



BUILDING FOR THE FUTURE

VERMONT'S PLAN FOR EDUCATION RECOVERY AND BEYOND

Original Publication Date: September 3, 2021
Revised: January 26, 2023

Prepared by the Vermont Agency of Education pursuant to Act 74 Sec. E.501.3 and the U.S.
American Rescue Plan Act of 2021

ARP ESSER PR Award Number (e.g., S425U2100XX): S425U210011

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By signing this document, I agree to each of the assurances listed in Appendix C and further assure that:

To the best of my knowledge and belief, all information and data included in this plan are true and correct.

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Introduction

Vermont Education's journey to recovery and the world beyond the COVID-19 pandemic began in January of 2021. Aided by good epidemiological conditions overall due to the efforts of Vermonters to prevent and contain transmission of the virus, Vermont schools were open for school year 2020-21 and operating under a robust set of health and safety guidelines developed by the State with the input of medical and educational professionals during the summer of 2020.

With additional support from a school staff polymerase chain reaction (PCR) testing effort administered by the State, a robust contact tracing effort run by the Vermont Department of Health, and through the tireless efforts of Vermont's educators and administrators, our schools were open and educating students in a combination of in-person, remote and hybrid instructional models throughout the school year.

In this context, Vermont was in a better position than many of our peer states around the nation and had time and space to begin the process of envisioning the world beyond COVID-19. Our school communities and the Vermont Agency of Education (AOE) have had the opportunity to consider and plan for not only what students need immediately to remediate the impacts of the pandemic, but also in the months and years ahead.

By engaging with Vermont's education stakeholders, the AOE identified three critical focus areas for education recovery: academic success, mental health and social emotional learning, and student engagement. With these focus areas, we could begin the work of education recovery, as well as start planning for the strategic use of Federal COVID-19 emergency funds for education, most predominantly for the use of Elementary and Secondary Schools Emergency Relief (ESSER) funds.

While Vermont's favorable conditions gave us more time to plan and engage with stakeholders on education recovery, it also put us in a place to be able to see farther, beyond reopening classrooms and the immediate impacts of COVID-19 on students and staff. The favorable position means that Vermont's State Plan can look beyond returning students to the classroom. We can turn the corner to not only address the impact of the pandemic on students, but strategically advance learning and improve the quality and integration of social services needed to make sure students across Vermont have an opportunity to succeed. Vermont is a small, rural state; it is becoming increasingly clear that regional approaches that integrate and scale both learning opportunities and services availability, such as the community schools model, are likely to achieve long-term success for our education system. For instance, Vermont's plan to focus on community schools that integrate academic learning with robust social and community services under one roof will deliver on the promise of a high-quality education in all of our communities.

Vermont's special context provided one additional unique aspect to the planning process. Early in the 2021 Session, the General Assembly (GA) identified priorities for COVID-19 response and recovery and resolved to appropriate ESSER state-level set aside dollars for those priorities. Once it was confirmed that this was an allowable process under the federal law, the AOE collaborated with the GA to build a plan, outlined in the pages that follow, that address both

the needs of education recovery and the legislature's strategic priorities for education. Accordingly, this plan is developed to meet the needs and serve the interests of all Vermont's residents in ensuring that student learning and achievement are advanced, not only during the period of education recovery, but into the future as well. It reflects the interests and strategic priorities identified in the 2021 Session and in previous years, with the collaboration of the Governor and the AOE, and with robust input, engagement and advocacy by a diverse range of stakeholders.

Organizational Note

The U.S. Department of Education (hereinafter US ED) specified a template with specific questions for State Education Agencies (SEAs) to answer. In the interest of clarity and readability these prompts have been summarized at the beginning of each section. The full questions can be found at the [US ED's State Plan Template](#). More information can be found on the Office of Elementary and Secondary Education (OESE)'s [ARP ESSER website](#).

A. Describing the State's Current Status and Needs

In this section, the US ED requires states to outline the progress they have made in supporting students during the COVID-19 pandemic and describe the priorities and student needs guiding their American Rescue Plan (ARP) ESSER funding decisions, and their current and projected operating status. [Section A State Plan Template Questions \(page 4\)](#)

1. Progress and Promising Practices

States are required to provide their assessment of the most effective strategies in supporting the needs of students during the pandemic.

Overview of Vermont's Response to the Pandemic

After an initial school closure period in March 2020 due to the pandemic and mandated fully remote operations during the rest of the 2019-2020 school year, Vermont successfully reopened its schools for full-time instruction in September 2020. To do so, Vermont promulgated stringent public health requirements for schools through its mandatory guidance. Vermont also enabled operational flexibility for schools to shift to remote learning as local conditions for COVID-19 warranted, or for logistical considerations such as staff and student availability for in-person instruction.

Since September 2020, we estimate about 85% of our students were in some form of hybrid learning during the 2020-2021 school year. The most common model of hybrid learning was four days a week of in-person instruction and one day of remote learning. About 50% of our elementary schools made the shift to full in-person instruction by November 2020 and sustained that level of in-person instruction throughout the year. Approximately 10% of our students received instruction through full remote learning during the 2020-2021 year.

Our schools were able to maintain continuous instructional operations during the pandemic by working closely with the Vermont Department of Health (VDOH) to enact a disciplined program of public health mitigation strategies and contact tracing. We also implemented a weekly statewide program of PCR surveillance testing for school staff from November 2020 through April 2021.

The surveillance testing program consistently yielded a very low positivity rate among school staff, generally lower than 1%, and demonstrated that the stringent health protocols implemented by local education agencies (LEAs) were effective in keeping positivity rates well below the state's already low average. This built confidence in our ability to return to in-person learning. This surveillance testing program was ended in April when it became clear that our vaccination program for school staff was sufficiently complete.

The close coordination of communications between state and local leaders also contributed to our ability to maintain operations statewide. School superintendents received daily emails with the latest information and state guidance on COVID-19. The AOE leadership team held weekly statewide calls with superintendents to review the conditions for the virus, state guidance and the need to develop additional frequently asked questions (FAQ) documents, and other

emergency response concerns such as the management of federal and state relief funding. This allowed school system leaders to understand the broader strategic context while simultaneously providing insight into the more immediate decisions they would need to make at moments of key transition in the state's emergency response.

In preparation for Vermont's April 2020 reopening within fully remote operations, the AOE provided resources and supports to the field through the provision of a Continuity of Learning (COL) template and mandatory COL plan submitted by each district. The template required districts to identify the strategies they would employ to assure that students were learning and able to access supports during the pandemic, including fully remote, in-person, and hybrid school operations paradigms. These planning documents were useful to districts as they subsequently moved into the more long-term, largely hybrid operational paradigm during the 2020-2021 school year. Most recently, Vermont's education system has turned toward a statewide focus on "education recovery," explained in further detail in subsequent sections of the plan.

2. Overall Priorities

States are required to provide their assessment of the top issues facing students and schools across their state as a result of or in response to the pandemic, and if possible, provide data illustrating why these are the most critical or most widespread issues.

The state strategy most effective in supporting our students throughout the pandemic has been intentional, regular planning and coordination across several key stakeholders and decision-makers involved in the pandemic response. As noted above, the strong partnership among state agencies and key departments was a significant factor in Vermont's largely successful handling of the crisis. From day one of the pandemic, Vermont's small size allowed for close working relationships among key state partners, including the Department of Health, State Emergency Operations Committee (SEOC), AOE, Agency of Human Services (including Departments of Mental Health and Children and Families), Department of Public Safety, and the Governor's Office. AOE embedded staff directly within the SEOC, providing the SEA and the field with a bird's eye view of current virus activity, key decision-making, and any rapid changes needed to optimize the state response. This robust structure and effective work together set the stage for Vermont to both manage the next steps in the pandemic response and enact strategic solutions to meet more immediate needs as they emerge.

A second effective strategy in supporting student need during the pandemic, particularly during the past school year, was rapid expansion of Vermont's ability to provide hybrid and remote learning opportunities that were flexibly deployed to maintain student learning even when viral activity or workforce challenges forced a school's closure. To enhance the state's virtual capacity, the AOE contracted with an existing virtual learning collaborative, Vermont Virtual Learning Cooperative (VTVLC), to massively expand its course offerings, offer full-time virtual programs in partnership with districts at younger grades than had previously been available, and create a collaborative schools option (CSO) that allowed teachers who needed to work remotely due to the pandemic to offer fully remote courses and programs for students

throughout the school year. Although this system was not perfect, and required substantial effort by AOE and VTVLC, it was a significant accomplishment that enhanced both student and educator safety during a time of immense operational instability due to the pandemic.

A third strategy that Vermont deployed to ensure that the needs of our most vulnerable students and populations were addressed was requiring a formal recovery planning process of each LEA (i.e., district). The planning process consisted of:

- (1) Assessing need at the local level, using readily available information and data (April 2021);
- (2) Creating an action plan to meet that local need (June 2021);
- (3) Executing initial implementation of the action plan (June - December 2021); and,
- (4) Tuning and refining the plan over time (June 2021-beyond).

Districts were required to complete a mandatory Needs Assessment (NA), across three separate but interrelated arenas of student functioning. First, students' social emotional health, mental health, and well-being were assessed, including students' internalizing and externalizing challenges, both inside and outside the classroom, as well as nutrition, physical health, and family functioning. Next, taking stock of student engagement, including the extent to which students were fully engaged in learning and academic progress, coupled with the extent to which they experienced remote or in-person learning during the pandemic, in addition to identifying when and how students were disengaged was required. Finally, districts were charged with assessing academic achievement and success, including identifying the extent to which any students had fallen behind due to the pandemic. In conducting their Needs Assessment and finalizing their reports, districts were strongly encouraged to attend to the needs of historically marginalized students, as defined in Vermont's ESSA plan.

For this section, we have intentionally highlighted the most effective state-level aspects of Vermont's pandemic response and recovery planning. However, each LEA has specific areas they can be proud of having accomplished throughout the pandemic, including ensuring that students were well-nourished, maintained some level of continuity in their learning and had continued access to key relationships at school and educational supports. We will encourage Vermont LEAs to submit their success stories to our Agency Communications team and will share these both publicly and with US ED.

Summary of Education Recovery Planning

Shortly after January 1, 2021, the AOE began to plan for Vermont's last phase of the COVID-19 emergency response, termed the "education recovery phase." In [guidance](#) published February 2021, the AOE outlined a recovery planning process establishing three focus areas: socioemotional functioning, mental health, and well-being; student engagement; and academic achievement and success. The first part of the recovery planning process required school districts (LEAs) to conduct a needs assessment in each of these three focus areas. The AOE then engaged with LEAs to determine planning priorities and to establish a plan for recovery

strategies by June 1st. The results of these local needs assessments and the resulting priorities are described in more detail below.

Although Vermont's education recovery planning process was developed and established well before the required federal planning process under ARP ESSER, our state now benefits from significant synergy in both state and federal requirements. As the state recovery planning efforts emerged and were refined during the past several weeks, we intended for districts to utilize the required state recovery planning process to inform their local use of federal relief funds. In addition, the AOE leveraged the local NAs to help establish state-level priorities for education recovery.

Recovery planning efforts quickly identified "student engagement" as an immediate priority. We reasoned it would be difficult to make progress in the other focus areas if robust engagement with students was not restored. This led to the prioritization of summer engagement activities. Governor Scott gave direction to this work by establishing Vermont's [Summer Matters](#) initiative for the summer of 2021, developing a new public-private partnership to expand engagement activities for all Vermont's students.

Engagement with students will remain a priority for the fall. AOE conducted an initial thematic analysis of districts' submitted NA documentation and discovered that 30% of districts reported a decline in student attendance and 30% reported a decline in student engagement as a result of the pandemic. We expect local activities to involve re-engaging students on a continuum from re-focusing attendance and ensuring timely assignment completion to successfully reconnecting with truant students and their families, so they return to the education system. Local efforts will inform statewide work in areas such as truancy policy reform and the deployment of state services such as mental health and youth services.

A second pressing issue facing Vermont's students and schools as a result of the pandemic, consistent with national patterns, is a significant rise in anxiety and stress, and a need for additional supports to address this. AOE's thematic analysis revealed that 47% of districts reported an increase in students' anxiety, stress, or internalizing behavior, and 49% reported an increase in the need for school counseling, mental health counseling and/or family supports. Interestingly, 32% of districts reported a decline in behavioral referrals, typically those within the classroom. To assist in addressing these challenges, the AOE is providing tailored state support teams including AOE personnel, and both Department of Mental Health and Division of Child and Families personnel, to each LEA. Our goal with state-level recovery work will be to develop more robust, integrated service delivery models and structures between education and other social services, and to see those integrated models well established in all regions of the state.

