Edits to EQS

22 January 2023

- 1. 2000/2110 Consider "to ensure that all Vermont students are afforded educational opportunities..." (this make the focus of the statement of purpose the Vermont student/learner, rather than the institution they attend, and would allow the opportunity to later address the area of the law that states whether these rules apply to recognized, approved and/or approved to received public tuition independent schools) (Tammy: I had something similar but, I like Kim's language better; noting that in Act 1's charge from the General Assembly, it references "promote an overarching focus on preparing all students to participate in an increasingly racially, culturally, and socially diverse Vermont and in global communities" (emphasis added); "ensure every student is in a safe ..."
- 2. 2110 (2)—"opportunities that are equitable.....and equal in quality and that enable.... (Would like to hear understand rationale for reordering)
- 3. 2110 (3)—"dual enrollment and early college programs"
- 4. 2110 (3)—"language or linguistic diversity"
- 5. 2110 spell out SU/SD Supervisory Union/Supervisory District (may also add (SU/SD) so that can be used later)
- 6. 2110 (3)—redundant last sentences (I would suggest leaving the last two sentences for legal review, as they are intended to protect the liability of school districts from private right of action as a result of the expansion of the definition.)
- 7. 2111 (3)—Student performance versus learning standards (Content Area Standards I believe that is the reference on the AOE website)
- 8. 2112 (4)—add language from 2110 about opportunities Consider language from above that centers the Vermont student
- 9. 2112 (4)—what is an inclusive form? I believe this would include translated reports for example.
- 10. 2112 "In order to carry out Vermont's policy that all students will be afforded educational opportunities that are substantially equal in quality, and to ensure continuous improvement in student performance, SU/SDs and schools to which this rule applies pursuant to 16 VSA Section 165 shall meet the the following education quality standards, and annually report to their communities in an understandable, inclusive and comprehensive form as required in 16 VSA Section 165(a)(2). (Note: Recommending dropping reference to public and independent schools and instead make it clear that the rule applies to SUs/SDs and schools as required by statute)
- 11. 2112 Replace "each supervisory union" with "SU/SD"
- 12. 2114: NOTE School is defined, but not SU/SD. This may not matter but, I'm flagging for a consistency check with group.
- 13. 2114 (academic record)—mention distinction from educational record I don't believe that we define "educational record"
- 14. 2114 (anti-discrimination and anti-racist)—move "programs and policies" to end of list or add verb after "policies" consider edit to say "...programs and policies designed and/or implemented..."
- 15. 2114 (applied learning)—neurodivergent cultures or groups?
- 16. 2114 (CTE)—"designed" now modifies diploma Consider: removing "supports attainment of a high school diploma" "CTE means an educational program that is designed to provide....
- 17. 2114 (caste)—singular or plural? System or class?
- 18. 2114 (college and career readiness)—"student's ability to possess" or "student's possession of", "skills needed to enter"
- 19. 2114 (critical thinking)—purpose to form a judgment or to better understand the question I think this read OK as is for me, as I believe it can be to "form a judgment" and/or "better understand the question."
- 20. 2114 (culturally and linguistically diverse students)—combine first two sentences so that it is a definition, pull out "linguistic competencies" as its own definition If Linguistic competencies is not otherwise used in the

