

# **AOE Graduation Requirements Recommendations**

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**Vermont Agency of Education**

# Graduation Requirements Report - Overview

Section 9a of Act 73 requires the Agency of Education to recommend to the State Board of Education standards for statewide graduation requirements.

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- **AOE Deliverable:** A report recommending statewide graduation requirements for the Vermont State Board of Education.
- **Objectives:** The recommendations for statewide graduation requirements will:
  - set the standard for excellence for graduates throughout Vermont,
  - promote equity and consistency of rigor across the state,
  - support vertical alignment and integrations across the PreK-12 system,
  - align to the Vermont Portrait of a Graduate, and
  - ensure all Vermont graduates are set up for success in college and/or career and prepared to be actively engaged citizens.
- **Due Date:** December 31, 2025

# Main Takeaways

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- U.S. Department of Education finding from their last monitoring visit in Vermont (2024) showed uneven rigor in graduation requirements.
- Statewide graduation requirements alone will not fully address this concern but are an important first step in the AOE's broader strategy and work on the horizon.
- The AOE's graduation requirements report includes our recommendations and the rationale for them, as well as identifies areas of further inquiry and next steps.
- We are already engaging further with stakeholders to support the State Board's decision-making process.

# **Objective:** Promote equity and consistency of rigor across the state

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**U.S. Department of Education's 2024 monitoring visit to Vermont found uneven rigor** across flexible pathways programs and graduation requirements in its evaluation of our graduation rate indicator.

Under section 8101(25) of the federal Elementary and Secondary Education Act, **each pathway for earning a regular high school diploma must be aligned with requirements for the standard diploma awarded to the preponderance of students in the state.** "A pathway that is clearly less rigorous than the pathway most students follow is not consistent with statutory requirements."

Vermont's **existing approach to determining the criteria for earning a high school diploma involves deferring to local districts** to set Proficiency-Based Graduation Requirements (PBGRs) aligned with Vermont's Education Quality Standards. Leaving the criteria for earning a high school diploma up to interpretation by 119 different governance units naturally complicates Vermont's ability to align requirements for earning the standard diploma—and opened the door to inconsistency in rigor.

# Conceptualizing the components of the Vermont education system

Portrait of a  
Learner/Graduate

Transferable Skills

Content Standards

Flexible Pathways  
and Coursework

Curriculum and  
Instruction that  
Provide Practice,  
Assessment, and  
Feedback

These components have been defined as educational priorities in Vermont - though operationalize differently across the state - and there are examples to build upon.

The statewide graduation requirements provide us with an opportunity to strengthen the implementation of Act 77 and Act 173, among others.

By being clear and tight on what the graduation requirements are statewide, we can ensure more consistent implementation across SU/SDs and focus on evidence-based practices for delivering support to all learners so that they can achieve the Portrait of a Graduate.

# Current State of SU/SDs' Graduation Requirements

English Language Arts	4-5 credits
Mathematics	3-4 credits
Social Studies/Global Citizenship	3-4 credits
Science	3-4.5 credits
Arts	1-2 credits
World Language	0-2 credits
Financial Literacy	0-1 credit
Health	.5-1 credit
Physical Education	.5-2 credits
Electives	0-10 credits
<b>Total Credits</b>	16.5-28.5 credits

Across SU/SDs, not only is there inconsistency in the number of content-specific credit requirements, but there is also inconsistency in whether their current Proficiency-Based Graduation Requirements attend to transferable skills, content standards, or a combination of both.

Depending on their implementation of PBGRs, some SU/SDs are maintaining a system of content-specific requirements measured in credits and an additional set of required proficiencies.

# AOE's Corrective Action Response to USDOE

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**Compliance with federal law is not the only concern; different standards of rigor leave the door open to differing standards for educational quality**, complicating Vermont's constitutional guarantee of providing every student with a "substantially equal" education.

**Statewide Graduation Requirements beginning in 2027** - "Local supervisory unions and districts will be required to align their policies and practices to ensure that their students are provided the learning opportunities to demonstrate that they have met each of the graduation requirements regardless of the paths they have chosen to demonstrate proficiency."

**Flexible Pathways** - "While the state will maintain its statutory commitments in 16 V.S.A. § 941 to providing multiple means of demonstrating proficiency in statewide graduation requirements (e.g., CTE, virtual learning, dual enrollment, Early College, internships, etc.), the newly enacted statutory language makes explicit that the graduation requirements themselves will be constant."