Academic slippage was also an area identified as a key concern in LEAs' NAs, with 40% reporting a decline in students' academic performance or growth in math, due to the pandemic. Thirty percent of districts reported similar declines in English Language Arts (ELA). Our recovery planning process requires districts to utilize their Education Support Teams (ESTs) to assess student needs broadly, but to also focus on academic interventions. We are anticipating that ESTs will identify the need for academic supports such as tutoring services, after school

programming, and the utilization of online learning resources to augment the regular curriculum and instructional program. As noted, AOE support teams will interface with the recovery planning efforts in each district (districts are required to designate a Recovery Coordinator) and convene communities of practice to identify and share best practices in this work as they emerge.

In addition to the three focus areas outlined in the state’s recovery planning process, a fourth recovery priority emerged—improving the overall health and safety of Vermont’s school facilities. Due to our extensive experience continuously operating schools safely throughout the pandemic, we have come to better understand the needs of our schools in this area. The AOE will be providing coordinating support for schools in the area of facilities improvement, including heating/ventilation upgrades, and will continue to focus on the safe operations of schools in the coming months.

3. Identifying Needs of Underserved Students

States are prompted to describe the highest priority academic, social, emotional and/or mental health needs for the remainder of the 2020-21 school year and the 2021-2022 school year, related to the impact of COVID-19 on each of the following student groups:

- Students from low-income families
 - Students from each racial or ethnic group
 - Gender
 - English learners
 - Children with disabilities
- Students experiencing homelessness
 - Children and youth in foster care
 - Migratory students
 - Other groups disproportionately impacted by the pandemic

Table A1 – Priority Needs by Student Group

Based on both local Needs Assessment (NA) information, as described above, as well as feedback obtained through regular interactions among AOE staff and key education stakeholders during the pandemic, the following table represents Vermont’s most pressing needs for the successful post-pandemic recovery of unique student groups.

Student Group	Highest Priority Needs
Students from low-income families	<ul style="list-style-type: none">• Reducing achievement gaps, particularly in math and ELA, between low-income students and their peers.• Increasing mental health and wrap-around supports for students who have experienced trauma, new or continued family economic stress, and/or family dysfunction as a result of COVID-19.• Ensuring students from families with less resources have sufficient access to school, healthy nutritional options, and internet access/materials to fully participate in learning opportunities.

Student Group	Highest Priority Needs
	<ul style="list-style-type: none"> Reducing stigma related to low-income populations. <p>Notes:</p> <ul style="list-style-type: none"> 11% of districts reported disparity by free and reduced lunch (FRL) status with respect to social emotional learning (SEL), mental health, and well-being, as a result of COVID-19 (i.e., via Agency's thematic review of LEA recovery NAs). 13% of districts reported disparity by historically marginalized group status for student attendance and engagement, as well as academic performance, during COVID-19. 11% of districts reported gaps in academic performance for students qualifying for FRL, as a result of COVID-19.
Students from each racial or ethnic background used by the State for reporting purposes	<ul style="list-style-type: none"> Reducing achievement gaps, particularly in math and ELA, between underserved black, Indigenous, and people of color (BIPOC) students and their peers. Increasing mental health and wrap-around supports for BIPOC students who have experienced trauma, new or continued family economic stress, and/or family dysfunction as a result of COVID-19 or other national events. Deploying equity supports that were delayed due to the pandemic, consistent with ESSA state plan. <p>Note: Due to small population sizes, it is difficult to break down trends for Vermont by specific racial or ethnic groups. This is particularly true for information that is narratively reported to the AOE, such as that garnered from recovery NAs.</p>
Students by gender – please add a row for each gender	Recovery themes related to gender and/or gender differences have not yet emerged in our work to date. However, we will be monitoring local and statewide trends in the coming months to prepare and offer targeted supports as needed.
English Learners (EL)	<ul style="list-style-type: none"> Ensuring ELs have opportunities to attain proficiency and achieve content standards through access to high-quality Language Instruction Educational Programs (LIEPs) and differentiated supports. Embedded professional learning, collaboration and co-teaching opportunities to provide effective educational services to ELs across learning environments and optimize resources for coordinated programs and instructional contexts.

Student Group	Highest Priority Needs
Students with disabilities	<ul style="list-style-type: none"> Ensuring sufficient staffing ratios of qualified EL and Multilingual educators to provide effective evidence-based language and academic programs/services for ELs with diverse needs and backgrounds. <p>In their NAs, 11% of districts reported specific gaps in academic performance for students qualifying for special education as a result of COVID-19.</p> <p>Based on both AOE's assessment and recommendations from the Vermont Special Education Advisory Panel, the following unmet needs are deemed highest priority:</p> <ul style="list-style-type: none"> Ensuring all general and special education educators, and administrators, understand and can effectively implement Multi-tiered Systems of Support (MTSS); ensuring all parents understand key features of MTSS. Assisting LEAs in developing processes to effectively solicit parents' suggestions, opinions, and concerns, and uniformly integrate this information into student plans for assuring a free appropriate public education (FAPE). Ensuring that articulated processes and policies for effectively addressing students' unique academic and behavioral needs align with actual education practice. Proactive planning to ensure physical and emotional safety, and dignity, of BIPOC and other marginalized students qualifying for special education services, including protection against bullying and harassment. Elementary level strengthening of the comprehensive assessment system by providing dyslexia identification resources, training and professional development to all general educators, as well as special education and reading specialists.
Students experiencing homelessness	<ul style="list-style-type: none"> SEL and mental health supports, including adequate counseling and expertise in issues specific to homeless students and populations. Wrap-around services and supports, including sufficient access (including transportation) to all available resources. Increased outreach and improved awareness about educational rights to youth/families experiencing homelessness.
Children and youth in foster care	We will be monitoring trends for our children and youth in foster care, via partnership with the Vermont Department of Children and

Student Group	Highest Priority Needs
	Families (DCF), as well as local and statewide education trends in the coming months. We will deploy targeted supports as needed.
Migratory students	<ul style="list-style-type: none"> Expanded access to extended learning and early educational programs, including prekindergarten (PreK), after school, and summer programs. Intensive academic supports to ensure that migrant students achieve at levels comparable to like peers. Support to facilitate and improve communication between migrant families and schools. Greater access to educational resources including necessary materials and supplies.
Other groups of students identified by the State	<ul style="list-style-type: none"> To be determined.

4. Understanding the Impact of the COVID-19 Pandemic

States are asked to describe how they will support their LEAs identification of the extent of the impact of COVID-19 on student learning and well-being, and the student groups most impacted.

As outlined above, AOE mandated an education recovery planning process of each LEA in Vermont. Districts were required to conduct a NA across three key areas of student functioning, as well as delineate specific plans for addressing these identified needs. In the required template, LEAs were instructed to “Pay particular attention to the status of historically marginalized students (students in different racial/ethnic groups, English learners, students with disabilities, students in poverty, migrant students, military-affiliated students, homeless students, students in foster care).”

AOE provided a comprehensive list of suggested key indicators for districts to draw from in developing their NAs, including metrics such as the number of students demonstrating a decline in mental health and/or well-being, the number of students requiring mental health supports, the number of student absences, percent of students fully engaged/not engaged with schoolwork, number of students qualifying for an Individualized Education Program (IEP) or 504 plan, and data from local comprehensive assessment systems that addressed student performance and growth in core academic proficiencies. Districts were instructed to compare current data to the 2018-2019 school year whenever possible. Potential data sources identified for districts to draw from included: formative assessment measures, curriculum-based measures, mental health and well-being screening measures, other student self-reports (e.g., referrals regarding mental health/well-being), grades and proficiencies, graduation rates, dropout rates, attendance/truancy data, student portfolio measures, college and career readiness measures, physical education data, nurse and school counselor referrals, teacher absences, parental requests for services, kindergarten readiness results, data from local EST work, and exclusionary discipline practices and outcomes. Districts were also instructed to

“Draw on your learning from the data literacy professional development series to consider new and existing data sources for understanding needs.” The data literacy series is an ongoing professional training opportunity, initiated by AOE during the pandemic, to assist district personnel with selecting optimal data and using it to make decisions for education systems improvement.

5. School Operating Status

States are asked to describe the data collection on school operational status and modes of instruction for all schools in the State.

Throughout SY 20-21, the AOE has conducted survey activity that played an active and ongoing role in Vermont’s COVID-19 response. The [Strong and Healthy Schools Survey](#) (SHS), first deployed in September 2020, is a monthly collection of Continuity of Operations questions and a twice-yearly extended collection comprised of both Continuity of Operations and COL questions (see [complete list of questions](#)). The SHS was deployed the last Friday of each month to LEA Superintendents and was due the following Friday (i.e., a one-week timeframe to complete the response).

The collection tool provided a means by which Superintendents could decide how supervisory district/union questions were answered, typically through coordinating with their principals to answer school-specific questions. LEAs were asked to answer questions to the best of their ability and in a manner that best reflects, when appropriate, a monthly average. This survey is a required activity, designed to ensure that Vermont can maintain a strong, coordinated, statewide response to the ongoing emergency. It is currently built using a lightweight, web-based tool called Cognito to gather these data. Data are recorded in a SharePoint list where AOE Data Management and Analysis Division (DMAD) staff retrieve them and execute Python scripts to process them for reporting.

Monthly data collection questions about instructional mode have provided insight into districts’:

- (1) mode of instruction (in-person, fully remote, hybrid) across grade spans (elementary, middle, and high school),
- (2) school-level percent of students in each instructional mode across grade levels,
- (3) split of in-person/remote days for students in a hybrid learning model,
- (4) activities that occur in hybrid 1-day remote models, and
- (5) options for students/families to choose a mode of instruction. These district-level data, in turn, allowed the AOE and partners to determine state-level trends and regional patterns in instructional disposition across the state.

Survey results have informed current and future state guidance, enabled coordinated support efforts across the state, and met federal reporting expectations for assessments such as National Assessment of Educational Progress (NAEP). These data are shared with the Vermont Department of Financial Regulation, which has led the Vermont COVID-19 data modeling effort, the Vermont Department of Health, and the general public via an [interactive dashboard](#).

To disaggregate the data based on the required demographic groups, the AOE cross-referenced available demographic data for each supervisory union/supervisory district (SU/SD) with the information collected through the Strong and Healthy Schools Survey.

While there are efficiencies the Data Management and Analysis Division (DMAD) is building into this system at present, it is not a feasible long-term solution if this collection is required for longer than SY21. The current setup requires a monthly workflow with human execution at both the LEA and the SEA level, taking valuable time that otherwise might be invested in operational and/or recovery work.

Data on Instructional Modalities for School Year 2020-21

States are asked to provide the data described in the question above for the most recent time period available.

The AOE published this data on our website as the [ARP ESSER Summary of Instructional Modalities for School Year 2020-21](#).

Planned Operational Status and Mode of Instruction for Summer 2021 and SY 2021-22

States are asked to describe, to the extent they are able, plans for operation and mode of instruction during the Summer of 2021 and School Year 2021-22.

In May 2021, the AOE published [guidance indicating that LEAs should expect a return to full in-person instruction for the 2021-2022 school year](#) with nominal, if any, recommended mitigation strategies. Summer programs operated under normal operations with a general recommendation that unvaccinated individuals wear masks when indoors.

On August 5, the AOE and Vermont Department of Health released a joint advisory memo, [COVID-19 Prevention Measures for Fall 2021](#). This document is a much streamlined and simplified approach from the extensive health guidance published in Fall 2020 and places emphasis on masking, contact tracing, COVID-19 testing and, ultimately vaccination as the most important strategies to maintain in-person instruction for the 2021-2022 school year.

B. Safely Reopening Schools and Sustaining their Safe Operations

In this section, the US ED requires states to outline how they will support LEAs to safely reopen schools and sustain their safe operations.

[Section B State Plan Template Questions \(page 6\)](#)

1. Support for Local Education Agencies

States are required to describe how they will support LEAs to safely return to in-person instruction and safe operation, including the following subsections:

Implementing Mitigation Strategies

States are required to outline how they will support the LEAs in implementing prevention and mitigation policies in line with the most up-to-date guidance from the Centers for Disease Control and Prevention (CDC).

Vermont successfully reopened its schools in September 2020. Schools were able to toggle between full in-person, remote, and hybrid learning to adjust for local operational conditions. The mitigation strategies outlined below proved to be very successful in allowing schools to maintain continuous operations throughout the school year. In May 2021, the AOE and the Vermont Department of Health announced schools would return to full in-person in the fall of 2021 with minimal mitigation measures being recommended.

In preparation for the full return to in-person instruction in Fall 2021, the Agency has been working with our state partners to implement a statewide COVID-19 PCR testing program. In light of concerns around the Delta variant, all students older than five, staff and educators are eligible to participate in the testing program, regardless of vaccination status. This program will be augmented by the same robust contact tracing program that supported our schools in 2020-2021.

