

Agency of Education Feedback on Rule Series 2000 v. 19

Section/ Rule Number	v.19 Language	Suggestion/Revision/Modification Requested	Rationale and Division Contact
2110.1 Definitions	"Proficiency-based learning" refers to systems of instruction, assessment, grading and academic reporting that are based on students demonstrating mastery of the knowledge and skills they are expel to learn before they progress to the next less, get promoted to the next grade level, or receive a diploma.	<p>Copy edit: <i>mastery of the knowledge and skills they are expel to learn before they progress to the next less, get promoted to the next grade level, or receive a diploma</i></p> <p>"Proficiency-based learning" refers to systems of instruction, assessment, grading, and academic reporting that are based on students demonstrating mastery of the knowledge and skills they are expel-expected to learn before they-progressing to the next levelless, get promoted to the next gradelevel, or receiving a diploma."</p>	SPD - DeCarolis There are some typos in this section.
2110.1 Definitions	<u>"Proficiency-based graduation requirements" refer to the locally determined requirements all students must demonstrate significant evidence of learning to graduate. The requirements shall be clear, shared learning objectives, instruction, 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 proficiency in knowledge and skills. In this system, "proficiencies" are supervisory union or supervisory district-wide learning</u>	<p>Use definition currently on AOE website and in Agency materials.</p> <p>Replace first sentence with: <i>Proficiency-Based Graduation Requirements (PBGRs) are the locally-determined set of content knowledge and skills aligned to state standards that, when supplemented with any additional locally-developed requirements, have been determined to qualify a student for earning a high school diploma.</i></p> <p>Edit remaining definition: The requirements shall be clear, shared learning expectations that empower students and provide opportunities for choice in learning experiences and accord multiple ways to demonstrate proficiency in knowledge and skills. In this system, Proficiency-Based Graduation Requirements are supervisory union or supervisory</p>	SPD - DeCarolis Learning objectives are more specific, immediate, and focused on individual lessons or units, while learning expectations are more general and describe overarching learning outcomes. [OMIT and common assessment tools for effective cycles of practice, feedback, assessment, and

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	<u>objectives used by educators and students to drive instruction and assess growth in new learning.</u>	<u>district-wide learning objectives used by educators and students to drive instruction and assess growth in new learning.</u>	reflection – part of LCAS not PBGRs]
2110. Definitions		See the definition below.	I think it is confusing that some language is defined in this section and some definitions such as Transferable Skills are included in a related section. If I was looking for a definition, I would go to this section of EQS rather than a section related to transferable skills.
2110 Definitions	No definition for tiered system of supports (TWatterson)	The collaboration of all adults to meet the academic, behavioral, social, and emotional/mental health needs of each and every student. Supports are provided as layered high-quality, evidence-based instruction, intervention, and assessment practices that are matched to student strengths and needs, based on the effective and timely use of meaningful data,	A tiered system of supports in VT is more comprehensive than some national MTSS models. It is important that we define our every child/whole child, systemic approach of our organizational model.
2110 Definitions	No definition for student	Add definition	
2111. Adoption of Performance Performance Standards	Pursuant to 16 V.S.A. § 164(9), the State Board will implement and periodically update standards for student learning in appropriate content areas from kindergarten to grade 12- Supervisory	Pursuant to 16 V.S.A. § 164(9), the State Board will implement and periodically update standards for student learning in appropriate content areas from kindergarten to grade 12- Supervisory Union <u>Supervisory union and supervisory district</u> boards shall use these standards as the basis for the developing	Omit “locally developed” since the board is developing or selecting assessments so some assessments might not be