# A lead domino in setting the standard for excellence

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**By setting statewide graduation requirements, we have the opportunity to more fully achieve our promise to Vermont students.** The requirements will set the standard for excellence for graduates throughout Vermont and ensure all Vermont graduates are set up for success in college and/or career and prepared to be actively engaged citizens.

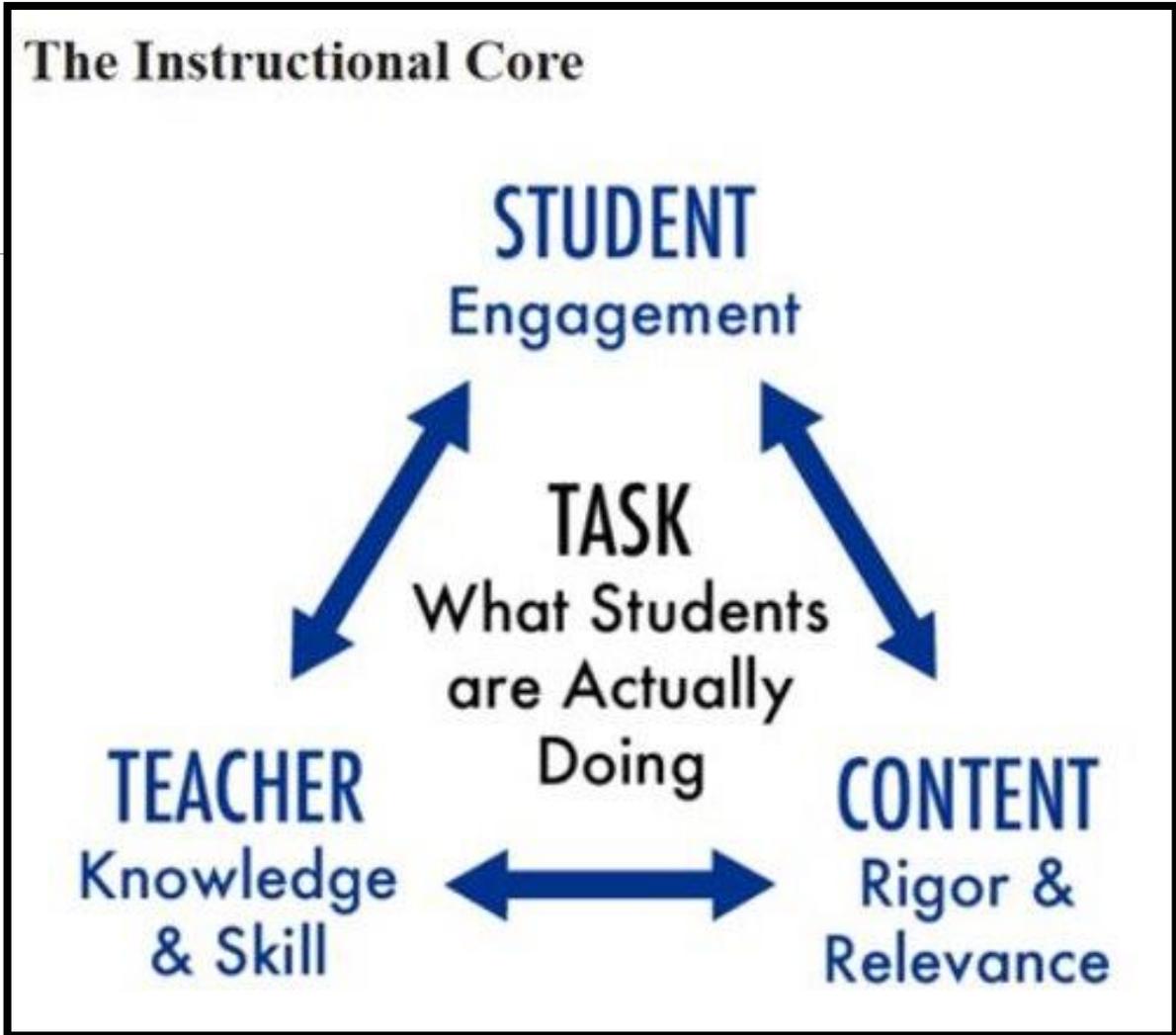
Additionally, consistency in what requirements students must satisfy will **allow for more collaboration across SU/SDs** in the flexible pathways, personalized learning, and locally-designed experiences available to students in order to graduate. This will also **eliminate the challenges students currently face** if they move from one SU/SD to another where the graduation requirements are different and that CTE centers face when receiving students from multiple sending schools with varying graduation requirements.