The state is also greatly expanding opportunities for students, aged 12-18, to receive a vaccine, by standing up clinics at school sites across the state with a particular emphasis on reaching students in rural areas with limited access to health care providers. This program will be enlarged to include younger-aged students as eligibility is expanded.

Mitigation Strategy	SEA Response
Universal and correct wearing of masks	Required of Vermont schools through mandatory state guidance as of August 2020
Physical distancing (e.g., including use of cohorts/podding)	Required of Vermont schools through mandatory state guidance as of August 2020. Three (3) foot was the minimal distancing requirement for students in grades PreK-6, and six (6) foot was the minimal distancing requirement for students in grades 7-12. In April 2021, the minimal distancing requirement was modified to three (3) feet for all students PreK-12.

Mitigation Strategy	SEA Response
Handwashing and respiratory etiquette	Required of Vermont schools through mandatory state guidance as of August 2020
Cleaning and maintaining healthy facilities, including improving ventilation	Required of Vermont schools through mandatory state guidance as of August 2020
Contact tracing in combination with isolation and quarantine, in collaboration with the State, local, territorial, or Tribal health departments	Implemented by the Vermont Department of Health throughout the 2020-2021 school year
Diagnostic and screening testing	Voluntary, weekly PCR surveillance testing for school staff implemented in Vermont schools from November 2020 through April 2021. A pilot PCR testing program for all students and staff launched in May 2021 to be continued through the summer for schools and community-based summer programs. AOE will offer testing for both vaccinated and unvaccinated students and staff to schools in Fall 2021.
Efforts to provide vaccinations to educators, other staff, and students, if eligible	<p>Staff were vaccinated at schools, pharmacies and community clinics in March and April of 2021. Statewide efforts are underway to vaccinate all eligible Vermonters, including eligible students, with the highest vaccination uptake rate (over 80% with at least one dose) of any state.</p> <p>In August and the fall 2021 a statewide push to increase vaccination rates in students ages 12-18 was initiated and will be expanded if eligibility is extended to younger students.</p>
Appropriate accommodations for children with disabilities with respect to the health and safety policies	Required of Vermont schools through mandatory state guidance as of August 2020

Statewide Plans and Policies

States are required to outline plans, policies, timelines and milestones related to reopening and operations of school facilities, including mechanisms to track and monitor implementation.

Vermont successfully opened all its schools in September 2020. We implemented a monthly survey to collect information on learning modalities (e.g. in-person, hybrid and remote), and weekly PCR surveillance testing. In May 2021, the AOE, in conjunction with the Vermont Department of Health, advised districts that all schools would return to full in-person

instruction in the fall of 2021 with nominal mitigation measures, if any. Shortly after this announcement, Governor Scott ended the state of emergency in Vermont.

Consultation with Federal, State and Local Health Officials

States are required to outline how they will consult with federal, state and local health officials.

The AOE worked closely with the Vermont Department of Health throughout the emergency. With the conclusion of our PCR surveillance testing program, we are now implementing a pilot testing program for unvaccinated students and staff that started as a pilot in May 2021 and will continue through the summer and fall. This program is paid for by the Vermont Department of Health and funded via a federal grant.

Guidance, Professional Learning and Technical Assistance

States are required to outline any guidance, professional learning, and technical assistances they will provide to LEAs.

The AOE holds weekly calls with education stakeholder groups and continues to respond to inquiries through its helpdesk.

2. Safe Return to In-Person Instruction and Continuity of Services Plans

In this section states are required to describe how the SEA will ensure that LEAs that receive the ARP ESSER funds meet the requirements of the ARP to either within 30 days of the act have a plan for safe return to in-person instruction and continuity of services, or have developed and made publicly available on the LEA's website a plan that meets the requirements of the ARP.

Because of the strategies and requirements highlighted above, Vermont's schools have had plans for in-person and hybrid learning in place since September 2020 and, as of June 2021, all Vermont schools have returned to in-person instruction. In May 2021, the AOE reviewed LEA websites to determine if they had developed plans that met the Interim Final Rule requirements of the Safe Return to In-Person Instruction and Continuity of Services and, in consultation with our partners at the OESE office, determined that LEAs did not need to create separate documents if all elements of the required plan were present, available and accessible to the public and families on the LEA website.

To ensure that LEAs had met the IFR requirements, in June 2021, the AOE created the [ARP ESSER LEA Plan for Safe Return to In-Person Instruction and Continuity of Services Checklist](#). In their ARP ESSER Phase II application, LEAs must attest that they have completed a self-audit of all the required plan elements using the Checklist and attest that they are available to families and open for public comment and input; that they are updated in light of new guidance from the CDC and the advisory memo, [COVID-19 Prevention Measures for Fall 2021](#) from the AOE and Vermont Department of Health; and that it will be reviewed every 6 months.

C. Planning for Use and Coordination of ARP ESSER Funds

US ED requires SEAs to seek input from diverse stakeholders to ensure plans are responsive to the needs of students, families and educators. In this section, states are required to describe their plans for consultation and for coordinating the use of APR ESSER funds.

[Section C State Plan Template Questions \(page 8\)](#)

1. SEA Consultation

States are required to describe how the SEA engaged in meaningful consultation with stakeholders.

AOE's state plan reflects a broader "education recovery" planning initiative launched in January 2021. Meaningful consultation with stakeholders occurred in three ways: (1) targeted meetings with those representing students from low-income families, students from BIPOC communities, English learners, children with disabilities, students experiencing homelessness, and/or migratory students; (2) public engagement and input to the Vermont legislature that captured concerns related to youth with disabilities, issues for students from low-income, disadvantaged, and BIPOC backgrounds, and other vulnerable youth including those in foster care and (3) wide dissemination of the state plan for public feedback.

Some examples of this consultation process include, but are not limited to:

- (1) AOE's McKinney-Vento state coordinator held several office hour opportunities for local homeless liaisons. These meetings, along with technical assistance phone calls, presented an opportunity for liaisons to discuss the specific challenges and needs of homeless children and youth in their communities. The state coordinator also attended meetings with the Vermont Agency of Human Services Office of Economic Opportunity, the Vermont Coalition to End Homelessness, and the Vermont Council on Homelessness. These groups presented information on the current housing situation as a result of the pandemic, as well as corresponding support needs for affected students and families. These numerous meetings and calls provided important information about the unique needs of homeless youth that framed AOE's plan development (see Table A1).
- (2) (AOE's subgrantee, UVM Agricultural Extension, operates Vermont's Migrant Education Program (MEP). Program staff work directly with migrant students and their families, spend time on farms doing recruitment, and connect regularly with educators and tutors on student progress and struggles. MEP provided important information to AOE's state migrant program coordinator about the unique needs of migrant students and their families that was used in state plan development (see Table A1).
- (3) AOE's state EL coordinator connected regularly through phone calls, virtual meetings and email with EL district coordinators, EL teachers, and multicultural liaisons directly responsible for administering programs supporting EL students and their families. In addition, the EL coordinator communicated regularly with the State Refugee Coordinator and other community-based organizations about the significant challenges faced by EL students and their families, as well as the potential supports available or needed. This consultation activity provided important information about the unique needs of EL students that framed AOE's plan development (see Table A1).

- (4) A special education advisory group, formed originally to implement changes to Vermont's special education funding system, was consulted monthly about the ongoing impact of COVID-19 on students with disabilities. Vermont's state director for Special Education also provided updates and discussed key aspects of ongoing state plan development. This consultation and communication activity resulted in formal feedback on the plan from chief disability advocacy organizations in the state.
- (5) During testimony on Vermont's decision to use ARP ESSER funds for community school expansion, Vermont's Senate Education committee heard from Voices for Vermont's Children, an advocacy organization representing the needs of low-income, BIPOC, and all other vulnerable Vermont children and youth. According to VVC, the final bill funding community schools was one of their "top education policy priorities" last session.
- (6) Vermont's House Education committee took hours of testimony from professionals both practicing and teaching literacy instruction, as well as parents who were advocating for better literacy instruction and learning opportunities for their children with disabilities. The latter testimony was directly related to the ultimate creation of a statewide Literacy Council as well as the use of ARP ESSER funds to foster universal evidence-based literacy instruction across Vermont.

In addition, the AOE consulted regularly with superintendents and its Secretary's Advisory Group, comprised of representatives for superintendents, principals, school board members, teachers, nurses, principals, business managers, and CTE directors, through weekly meetings. The AOE also reviewed the state plan with the Vermont State Board of Education through its open meeting process.

Additional testimony to the Vermont legislature on how students were faring as a result of COVID-19, as well as provision of specific feedback concerning ARP ESSER-funded initiatives, came from Vermont After School, Vermont School Counselors Association, district Directors of Student Support Services, Vermont Special Education Administrators Association, and Vermont's Racial Equity Task Force. Each of these organizations and individuals brought specialized knowledge about and advocacy on behalf of Vermont's most vulnerable students and families including the groups referenced in Table A.1.

Finally, the AOE posted the plan on its website and actively solicited statewide public comment. The initial draft of this plan was shared with the General Assembly (GA) and the education policy committees received testimony on it. This resulted in the passage of a Vermont law which requires the AOE to submit the plan to the education policy committees of the legislature for their approval.

Summary of input

Significant themes arising from meaningful stakeholder consultation and feedback, across all methods described above, focused on addressing the specific needs of Vermont's most vulnerable youth, as identified by the student categories and information presented in Table A.1. For instance, as demonstrated in Table A.1, addressing literacy and gaps in achievement linked to the pandemic emerged as a strong theme, showing up in discussions and stakeholder feedback regarding students from low-income families, students from BIPOC populations, students with disabilities, and migratory students. Focusing on addressing gaps in literacy and/or reading was also a salient theme in the public comment received on the state plan, with about 29% of respondents indicating the state plan should address literacy and related topics.

A second theme regarding improving supports and wraparound services for Vermont's most vulnerable students also emerged. As summarized in Table A.1, this topic was noted as a salient issue to address for students from low-income backgrounds, BIPOC populations, and both homeless and migrant youth. In addition, this theme was a core focus of numerous discussions held by Vermont's General Assembly, particularly concerning the use of ESSER funds for summer programming and overall recovery efforts, statewide improvement in literacy performance, and expansion of community schools to provide robust, integrated services for vulnerable youth and families.

Additional topics that emerged from a review of the public feedback received include addressing CTE funding, ensuring the plan includes a focus on PreK students in addition to K-12, and improving building facilities such as air quality and ventilation.

Incorporation of Stakeholder Feedback into State Plan

Stakeholder feedback was an important aspect of how Vermont's plan was developed and finalized. As noted previously, a widely shared recommendation was to use ARP ESSER dollars to address literacy and integrated supports for students. This was directly borne out by Vermont's plan to fund evidence-based literacy professional development and associated activities, including family literacy supports (total = \$3.38M), as noted in section D.1. Parental requests for a standing statewide Literacy Council were also heeded; the council was formed in 2021. In addition, the Vermont General Assembly's decision to use part of the ARP ESSER state set-aside to fund a limited services literacy coordinator position at the SEA illustrates how the state responded to stakeholder feedback.

In addition, section D.1 describes in further detail Vermont's investment in expanding community schools through ARP funding (\$3.39M). This grant program was developed in direct response to the multiple examples of stakeholder feedback urging greater wrap-around services and supports for students due to COVID-19. Similarly, Act 112 was developed with input from the Department of Mental Health and mental health professional using \$3M of ARP ESSER state set-aside funds to support integrated service delivery models to better ensure each region of the state has a well-articulated service delivery system working to address students' social emotional and mental health challenges due to their experience of the pandemic (see

section D.1). This approach was endorsed by the General Assembly (GA), who allocated these funds for LEA and partner entity grants to address students' social, emotional and mental health needs, as well as contracted services to address educator's acute mental health needs.

One important theme that arose in the latter part of the pandemic response is the challenging and even unacceptable physical condition of some LEA facilities throughout the state. Through a variety of feedback channels including:

- (a) regular feedback from LEAs to the Secretary during planned meeting times;
- (b) formal testimony provided to the General Assembly;
- (c) parent complaints received via email, and;
- (d) a number of media stories depicting conditions in schools,

these facility weaknesses, such as inadequate HVAC systems; unusable space due to rot, mold or other health hazards; and antiquated or non-existent outdoor instructional facilities affected the capacity of some LEAs to sufficiently or effectively address pandemic response requirements. Accordingly, the GA and AOE agreed to use state set-aside funds to engage in an assessment and implementation planning exercise to ensure that all facilities in which students must learn, grow, and thrive in the state meet minimum standards of quality. This program includes the hiring of a consultant to support LEAs in Heating, Ventilation and Air Conditioning (HVAC) and other projects to address safety and health needs in school facilities, completion of a statewide school facilities inventory that includes information related to indoor air quality and other facilities safety concerns, and additional investments in school safety as detailed in D.4. These investments are all aimed to "level the playing field" for our most underserved LEAs, those who serve our largest populations of historically marginalized students. Investments in activities to improve access to high quality instruction for all students, particularly our historically marginalized youth, and infrastructural improvements to assist in data-based decision-making, curricular re-design, etc. (see D.1) are all in response to stakeholder feedback through on-going conversations with the field in our Student Pathways Division and testimony in the General Assembly from state superintendents, principals, school boards, school counselors, school librarians, and parent advocacy organizations, indicating the need for greater attention to equity statewide in the resources, infrastructure, and capacity of LEAs to best meet student need.

