

**Act 1 Working Group's Response to AOE Technical Corrections to EQS Manual  
November 28, 2022**

Dear Tammy and Kim,

We hope you are well.

As promised, we are delivering with this message the Act 1 Working Group's response to your subcommittee's specific concerns about technical corrections to the EQS Manual from the AOE on "Personalized Learning Plans" and its proposed definition for "Civic Engagement." Additionally, we are weighing in on all the AOE's technical corrections. The recommendations herein were endorsed at a special meeting of the Working Group's EQS Subcommittee on November 28.

We have no qualms with the great majority of the AOE's technical corrections, as the table below makes clear (see pages 4-11). If that table's contents raise questions, feel free to contact us for clarification. Our subcommittee read the corrections as they were presented in the AOE's spreadsheet, then reordered them thematically in a table to the greatest extent possible, rather than addressing each where it fell chronologically in the EQS Manual or in the AOE's Excel spreadsheet. This formatting change more easily facilitated our interpretive work and dialogue. Alert us, please, to anything you think we might have missed or misread in the AOE's spreadsheet.

Next, we want to take up more substantive corrections, notably those where our thinking diverges from that of the AOE.

**First, the matter of "Personalized Learning Plans."** The AOE, with the exceptions of the highlighted "with" in the third line and "supports" in the fifth line, has proposed the following:

*As required in 16 V.S.A. § 941, schools shall ensure all students in grades seven through 12 shall have a Personalized Learning Plan, which shall be a written document developed by **and for** the student, **with** ~~by~~ a representative of the school and, if the student is a minor, the student's parent or legal guardian. The Personalized Learning Plan shall describe the scope and rigor of learning opportunities and **supports** ~~and support services~~ necessary for students to develop aspirations, to achieve college and career readiness, and to attain a high school diploma, and to participate confidently as youth and adults in civic, cultural, and social life of their school system, community, state, and nation. This plan must be reviewed at least annually.*

We are amenable to the AOE's call to remove the words "**support services**" because of potential confidentiality issues with IEPs and 504 Plans. However, certain services for students may be needed in respect to PLPs that do not have implications for IEPs and 504 Plans. Therefore, we propose substituting the word "**supports**" for "and support services." We believe this will satisfy the AOE's concerns and give students the assistance they may need in this context.

With respect to substituting "**with**" for "**by**" above, quite simply, "**with**" conveys more clearly that the process of producing the "written [PLP] document" is collaborative, involving students, school personnel and families/legal guardians, rather than something designed predominantly "**by** a representative of the school" and parents/legal guardians. When "**and for**" was added, it changed slightly the syntax of the section, and this, we thought, might lead unintentionally to an interpretation that contradicts the collaborative thrust of the original language.

**In respect to a definition of “Civic Engagement,” two things of note:**

1. We accept the AOE’s recommendation to add such a definition.
2. However, we will propose a definition that is more expansive in its title and differently worded in some respects.

**AOE Proposed Definition: “Civic Engagement”**

*“Civic Engagement” means individual and/or collective actions designed to identify and address issues of public concern with the goal of preparing young people for participation in their community and in democracy. Engagement activities may include, but are not limited to, electoral participation, volunteer opportunities and participation in social movements.*

**The Working Group’s Proposed Definition: “Civic and Community Engagement”**

*“Civic and Community Engagement” means individual and/or collective actions that identify and address issues of public importance, and that provide young people with opportunities that contribute to the current and future development of their communities and a democratic society.*

*Civic and Community Engagement can take place in a variety of formal and informal settings, including, but not limited to, those in governance and electoral politics, educational, cultural, and recreational activities, and social justice movements.*

In brief, while we borrowed from the AOE’s definition, we also felt strongly that the inclusion of “community” in the definition strengthens its purpose, and, as importantly, anchors it to a site of public engagement that has the most meaning and resonance for children and young people – *their community*. We also wish to stress that this form of engagement should be framed as extending beyond “participation” to actively “contributing” to the current and future life and wellbeing of a community and society.

The last section of our definition offers a broader articulation of the manifestations of civic and community engagement.

**AOE Proposed Definition: Transferable Skills**

*“Transferable skills are comprised of an essential set of knowledge, skills, and abilities that can be taught across content areas and are critically important to success in today’s world, particularly in collegiate programs and modern careers. Transferable skills may include communication, collaboration, creativity, innovation, inquiry, problem solving, critical thinking, and the use of technology.”*

**The Working Group’s Modified Definition: Transferable Skills**

*“Transferable skills” refers to an essential set of knowledge and lifelong learning skills, such as, but not limited to, creativity, communication, collaboration, critical thinking, inquiry, innovation, intercultural competency, problem solving, and the use of technology.*

*Transferable skills are interdisciplinary skills that are vitally important for students’ personal agency and contributions as members of a diverse and democratic society.*

The list of transferable skills in our first paragraph is identical to those in the AOE's definition, except we reinserted **"intercultural competency,"** which is extremely important. Next, we prefer the single word **"interdisciplinary"** to **"can be taught across content areas"**; the former, we believe, is better understood as a term of art than the latter.