**Statewide graduation requirements alone will not increase rigor or establish more consistency,** but they are an important first step that also fits into the Agency's broader focus on increasing academic leadership and support.

# Academic Leadership

Proficiency-based learning, defined in the Education Quality Standards (EQS) as a system of instruction, assessment, grading and academic reporting based on students demonstrating mastery of the knowledge and skills they are expected to learn before they progress to the next level, get promoted to the next grade or receive a diploma, will continue to be work the AOE supports alongside a focus on supporting the instructional core and coordinated curriculum.

Locally-defined, proficiency-based graduation requirements are being replaced with statewide graduation requirements as part of Act 73.



*\*concept from Richard Elmore, image from [PWCS](#)*

# Timeline of Events

\*As specified in sections 8a and 9a of Act 73



# Graduation Requirements Recommendations

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**PHASE 3 – REPORTING & RECOMMENDATIONS**

# Recommendations Process

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- In Phase 3 – Reporting and Recommendations, the AOE spent time reviewing and synthesizing initial research on requirements within and outside of the state, alongside stakeholder feedback to refine policy options and draft a comprehensive report.
- The report includes an executive summary, research findings, and stakeholder feedback trends.
- It also includes specific graduation requirements recommendations and rationale for these recommendations.
- It concludes by identifying further areas of inquiry with a suggested workplan for additional decision-making support to the SBE.

# Recommendation: Use credits as a unit of measure

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- We recommend quantifying the requirements as "credits," but not with the Carnegie unit implication of a specified amount of seat time. Rather, **we recommend aligning to the existing guidance in EQS – 2120.8** Local Graduation Requirements:
  - "Schools may or may not use credits for the purposes of demonstrating that a student has met the graduation requirements. When used, credits must specify the proficiencies demonstrated in order to attain a credit and shall not be based on time spent in learning."
- We recommend defining **1 credit as a set of essential, enduring skills and knowledge in a content area based on the typical coverage of standards included in a year-long course or equivalent learning experience**. For example, an Algebra I credit would have a set of standards expected to be covered to earn that credit. One student may be able to show proficiency in the standards covered for the Algebra I credit more quickly, while another may need additional time or support. Both would receive 1 credit for that learning experience.
- This is to **empower students and their caregivers** when making decisions about how they will satisfy the graduation requirement by **using a familiar and well-understood approach to the unit of measure** for each requirement. Additionally, 48/56 (86%) of the SU/SDs we inventoried already use "credits" as the unit of measure for their content-area graduation requirements under the current guidance within EQS.
- **Additional rationale in terms of change management:** We recognize this is a shift in the definition of the term "credit" for those who still think of credits as a set amount of seat time. However, we believe the benefits of using a familiar term make it the most appropriate. Alternative units of measure like "proficiencies" have a broader array of understood definitions across the state that would make it more difficult to gain consensus around a definition than "credit" does.

# AOE's Graduation Requirements Recommendation: **22.5 total credits**

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Math (4 credits) - 1 Algebra I, 1 Geometry, 1 Statistics or Data Science (depending on student pathway), 1 elective math credit based on college/career pathway

ELA (4 credits) - 1 Introductory credit, 3 Specialized Mastery credits based on college/career pathway

Social Studies (3 credits) - 1 US History, 1 Civics/American Government, 1 World Studies

Science (3 credits) - 1 Physical Science, 1 Life Science, 1 Earth and Space Science, with required science and engineering practices (labs) in each

Arts (1.5 credits) - 1.5 elective credits in performing and/or visual arts of student's choice

World Languages (1 credits) - minimum of 1 world language or ASL credit

Financial Literacy (0.5 credits) - minimum half credit of stand-alone financial literacy content

PE/Health (2.5 credits) - 1.5 Physical Education, 1 Health Education

Electives (3 credits) - electives in areas of student's choice

# Stakeholder Engagement Overview

(in addition to the survey)

Stakeholder	Engagement	Date
Teachers of the Year (educators)	Virtual meeting	Oct 2
SEAP (Special Education Advisory Panel)	In person meeting	Oct 7
VT Music Educators Association (educators)	In person breakout at conference	Oct 10
VPA (principals)	In person Executive Council meeting	Oct 17
Special Education Leadership	In person at conference	Oct 20
CTE School Counseling Coordinators	In person at conference	Oct 22
Vermont Mathematics Improvement Collaborative Coalition (educators)	In person at conference	Oct 24
VT-NEA (educators)	In person at board meeting	Nov 1
VTSCA (school counselors)	In person at conference	Nov 3
Statewide Planning Retreat (SU/SD representatives, higher education, independent schools, legislators, students)	In person at conference	Nov 4
VTCLA (curriculum directors)	Virtual meeting	Nov 7
Superintendents	Monthly virtual meetings, weekly Supt Updates emails	Oct and Nov
VACTED (CTE)	In person meeting	Nov 20
VCSEA (special education)	In person meeting	Nov 21