Advocates for improving after school and summer programming were successful in convincing the General Assembly and Governor's office that this arena was critical for students' recovery from the pandemic. Accordingly, the Summer Matters program, funded by ESSER II state set-aside dollars (see D.2) was launched successfully in Summer 2021. In addition, by Executive Order, Governor Scott formed in November 2021 the Interagency Work Group for Youth After School and Summer Program, charged with building a sustainable statewide private-public model for both after school and summer programming post-pandemic. Stakeholder feedback was also strongly considered in Vermont's decision to use an additional \$4M of ESSER II funds to continue investments in after school and summer programming through grants available beginning in Winter/Spring 2022. This work dovetailed with the federal requirement that AOE invest at least \$2.8M in ARP ESSER state set aside funds in evidence-based summer programming and a separate \$2.8M allocation for addressing pandemic effects via expanded

after school programming. These investments, although required, directly addressed and supported many stakeholders’ and advocates’ calls for investments in summer and after school supports.

Additional suggestions from public comment were also addressed in the ARP ESSER state plan submitted in 2021, including the use of PreK-12 (instead of K-12) throughout the plan. CTE funding was a salient theme, but Governor Scott elected to use GEER II dollars for CTE supports, just as he did with GEER I funding.

2. Coordinating Funds

States are required to describe how they have and will coordinate Federal COVID-19 pandemic funding and other federal funding.

Use of CARES Act and CRRSA Act Funds

States are required to outline how SEAs and LEAs have used, are using and plan to use Federal COVID-19 funds under the Coronavirus Aid, Relief, and Economic Security Act (CARES) and the Coronavirus Response & Relief Supplemental Appropriations Act (CRRSA) to support safe return to and maximized in-person instruction, and address the impact of the COVID-19 pandemic on individual student groups.

Emergency Response

As part of the Agency’s emergency response, which began in March 2020 and lasted through January 2021, AOE used ESSER I and II funds to create an improved communication infrastructure, provide new platforms to facilitate remote learning and responded to emergency needs in the field as LEAs worked to meet pandemic health guidance for safe operations and took steps to make their schools safe for in-person learning. Governor’s Emergency Education Relief funds (GEER) were used to support the state’s Career and Technical Education (CTE) centers by providing funding for supplies, equipment and staffing to rapidly build out remote learning opportunities and, starting in the Fall 2020, safely return to in-person learning and the hands-on opportunities that are central to CTE curriculum.

Fund	Project Name	Short Description	Emergency Response	Cost
ESSER I	Salesforce CRM	Customer Relationship Management (CRM) tool to respond to queries from the public and the field related to COVID-19 response.	In the initial months of the pandemic, AOE was inundated with questions from schools, families, and members of the public, but the AOE’s decentralized communication structure was challenged to respond in a consistent and timely manner. This tool was created to	\$251,584

Fund	Project Name	Short Description	Emergency Response	Cost
			facilitate consistent, rapid communication.	
ESSER I	Salesforce (Knowledge Base) and Helpdesk Expansion	The addition of a public knowledge base component to the existing helpdesk tool to provide knowledge articles to users.	As part of AOE's ongoing priority to improve the consistency and timeliness of communication, this addition to the existing Helpdesk provides an accessible resource for public and partners during the response to the COVID-19 pandemic.	\$294,025
ESSER I	Salesforce (Symptom Tracker)	Framework for COVID-19 related symptom checking and tracking for schools.	To assist schools in following Department of Health guidance upon return to in-person learning in Fall 2020.	\$407,412
ESSER I	School Vaccine Incentive Program	Incentive program to increase the COVID-19 vaccination rate in schools	To support in-person instruction, funds were awarded to schools that achieved high rates of COVID-19 vaccination (+85%) from November 2021 to April 2022	\$176,535
ESSER II	Burlington High School Macy's Retrofit	Costs associated with the retrofitting of the former Macy's retail space to accommodate in-person learning for Burlington High School (BHS) students.	During their pandemic response as part of air quality testing, BHS, the largest high school in the state, discovered high and unsafe levels of PCBs that necessitated the closure of the school. To ensure that BHS students could access in-person learning, the AOE committed its ESSER II funds (with US ED approval) to the costs associated with retrofitting an existing, defunct Macy's retail space. Vermont's General Assembly also approved this funding decision.	\$3,500,000
GEER	Grants for CTE Centers	Grant program for the state's Career and Technical Education (CTE) centers	Allowable costs included supplies and equipment to address student needs during closure and costs associated with returning to safe in-person or hybrid learning.	\$4,268,801

Future Supports for Recovery

During the winter and spring of 2021, as the state and education system moved from the urgent and immediate COVID-19 response to a sustained operations modality, AOE developed a Recovery Planning strategy centered on three main foci: social emotional health, mental health, and well-being; student engagement; and academic success. These three priorities are central to the work and planning that is being done currently at both Agency and LEA levels, and will inform the use of both SEA and LEA ESSER funds for the next 2-3 years.

Fund	Project Name	Short Description	Recovery Supports	Cost
ESSER I	Edmodo	Professional Network and K-5 Learning Management System	New state-wide platform to support remote learning for K-5 and create virtual space for educators and school administrators to communicate best practices. A second stage included the addition of Zoom capabilities.	\$322,432
ESSER I	PBS Learning Kits	Learning kits created by Vermont PBS, in partnership with AOE staff, and distributed in summer 2021 to young learners attending 21C programs.	The goal of AOE's partnership with Vermont PBS is to provide access to free educational programming, curricular connections, and in-person and distance learning tutorials that are publicly available to families. These kits were distributed summer 2021 to young children attending 21C programs and include: <ul style="list-style-type: none"> • Directions for educational and enrichment activities students can do at home; • Materials needed for activities; • Books related to topic of kit; and • Connections to PBS programming and resources. 	\$50,000
ESSER I	Social emotional and Mental Health	Development and support of a website containing curated materials on best practice for educators to ensure students' social emotional, and	In anticipation of a greater need for social, emotional, and mental health supports for students, AOE will contract with an outside vendor. Even prior to COVID-19, inequities have existed in access to services available. Initial data from Recovery Plan needs assessments indicate a widespread need across	\$378,000

Fund	Project Name	Short Description	Recovery Supports	Cost
		mental health/well-being	LEAs for new approaches to supporting students in these areas. Prior to the pandemic, there existed limited attention to and integration of social, emotional and mental health into everyday curricula, as well as regional inequities in service availability.	
ESSER I	Educator Summer Recess Park Pass Program	Summer passes to VT state parks to support educator wellbeing and mental health	Partnership with VT Agency of Natural Resources to provide VT educators with passes to all of VT's state parks.	\$737,124
ESSER I	Afghan Refugee Grant	Grants to statewide refugee support organizations to support engagement with Afghan refugee community	Summer programming and mentorship activities to engage newly arrived Afghan students and families and prepare them for 2022-23 school year.	\$200,000
ESSER I	Federal Emergency Funds Dashboard	Public facing dashboards to support transparency on use of LEA and SEA funds	LEA dashboard highlighting the planned uses of ESSER and GEER funds, along with an SEA-level dashboard to support transparent use of funds and support stakeholder engagement around VT AOE priorities.	\$57,645
ESSER II	Construction Consultant	Consultant to support LEAs in facilities and construction projects	AOE will contract with an experienced consultant to conduct an inventory of facilities in Vermont schools centered on identifying needs to address health and safety concerns. (approved by the Vermont GA)	\$ 127,500 (through 9/30/23)
ESSER II	Summer Learning 2021	Subgrant to Vermont Afterschool	AOE sub-granted to Vermont Afterschool to provide grants to summer programs to expand access to summer opportunities for all Vermont students as part of Governor Scott's priority to increase student engagement and improve social emotional and	\$ 4,095,838

Fund	Project Name	Short Description	Recovery Supports	Cost
			mental health. (approved by the Vermont GA)	
ESSER II	Summer Learning and Afterschool 2021-2023	To be determined	Amount allocated by the Vermont GA to conduct summer and afterschool programming.	\$4,339,131
ESSER II	Expanding Access Afterschool and Summer Grants	Grants to Vermont Afterschool	AOE has partnered with Vermont Afterschool to support the expansion of summer and afterschool programming with an emphasis on underserved student populations and increasing geographic equity.	\$4,339,131
GEER II	Electric transportation grants	Grants to CTEs to support the development or expansion of innovative programs in electric transportation	As part of the larger investment in Cradle to Career workforce development, the Governor used GEER II funds to support several development grants to CTEs to create partnerships in local industries.	\$530,818
GEER II	CTE Marketing and Recruitment Campaign	Contract to increase awareness of and enrollment in CTE centers	As part of the larger investment in Cradle to Career workforce development, the Governor used GEER II funds for a marketing and recruitment campaign for VT's CTE centers.	\$195,000

Award of ESSER I and ESSER II funds to LEAs

States are required to outline to what extent ESSER I and ESSER II funds have been awarded to LEAs, with a timeline for award if not already available, as well as information on dollar amounts already obligated but not expended.

All ESSER I funds have been awarded and AOE has reimbursed LEAs for \$7,150,863. The application for ESSER II funds was opened on March 22, 2021 and closed on November 1, 2021. LEAs must fully budget their allocations in the ESSER II application due November 1, 2021 and the AOE will award all ESSER II funds by December 26, 2021. To date, AOE has awarded \$39,498,440.82 in ESSER II funds and has made \$1,086,389 in reimbursements. AOE is unable to track LEA obligations.

Supporting LEA Planning for Return to In-Person Instruction and Education Recovery

States are required to outline how they will support LEAs planning for the safe return to and continuity of in-person instruction, and meeting the academic, social, emotional and mental health needs of students.

AOE leveraged state-level Title I School Improvement and Title IIA School Leadership funds to offer state-wide training and professional development on data literacy through a contracted vendor. The vendor offered targeted training sessions for LEAs as they completed their Recovery Plan needs assessment in the spring of 2021, which has informed the development of their plans for education recovery and their use of ESSER funds. Vermont also used state-level Title IIA and Title IVA funds to offer LEAs free [Youth and Teen Mental Health First Aid](#) training in support of their education recovery efforts. We deployed federally funded grant activity to expand outreach and service delivery for migrant students and worked with human services agency partners, school districts, and school food authorities to identify all students who might qualify for Pandemic Electronic Benefit Transfer (P-EBT) benefits and better ensure their family completes required paperwork to be eligible. Our state Child Nutrition program drew down substantial additional U.S. Department of Agriculture (USDA) funding by availing themselves of all USDA waiver options for nutrition programs during COVID-19 and recovery. In addition, AOE provided substantial additional support to the Vermont Foodbank through the Emergency Food Assistance Program (TEFAP) funds. Perkins funds were used to assist CTE centers in identifying core learning proficiencies that can be aligned to schools' local graduation requirements. In addition, Governor Scott deployed 4,488,802 of GEER funds to assist the CTE system, ensuring continuity of high-quality CTE programs of study and instruction during COVID-19.

D. Maximizing State-Level Funds to Support Students

This section addresses the “extraordinary opportunity” States have to address the disproportionate impact of the COVID-19 pandemic on underserved students through the American Rescue Plan Act’s required State Set-asides. SEAs are required to describe their evidence-based strategies for these resources.

Vermont finds it useful to conceptualize and organize our multiple ESSER and ARP state-funded initiatives in service to ameliorating the impact of COVID-19 in the following manner:

- (1) Expanding access to high quality educational opportunities.
- (2) Building infrastructure for efficient instruction and student supports.
- (3) Supporting student and educator mental health and well-being.
- (4) Fostering and ensuring safe and healthy schools.

Accordingly, we use this organizational framework when appropriate within the required elements of the state plan template.

Vermont state law passed in 2021 (Act 74) required the AOE to secure approval from the General Assembly for the activities funded by the ARP ESSER state set-aside. Accordingly, for the balance of ARP ESSER funds (approximately 1/3) not already appropriated as of Vermont’s initial ESSER plan submission in 2021, during the 2022 legislative session, the AOE worked with the General Assembly (GA) to make final appropriations to address the impacts of the pandemic. By June 30, 2022 all ARP ESSER state set aside funds were appropriated by the GA. Discussed and integrated below are the additions to our state plan activities, now that we have worked with Vermont’s GA to fully identify all evidence-based interventions to be deployed.