The first sentence establishes that these skills are "essential" and yield benefits over the course of a lifetime of learning, which, implicitly, includes college and work – therefore, there is no compelling reason to explicitly reference "collegiate programs and modern careers."

Finally, our group is united in the belief that this definition, like certain others, should speak to the primacy of "transferable skills" in promoting student agency in a culturally diverse society and in strengthening democracy.

Once again, let us know if you have questions or concerns about anything in this document. We have shared it as a courtesy with Deputy Director Heather Bouchey at the Agency of Education.

Best,

Amanda Garces, Chair, Act 1 Working Group

Mark Hage, Vice-Chair, Act 1 Working Group

EQS Sections	AOE Recommendation	Act 1 Working Group Decision	Comments & Alternative Proposals
2114 2120 2120 2121 ..... 2120.6	Remove the "and" in "Career and Technical Education" so it reads <b>Career Technical Education</b> .  c. coordinated across the supervisory union, including sending high school and <del>technical schools</del> <b>career technical education centers;</b> "	<input type="radio"/> Agree	
2114	<p><b>"Equity" or "Equitable"</b> means that each student receives the resources and educational opportunities needed to learn and thrive in the classroom and in all aspects of learning and school life, <del>vocational,</del> <b>in career and occupational training</b>, and in community-school interactions, and to discover and cultivate their talents and interests. Equity goes beyond formal equality where all students are treated the same. To be achieved, Equity requires an inclusive school environment and may necessitate an unequal distribution of resources and services based on the needs of each student.</p>	<input type="radio"/> Agree	

2120	<p>The roles and responsibilities of the school’s leadership, including the school board, superintendent and principal, or <del>career and technical</del> <b>career technical center</b> director shall conform to...</p> <p>a. Supervise licensed principals <b>and CTE Directors</b> who shall be responsible for the day-to-day leadership of their school or center.</p> <p>e. coordinate the principal’s or <b>CTE director’s</b> schedule to enable this person to engage in student learning, such as:...</p>	<input type="radio"/> Agree	
2114	<p><del>“Career and Technical Education (CTE)”</del> means...or lead to a <b>post-secondary industry recognized</b> standard....and strengthen their ability to work collaboratively in their chosen <del>vocations</del> <b>occupations or careers</b> with all persons.</p>	<input type="radio"/> Agree	
2112	<p>“In order to carry out Vermont’s policy that all <b>children students</b> attending a public school or an approved independent school...”</p> <p>.....</p>	<input type="radio"/> Agree	
2114	<p>“Research Based” means practices and activities that are consistent on how <b>children students</b> learn...”</p>		
2114	<p><del>“Evidence-Based”</del> <b>Research Based</b>” means practices and activities that are consistent on how <del>children</del> <b>children students</b> learn...”</p>	<input type="radio"/> Agree	
2120	<p>Classroom instruction shall include a range of <del>research-based</del> <b>evidence-based</b> instructional strategies that most effectively</p>	<input type="radio"/> Agree	

	improve student learning and engage all learners as identified by national and Vermont guidance and locally collected and analyzed student data.		
2120.5	c. Scientific <b>practices, cross-scientific</b> inquiry, and content knowledge (including the concepts of life sciences, physical sciences, earth and space sciences, engineering <b>and technology</b> design);....	<input type="radio"/> Agree	
2121.5	Staffing shall be filled by licensed school counselors and other student support personnel with sufficient staff to carry out the school counseling services, such as guidance counselors, Student Assistance Program counselors, home-school coordinators, <b>multi-lingual learner English-as-a-Second Language</b> coordinators and school-based clinicians.	<input type="radio"/> Agree	
2125	“A Continuous Improvement Plan, as required in 16 V.S.A. §165, shall be developed and implemented in each <b>public school district Supervisory Union/Supervisory District</b> . The plan shall be designed to improve the performance of all students enrolled in the <b>district Supervisory Union/Supervisory District</b> . If a <b>school district Supervisory Union/Supervisory District</b> comprises more than one school building, a combined plan for some or all the buildings may be developed. The plan, however, may reflect the different needs of individual schools.”	<input type="radio"/> Agree	

2121.5	<p>Proposed change to <b>“Tiered System of Support”</b>:</p> <p>...This system shall be aligned with the school's Personalized Learning Plan structures, and specific student support services shall be specified within a student’s Personalized Learning Plan <b>process. Student Personalized Learning Plans should help inform the structures and services put in place to support individual student learning. Provision of specific student supports, including relevant accommodations, shall be detailed within a student’s IEP or 504 plan as required by federal law. Tiered systems of support should also integrate elements of early multi-tiered systems of support (MTSS) as relevant, to ensure that comprehensive and integrated systems of support are in place for all students within a district.</b></p>	<ul style="list-style-type: none"> <li>○ Agree</li> </ul>	<p>Note: we wrote out <b>“MTSS” – Multi-tiered Systems of Support.</b></p>
2114	<p><b>“Education Support Team” (EST) means a collaborative, school-level team that determines the additional short-term supports a <b>child student</b> may need to be successful, identifies student-specific performance goals, and tracks student progress towards those goals. Ideally, the EST includes an administrator, teachers, a school psychologist, special educator, school counselor(s), parents/families, a social worker, other staff with behavioral and/or academic expertise, and students when appropriate.</b></p>	<ul style="list-style-type: none"> <li>○ Agree</li> </ul>	<p>The word “child” is in the AOE’s correction; it was unintended, we’re certain, given the Agency’s earlier recommendation to substitute “student” or “learner” for “child/children.”</p>

