents can be referred to meet medical, dental, social services, ELL, and other needs.	N/A	3.1 Provide year-round coordination and mentoring for preschool students and their families to increase school readiness and enrollment in high quality preschool programs.	3a) Each year, 80% of 3-5 year old children enrolled in a high quality preschool for at least 10 hours/week or receiving at least six in-home early literacy interventions per trimester, will receive an age-appropriate score on the Vermont Ready for Kindergarten! Survey.	In-school Coordinator Report (new)
		3.2 Develop and support family literacy through early literacy intervention services and increase parents' ability to support their children's education.	3b) Each year after participating in family literacy services, 80% of participating parents will report an increased ability to support their children's education through a rating of four or five on a five-point scale.	· Parent Survey

Solution identified in the CNA	**Performance Target (Goal)**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
3.2c) Provide parent leadership activities. 3.2d) Provide training for parents and prepare materials for parent use in the home to assist with preparing their children to be ready for school. 3.2e) Provide literacy resource materials for parents to use with their children in the home. 3.3a) Work with state ECE leadership to coordinate assessments and facilitate communication about pre-K services. 3.3b) Work with parents to identify and access high quality preschool, and help problem-solve barriers to attendance. 3.3c) Coordinate with community resources providers to remove barriers to migrant children's attendance in pre-K programs. 3.4a) Support parents with literacy materials				

Solution identified in the CNA	Performance Target (Goal)	Strategy	MEP Measurable Program Outcome (Objective)	Evaluation Tools
including books to read to their children 3.4b) Provide family literacy home visits to model activities that parents can do with their children 3.4c) Sponsor parent events that promote pre-literacy strategies and activities to do in the home.				

GOAL AREA 4: High School Graduation and Out-of-School Youth

***NEED/CONCERN:* 4.1)** We are concerned that over 50% of OSY have not attended school beyond 8th grade and have limited literacy. **4.2)** We are concerned that H.S. students who are migrant and OSY are not able to attain their educational goals. **4.3)** We are concerned that secondary-aged students exhibit many characteristics associated with at-risk for H.S. dropout. **4.4)** We are concerned that OSY are limited in English proficiency which may limit their access to education and other services, resources, and opportunities. **4.5)** We are concerned that schools are not assessing OSY readiness for a high school programs. **4.6)** We are concerned that OSY do not have access to, or skills to use, computers and the Internet.

Solution identified in the CNA	Performance Target (Goal)	Strategy	MEP Measurable Program Outcome (Objective)	Evaluation Tools
4.1a) Develop research/evidence-based literacy instruction for OSY	**Number of 12th grade migrant students is less than 30. Number of**	4.1 Provide secondary-aged migrant students with individualized year-round guidance,	4a) Each year, 80% of MEP students in grades 9-12 will be on track toward graduation as measured by a PLP	· Coordinator report (new)

Solution identified in the CNA	**Performance Target (Goal)**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
4.1b) Provide targeted instruction based on assessment data on OSY 4.2a) Promote the economic benefits of education to students who have not attained their established educational goals 4.2b) Work with schools on flexible graduation plans using a template (i.e., HSCP) 4.2c) Establish goal setting incorporating student work and economic goals 4.3a) Provide guidance, mentoring, and counseling assistance to migrant families on the benefits of staying in school & post-secondary options 4.3b) Offer professional development for staff on migrancy/mobility and H.S. completion strategies	**graduate is reported**	mentoring, and counseling that leads to high school graduation and informed by their Personalized Learning Plan (PLP).	that meets Vermont's Education Quality Standards' requirements.	
		4.2 Provide year-round coordination and mentoring for OSY to increase academic skills to include English language lessons, life skills, and technology skills.	4b) Each year, 75% of OSY receiving direct instruction for at least 10 hours will score proficient on at least one appropriate OSY lesson.	· Modified Student Assessment Score Sheet
		4.3 Assist OSY to articulate goals and create a personalized learning plan in coordination with the OSY consortium materials.	4c) Each year, all OSY who enter Tier 2 services will have a personalized learning plan that meets VT MEP standards.	· Coordinator report (new)
		4.4 Provide year-round coordination and mentoring for OSY to make progress on their personalized learning plan toward career and/or high school graduation.	4d) Each year, OSY participating in Tier 2 services for at least 30 hours will complete at least 50% of their personalized learning plan objectives.	· Coordinator report (new)
		4.5 Provide professional	4e) Each year, 75% of .75 to full-time	· Staff survey

