

Page & Line	Current Bill Language	Recommended Language Changes	Rationale
p. 1 line 2	“An act relating to supporting Vermont’s young readers through evidence-based literacy instruction”	“An act relating to supporting Vermont’s students through systematic, explicit, and evidence-based literacy instruction”	S.204 encompasses instruction, assessment and support for all students’ literacy, not only PK-5. The bill should be consistent as stated, “any enrolled student whose proficiency falls below proficiency standards...” (p. 8, line 17, 18).
p. 4 line 19	notified in writing not later than 30 days after the identification of the reading deficit.	30 calendar days	This clarification will lead to consistent implementation and earlier notification.
p. 5 line 13	(1) the number and percentage of students in kindergarten through grade three performing below proficiency on local and statewide reading assessments, as applicable; (2) the universal reading screeners utilized;	(1) the number and percentage of students in kindergarten through grade three performing below proficiency on local and statewide reading assessments, disaggregated by the following subgroups: (a) free-reduced lunch/non free-reduced lunch, (b) special education/non-special education, and (c) African-American and other students of color/white students.	Reporting student progress by subgroups will help schools and the Vermont Agency of Education identify inequities and target the resources needed to help close achievement gaps. Disaggregated data will also allow the VT-AOE and Legislature to monitor reading progress within each subgroup. Without this disaggregation, VT will face another decade (or more) of widening achievement gaps and diminished opportunities for underreported disadvantaged students.
p. 5 line 19	(4) growth measure assessment data.	(4) growth measure assessment data that includes benchmark data three times a year, fall, winter and spring, in comparison to grade-level benchmarks.	Progress-monitoring assessments administered 3x/year inform educators on student growth patterns and changing instructional needs.
p. 1 line 19	Annually, the Agency of Education shall update and publish a list of reviewed universal reading screeners and assessments	Change reviewed to recommended	Districts want clear guidance on what screeners meet the criteria set forth in S 204
p. 6 line 14	On or before January 15, 2025, the Agency of Education shall submit a written report to the Senate and House Committees on Education with a list of the	On or before January 15, 2025, the Agency of Education shall submit a written report to the Senate and House Committees on Education with the reliable, valid recommended universal	To guide districts in evidence-based decision making, the VT-AOE should publish a list that only includes screeners proven by the National Center for Intensive Intervention at the American

	reviewed universal reading screeners and assessments it has published pursuant to 16 V.S.A. § 2907.	reading screeners and assessments it has published pursuant to 16 V.S.A. § 2907.	Institutes for Research to be reliable and valid. The current list published by the VT-AOE includes disproven assessments as well as evidence-based assessments, which will cause confusion and poor implementation of S.204.
p. 7 line 5	instruction in the early grades from a teacher who is skilled in teaching the foundational components...	instruction in the early grades from a teacher who is trained in teaching the foundational components...	This new language is consistent with the S.204 training requirement for PK-5 teachers on p. 10, lines 3-8.
p. 8 line 21	support and information to parents and legal guardians.	support and information to parents and legal guardians stating the student's current level of performance based on valid and reliable assessments .	S.204 already includes the provision that students' plans will include "the student's specific reading deficit as determined or identified by diagnostic assessment data" (p. 4, line 6-7). This should be consistent regarding "any enrolled student whose proficiency falls below proficiency standards..." (p. 8, line 17, 18).
p. 13 lines 8-9	(B) three teachers, appointed by the Vermont-National Education Association, who teach literacy, one of whom shall be a special education literacy teacher and two of whom shall teach literacy to students in prekindergarten through grade three;	(B) three teachers, appointed by the Vermont-National Education Association, who teach literacy and have been trained in an evidence-based literacy program , one of whom shall be a special education literacy teacher and two of whom shall teach literacy to students in prekindergarten through grade three;	The Advisory Council on Literacy needs members who have been well trained and have gained expertise in evidence-based literacy practices to support the Council's mission.
p. 15 line 6	recommend best practices for Tier 1, Tier 2, and Tier 3 literacy instruction...	Recommend evidence-based practices for Tier 1, Tier 2, and Tier 3 literacy instruction...	Keeping terminology consistent throughout S.204 will improve clarity and implementation. Tiers 1, 2, and 3 instruction should be grounded in scientific research.
p. 15 line 18	The Council shall meet not more than four times per year.	The Council shall meet not more than eight times per year.	Reducing the number of meeting times by half will likely slow the Council's progress by half as well. Student reading is an urgent matter for Vermont; the Council should reflect that urgency.