# Stakeholder Feedback Survey



## 2025 Vermont Statewide Graduation Requirements Input

Act 73 requires the Agency of Education to recommend statewide graduation requirements to the State Board of Education by January 1, 2026, in the form of a report. The State Board of Education then has until July 1, 2027, to finalize their decisions about the statewide graduation requirements, and the AOE will be available to provide ongoing support to them during this decision-making period.

The purpose of this survey is to gather input from a variety of stakeholders and your responses will help inform the recommendations the AOE makes in their December 2025 report. The survey will be open through Friday, November 14th, 2025. You may save and come back to the collection before submission by clicking save at the bottom of the collection and following the instructions in the pop-up anytime. Thank you for taking the time to submit your responses.

Enter your supervisory union/school district/CTE center/Independent School Name

- The survey consisted of four major sections:
  - "Build Your Own" graduation requirements
  - Considerations in the approach to graduation requirements
  - Transferable skills questions
  - Flexible pathways questions

# Survey Respondents – 382 total\*

\*some respondents did not indicate their role and are not included in the disaggregated data below

Stakeholder Group	Respondents
CTE (directors, superintendents, teachers, counselors)	21
Curriculum Directors/Coordinators	26
Parents/Caregivers/Community Members	12
Principals/Asst Principals	27
School Counselors	41
Special Education (directors, coordinators, teachers, counselors)	13
Superintendents	9
Teachers	197
Other (e.g., nurse, admin asst, flexible pathways coordinator, director of technology)	32

# "Build Your Own" Graduation Requirements from Survey: 24 total credits on average

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Math (3 credits) - Algebra I and Geometry

ELA (4 credits)

Social Studies (3 credits) - US History, Civics, and World Studies

Science (3 credits) - Life Science, Earth Science, and Physical Science

Arts (1.5 credits) - in performing and/or visual arts of student's choice

World Languages (1 credits)

Financial Literacy (0.5 credits)

PE/Health (2.5 credits) - 1.5 Physical Education, 1 Health Education

Electives (4 credits)

These are the graduation requirements and corresponding average number of credits that were included in 70%+ of survey respondents' models

# AOE's Graduation Requirements Recommendation: **22.5 total credits**

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PE/Health (2.5 credits) - 1.5 Physical Education, 1 Health Education

Electives (3 credits) - electives in areas of student's choice

# **Recommendation:** Increase some content requirements while building in space for flexible pathways and deeper learning

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- The AOE recommendations for graduation requirements will **provide sufficient consistency across SU/SDs** and include an increase in requirements in content areas that will ensure all Vermont graduates are set up for success in college and/or career and prepared to be actively engaged citizens. For example, an **increase in Health and Financial Literacy across the state will better prepare graduates for their post-secondary lives** and support the realization of the Vermont Portrait of a Graduate.
- Assuming a typical high school 8 block schedule and a student who shows proficiency in the standards of the required credits within a year's time over four years of high school: this student could earn up to 32 credits. The AOE's recommendation of **22.5 total credits supports flexible pathways as outlined in Act 77, allows students to make decisions about deeper learning** such as participation in CTE programs or satisfying additional requirements for entrance into institutions of higher education, **and provides sufficient room for students who need additional time** to satisfy the requirements.

# Acknowledging the Change the Recommendations Would Necessitate

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- The recommendations for Math, Health, Art, Financial Literacy, and World Languages will be a change for the many of the SU/SDs:
  - 88% of SU/SDs would be increasing their Art requirements, though many already require 1 credit of art so there would only be a 0.5 increase
  - 86% of SU/SDs would be increasing their Math requirements, see above for rationale
  - 76% of SU/SDs would be increasing their Health requirements since most only require 0.5 credits currently
  - 76% of SU/SDs would be increasing their standalone Financial Literacy requirements, though many already embed this content into other requirements
  - 69% of SU/SDs do not currently have a World Language requirement. Vermont is one of only 12 states with neither a world language graduation requirement nor a requirement that world language courses be offered to students, despite EQS requiring that students engage in learning around global citizenship, which includes world languages

# A Note on Entrance Requirements to Institutions of Higher Education

- In addition to the AOE's recommended graduation requirements, many institutions of higher education have additional entrance requirements. At Vermont institutions this includes requirements such as Algebra II, 2 credits of the same World Language, and "a full course load of challenging academic subjects in the senior year." We acknowledge not all students aspire to attend high education institutions and therefore have not aligned our statewide graduation requirements to these.