- Through our work with the GA, the Governor’s office and engagement with stakeholders, the AOE is investing ARP ESSER state set aside funds in four major areas, that align with our Education Recovery priorities. Expanding access to high quality educational opportunities;
- Building infrastructure for efficient instruction and student supports
- Supporting student and educator mental health and well-being; and
- Supporting safe and healthy schools

1. Academic Impact of Lost Instructional Time

States are required to describe how the SEA will use its set aside funds (reserved under section 2001(f)(1) of the American Rescue Plan Act) on evidence-based interventions to address the academic impact of lost instructional time.

Description of the Evidence-based Interventions

States must describe the interventions they have selected.

(1) Expanding access to high quality educational opportunities

A shared area of concern across multiple education stakeholders (i.e., AOE, General Assembly (GA), public input comments, and districts’ Needs Assessment (NA) summaries) is ensuring

that all Vermont students can read, preferably by third grade. Concern about the negative impact of COVID-19 on students' literacy was often discussed during the 2021 legislative session and declines in ELA performance corresponding with the COVID-19 timeframe were reported by districts across the state. In addition, the stakeholder engagement process revealed a salient focus on improving literacy for Vermont's students. Using ESSER funds to assist in efforts to ensure universal literacy was clearly a shared priority across many stakeholder groups in Vermont.

Literacy Supports. Through [Act 28](#) of 2021, the GA allocated \$3.06M of ARP ESSER Section 2001(f)1 state set-aside funds to provide professional learning modules for teachers focused on evidence-based practice for literacy instruction and assist districts in implementing evidence-based systems of literacy instruction in their schools. These modules and technical assistance include five key areas of literacy instruction as identified by the National Reading Panel—phonics, phonemic awareness, vocabulary, fluency, and reading comprehension. In Act 28 of 2021 the GA also allocated \$450,000 of Emergency Reserve funds (ARPA Section 2001(f)4) for the AOE to retain contracted services or a limited service position to:

- (1) recommend how federal funds can be used to improve literacy outcomes;
- (2) recommend evidence-based best practices in teaching literacy instruction to students in prekindergarten through grade 3;
- (3) recommend how to provide professional development for teachers and school leaders in methods of teaching literacy; and
- (4) recommend policies, procedures, and other methods to ensure that improvements in literacy outcomes are sustained.

In addition, using funds from ARPA Section 2001(f)1 authorized under [Act 74 of 2021](#) the AOE will contract with an entity to provide professional development for educators and/or a program to significantly improve family literacy engagement. Decades of research demonstrate the importance of family literacy, reading, provision of home reading materials, etc. to children's own literacy and reading development. This contracted work will be targeted to sites that already engage in community engagement efforts (i.e., 21C sites, new Community School sites [see below]). Because the districts that qualify for 21C and Community School grants include some of our most historically marginalized students, it is critical that we direct family literacy supports to these areas. (\$325,000)

The GA also appropriated \$24,000 of Emergency Reserve funds (ARPA Section 2001(f)4) to support the work of the Literacy Council described in Section C above.

In all contract procurement processes, the AOE reviewed proposals closely to ensure that the selected vendor(s) are experts in evidence-based literacy interventions.

Expansion of Virtual Learning Opportunities. In the [Act 83 of 2022](#), the GA directed the AOE to leverage its partnership with the Vermont Virtual Learning Cooperative (VTVLC) by granting expansion funds to expand remote learning access for supervisory unions and districts, CTE centers, and AEL centers to support online and blended learning during and beyond school

closure. In addition, during the transition phase of this opportunity, educators have access to professional learning through VTVLC and, through a variety of partnership models, online and blended learning opportunities for middle and secondary level students. Throughout the pandemic, educators have learned about the promise (and pitfalls) of well-designed virtual learning opportunities. VTVLC, a longstanding and well-respected entity within Vermont, uses Vermont licensed teachers for delivering its content.

Investment in this state-level service will provide a necessary asset for our PreK-12 education system to address and *prevent* learning loss now and into the future for all students, including those who may be most challenged to re-engage and/or serve in the pandemic ecosystem (e.g., historically marginalized students, home study students, state-placed students, and students in non-operating districts to name a few). The GA allocated \$1.9M of ARP state set-aside for this set of activities.

High Quality Instructional Materials and Coordinated Curriculum. One of the challenges in a highly decentralized state such as Vermont is that curricular and instructional materials are decided at the local level. Our state Board of Education sets curriculum standards, but it is up to the LEA to determine how students will master those standards. Although this paradigm has worked well in honoring Vermont's strong New England history of local governance, one could argue it has not worked to improve students' academic performance outcomes statewide. In addition, this decentralization has almost certainly played a role in student subgroup differences in performance and inequities throughout the state. Accordingly, we plan to use the opportunity of ARP ESSER funds to better ensure that all students have access to high quality instruction and, at minimum, a robust curriculum that is coordinated both within and across grade levels. This investment is intended to substantially reduce further gaps in learning, particularly for our most underserved students, resulting from the pandemic.

The AOE will engage in a contract to develop and offer a state-level coordinated curriculum or develop an implementation plan for those LEAs who choose to adopt a model curriculum. This initiative will involve strong coordination with our LEAs and state partners, as it is likely that "one size" will not fit all. By facilitating the adoption and implementation of a model coordinated curriculum, the AOE looks to create additional stability within our educational system that is still addressing the daily impact of COVID-19 on students. By investing in a model coordinated curriculum, we can better ensure that any Vermont student, regardless of learning modality, district resources, family background, or geographic location, will have the same access to high quality instructional materials, supporting an equitable education system in a 21st century learning environment (authorized under Act 74, \$1.276M).

(2) Building infrastructure for efficient instruction and student supports

Cybersecurity Investments. The pandemic forced schools to rely heavily on their IT networks to ensure accessibility to and communication with students, teachers, and staff, enabling daily work to continue as systems moved flexibly between remote, hybrid and in-person learning. This novel instructional paradigm prompted many districts to assess and identify vulnerabilities in their networks that could be exploited. Nationwide, the Cybersecurity and Infrastructure Security Agency reports an increase in malicious cyber activity, including attacks directed at schools. With the increased reliance on school IT networks to ensure student instructional continuity via technology, the AOE is supporting individual Vermont school districts and supervisory unions in establishing a cybersecurity framework and data breach response plan, so that educators, students and other users maintain access to education platforms, tools, etc.

ARP ESSER funds (\$250,000) appropriated in [Act 74 of 2021](#) from ARPA Section 2001(f)1 are available as grants to LEAs to carry out these critical investments. The AOE made available one-time funds for competitive grants to assist districts in developing comprehensive data breach protocols and response plans, and for purchasing needed equipment and software to support this cybersecurity planning and response. Ensuring safe and effective continuity of local IT services will support ongoing academic and mental health recovery efforts, including both instruction and support services, as well as the fidelity of student educational work.

In order to receive an ARP ESSER Cybersecurity grant award, an LEA must demonstrate that they meet the following criteria:

- Applicants **must** be able to describe how the pandemic and the resulting remote, hybrid, to in-person learning made the SU/SD aware of the need to conduct cybersecurity planning and strengthen technology to prevent a cyber-attack and to ensure a continuous learning environment is maintained to remediate the academic impact of the pandemic on student learning.
- Planning activities must incorporate the National Institute of Science and Technology (NIST) Cybersecurity Framework planning process.
- Planning work must directly result in an update to or an original composition of a data security and cybersecurity policy for the SU/SD and an update to or composition of a data breach response plan for the SU/SD.
- Applicants required to include a communication process for implementing the plan within all SU/SD schools.
- Successful applicants are expected to share the data security and cybersecurity policies and data breach response plans at the end of the grant period with AOE for use in professional learning for all districts.
- Plans must include measures for sustaining this work beyond the grant period.

In addition, AOE will support LEAs to send staff to the VITA cybersecurity conference as part of this effort, to support robust systems that protect student information and LEAs from financial risk or other data breaches. (\$4,000; authorized under Act 74).

Virtual Library of Streaming Videos. Given the need for flexible instruction, including multiple modalities and online options during and after the pandemic, AOE partnered with the VT Department of Libraries to provide free learning content to school libraries throughout the state. A two-year contract for \$220,000 was procured with Swank Motion Picture, Inc to support student learning by allowing classroom teachers to deploy free viewing, streaming, and download options for the full catalog of the company's educational videos. In addition, an option to allow students themselves to stream assigned videos at home on their own devices is important for fully ensuring that all students, even those quarantining at home, can access course content. The funding for this contract was authorized under Act 74 of 2021 from ARPA Section 2001(f)1.

Early Warning Systems. Several studies demonstrate the power of school- and district-level early warning systems, mapped onto existing student information systems and other relevant student data, in alerting teachers, education support teams, and/or administrators when a student is at risk of poor academic performance, failing to complete requirements for high school graduation, etc. Using such systems is not all that common in Vermont to date. We plan to leverage state set aside funds to provide both direct support and professional learning so that LEAs can identify gaps or disconnects in their local SIS that hamper efforts to stand up a viable early warning system. Importantly, we aim to procure this support so that LEAs do not require new data collections or significant manual work to set up such a system. The AOE and the procured supports will leverage the federal EdFi program. This work uses \$350,000 in funds appropriated from APRA Section 2001(f)1 under [Act 185 of 2022](#).

Local Benchmark Assessment Improvement and Professional Learning. The AOE will offer two-year grants to LEAs who wish to improve their local benchmark assessment system, one component of the state's required Local Comprehensive Assessment System (LCAS). This activity is authorized through \$500,000 in funds appropriated from ARPA Section 2001(f)1 under [Act 185](#) of 2022 and will be used to provide SU/SDs, their schools, and CTE centers with competitive grant funding. Consistent with the State's primary education recovery strategy and goals, this funding opportunity focuses on both addressing the learning loss caused by the COVID-19 emergency and on improving the core functions of our schools and communities into the future by supporting LEAs in improving their LCAS, one of four system levers required by Vermont's state [Education Quality Standards](#).

This grant opportunity will focus on academics, specifically English Language Arts and Mathematics, by providing funding to SU/SDs to improve their benchmark assessment(s) in one or both of the following:

- (1) Purchase a new benchmark assessment system(s) that includes Lexile and Quantile measures;

- (2) Extend the grade levels assessed in the current benchmark assessment system that provides Lexile and Quantile measures throughout K - 8 with the possibility of including high school; and/or
- (3) Fund participation in the Educator Academy for Lexile and/or Quantile Frameworks.

Grant applications will be reviewed by AOE staff after January 17, 2023 and grants will be awarded no later than February 3.

Applicants will be evaluated on how well their Project Description and Justification addresses the following criteria.

- 1) A description of how the project will meet the Vermont Agency of Education Priorities:
 - Improving Local Comprehensive Assessment Systems (LCAS) and outcomes for students through the inclusion of SU/SD benchmark assessments.

Leadership teams may decide to:

- Purchase a new benchmark assessment system(s) that includes Lexile and Quantile measures; and/or
- Extend the grade levels assessed in the current benchmark assessment system that provides Lexile and Quantile measures throughout K - 8 with the possibility of including high school.
- Fund participation in the Educator Academy for Lexile and/or Quantile Frameworks.
- Ensuring that all students are provided equitable educational opportunities. Leadership teams will explain how they will:
 - Refine assessment systems to be responsive to the needs of all students.
 - Use assessments to collect evidence of learning that informs the selection of evidence-based practices to meet students' needs.
 - Review assessment data to determine if all students are receiving necessary supports.

- 2) Connections to Recovery and Continuous Improvement Plans that explain how leadership teams will review, select, and use benchmark assessment data.
- 3) Assurance that the SY22-23 Universal Screener, Interim or Benchmark Census has been completed

Applications will also be evaluated on whether the proposed Benchmark Assessment elected assessments are aligned to Common Core State Standards and report Lexile or Quantile Measures and whether the application makes project outcomes and plans for sustainability evident.

In addition, authorized under Act 74, the AOE will procure a state contract to provide LEAs with professional learning related to the use of benchmark assessments. Simply deploying an assessment is insufficient for fully realizing its potential. Teachers and support staff, as well as district-level personnel, should have a robust understanding of how to use benchmark data to improve teaching, inform fiscal investments in appropriate supports, and develop leadership at the local level in the use of assessments. Ultimately, this work is aimed to improve all students'

outcomes and performance, addressing learning gaps due to the pandemic emergency response. AOE anticipates that the \$500,000 for this state contract will serve 33 SU/SDs (66% of Vermont's total) with each LEA having 6 staff, including administrators, receive training and supports for through September 2024.

