
Testimony on Education Quality Standards and Assurance

Testimony To: Task Force on the Implementation of the Pupil Weighting Factors Report

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Background

The Task Force asked me to provide some background on Vermont's Education Quality Standards (EQS) and the processes the agency uses to provide quality assurance for those standards. I raised these topics during my previous testimony to various legislative committees when discussing potential adjustments to pupil weights.

Our current education standards for education are articulated in State Board Rules, specifically [Rule Series 2000](#). These rules were revised in 2014 as part of a larger policy reform initiative that included Act 77 and Flexible Pathways. Previously, the quality standards were articulated as School Quality Standards. In 2014, they were changed to Education Quality Standards with a greater focus on outcomes as opposed to minimal inputs. Many of the "input" requirements (e.g., minimal staffing ratios) were retained in the revised rules, however.

The shift in standards coincided with a change in the quality assurance process, previously known as the Public School Approval Process. This Vermont quality assurance process was derailed somewhat by the federal No Child Left Behind Act (NCLBA) and its prescribed accountability system which emphasized student proficiency on statewide assessment results as the primary indicator of education quality. Under the NCLBA and related State Board rules, each school was required to make "Adequate Yearly Progress" or AYP. The change to Vermont's standards in 2014 with their shift from school quality to education quality coincided with the end of NCLBA policies, but State Board quality assurance rules, specifically Rule Series 2500, still speak to compliance with the AYP accountability model and have not been revised since 2004.

Vermont leveraged the greater flexibility imparted by NCLBA successor legislation, the Every Student Succeeds Act (ESSA), to create a new system of accountability called Education Quality Review that is based on a model of continuous improvement. A full description of this model can be found on the agency's website at <https://education.vermont.gov/education-quality-assurance>.

This model of Education Quality Review includes two major components: 1) a visualization of key performance data in the [Annual Snapshot](#) portal or report card, and 2) Integrated Field Reviews (IFR).

The Annual Snapshot provides data on several indicators spread across all five domains of the Education Quality Standards. Every school, supervisory union/district, and the state itself have a snapshot of these data published each fall.

The Integrated Field Reviews provide a qualitative lens to demonstrate a broader picture of the strengths and needs of supervisory unions/districts. A team of peers in the education community spend a day visiting classrooms, reviewing documents, and interviewing educators, students, and parents. At the conclusion of the visit, the team reports out commendations and recommendations for each of the five domains of the Education Quality Standards. A list of IFR reports and a pre-COVID-19 schedule for the review visits can be found on the agency's website at <https://education.vermont.gov/education-quality-assurance/integrated-field-reports>.

Recommendations

I believe state-level quality assurance regulation is necessary to address issues of both education quality and equity. This has always been the case in Vermont and is consistent with the role regulation plays in other states since education is largely a state responsibility not a federal one.

Additionally, the Vermont Supreme Court has affirmed on several occasions that the state, not local districts, is ultimately responsible for the education of students; the state can delegate some authority over educational processes to local districts, but it cannot not delegate its constitutional responsibility. This tension over responsibility for outcomes vs. authority over inputs is at the heart of the pupil weight conversation relative to education quality standards and state-level quality assurance processes - the state needs to ensure that its delegated authority to local districts is being enacted in a quality manner to fulfil its educational responsibility to students.

Although adequate funding is necessary to ensure educational outcomes, adjustments to pupil weights alone will not be sufficient to ensure that a quality education is available for each student. A revision of pupil weights should be considered in conjunction with a review of education quality and quality assurance regulations. To that end, I offer the following observations and recommendations:

1. Education quality assurance processes should be formally described in regulation. The current system of Education Quality Review was never enacted in regulation, and existing quality assurance regulations such as those found in Rule Series 2500 are outdated.
2. The focus of state-level quality assurance processes needs to be updated to focus on school districts not schools:
 - a. Act 46 of 2015 shifted state accountability from schools to school districts with a theory of action that a single "preferred" governance structure would be in the best position to confront issues of quality and equity in a school system.

- b. Many educational processes directly related to outcomes (e.g., curriculum, professional development, data systems, and special education) were centralized at the district level through Act 153 (2010) and Act 156 (2012).
3. The Education Quality Standards should be expanded to focus on district-level systems. By way of example, Massachusetts has district quality standards with the following domains: Leadership and Governance, Curriculum and Instruction, Assessment, Human Resources and Professional Development, Student Support, and Financial and Asset Management. Notably, despite our emphasis on the importance of local control in our education system, Vermont has no quality standards for governance and financial management, two areas directly implicated in a consideration of revisions to pupil weights. I would also observe that if district systems are working well, positive outcomes for students can be more consistently achieved. Based on my experience, the potential for inconsistency due to weak and unstable school district systems across the state, now exacerbated by labor shortages and the more frequent turnover of staff, is the greatest factor contributing to our persistent issues of educational quality and equity and undermines the ability of schools to adopt a continuous improvement disposition.
4. The General Assembly has already created a vehicle to begin this work in Act 66 (2021) which requires the State Board and the agency to review education rules relative to their respective roles. This law requires the Board and the agency to issue a report later this year.