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	<p>Union Supervisory union and supervisory district boards shall use these standards as the basis for the developing and selecting curriculum, methods of instruction, locally developed assessments, and the content and skills taught and learned in school.</p>	<p>and selecting curriculum, methods of instruction, locally developed assessments, and the content and skills taught and learned in school.</p>	<p>locally developed such as benchmark assessments.</p>
<p>2113.3 Federal and State Requirements; Student Records</p>	<p>Student Record Maintenance and Retention.</p> <p>1. For the purposes of this section, a transcript is a formal record certifying and documenting a student's or former student's academic achievement and shall include, at a minimum, the student's name, date of birth, last known address, dates of attendance, courses taken, standardized test scores. . .</p>		<p>Should standardized test scores be required for every student?</p>
<p>2120.1. Instructional Practices Strategies</p>	<p>Practices employed by educators shall include <u>examining and teaching a subject from multiple academic perspectives and encouraging students to engage with and to synthesize diverse perspectives and narratives, including those from the students' lived experiences, into a coherent understanding or analysis.</u></p>		<p>I don't understand the expectation related to the highlight. What does that look like? Could it be deleted?</p>
<p>2120.2. Career Counseling and Flexible Pathways</p>	<p><u>Supervisory unions, supervisory districts, and s</u>Schools must Schools shall ensure that students receive appropriate career counseling and program information</p>	<p>The highlighted passage referencing learning expectations should be amended as follows:</p>	<p>SPD - DeCarolis</p> <p>There is no need to state that learning expectations</p>

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	<p><u>regarding the availability of education and apprenticeship program offerings at career technical centers -and must</u> provide students the opportunity to experience learning through flexible and multiple pathways, including but not limited to career technical education, virtual learning, work-based learning, service learning, <u>internships, apprenticeships, community research, and civic and community engagement</u>, dual enrollment, and early college. Learning must occur under the supervision of an appropriately licensed educator. Learning expectations must be aligned with state expectations and standards...</p>	<p>Learning expectations must be aligned with the expectations of the supervisory union/district curriculum for the applicable content area.</p> <p>Career and College Counseling should be integrated into both 2120.4 and further explicated in 2120.5 where they are already referenced. Integration here over-emphasizes certain flexible pathways and divorces career counseling from post-secondary education counseling.</p> <p>2120.4. Personalized Learning Plans <i>As required in 16 V.S.A. § 941, school districts shall ensure all students in grades seven through twelve are engaged in an ongoing personalized learning process that is documented by a personalized learning plan, which shall be a written document developed by <u>and for</u> the student, <u>with</u> 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 necessary for students to <u>develop aspirations, achieve college and career readiness, prior to graduation, and to attain a high school diploma, and participate confidently in the civic, cultural, and social life of their school system, community, state and nation.</u> This plan must be reviewed at least annually by November 30.</i></p> <p><i>This section is effective in accordance with the rolling implementation dates established in Section 14 of Act 77 of 2013, as may be amended.</i></p> <p>2120.5 [...]</p>	<p>must be aligned to state standards as that is already spelled out in 2120.5. Flexible Pathways are intended to provide students with a means of demonstrating proficiency in academic areas (including transferable skills) necessary for secondary completion and post-secondary continuation (see 16VSA941).</p> <p>Career and College Counseling should be integrated into both 2120.4 and further explicated in 2120.5 where they are already referenced. Integration in FP over-emphasizes certain flexible pathways and divorces career counseling from post-secondary education counseling. It also suggests that career counseling can only occur with flexible pathways when this should be occurring as part of career and college</p>

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		<p><i>School counseling services shall support the mission and vision of the school and shall be available to all students K-12. The services shall address students' academic, career, personal and social development, offer support and resources that are respectful of the lived experiences and unique identities of students, and support students who either experience or witness instances of racism and discrimination. Such services shall be aligned and integrated with the work of other professionals in the school setting, as well as those in other educational and human services.</i></p>	<p>counseling over the K-12 continuum as part of robust school counseling framework consistent with ASCA standards.</p>
<p>2120.5. Learning Content Areas</p>	<p>2120.5. Learning Content Areas</p>	<p>This should return to <u>Curriculum Content.</u></p>	<p>SPD – DeCarolis</p> <p>The AOE’s website has nested under “Student Learning” multiple sub webpages, the first being “Coordinated Curriculum.” Consistent with Statute describing the minimum course of study and rule, we have state adopted content standards and transferable skills that must comprise the curriculum which must be coordinated. Without an expectation of curriculum content we lose that the learning must be guaranteed and viable.</p>

