



April 21, 2026

Dear Chair Bongartz and Members of the Senate Education Committee,

On behalf of the Vermont School Boards Association, the Vermont Superintendents Association, and the Vermont Principals' Association, we write to express our support for the core positions articulated in recent testimony from the Agency of Education (AOE) and VITA-Learn regarding H.650, and to encourage a thoughtful refinement of the bill that builds on Vermont's existing strengths.

The education community is in broad agreement regarding the importance of protecting student data privacy, ensuring the quality and effectiveness of educational technology, and supporting educators in making informed instructional decisions. We appreciate this Committee's attention to these issues and share the commitment to advancing them in a meaningful and sustainable way. The question before the Committee is not whether to act, but how to do so effectively.

As highlighted in the testimony that both Senate Education and the House Commerce and Economic Development have received, Vermont has already developed a robust foundation for student data privacy through participation in the Vermont Student Data Privacy Alliance and the National Data Privacy Agreement framework. These systems allow districts to manage vendor agreements in a coordinated, efficient, and nationally aligned manner. They are widely used, cost-effective, and supported by existing expertise.

For this reason, we share the concerns raised by both the AOE and VITA-Learn about creating new, duplicative structures that could unintentionally complicate or weaken current practices. Instead, we support a more targeted approach that ensures all districts participate in and have the capacity to fully implement the existing system. This represents a practical and immediate opportunity to strengthen student data protections statewide.

We also agree that data privacy and educational technology effectiveness are distinct issues that should be addressed through different policy approaches. Data privacy is largely a matter of legal compliance and contract management, where consistency and standardization are critical. In contrast, the effectiveness of educational technologies depends on local context, curriculum alignment, and professional judgment. Attempting to address both issues through a single statewide approval or certification process risks oversimplifying these challenges and may inadvertently limit flexibility for educators.

A "two-track" approach offers a constructive path forward; it allows the Legislature to take immediate action on student data privacy by reinforcing and expanding existing systems, while also creating space for a more deliberate and collaborative effort to evaluate the role of

educational technology in supporting teaching and learning. This second track appropriately centers the expertise of educators and the importance of local decision-making.

We also want to underscore the importance of maintaining local flexibility in the selection and use of instructional tools. Educators and school leaders already engage in thoughtful vetting processes that consider student needs, instructional goals, and alignment with Vermont's Education Quality Standards. Policies that unintentionally shift these decisions away from the local level may limit innovation and responsiveness in classrooms.

In closing, we respectfully urge the Committee to build on the direction articulated by the AOE and VITA-Learn:

- Reinforce and standardize Vermont's existing student data privacy infrastructure; and
- Address data privacy and educational technology effectiveness through separate, appropriately tailored approaches.

This approach allows Vermont to act decisively where it is ready to do so, while preserving the strengths of our current system and supporting the professional judgment of educators.

Thank you for your continued leadership on this important issue. We appreciate your consideration and stand ready to support this work moving forward.

Respectfully submitted,



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