(3) Supporting student and educator mental health and well-being

Community Schools. Consistent with broader national calls for investing in community school models, the Vermont GA allocated \$3.4M of ARP ESSER state set-aside to be used for a multi-year grant program for districts to engage in planning for and implementation of community schools models throughout the state. Community schools promise to address learning loss and other deleterious student outcomes resulting from the pandemic, particularly in our most rural areas where services are scant or difficult for struggling families to access. The vision is that embedding medical, mental health, social services, and other relevant supports within the school setting will not only assist students and parents with securing these services but will bring about improved academic performance and growth through receiving the non-academic supports needed because of COVID-19. ARP ESSER state set-aside funds will also be used to evaluate the effectiveness of this community schools program. Community schools and related initiatives such as “whole school, whole community, whole child” approaches have been shown empirically to improve academic success, and both physical and mental health/well-being for students and families.

Five Vermont SU/SDs were awarded grants from the state level ARP ESSER funds appropriated from APRA Section 2001(f)1 through [Act 67](#) in Fall 2021 for developing and establishing community schools in their region. Applicants were required to either: (1) have at least 40% of students at the district or school level eligible for FRL or (2) currently qualify for comprehensive or targeted Title I supports under ESSA. These were the selection criteria established by Vermont's legislature in Act 67.

Mental Health Supports. The impact of COVID-19 on students' (and educators') mental health, socioemotional functioning, and well-being has continued to draw attention in Vermont. Initial LEA Needs Assessments (NAs) conducted in winter 2021 indicated that students' anxiety, depression, and related behaviors were on the rise during and right after the pandemic; unfortunately, reports indicate that this trend continues in Vermont. [Act 112](#) directed the AOE to operate a \$2.5M grant program to address the impact of COVID-19 on students' mental health, social emotional learning, and general wellness. Specifically:

“...the Agency of Education shall work collaboratively with the Department of Mental Health to establish and administer a two-year program utilizing a tiered-support approach to ensure continuous support to children and youth in a variety of settings, including supervisory union and district-wide, in-school, community technical education centers, and afterschool, by providing grants to: (1) expand existing school-based counseling services in underserved districts of the State; or (2) develop either school-based or community-based afterschool programs, operating in a variety of settings outside the school day and over the summer, including before and

after school, in-service days, and school vacation week, that support the mental health and wellness needs of students...”

The AOE partnered with Vermont’s Department of Mental Health (DMH) to review grants applications from 13 SU/SDs and non-LEA entities across the state. Seven districts propose to use the funds to establish new mental health supports and programs during and after school hours. Six of the grant applications propose to use funds to expand their current offerings.

A mandatory eligibility criterion, set in statute, was that “The applicant uses evidence-based strategies to address students’ social, emotional, mental health, and wellness needs. As used in this subdivision, “evidence-based” means the same as in the Elementary and Secondary Education Act of 1965, 20 U.S.C. § 8101.” This assured that only evidence-based proposals and activities would be funded; applicants were required to provide materials documenting the levels of evidence that supported their proposed activities.

We note that Act 112 was a further specification on the part of the GA regarding how AOE should spend the \$3M of ARP ESSER funds previously allocated in Act 74 (and reported in Vermont’s initial plan, see original language below):

\$3M of state set-aside ARP ESSER funds will be used to support integrated service delivery models statewide to ensure each region of the state has a well-articulated service system between and among social services and education services. This approach was endorsed by the General Assembly (GA), who allocated these funds for regional capacity grants to address students’ social, emotional, and mental health needs.

To address educators’ acute mental health needs due to COVID-19, [Act 112](#) also directed AOE and DMH to secure contracted services (up to \$500,000) providing statewide recovery supports for school educators and staff through mental health clinicians. Specifically, the selected vendor must provide mental health services through multiple modalities to Vermont educators, to support their recovery from the effects of COVID-19. The effects of the pandemic have changed the needs of many students, and thereby impacted the demands on educators and school staff. It is essential that Vermont’s educators and school staff are strong and healthy so that they can best assist students in their recovery processes across social and emotional, mental health, academic, and student engagement domains.

An RFP for these contracted services is currently posted on Vermont’s state procurement [website](#). Proposals are due by January 31, 2023, with an anticipated service start date of March 3, 2023. Bidders are asked to respond to the scope of work requirements including best practices for accomplishing the deliverables based on their specific knowledge and experience. In addition, successful bidders must document “experience using evidence-based practices to provide mental health support in educational settings.” They are also required to document the success of project objectives (e.g., number of participants, number and type of forum or group, and geographical region), improvement of educators’ reported stress levels, or related indicators.

In total, the AOE has allocated the entire Section 2001(f)1 mandated reserve (\$14,261,170) and is using additional funds from Section (f)4 for evidence-based investments to address learning loss. These investments total \$14,784,000.

How the Interventions will Address Impacts to Certain Groups of Students

States must describe how the evidence-based interventions will address the impact of the pandemic on certain groups of students.

As noted in the descriptions of evidence-based activities above, nearly all of our state-level strategies are designed to address gaps in outcomes for Vermont's historically marginalized students, consistent with our state ESSA plan under ESEA. Due to Vermont's small size, we use a "supergroup" of students comprised of those qualifying for FRL, BIPOC students, students with disabilities, English learners, and homeless students to encapsulate "historically marginalized." As noted above, nearly every strategy we are investing in is predicated on the goal to reduce inequities in access to high-quality instruction, reduce gaps in student performance by subgroup, or address underlying infrastructural challenges that typically unfairly affect our most vulnerable students. Data will be collected for all strategies when possible, including new data collections to ensure we track initiative progress. A key indicator of progress for each strategy will examine its impact on historically marginalized students. We will deploy this analysis (when possible) throughout our entire set of ARP ESSER strategies.

As specific examples of this approach, consider our state plans for the following strategies:

Because reading, particularly early reading, is fundamental to students' ultimate educational progress and success in both the classroom and life, supporting teachers to use evidence-based practices aimed to assist the most vulnerable populations in learning to read are of critical import for Vermont. If all literacy teaching is of high-quality, is based in science and evidence, and is regularly practiced throughout each district and school across the state, we will see reduction in the literacy gaps that became wider due to the pandemic. This is the model and vision adopted in Vermont's plan. Existing literacy gaps to be addressed involve students from low-income backgrounds, BIPOC students, EL students, students with disabilities and the other vulnerable student groups as identified in Table A.1.

With respect to community schools, they are inherently designed to meet the needs of our most vulnerable youth, including those without ready access to healthcare, social supports and community interventions. By facilitating and fostering the development of community schools throughout the state, Vermont is helping create structures that will bring more direct supports to exactly those students who need them. The unique needs of these community school systems and focus were delineated at the local level. Strategies included will improve supports for all of the student groups indicated in Table A.1, depending on each school and district's unique population makeup.

In providing technical assistance to districts and schools, as well as in all grant application requirements, the AOE prioritizes an equity lens. In this context, we are requiring districts who receive grant funds to monitor outcomes broken down by historically marginalized student

populations, to the best of their ability. This requirement tracks well with a recent AOE-sponsored initiative focused on ensuring data literacy across all districts in Vermont. Much of the work in that sphere is training local educator teams how to effectively discern patterns across different groups of students to best tailor subsequent interventions. Similarly, we will be working with grantees to not only report on the impact of their interventions for certain groups of students, but also on how this information will inform the subsequent phases of their work.

In addition, the AOE is requiring LEAs to implement a systems approach to Education Support Teams (ESTs), a long-standing policy requirement in Vermont, to guide local and state decision making on intervention priorities. Through a consistent EST data collection process, patterns of impact will be identified, and strategies will be developed locally, regionally and at the state level as necessary. Such an approach is intentionally designed so that any student who is identified in need of education supports will be able to receive the interventions they need.

Engaging Students Who Missed In-person Instruction

States must outline the extent to which the SEA will use its funds to identify and engage students who missed the most in-person instruction or who did not consistently participate in remote instruction.

Almost all schools in Vermont were able to offer some in-person instruction during the 2020-2021 school year, and all schools operated fully in-person during the 2021-2022 school year. Most districts used the state-supported Vermont Virtual Learning Cooperative to provision remote learning, and that allowed schools to ensure a certain level of quality in remote learning activities.

2. Evidence-Based Summer Learning and Enrichment Programs

States are required to describe how the SEA will use its funds (reserved under section 2001(f)(2) of the American Rescue Plan Act) for evidence-based summer learning and enrichment programs.

Description of Programs

States are required to describe the evidence-based programs that address the academic, social, emotional and mental health needs of students.

ESSER II state set-aside funds were used to fund a significant expansion of summer enrichment activities during 2021 as part of Vermont's education recovery framework. This initiative was called "Summer Matters for All" Our Education Recovery framework includes three focus areas. One of those focus areas is student engagement, and Summer Matters for All was accordingly designed to improve geographic equity and bring all students back into the supportive context of high-quality expanded learning and enrichment experiences. \$4.1M of SEA ESSER II set-aside funds were used to contract with Vermont Afterschool (VAS) to expand student summer engagement activities statewide. Funds were used at the state level, not allocated directly to LEAs.

In addition, the Interagency Task Force for After School and Summer Youth programs (via Governor's Executive Order) is developing a system-focused proposal for universal afterschool services, based on a public-private partnership model, to continue the expansion efforts begun summer 2021. Through Act 9 of 2021 the GA allocated an additional \$4M of ESSER II state set-aside funds for expansion of summer and afterschool programs and VAS began granting funds to summer and afterschool programs in Spring 2022.

Under ARP ESSER Section 2001(f)(2), the AOE must reserve \$2,852,234 of its total allocation,

"to carry out, directly or through grants or contracts, the implementation of evidence-based summer enrichment programs, and ensure such programs respond to students' academic, social, and emotional needs and address the disproportionate impact of the coronavirus on the student populations described in section 1111(b)(2)(B)(xi) of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 6311(b)(2)(B)(xi)) [each major racial and ethnic group, children from low-income families, children with disabilities, English learners, gender, migrant students, students experiencing homelessness, and children and youth in foster care]"

The GA appropriated these funds in [Act 185 of 2022](#).

Accordingly, AOE invited school districts and their schools and CTE centers, in partnership where possible with community-based organizations, to apply for ARP ESSER SEA Summer grant funding for the purpose of providing a variety of high-quality, evidence-based summer learning opportunities for Vermont students for grades K-12. Policy guidance advises: "Effective summer programming can address students' social, emotional, mental health, and academic needs through a combination of activities that include strong partnerships with community-based organizations and other summer providers, including summer camps. These partnerships can help to sustain these programs and can also support programs in rural and remote communities."

In line with the statutory language above, competitive grants will be awarded to applicants that show the greatest promise of supporting the following overarching goal adopted by the Vermont State Board of Education to, "Ensure that Vermont's public education system operates within the framework of high expectations for every learner and ensure that there is equity in opportunity for all."

Use of funds towards these objectives was considered within [Vermont's Education Recovery and Revitalization Framework](#), in concert with other local strategies, and aligned with these three recovery areas:

1. Social emotional functioning, mental health, and well-being
2. Student engagement, and reengagement
3. Academic achievement and success

Importantly, these strategies align explicitly with federal and state afterschool and community school models and associated funding streams being used in Vermont that can be further leveraged where capacity exists during pandemic recovery. As such, intentional integration and/or expansion with local ARP ESSER funds, ESSA Title IVB (the Nita M. Lowey 21st Century Community Learning Centers Programs (21st CCLC)), and Act 67 (Vermont's Community School legislation), among others, is carefully considered. In addition, there is coherence between this initiative and these other funding streams and initiatives, as all can support a broad menu of expanded learning approaches using out of school time, including evidence-based high-dosage tutoring activities.

The AOE has received applications for twelve SU/SDs with an average request of \$204,000. The average program proposed supports for 170 students and 26 days of program per year. The AOE is evaluating applications based on the following priorities:

- The applying district has greater than 40% free or reduced lunch participation.
- Students in the applying district do not currently have access to afterschool programming through the school or a local organization.
- The proposed program includes an academic component such as evidence-based high-dosage tutoring.
- The proposed program includes 25 days of full-day summer program in the first year.

Addressing Impact to Students

States must describe how the evidence-based summer programs will address the impact of the pandemic on certain groups of students.

A core feature of the Summer Matters for All program of 2021 was to expand both the number of slots and the number of weeks summer programming was available to students and families. The initiative provided training to non-school entities so that they could better serve students with disabilities, providing an important opportunity for such students to have an enriching and engaging experience that had previously been unavailable to them. In addition, by adopting a strong equity lens in its review of grant proposals, the subgrantee Vermont After School (VAS) awarded grants to communities most in need of summer resources, including those in Chittenden County where the bulk of Vermont's EL, BIPOC, and homeless students reside. Because Vermont is predominantly rural, by also focusing on summer program expansion across the entire state, and particularly in some of our most rural underserved regions, VAS and partners were also able to bring summer programming opportunities to students in other groups listed in Table A.1, including students from low-income backgrounds and migratory students. Summer program providers who received grants under the Summer Matters initiative were required to assure their programs were accessible to all students, with an emphasis on ensuring access to those students who were disproportionately impacted by COVID-19. AOE and partners provided training to the field, including new summer programs staff, on how to best work with families of students with disabilities to ensure programs were accessible and high-quality for even our most under-served students.