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2120.5. Learning Content Areas	<p>(a) Literacy, including critical thinking, language, reading, <u>spelling, comprehension, speaking and listening, and writing</u>; <u>demonstrating proficiency in literacy includes the ability to engage with language to acquire, construct and communicate meaning, and to shape meaning to identity in aspects of daily living</u>. All students need to receive systematic reading instruction in the early grades from a teacher who is skilled in <u>teaching reading through a variety of evidence-based instructional strategies that take into account language knowledge and skills, as measured by effective assessments (e.g., screening, formative, summative, and diagnostic) and the linguistic background of each student</u>. Some students may require <u>intensive supplemental instruction tailored to the unique difficulties encountered, irrespective of special education eligibility</u>;</p>	<p>a. <u>English language arts</u> and literacy (including critical thinking, language, reading, spelling, comprehension, speaking and listening, and writing);</p> <p>Omit highlighted section since that should be happening across all content areas and include this at the bottom after the final content bullet that is currently Ethnic and Social Equity Standards:</p> <p><u>Students will have multiple opportunities to develop demonstrating proficiency in literacy across content areas by includes the ability to engage with language to acquire, construct, and communicate meaning, and to shape meaning based on to identity in aspects of daily living.</u></p>	<p>SPD - DeCarolis</p> <p>Critical thinking is a transferable skill. Does it belong here also since it could be included in each content area.</p>
2120.5. Learning Content Areas	<p>(b) mathematical content and practices, including numbers, operations, and the concepts of algebra and geometry <u>by the end of grade 10</u></p>	<p>Omit: by the end of 10th grade.</p>	<p>SPD - DeCarolis</p> <p>Including the year of completion does not align with a proficiency-based system of education.</p>

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			This should be better aligned to mathematical domains as stated in CCSS and also in the VT AOE Math PBGR hierarchy. Possible wording could be: (b) mathematical concepts, skills, and practices that enable students to reason mathematically, including concepts of number and quantity, algebra, functions, geometry, and statistics.
2120.5. Learning Content Areas	(c) scientific practices, cross-scientific inquiry and content knowledge (including that includes the concepts of life sciences, physical sciences, earth and space sciences, engineering and technology design);	(c) Science and Engineering Practices, scientific practices, eCross-Cutting Concepts, and Disciplinary Core Ideas scientific inquiry and content knowledge (including that includes the concepts of life sciences, physical sciences, earth and space sciences, engineering and technology design);	SPD - DeCarolis NGSS intentionally did not use “inquiry” intentionally since it was interpreted in many different ways. The Science and Engineering Practices provide clear guidance on how inquiry can be carried out in the classroom
2120.5. Learning Content Areas	(e) physical education and health education as defined in 16 V.S.A. § 131; Schools shall comply with the national physical education standards as approved by the State Board, and: physical education standards as approved by the State Board, and;	The highlighted section applies to all standards so it does not need to be included here. (e) physical education and health education as defined in 16 V.S.A. § 131; Schools shall comply with the national physical education standards as approved by the State Board, and: physical education standards as approved by the State Board, and;	SPD - DeCarolis all state adopted content standards that comprise the minimum course of study are required of schools