Solution identified in the CNA	**Performance Target (Goal)**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
4.4a) Partner with ABE providers for local ELL classes 4.4b) Bring formal, practical English classes onsite with employer buy-in 4.4c) Continue to promote distance learning and "bite-sized" app-based practice 4.5a) Identify instruments to assess OSY readiness for high school programs (e.g., TABE-M) 4.5b) Help students and staff request transcripts 4.5c) Utilize the OSY Consortium to identify promising practices in assessment in other states 4.6a) Provide technology mentors 4.6b) Increase access to basic computer classes through local ABE providers 4.6c) Establish a system for a device		development on identification, recruitment, and instructional services for MEP-funded administrative and instructional staff to include an average of 4 hours per month for .75 to full-time staff and an average of 2 hours per month for staff funded at least half-time.	staff participating in a monthly average of four hours of professional development will report an increased capacity for delivering instruction or providing services by 20% as measured by the staff survey.	
		4.6 Ensure that all .75 and full time staff have a professional development plan in place that responds to their annual performance appraisal for continuous program improvement.	4f) Each year, all .75 to full-time staff will have a professional development plan that supports their needs and goals as outlined in their annual performance appraisal.	· Coordinator report (new)

Solution identified in the CNA	**Performance Target (Goal)**	**Strategy**	**MEP Measurable Program Outcome (Objective)**	**Evaluation Tools**
setup and distribution program 4.6d) Use the OSY Profile and Farm Sheet to monitor OSY with Internet and cell service				

Appendix E: Homeless Appeal Procedure

McKinney-Vento Homeless Assistance Act Appeal Processing Procedure

Purpose

This procedure sets forth the steps for processing a written appeal submitted by a parent/ guardian or unaccompanied youth (referred to as appellant) regarding a decision made by a Local Education Agency (LEA) related to the McKinney-Vento Homeless Assistance Act (http://www2.ed.gov/policy/elsec/leg/esea02/pg116.html). *Please note that an appeal submitted via email is acceptable.*

Investigation and Resolution of an Appeal

1. *Written Receipt.* When a written appeal is received, the State Education Agency (SEA) will provide a written receipt to the appellant via email and return receipt mail within 10 business days, which will include the following information:
    a. The date that the appeal was received;
    b. A tentative resolution date;
    c. The name and phone number of a contact person for status updates;
    d. A copy of the SEA's appeal procedure.
2. *Investigation and Resolution*. On behalf of the Vermont Secretary of Education, the SEA Homeless Coordinator will:
    a. Notify the superintendent of the LEA involved within 10 business days of receipt of the appeal via email and return receipt mail. The notification will include instructions for requesting a copy of the appeal.
    b. Request documentation needed from the appellant and the LEA to clarify the facts.
    c. Review documentation and, if needed, request additional documentation and/or interview the parties involved.
3. *Recommendation and Final Decision.* Within 30 business days of receipt of the appeal, the Homeless Coordinator will make a recommendation to the Secretary of Education, who will make the final decision to support or deny the appeal. The timeframe for this step may be extended if additional investigation time is needed. The appellant and the LEA involved will be notified if additional time is required.
4. *Notification and File*. The SEA will notify the appellant and the LEA involved of the final decision and, if the appeal is granted, the LEA will be expected to follow through on the Secretary's ruling. The SEA will retain a record of all appeals, findings and final decisions. These documents are considered public record and may be made available to the appellant, the LEA, and other members of the general public in a format that meets privacy law requirements.

OMB Control No. 1894-0005 (Exp. 03/31/2017)

NOTICE TO ALL APPLICANT

The purpose of this enclosure is to inform you about a new provision in the Department of Education's General Education Provisions Act (GEPA) that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. **ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.**

(If this program is 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 statement as described below.)

What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in, the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve to high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant may comply with Section 427.

(1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.

(2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.

(3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.

(4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concern of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students

We recognize that many applicants may already be implementing effective steps to ensure equity of

access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC 20210-4537 or email ICDocketMgr@ed.gov and reference the OMB Control Number 1894-0005.