In addition, Vermont Afterschool, the organization that administered the Summer Matters program, must provide a report on a variety of programmatic indicators to the AOE as a condition of their award. With this summer program under our collective belts, the state work group is now designing a robust program evaluation paradigm as we move forward with expanded universal afterschool and summer programs, per the Governor's directive. A key component of this evaluation paradigm is testing whether historically marginalized students such as those who qualify for special education services, are English learners, experience poverty, or are members of the BIPOC population were able to fully access and participate in the programs. This logic informed the VAS Expanding Access grants for summer and afterschool programs through September 2023 and the development of the ARP ESSER Summer Programming grants described above.

As noted above, ARP ESSER funded summer grants, will be targeted to sites that already participate in community engagement efforts (i.e., 21C sites, Community Schools grant sites). Because the districts that qualify for 21C and Community School grants include some of our most historically marginalized students, we are ensuring that summer funding is leveraged to address learning loss and pandemic-related challenges for our most vulnerable students.

Total budget: \$2.8M

Engaging Students Who Missed In-person Instruction

States must outline the extent to which the SEA will use its funds to identify and engage students who missed the most in-person instruction or who did not consistently participate in remote instruction.

Almost all schools in Vermont were able to offer some in-person instruction during the 2020-2021 school year, and all schools operated fully in-person during the 2021-2022 school year. Most districts used the state-supported Vermont Virtual Learning Cooperative to provision remote learning, and that allowed schools to ensure a certain level of quality in remote learning activities.

3. Evidence-Based Comprehensive Afterschool Programs

States are required to describe how the SEA will use its funds (reserved under section 2001(f)(3) of the American Rescue Plan Act) for evidence-based comprehensive afterschool programs.

Description of Programs

States are required to describe the evidence-based programs that address the academic, social, emotional and mental health needs of students.

In addition to Vermont's integrated approach for afterschool and summer programming that we recently adopted to ensure universal out-of-school opportunities for all students (detailed in Section D.2), AOE recognizes the requirement to keep separate ARP ESSER funding streams for summer learning and enrichment (D.2) and developing comprehensive afterschool

programming (D.3). Below we describe our strategy for the required state set aside regarding afterschool.

Under ARP ESSER Section 2001(f)(3), the AOE must reserve \$2,852,234 of its total allocation:

“to carry out, directly or through grants and contracts, the implementation of evidence-based comprehensive afterschool programs, and ensure such programs respond to students’ academic, social, and emotional needs and address the disproportionate impact of COVID-19 on student subgroups (each major racial and ethnic group, children from low-income families, children with disabilities, English learners, gender, migrant students, students experiencing homelessness, and children and youth in foster care).”

The GA appropriated these funds in [Act 185 of 2022](#).

For the purposes of ARP ESSER, Vermont is using the US DOE [ESSA levels of evidence](#). In line with this legal framework, competitive grants will be awarded to applicants showing the greatest promise of supporting the following overarching goal adopted by the Vermont State Board of Education to, *“Ensure that Vermont’s public education system operates within the framework of high expectations for every learner and ensure that there is equity in opportunity for all.”*

Use of funds towards these objectives will be considered within [Vermont’s Education Recovery and Revitalization Framework](#), in concert with other local strategies, and aligned with these three recovery areas:

1. Social emotional functioning, mental health, and well-being
2. Student engagement, and reengagement
3. Academic achievement and success

Importantly, these strategies align explicitly with federal and state afterschool and community school models and associated funding streams being used in Vermont that can be further leveraged where capacity exists during the Recovery phase of the pandemic. As such, intentional integration and/or expansion with local ARP ESSER funds, ESSA Title IVB (the Nita M. Lowey 21st Century Community Learning Centers Programs (21st CCLC)), and Act 67 (Vermont’s Community School legislation), among others, is carefully considered. In addition, there is coherence between this initiative and these other funding streams and initiatives as all can support a broad menu of expanded learning approaches using out of school time.

There have been two rounds of applications for the ARP ESSER Afterschool grant program. In Round I, 13 SU/SDs were awarded an average of \$145,000 based around the following funding priorities:

- The applying district has greater than 40% free or reduced lunch participation.
- Students in the applying district do not currently have access to afterschool programming through the school or a local organization.

- The proposed program will be offering supports to secondary students.
- The applying districts applied for, but did not receive, 21C funding in the last round of grant applications.

The second round of applications is now under review with eleven applicants requesting an average of \$96,000 and will be awarded based on the following funding priorities:

- The applying district has greater than 40% free or reduced lunch participation.
- Students in the applying district do not currently have access to afterschool programming through the school or a local organization.
- The proposed program includes an academic component such as evidence-based high-dosage tutoring.
- The proposed program will be offering supports to secondary students.

Total budget: \$2.8M

Addressing Impact to Students

States must describe how the evidence-based summer programs will address the impact of the pandemic on certain groups of students.

As noted above, ARP ESSER funded afterschool grants, are targeted to align with other community engagement programs (i.e., 21C sites, Community Schools grant sites). Because the districts that qualify for 21C and Community School grants include some of our most historically marginalized students, we are ensuring that afterschool funding is leveraged to address learning loss and pandemic-related challenges for our most vulnerable students.

Engaging Students Who Missed In-person Instruction

States must outline the extent to which the SEA will use its funds to identify and engage students who missed the most in person instruction or who did not consistently participate in remote instruction

Almost all schools in Vermont were able to offer some in-person instruction during the 2020-2021 school year, and all schools operated fully in-person during the 2021-2022 school year. Most districts used the state-supported Vermont Virtual Learning Cooperative to provision remote learning, and that allowed schools to ensure a certain level of quality in remote learning activities.

4. Emergency Needs

Description of Programs

States are required to describe how the SEA anticipates it will use its funds (reserved under section 2001(f)(4) of the American Rescue Plan Act) for emergency needs, if applicable, including the extent to which these funds will build SEA and LEA capacity to ensure students' and staff health and safety, meet academic, social, emotional and mental health needs, and implement evidence-based interventions.

School Safety and Facilities Improvement. Through [Act 72](#), the Vermont General Assembly has appropriated \$4,000,000 in ARPA Section 2001(f)4 funds for a school facilities improvement program. This program includes the hiring of a consultant to support LEAs in Heating, Ventilation and Air Conditioning (HVAC) and other projects to address safety and health needs in school facilities and the completion of a school facilities inventory and assessment that includes a comprehensive evaluation of major school facilities systems, including HVAC and other systems related to indoor air quality.

Educator Workforce Supports. In Act 74, the GA appropriated \$1,000,000 in ARPA Section 2001(f)4 funds for Educator Workforce development. The AOE is using these funds, along with the remainder of the Section 2001(f)4 reserve to conduct an analysis of Vermont’s educator workforce landscape (\$69,200) and support educator wellness and mental health through a partnership with the Vermont Education Health Initiative (VEHI).

The VEHI PATH forward program uses a total of \$1,395,000 appropriated by the GA in Acts 74 and 83 to expand district wellness programs for employees and provide direct service supports while strengthening the foundation of this critical program so that more Vermont educators have access to safe, healthy and supportive work environments. These funds are intended to stabilize the workforce and retain staff in a tight labor market.

Supports for LEAs. Finally, the AOE has dedicated \$149,560 of ARPA Section 2001(f)4 funds appropriated through Act 185 of 2022 to fund a programmatic and fiscal analysis of LEA ESSER-funded activities. This study will identify best practices nationally that are well-aligned with Vermont’s small, rural state context. In addition the consultants will work closely with LEAs to identify their most important student outcomes and provide an opportunity for LEAs to share impactful activities. Finally, this study will result in a district by district analysis of areas where ESSER investments may lead to fiscal exposure in the Fiscal Year 2025 budget and identify ways that other federal funding sources could be leveraged to support programs that are leading to better student outcomes.

E. Supporting LEAs in Planning for and Meeting Students' Needs

This section addresses the need for safe return to in-person instruction to be accompanied by a focus on meeting academic, social, emotional and mental health needs, and by addressing opportunity gaps. States are required to outline how the SEAs will support LEA development of high quality plans for use of ARP ESSER funds.

[Section E State Plan Template Questions \(page 13\)](#)

1. LEA Plans for the Use of ARP ESSER Funds

States are required to describe what the SEA will require its LEAs to include in LEA plans consistent with ARP ESSER requirements, how each plan will be made available to the public, and the deadline for submission.

In advance of the passage of ARP, Vermont has already required all LEAs to create and submit a Recovery Plan. In their Recovery Plans, each LEA needs to identify a need under three different recovery areas—social and emotional health, mental health, and well-being; student engagement, and academic achievement/success. Vermont will be leveraging these Recovery Plans to demonstrate how schools have prepared for reopening. In addition, to ensure that LEAs meet the IFR requirements for the ARP ESSER LEA Plan, in August 2021, the AOE created a template that contains all of the required elements of the IFR.

Prepared with these tools, LEAs will be required to submit the URL link to their public ARP ESSER LEA Plan using a webform within 90 days of receiving the final one third of the ARP ESSER funds.. In addition, Vermont is using its Grants Management System ARP ESSER Phase II application to address the requirements outlined in the IFR.

In the ARP ESSER Phase II application, LEAs are required to upload this template or a similar document, which must include evidence of stakeholder engagement and any other required IFR elements and the URL for their ARP ESSER LEA Plan.

Prevention and Mitigation Strategies Aligned with CDC Guidance

LEA plans must include information on whether and how the funds will be used to implement prevention and mitigation strategies in line with current CDC guidance, in order to continuously and safely operate schools for in-person learning.

Unlike many parts of the country, all Vermont schools reopened to at least partial in-person instruction in September 2020 following the Vermont Department of Health and Agency of Education's [Strong and Healthy Start guidance](#). The ARP ESSER LEA application will include an assurance that the LEA continues to operate safely and in line with CDC guidance. In addition, the LEA will be required to post its Recovery Plan on its website and make it available for public comment. Any changes to the LEA's Recovery Plan will need to be reflected in that posting. Reopening guidance to LEAs can be found as part of the Strong and Healthy Start Guidance outlined above.

Addressing Impact of Lost Instructional time

LEA plans must include information on how the LEA will use funds (reserved under section 2001(e)(1) of the American Rescue Plan Act) to address the academic impact of lost instructional time.

In the ARP ESSER LEA application, LEAs will need to identify which investments specifically address lost instructional time and the amount and nature of those investments. AOE approval of applications is contingent upon meeting the 20% threshold. LEA Recovery Plans will allow LEAs to identify both broad needs and specific investments. Many, but not all, needs identified in their required Needs Assessments will be funded through ESSER funds. The ARP ESSER LEA application will include funding details addressing the 20% threshold.

Use of Remaining Funds

LEA plans must include information on how the LEA will spend its remaining funds consistent with section 2001(e)(2) of the American Rescue Plan Act.

In the ARP ESSER LEA application, LEAs will need to identify how they will spend the remainder of their ARP ESSER funds. AOE will review the proposed investments to ensure that they reflect allowable uses.

Addressing Impacts of Students Disproportionately Impacted by COVID-19

LEA plans must include information on how it will ensure the interventions it implements address the academic, social, emotional and mental health needs of all students, and particularly those disproportionately impacted by the COVID-19 pandemic.

AOE will review the investments detailed in the ARP ESSER LEA plan to ensure that the proposed investments meet the intent of the law regarding response to and as a result of the COVID-19 pandemic and ensure that the investments specifically support historically marginalized students in areas of academic, social, emotional, and mental health.

2. LEA Consultation

In this section, States are required to describe how the SEA will ensure that LEAs engage in meaningful consultation with a wide range of stakeholders; specifically students, families, school and district administrators, and educators. LEAs must also meaningfully consult with Tribes, civil rights organizations, and stakeholder representing the interests of children with disabilities, English learners, children experiencing homelessness, in foster care, and other underserved student groups, if represented in the district.

The ARP ESSER LEA application will include assurances from the LEA that they have conducted meaningful consultation with identified stakeholders and evidence of the outreach to stakeholders, the content of feedback, and how plans have been altered as a result of that feedback.

Vermont's LEAs, through their Education Recovery planning process, have already begun to engage stakeholder groups. In addition, many LEAs are conducting communications outreach through websites, informational sessions and direct contact with families. The AOE requires that the LEAs document these stakeholder engagement efforts and will require evidence of this engagement in the ARP ESER LEA application.