2114	<p><b>“Civic Engagement”</b> means individual and/or collective actions designed to identify and address issues of public concern with the goal of preparing young people for participation in their community and in democracy. Engagement activities may include, but are not limited to, electoral participation, volunteer opportunities and participation in social movements.</p>	<p>We accept the recommendation to add a definition along these lines, but we offer an alternative.</p>	<p><b>“Civic and Community Engagement”</b> means individual and/or collective actions that identify and address issues of public importance, and that provide young people with opportunities that contribute to the current and future development of their communities and a democratic society.</p> <p>Civic and Community Engagement can take place in a variety of formal and informal settings, including, but not limited to, those in governance and electoral politics, educational, cultural, and recreational activities, and social justice movements.</p>
2114	<p><b>“Transferable skills”</b> are comprised of an essential set of knowledge, skills, and abilities that can be taught across content areas and are critically important to success in today’s world, particularly in collegiate programs and modern careers. Transferable skills may include communication, collaboration, creativity, innovation, inquiry, problem solving, critical thinking, and the use of technology.</p>		<p><b>"Transferable skills"</b> refers to an essential set of knowledge and lifelong learning skills, such as, but not limited to, creativity, communication, collaboration, critical thinking, inquiry, innovation, intercultural competency, problem solving, and the use of technology. Transferable skills are interdisciplinary skills that are vitally important for students’ personal agency and contributions as members of a diverse and democratic society.</p>

2114	<p>“Proficiency-based learning” and “proficiency-based graduation” <b>requirements</b>” refers <del>systems of instruction, assessment, grading and academic reporting that are based on students demonstrating mastery of the knowledge and skills they are expected to learn before they progress to the next lesson, get promoted to the next grade level, or receive a diploma.</del> to clear, shared learning objectives, <b>instruction</b>, and common assessment tools for effective cycles of practice, feedback, assessment, and reflection with students, who are empowered by choice in their learning experiences and who are accorded multiple ways to demonstrate <del>their new learning</del> <b>proficiency in knowledge and skills.</b></p> <p>In this system, “proficiencies” are district-wide learning objectives used by educators and students to drive instruction and assess growth in new learning.</p> <p>“Proficiency-based graduation <b>requirements</b>” refers <del>to a system that requires all students</del> to the <b>locally determined requirements</b> all students must demonstrate significant evidence of learning in order to graduate.</p>	○ Agree	
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2120.4  PLP	As required in 16 V.S.A. § 941, schools shall ensure all students in grades seven through 12 shall have a Personalized Learning Plan, which shall be a written document developed by <b>and for</b> the student, by a representative of the school and, if the student is a minor, the student's parent or legal guardian. The Personalized Learning Plan shall describe the scope and rigor of learning opportunities <b>and support services</b> necessary for students to develop aspirations, to achieve college and career readiness, and to attain a high school diploma, and to participate confidently as youth and adults in civic, cultural, and social life of their school system, community, state, and nation. This plan must be reviewed at least annually.	○ Yes, but with slight modifications as highlighted.	As required in 16 V.S.A. § 941, schools shall ensure all students in grades seven through 12 shall have a Personalized Learning Plan, which shall be a written document developed by <b>and for</b> the student, <b>with</b> by a representative of the school and, if the student is a minor, the student's parent or legal guardian. The Personalized Learning Plan shall describe the scope and rigor of learning opportunities and <b>supports</b> <del>support services</del> necessary for students to develop aspirations, to achieve college and career readiness, and to attain a high school diploma, and to participate confidently as youth and adults in civic, cultural, and social life of their school system, community, state, and nation. This plan must be reviewed at least annually.

2110:  Statement of Purpose	These rules are designed to ensure continuous improvement in student performance...both in traditional, school-based settings and in extended learning opportunities, with the latter including, but not necessarily limited to, virtual, <b>career technical education, adult education and literacy</b> , work-based, co-curricular, community-based and service-learning opportunities, community research, and <b>civic engagement</b> projects, dual enrollment and early college.	<ul style="list-style-type: none"> <li>○ Agree, with one modification: change “civic engagement” to “civic and community engagement.”</li> </ul>	These rules are designed to ensure continuous improvement in student performance...both in traditional, school-based settings and in extended learning opportunities, with the latter including, but not necessarily limited to, virtual, <b>career technical education, adult education and literacy</b> , work-based, co-curricular, community-based and service-learning opportunities, community research, and <b>civic and community engagement</b> projects, dual enrollment and early college.