

# Vermont Association of School Psychologists

April 11, 2022

Dear Senate Education Committee:

I am writing today on behalf of the Vermont Association of School Psychologists (VASP) regarding House Bill 716 and the request for the delay in the rule changes in special education. For the record, the VASP is in favor of a delay in order for the individuals responsible for implementing the rule changes to receive adequate training to ensure that the rule changes are implemented responsibly and with fidelity. While the rationale for supporting a delay focuses on training needs, it is important to understand this focus is an attempt to limit the inequities to our students across the state. If all districts are required to roll out this change without proper preparation, we risk the potential of harm to our already most vulnerable students. Ethically, we cannot support the rush to implement changes while knowing how unprepared our professionals are and the possible harm that could result to our students. We are requesting a delay as we feel the changes will ultimately benefit our students; however, these are extensive changes which require substantial systems-wide adaptations.

In a recent survey of Special Education Administrators in Vermont, 94.3% of respondents indicated that their districts were not ready to implement the required changes for the identification of Specific Learning Disability or Adverse Effect as of July 1, 2022. School psychologists responded to a similar survey, of which, 90% noted their districts would not be prepared by the July 1 deadline.

In an effort to help train professionals, the VASP has hosted two, one-day workshops on the identification of specific learning disabilities using the two models outlined in Rule 2360. These trainings were open to members and non-members. Approximately 90 participants attended the first training and 70 participants attended the second, fewer than the number of people that comprise the special education departments of some districts. The majority of participants were either school psychologists or special education administrators, not principals or superintendents. This is notable as the changes that are forthcoming are systemic changes, and at this time, there has not been training specific to building administrators or superintendents aside from the webinars published by the AOE. Furthermore, the AOE webinars give an overview of the rule changes but do not describe the “how to” that is needed for successful implementation.

Feedback from each of the trainings provided by the VASP revealed that participants found the workshops beneficial and helpful to their practice; however, additional trainings have been requested, including opportunities to practice with mock data. They noted that it was a “big shift in thinking” that would “require more training in order to fully understand.” They also

reported that presenting this information to administrators, instructional coaches, and curriculum coordinators would be helpful. It was clearly evident that participants felt additional training was needed and could not be accomplished in a one-day event.

In models submitted in previous testimony, schools and districts in other states making similar changes to those proposed took approximately 3 years to roll out the changes. This timing was used to gather information, ensure that core instruction and curriculum met the necessary requirements to be effective, train stakeholders expected to implement the changes, practice using mock data in order to become accurate and proficient in their decision making, and ensure the necessary infrastructure was in place to be successful.

The VASP adamantly supports the changes specified in Rule 2360; however, given the challenges outlined here, as well as in our previous testimony, the Vermont Association of School Psychologists urges the Senate Education Committee to consider delaying these rule changes. As others have testified, schools that are ready to utilize the models outlined in Rule 2360 for SLD identification have the opportunity to do so under the current regulations. Insisting on changes without proper training and preparation has the potential to harm the very children we seek to support. Thank you for your time and attention to this matter.

Sincerely,

Shannon Newell, NASP Delegate - Vermont Association of School Psychologists