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2120.5. Learning Content Areas	<p><u>1. Provide students in grades K-8 with at least two physical education classes per week and students in grades 9-12 with one and one-half years of physical education or the equivalent thereof.</u></p> <p><u>2. Offer options for students in grades K-12 to participate in at least 30 minutes of physical activity within or outside of the school day. Physical activity may include recess and movement built into the curriculum but does not replace physical education classes.</u></p>	<p>Delete 1 and 2.</p>	<p>SPD - DeCarolis</p> <p>In a proficiency-based system, time is flexible and the expected outcomes remain the same. Why do we specify time for PE classes and not for other content areas?</p>
2120.5. Learning Content Areas	<p><u>(h) ethnic and social equity studies.</u></p>	<p>This needs a descriptor/definition consistent with the other content areas</p>	<p>SPD – DeCarolis</p> <p>This should have a consistent framing as other content areas to guide SU/SDs and educators in developing curriculum aligned to clear, state-adopted content standards.</p> <p>What concepts should be included here?</p>
2120.5. Learning Content Areas	<p>(g) transferable skills, which refers to lifelong learning and interdisciplinary skills that are vitally important for students' personal agency and contributions as members of a diverse and democratic society, including communication,</p>	<p>Transferable skills are comprised of an essential set of knowledge and skills 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 include Clear and Effective Communication, Creative and Practical</p>	<p>SPD - DeCarolis</p> <p>Many schools use this group of transferable skills or something very close:</p>

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	collaboration, creativity, innovation, inquiry, problem-solving, critical thinking, the use of technology, and intercultural competency;	<p>Problem-Solving, Informed and Integrative Thinking, Responsible and Involved Citizenship, and Self-Direction Scoring Criteria</p> <p>This definition is based on what is in the PBL Terminology document as well as information related to transferable skills on the AOE website.</p>	<ul style="list-style-type: none"> • Clear and Effective Communication • Creative and Practical Problem-Solving • Informed and Integrative Thinking • Responsible and Involved Citizenship • Self-Direction Scoring Criteria <p>Intercultural competency is part of Responsible and Involved Citizenship.</p>
2120.5. Learning Content Areas	Each school district shall implement a written curriculum developed pursuant to 2120.5, that is:	<p>Strike “written.” Consider “documented” is the intent is to communicate that the curriculum can be published or produced for review.</p> <p>Each school district shall implement a written-curriculum developed pursuant to 2120.5, that is:</p>	SPD - DeCarolis See suggestion column and, The curriculum might be online. . . I’m not sure what we mean by written but don’t think it needs to be included.
2120.5 Tiered System of Supports (TWattersson)	<u>Student pPersonalized lLearning pPlans 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</u>	The VT PreK-12 tiered system of supports aligns the components of early multi-tiered systems of support (Early MTSS) with those of the VTmtss Framework to ensure a continuous, comprehensive, and integrated system of supports for every preK-12 student.	I am unsure why a tiered system of support was moved to 2120.5 as it is <i>the organizational structure</i> and not a Learning Content Area.

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	<p><u>should also integrate elements of early multi-tiered systems of support (EMTSS) as relevant, to ensure that comprehensive and integrated systems of support are in place for all preK-12 students.</u></p>	<p>Through PLP, IEP, EST, and Section 504 plans, educators work with the student and family to facilitate two-way communication and cooperative efforts to support the student’s success. These learning plans address individual needs with a tailored plan designed to help students personalize their learning, meet the state’s learning standards, and stay on track for graduation. Federal and State legislation, as well as State Board Rule have developed these plans over time to ensure student equity.</p>	<p>Student-Centered Learning Plans</p>
<p>2120.5. Tiered System of Support (Tammy Bates)</p>	<p>School counseling services shall support the mission and vision of the school and shall be available to all students K-12.</p>	<p>Should this include PreK?</p>	<p>Pre K should be included</p>
<p>2120.7. Graduation Requirements</p>	<p>A student meets the requirements for graduation when the student demonstrates evidence of proficiency in the curriculum developed in the learning <u>content</u> outlined in <u>Section 2120.5</u>, and completion of any other requirements specified by the board of the school district attended by the student.</p>	<p>A student meets the requirements for graduation when the student demonstrates evidence of proficiency in the curriculum developed in the learning <u>content</u> [<u>Academic Areas</u>] outlined in <u>Section 2120.5</u>, and completion of any other requirements specified by the board of the school district attended by the student</p>	<p>SPD – DeCarolis</p> <p>Curriculum is the vehicle for the development of proficiency in state-adopted content standards. A student may demonstrate proficiency in mathematical content – the curricula may vary.</p>

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