- document, I think that it is appropriate to leave it within the current definition. If mentioned otherwise, then it would benefit from its own definition.
- 21. 2114 (culturally responsive teaching)—change "a" to "an", combine sentences to make one definition
- 22. 2114 (educational technology)—technology does not mean instruction, change term or definition Agree it is unclear; may depend how it is used later in the document
- 23. 2114 (equity)—the state of each student receiving.... Or if (equitable)—each student receiving, no need to captilaize "Equity", combine sentences into one definition
- 24. 2114 (ethnic studies)—no need to capitalize "Ethnic Groups" or 'Indigenous Peoples" It would agree that we need not capitalize Ethnic Groups (unless we capitalize all other defined terms). It looks like we should capitalize Indigenous peoples (not P), but when referencing the specific groups within the parentheses, we should leave the capitals. I would also say that the Act 1 Working Group had representatives from those communities and they likely have capitalized as they wish to be referenced, but we could check that with Act
- 25. 2114 (ethnicity)—make "Indigenous Peoples" its own definition? I think that we don't need to capitalize Ethnic Group here, and I also don't think that we want to pull out a definition for Indigenous peoples, as in this context it there is also reference to the intersectionality of identities.
- 26. 2114 (interdisciplinary)—"means relating to the practice" or simply "examining and teaching", change "alternative" to "diverse"?
- 27. 2114 (language)—make term plural or definition singular, because the list has an element the contains commas, the elements of the larger list should be separated by semicolons, add the list that is ow included in (linguistic diversity)
- 28. 2114 (linguistic diversity)—begin with "the immense body of diverse and complex....", combine sentences to make one definition
- 29. 2114 (personalized learning plan)—this will include experiences of discrimination?
- 30. 2114 (racism)—replace "theory" with behavior or way of thinking?
- 31. 2114 (evidence-based)—hyphenate, put in alphabetical order, add other verbs to "learn" like "communicate", "behave", and/or "thrive".
- 32. 2114 (school)—last sentence seems redundant Agreed, and I think that we could eliminate "public" in the second sentence, as the determination of to whom the rules apply will be made early in the document or by reference to law and is unnecessary to make that distinction here.
- 33. 2114 (Supervisory Union/Supervisory District) "means an administrative, planning and educational service unit created by the State Board of Ed. A Supervisory Union consists of two or more school districts and/or supervisory district(s). A Supervisory District consists of only one school district and may be a unified union school district, inclusive of multiple towns.
- 34. 2114 (transferrable skills)—replace "such as" with "including", make sure this aligns with later references
- 35. 2120.1 (a)—semicolons after "perspectives" and "narratives"
- 36. 2120.1 (b)—dash after "learners" and "(dis)abilities" add "modeling and setting high expectations...."
- 37. 2120.2—comma after "community research"
- 38. 2120.2(a)—delete "an", "shape and impact" seems redundant, so does "as students" I think this one reads OK as is to me.
- 39. 2120.2 (d)—not sure what the verb "center" means here I believe that is meant to reflect and lift up the lived experiences of those with disabilities
- 40. 2120.3—add after "e.g."—"communicated in the learner's home language"
- 41. 2120.4—add language from definition? Or statement of purpose?
- 42. 2120.4 I believe that the last sentence is no longer necessary as I think that all students 7-12 must now have PLPs (check with the statute)
- 43. 2120.5 SU/SD replaces Supervisory Union
- 44. 2120.5—add language from statement of purpose?
- 45. 2120.5(c): Suggested revision: "scientific practices, cross-scientific inquiry, and content knowledge that includes concepts of life sciences, physical sciences, earth and space sciences, engineering and technology design.
- 46. 2120.5 Revise: "Each school shall provide" (dropping reference to public and approved independent school)
- 47. 2120.5 I would move the third from the last paragraph down and the paragraph referencing health and physical ed up, to keep them ore specific references at the top and the more general reference at the end of that section

- 48. 2120.6—no need for punctuation after "serve" in last sentence; last paragraph "a process that includes the diverse voices...."
- 49. 2120.6 Replace "supervisory union" with 'SU/SD"
- 50. 2120.7 I believe the second paragraph is dated and no longer necessary as this is a requirement for all students today.
- 51. 2120.8 check reference to supervisory union board (to SU/SD) and through the remainder of the document (pg. 21; 2121.3
- 52. 2120.8: Replace "secondary school board" with "SU/SD board with responsibility for secondary level students"
- 53. 2221.5—comma after "identities of students" at bottom of page 23; SU/SD mid page and extra space in end of first line of second to last paragraph 2122.1
- 54. 2221.5 (page 25)—add "services" after "mental health", and should we add other kinds of counseling besides gender identity, or should we delete that to be more global? I think that may fall under "health services" with the more general counseling support being addressed above that. We could add "to include counseling on gender identity...." and SU/SD reference throughout
- 55. 2122.1—add the anti-racist and equitable language (see 2125c)
- 56. 2121.1 Remove reference to supervisory union, replace with SU/SD
- 57. 2122.2 Drop reference to MP3, keep "high quality audio"
- 58. 2122.2 Replace reference to supervisory union with SU/SD
- 59. 2123.2 (end of section)—add "communication" after "This"
- 60. 2123.3 Remove reference to supervisory union, replace with SU/SD
- 61. 2123.3: DISCUSSION ITEM: To what extent is 2123 aligned with proposed DQS and QA approach
- 62. 2124: SHOULD THIS REFERENCE QA standards and reporting
- 63. 2125 & 2126: How does the continuous improvement plan align with DQS and QA?
- 64. 2125 (page 29)—"may include" versus "shall include", add "and" after "advanced placement courses" "Shall" was in the original EQS so I believe it must be required that the plan minimally provides those indicators that are required by the AOE (I think that is mandatory reporting for the state dashboard type info)
- 65. 2126.3 should check references to the law 165
- 66. 2128 consider the appropriate roll out/timeline for effective date and full compliance???