


MEMORANDUM

TO: Sen. Brian Campion, Chair, Senate Committee on Education
Rep. Kate Webb, Chair, Senate Committee on Education

CC: Vermont Superintendents Association
Vermont School Boards Association
Vermont Principals' Association
Vermont NEA
Meagan Roy, Ed.D., Chair, Act 173 Advisory Group

FROM: Daniel M. French, Ed.D., Secretary of Education 

SUBJECT: Administration Proposals on Literacy – Context and Theory of Action

DATE: February 12, 2021

Purpose

The Agency of Education is very grateful for the conversations that both the House and Senate Committees on Education are having with regard to literacy, and early literacy in particular. We have identified literacy as a fundamental challenge in Vermont education, that is critical both to the success of Act 173 of 2018 and to our COVID-19 recovery efforts. We are glad that you share this perspective and commitment and appreciate the work being done.

In that spirit, I would like to take the opportunity to provide a high-level overview of the context and theory of action that informed the Administration's proposals on this important issue. We believe that three elements are critical to any policy solution on Literacy:

- [An emphasis on using data](#)
- [Equal attention to the problem statewide](#)
- [Solutions cannot be exclusively legislated.](#)

We believe that any legislative solution on literacy that does not address all three of these elements will ultimately not be successful. We have offered language that is attentive to this theory of action and will support action to address literacy at the state level, and in school districts across Vermont.

Theory of Action

For each of the elements below you will find a recommendation as well as a narrative on why the Agency of Education believes this element is worthy of critical focus. We previously proposed language attentive to each of these elements, and respectfully suggest that, as the General Assembly works toward final legislation, it remains attentive to these elements.

An Emphasis on Using Data is Important

Recommendation:

Establish in statute a requirement that school district benchmark literacy assessments report information on literacy in a format to be determined by the Secretary of Education.

Narrative:

Anecdotes abound about both the critical importance of early literacy instruction, and the often-acute need in many of our school districts. We do not need data to know we have a problem, or that it is important to address it. But knowing that literacy is important and that there is critical need is not sufficient when it comes to addressing the problem. We have heard many members of your committees express a desire that support and technical assistance from the Agency and other entities be targeted to areas of greatest need. To meet that intent, we need a common, comparable data set to equitably target limited resources and support.

Another theme in the testimony is the need for professional development. Vermont's regulatory requirement for school districts and supervisory unions in this area, a "needs-based professional development system" specifies the "need" in needs-based professional development to be student need. This means districts must have a solid understanding of their student data before designing professional development activities. To that end, it would be useful to have a common understanding in data to design and share professional development activities within and among school districts. A common understanding in data would be very helpful in designing state-level professional development activities and related supports if larger trends in the data can be identified that would be applicable to all districts. Also, absent a common data understanding, evaluating the success of professional development activities becomes difficult.

We are advocating for legislative tools to require this common data reporting. Lexiles are only one measure, and as both committees have heard, they do not address everything. But they are common and comparable, they address technical proficiency in reading, and most benchmark assessments *already in use in Vermont school districts* have the capacity to translate into Lexile scores without changing the existing assessment, making this a low cost, low impact change to districts.

The Agency of Education appreciates the conversation about how best to measure and assess reading success, and welcomes feedback on additional measures or processes.

Accordingly, the Agency is amending recommended language to have assessments reported in Lexiles. The statute should direct school districts to report "in a format determined by the Secretary of Education." It is appropriately a responsibility of the Secretary, and a determination that can be made in consultation with stakeholders in the field and outside experts. Language drafted in this way will also allow the Secretary to be responsive to new developments in the science of reading and the advent of new tools for measuring literacy.

All School Systems Must Be Equally Attentive to This Problem

Recommendation:

Establish a requirement for school boards to establish a literacy policy, with goals for improving literacy outcomes set by the supervisory union board. The board would be required to periodically review and evaluate progress toward these goals.

Narrative:

We and the committees have heard of many districts addressing this work, many coming up with innovative solutions, and comprehensive approaches grounded in science and best practice. We know that many districts are also hungry to engage in this work, but may lack resources, guidance, or organizational buy in to do so.

We are advocating for a common set of statutory requirements to ensure school boards and superintendents are attentive to these issues. We are not advocating a top-down, one-size fits all approach. Solutions should be tailored to local conditions and meet local needs. The requirements we are advocating for allow boards to set goals, and then assess progress in relation to their own goals.

Adding requirements in statute will give the Agency of Education more regulatory, guidance, and technical assistance tools. Without adding a requirement, no amount of professional development, technical assistance, grant funding, or other solutions will guarantee that a school district will actually address this issue with the priority it deserves.

We are amending our recommendation regarding superintendent evaluation. It is appropriate for a superintendent to be evaluated, as one of many factors, on whether the Supervisory Union is *making progress toward* its literacy goals. This better fits within the context of a school district policy and reflects the appropriate relationship between board governance and oversight, with superintendents as the chief executive officer of the district(s).

Solutions Cannot Be Exclusively Legislative

Recommendation:

While crafting policy solutions, we recommend that the legislature weigh potential impacts carefully and avoid establishing new requirements, grants or programs that add additional complexity, create new burdens, or pose implementation challenges. Legislation on this issue should compel attention of local systems to literacy, while maintaining flexibility for interested parties (AOE, education stakeholders, educator groups, individual or groups of districts, and third-party entities) to offer non-policy solutions.

Narrative:

The Agency of Education conceives of this work as central to our ongoing work on Act 173. Effective solutions will be a blend of local and state actions. Under Act 173, and working with stakeholders, the Agency is already working on technical assistance related to his area. We have identified literacy as an area that is critical to the success of Act 173 implementation.

Even at this early point, we can also state confidently that literacy will be a key area for our COVID-19 recovery work. This opens up possibilities for non-statutory actions related to emergency response, as well as the dedication of non-state funding, either through direct federal aid to schools, or through state set asides.

Neither updated statute or more money alone will solve the problem. A case in point: Many school systems have federal dollars in their IDEA-B carryforward accounts that could be devoted to addressing literacy. While districts often carry forward unspent funds on a routine basis, if the funds remain unspent, they must eventually be sent back to the federal government. The Agency of Education is concerned that school districts are not sufficiently attentive to this problem, as outlined above, and that unspent IDEA-B, and other federal funds could be dedicated to address literacy.

There is space for other interested parties, including stakeholder groups, private entities, and professional education associations to develop, innovate, implement and spread best practices. This process cannot be legislated, but the legislature, and the Agency can take actions to encourage districts and educators to seek out these activities when going to the market for leadership development, professional development, etc.