College	ELA	Math	Science	Social Studies	World Languages
Champlain College	4 credits	3 credits	3 credits	3 credits	2 credits
St. Michael's College	4 credits	3-4 credits	3-4 credits	3-4 credits	2-3 credits
University of Vermont	4 credits	3 credits	3 credits	3 credits	2 credits
Vermont State University	4 credits	3credits	2-3 credits	3-4 credits	

- Recommendation:** Students should be supported to make decisions about how they satisfy and, in some cases, exceed the statewide graduation requirements based on their post-secondary goals and interests both in terms of specific types of credits and coursework such as Algebra II for a college-bound student to satisfy the math elective credit we included in our recommendations.

# Recommendation: Integrate transferable skills within content requirements

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- **Recommendation:** The AOE recommends that **transferable skills be embedded within content** rather than assessed as part of a separate graduation requirement.
- **Rationale:** This **aligns with stakeholder feedback** that transferable skills are more measurable and relevant when connected to disciplinary content and also allows for locally determined ones to be identified and embedded. Also **aligns with research** about transferable skills and the role of the instructional core.
  - The National Research Council (NRC) report, *Education for Life and Work: Developing Transferable Knowledge and Skills in the 21st Century* (2012), provides a clear framework for understanding how transferable skills—sometimes called "21st-century competencies"—are intrinsically linked to proficiency in academic content.
  - The report notes that **modern student standards**, including the Common Core State Standards for English Language Arts and Math, successfully **provide a deeper conceptualization of content knowledge and skill by encompassing various facets of 21st-century competencies** by fostering "deeper learning," which the NRC (2012) defines as "the process through which an individual becomes capable of taking what was learned in one situation and applying it to new situations (i.e., transfer)."

# Transferable Skills and the Instructional Core

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- Furthermore, evidence suggests that instruction that promotes the transfer of these competencies must occur within each content area, requiring **teaching practices and student engagement strategies** that simultaneously develop content knowledge and skills (such as critical thinking and math reasoning and argumentation) alongside intrapersonal skills (like conscientiousness and self-reflection) and interpersonal skills (like teamwork and effective communication). Additionally, this is a more effective approach than separate transferable skills graduation requirements, which present challenges in terms of consistent and accurate assessment of proficiency.
- By **recognizing the existing presence of transferable skills in the student standards that the State Board has already approved**, and by aligning the graduation requirements to credits that represent appropriate coverage of these content standards, we establish a framework to create more consistent implementation across SU/SDs and to **allow for greater focus on evidence-based practices in service of the instructional core** for delivering support to all learners to achieve this outcome.
- This will **ensure students develop the ability to utilize complex cognitive, intrapersonal, and interpersonal transferable skills with the content domain expertise necessary for success** in post-secondary education, career, and civic life.

# Recommendation: Prioritize Content Knowledge and Skills for Future-Ready Graduates

- To ensure that Vermont's statewide graduation requirements successfully prepare students for a future where Artificial Intelligence (AI) is a common tool, the Agency of Education strongly recommends that the State Board reinforce the central role of deep, disciplinary content knowledge and skills within student standards. **When generative AI users lack a robust existing knowledge base, they are reduced to passively accepting AI outputs as authoritative, using the technology as an oracle rather than a collaborative thinking partner, a phenomenon called "knowledge asymmetry."** A lack of content knowledge and skills would prevent the development of the independent judgment necessary for success when using AI in post-secondary and career environments.
- For a student to use AI effectively—to formulate sophisticated questions, recognize subtle oversimplifications, and evaluate the accuracy of information—they must first possess a complex framework of disciplinary expertise. Without it, the introduction of AI risks amplifying existing achievement gaps, as **students who already have strong foundations gain a powerful tool for extending their expertise, while those without foundational knowledge rely on AI as a crutch, avoiding the hard work of building true understanding.**

# Recommendation: Prioritize Content Knowledge for Future-Ready Graduates

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- This informs the AOE's recommendation to prioritize the **systematic, explicit development of core content and disciplinary expertise** across all grade levels, which has informed our recommendations about the graduation requirements and should be **supported through vertical alignment and integrations across the PreK-12 system**. By emphasizing content mastery, Vermont will ensure that its graduates develop the intellectual habits of verification, critical questioning, and synthesis. This approach transforms AI from a potential dependency into a collaborative tool that genuinely extends a student's capability.
- Ultimately, a future-ready education is one where graduates possess the deep disciplinary knowledge necessary to maintain critical distance, exercise their own judgment, and **actively direct their learning and professional inquiries, ensuring they are truly prepared for a complex, technology-driven future**.
- *Credit to Nick Potkalitsky, Ph.D., AI Specialist at the Educational Service Center of Central Ohio*

# Recommendation: Recognize Career and Technical Education learning toward graduation requirements

- Technical corrections are needed to section 2383.3 of the State Board Rules to more fully recognize CTE learning as it aligns to content areas and sending high schools are able to award credit appropriately, while considering the larger reform efforts regarding CTE under review by the legislature. CTE learning should, where appropriate, satisfy the content area graduation requirements, rather than only counting toward electives or creating an extensive additional set of requirements.
- State Board Rules currently state that one content credit must be provided upon program completion of specified CTE programs (SBR 2383.3). This does not reflect current federal Perkins V program quality and student outcomes requirements and the rigor of Vermont's CTE program content. As a result, some high schools use 16 VSA §1545's provision that "The school board of the high school from which the student wishes to graduate shall make a determination as to whether the credits shall be applied toward graduation requirements" to limit the credit they award for CTE learning. **This is another area where local decision-making opens the door for inconsistency of rigor in graduation pathways and expectations across the state.**
- Vermont has established CTE Program Quality Minimum Requirements. Every state approved CTE program must include a combination of postsecondary industry recognized credentials and/or dual enrollment credits. Due to the high specificity and reliability of the data the AOE gathers each year on every CTE program and CTE center in the state, the AOE is poised to be a key partner in moving forward content alignment work.
- Future planning should consider requirements around middle school career exploration and support for counselors regarding career navigation, so while it's not part of the graduation requirements themselves it will be part of our future conversations.

# **Recommendation:** Provide all students with access to receiving the same diploma through the graduation requirements

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- This recommendation ensures all students, including those with disabilities, are provided with the appropriate supports to satisfy the requirements and allows Vermont to remain a state that issues one diploma for all students.
- The AOE has launched a workgroup to **develop the accessibility system for each statewide graduation requirement**. This group will include folks from the field as well as other state level experts on disability, proficiency and access. The charge of the group is to build the accessibility system for each requirement that can be utilized by all VT high schools. Where appropriate, the Core Content Connectors (CCCs) would be leveraged to provide specialized learning targets for students with significant cognitive disabilities and act as a "bridge" from grade-level standards to the needs of some students with IEPs, guiding instruction and assessment for these students
- The workgroup will also **create the system for the mechanics of how any modified graduation requirement is documented**. The early thinking is that any modified graduation requirement would be documented in a student's PLP and signed off by the school counselor or principal and the IEP team.

# Student Feedback

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- Through the Listen & Learn tour last year and additional student-led events we've attended as recently as last week, we are hearing students ask to be provided opportunities for deeper learning. This has informed our approach to the recommendations.
- Additionally, AOE is partnering with a local organization for the next 3-4 months to ensure that youth voice (including students who attend CTE centers) is meaningfully included in stakeholder feedback.
  - Special emphasis will be placed on engaging students who may not currently be thriving in the system, so that their perspectives and experiences can inform more equitable and effective practices.
  - The intention is to gather input from a broad and diverse range of Vermont students ensuring that the recommendations reflect the needs and aspirations of all learners.
  - Focus group data will be compiled into a report, from which the AOE and SBE will have an opportunity to ensure student input into the final requirements.

# Next Steps

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In addition to the recommendations we included in our report, we are also taking the following steps be taken to ensure seamless transitions and implementation:

- Meetings with working groups to develop implementation plans and operationalize credit expectations, with direct connections to student standards
- Additional stakeholder development to support the following areas of further exploration:
  - CTE,
  - accessibility for all students,
  - AOE support for the instructional core and 2120.7 - coordinated curriculum
  - Seals and endorsements to support deeper learning
- Per section 8a, the State Board must finalize its decisions about statewide graduation requirements by July 1, 2027. **We recommend making the decision by the end of 2026** to allow SU/SDs sufficient time for adjustments to their budget, staffing, and schedules for when the graduation requirements begin to go into effect in SY2027-2028 for the class of 2031.

# Questions

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