3. Support and Monitoring for LEAs

In this section, States are required to describe how they will support and monitor LEAs in using ARP ESSER funds.

Monitoring Implementation of Interventions

States are required to outline how they will support and monitor LEA implementation of evidence-based interventions that respond to students' academic, social, emotional and mental health needs.

After final Recovery Plans have been submitted, AOE will identify the most frequent support themes from LEA plans. For each identified theme, AOE will develop networking opportunities pulling together LEAs with similar needs, along with external subject area experts, for intense and iterative professional development and coaching aligned with research-based best practice. AOE staff recently invested in Networked Improvement Communities (NIC) training and will leverage this model as appropriate. AOE plans to select the 4-6 most pressing needs to shape development of these professional learning opportunities.

AOE will monitor LEAs to ensure programmatic and fiscal compliance with federal and state performance goals (see Section G on Fiscal Monitoring Plan). Programmatic monitoring will mirror our current SI7 monitoring process, where AOE tracks individual investments, the data that the district and school will use to measure the impact of that investment, and the actual data showing the impact of the investment.

Addressing Impacts and Engaging Most Impacted Students

States are required to report how the SEA will support and monitor LEAs in addressing the disproportionate impact of the COVID-19 pandemic on certain groups of students, and reengaging and supporting students most likely to be impacted by lost instructional time.

VT AOE is working with its national and regional partners, including Council of Chief State School Officers (CCSSO), American Institutes for Research (AIR), Center on Great Teachers and Leaders, Comprehensive Center Network, Regional Educational Laboratory Northeast and Islands (REL-NEI) and others to develop a comprehensive and strategic plan for investments and data collection to support both immediate and long-term improvements, and a corresponding and robust monitoring plan for LEA use of ARP funds. It will be essential that the State takes a considered approach to identifying the data elements needed both to comply with ARP requirements and to promote the AOE's and LEAs' strategic use of the ARP funds.

4. Additional Strategies for Educational Equity

In this section, States are required to describe the extent to which the SEA will support LEAs in implementing additional strategies to address educational equity when expending ARP ESSER funds.

As all Vermont schools have been open to at least partial in-person instruction since September 2020, LEAs have been continuing to address inclusivity in school access. That said, LEA Recovery Plans need to identify goals addressing lingering student engagement challenges. Those goals are reviewed by AOE.

F. Supporting the Educator Workforce

This Section address the toll that the COVID-19 pandemic has taken on educators as well as students. SEAs are required to describe strategies for supporting and stabilizing the educator workforce and for making staffing decisions that will support students' academic, social, emotional, and mental health needs.

[Section F State Plan Template Questions \(page 15\)](#)

1.Supporting and Stabilizing the Educator Workforce:

States are required to describe the extent to which the State is facing shortages of educators, education administration personnel, and other school personnel involved in safely reopening schools, and the extent to which that varies by region or type of educators.

Area	Data on shortages and needs	Narrative description
Special educators and related service personnel and paraprofessionals	10% of special educators working on a provisional license (FY20 Educator Shortage Report); Approximately 6% of Early Childhood Special Educators are working under a provisional license. The SEA does not currently offer certification for paraeducators.	Data from our FY20 Educator Shortage Report suggests that approximately 10% of all special educators in the state are working on a provisional teaching license. This indicates a shortage as defined by the Educator Shortage report. Anecdotal data from LEAs suggest that the recruitment and retention of special educators is a persistent challenge.
Bilingual educators	No educators working on a provisional or emergency license.	We do not have any indication that educators with a bilingual endorsement are a shortage in Vermont.
English as a second language educators	One educator out of 88 teaching English Learners in Vermont are employed on a provisional license according to the FY20 Educator Shortage Report. Six educators in the state hold a provisional license out of a total of 314 educators who hold the endorsement.	Data suggest that there is not a shortage of educators with the English Language Learner endorsement in Vermont.
STEM educators	8% of educators teaching math were doing so on a temporary	Data from our FY20 Educator Shortage Report identifies only secondary math teachers teaching under their math

Area	Data on shortages and needs	Narrative description
	<p>license (FY20 Educator Shortage Report).</p> <p>5.5% of all endorsed (not necessarily teaching under that endorsement) STEM teachers held a temporary license. Middle grades STEM provisional endorsements accounted for 8% of all STEM endorsed educators. Secondary STEM provisional endorsements accounted for 3% of all STEM endorsed educators.</p>	<p>endorsement as constituting a shortage. Broader indicators suggest that middle grades STEM educators are more likely to be working under a provisional license than their secondary peers. This is not a surprise, as middle grades educators often are adding an endorsement in response to changing staffing and enrollment needs at a particular school. Therefore, it would follow that provisional licenses are requested at a greater rate in middle grades. It appears, however, that many educators holding middle grades STEM endorsements are either not teaching under those endorsements or are teaching under them for a limited number of classes.</p>
CTE educators	<p>Six out of 385 licensed CTE educators are working on a temporary license.</p>	<p>Neither CTE endorsements taken as a whole nor any subendorsement under the CTE umbrella was identified as a shortage area in the FY20 Educator Shortage Report.</p>
Early childhood educators	<p>Early childhood education is not identified as a shortage area (FY20 Educator Shortage Report); About 4% of all educators who hold an early childhood license have a temporary license.</p>	<p>We do not have evidence that recruitment of early childhood educators is a persistent problem in the public sector. Due to a PreK funding plan in Vermont, private PreK providers can be reimbursed by the state for a set amount per student in attendance, provided that a licensed early childhood educator is employed at the site. Private providers do report challenges in recruiting and retaining licensed educators.</p>

Area	Data on shortages and needs	Narrative description
		Further analysis suggests that this can be largely explained by lower pay structures at private providers when compared to public settings. Due to an initiative to support provisional licenses for Early Childhood Educators in private settings, we anticipate an increase in provisional licenses over the course of the next couple of years.
School counselors	9% of school counselors are currently working on a temporary license (FY20 Educator Shortage Report).	The Educator Shortage Report shows that about 9% of all school counselors are working under a temporary license. As LEAs have not contacted the SEA suggesting that recruitment and retention of school counselors is a persistent challenge, our assumption is that many of those on a temporary license are internal hires working toward completing requirements for full endorsement.
Social workers	Social workers are not identified as a shortage area (FY20 Educator Shortage Report).	While the school social worker endorsement is not identified as a shortage area in the FY20 Educator Shortage Report, approximately 8% of licensed school social workers are working under a provisional license. Licensed school social workers do not account for all social workers in schools. Vermont only has 60 licensed school social workers. Many licensed social workers are providing services without the education endorsement. We continue to monitor LEA needs described in their Recovery

Area	Data on shortages and needs	Narrative description
		Plans to see if there is a growing need for school social workers or other mental health professionals to respond to heightened student Social-Emotional Learning needs.
Nurses	School nurses are not identified as a shortage area (FY20 Educator Shortage Report); 5.5% of licensed school nurses hold a provisional license.	We do not have evidence of a past workforce shortage for school nurses based on our licensure data; however, we are monitoring potential changes in LEA needs in response to the pandemic.
School psychologists	School psychologists are not identified as a shortage area (FY20 Educator Shortage Report); 2% of licensed school psychologists hold a provisional license.	We do not have evidence of a past workforce shortage for school psychologists based on our licensure data; however, we are monitoring LEA needs described in their Recovery Plans to see if there is a growing need for school social psychologists to respond to heightened student Social-Emotional Learning needs.

These data reflect multiple data collection initiatives, not all of which have routinely consistent findings across sources.

According to U.S. ED's [Teacher Shortage Areas report](#), the following shortage areas were reported statewide for 2020-2021 due to at least 5% of FTEs for these endorsements being served by an educator with a temporary license:

- Administrative—Assistant Director for Adult Education
- Administrative—Career Technical Center Director
- Administrative--Superintendent
- School Librarian: PK-12
- Family and Consumer Sciences: 5-12
- Special Educator: PK-21
- School Counselor: PK-12
- Health & Physical Fitness – Physical Education: PK-12
- Health & Physical Fitness – Health Science: PK-12
- World Languages – Spanish: PK-12
- Mathematics – Basic & Advanced Mathematics: 7-12

- Driver Education: 9-12

Whereas the Educator Shortage Report reflects larger scale data on educators employed with temporary licensure, we also have more anecdotal data suggesting that LEAs are increasingly concerned about potential shortages. For example, the Vermont Virtual Learning Cooperative (VTVLC) struggled to hire educators to meet their staffing needs. In September 2020, the SEA put a call out to education networks around the state and to our New England SEA partners looking to recruit math, science, social studies, and foreign language teachers (especially at the middle level) in support of VTVLC.

The Vermont Department of Labor's 2018-2028 [Long-Term Occupational Projections report](#) indicates that Education, Training and Library Occupations ranks sixth out of all Major Occupation Clusters in number of annual openings in the state. Teacher assistants, registered nurses and nurse assistants, and childcare workers rank in the top 25 occupations with greatest number of annual openings. Finally, of the top twenty-five occupations at each level of educational attainment typical for entry, ranked by the number of openings and by rate of growth, the following school-related positions rank in the top ten:

- Educational guidance, school, and vocational counselors
- Clinical, Counseling and School Psychologists
- Education Administration, Elementary and Secondary School
- Librarians
- Instructional Coordinators

According to the monthly [Strong and Healthy Schools survey](#) data collected by the SEA since September, initial substitute shortage data suggests that filling openings, in the near term and potentially long-term, may prove challenging for LEAs statewide, with pockets of greater/lesser intensity. Since September, on average 60% or more of our responding public schools have reported not having adequate substitute coverage for absences every month. Broken out by five state regions, the lowest reporting region, at 48%, was in February. In April, our most recent data collection, 67.52% of schools reported the inability to find substitute coverage. Of note, our survey data suggests that both populous regions of the state and extremely rural parts of the state have consistently struggled to find substitute coverage, and while there has been some regional variability in the data at times, no region has reported below 50%. This data is supported by an increased demand for waivers for long-term substitutes over the last portion of the school year and numerous appeals to the Vermont Standards Board for Professional Educators to waive endorsement requirements.

In an effort to understand building leaders' perceptions of potential shortages and workforce issues they will be confronting next year, the Vermont Principals' Association surveyed Vermont principals and found that 50% of respondents reported that it was likely to very likely that positions in their schools would go unfilled, 28% reported that 5-10% of their positions might go unfilled, and 21% reported that they were anticipating more retirements than usual this year.

Finally, Vermont is ranked the third oldest state in the nation, with a median age of 42.8 years. The government sector, including public PK-12 schools, is the largest employer in Vermont. Though our current licensing data as described by the Educator Shortage Report has not uncovered broader shortages, additional data points to a growing concern about adequately staffing our schools to meet the needs of Vermont students now and in the future.

Identifying Shortages and Potential Shortages

In this section, SEAs are required to describe how they will assist LEAs in identifying the most urgent areas of educator shortages or potential shortages, with particular plans for individual LEAs facing the most significant needs.

At this point, we do not have evidence of layoffs related to the pandemic. Each LEA has submitted a Recovery Plan in which they identify specific needs related to Social Emotional health and well-being, Academic Achievement, and Student Engagement. Many of these plans identify hiring additional staff to meet perceived needs. The SEA is aggregating these needs to understand emerging staffing trends in response to recovery efforts.

Broader indicators suggest that the SEA will need to take a leadership role in supporting LEAs in long-term strategic planning, including fostering a statewide approach that can both support the unique regional needs of LEAs while guarding against an overly competitive marketplace that could further exacerbate regional disparities in staffing. This might include regional approaches to shared staffing and local educator pipeline programs, leveraging online and hybrid models to provide access to qualified staff despite geographic challenges, creating greater flexibility for new educators and out-of-state educators, and recruiting more teachers of color.

Filling Gaps in Certified Teachers

SEAs are required to describe the actions they will take to fill anticipated gaps in certified teachers for the start of the 2021-2022 school year and to what extent the SEA will further support its LEAs in expanding the educator pipeline and educator diversity.

In the near term, the SEA will work with LEAs to address gaps in certified teachers for the 2021-2022 school year by expediting access to provisional teacher licenses under existing Vermont regulations. The SEA will also partner with the Vermont Department of Public Safety to expedite the required background check process.

Additionally, the SEA will explore several strategies to expand the teacher pipeline and the diversity of its educator workforce:

- Create an annual scholarship fund of approximately \$25,000 to support educators seeking initial licensure through Peer Review.
- Hire a 0.5 FTE to work throughout the Northeast and Mid-Atlantic states to recruit educators to come to Vermont. This recruiter would represent Vermont schools at job fairs, develop relationships with education departments in schools throughout the

region, with particular attention to historically black colleges and universities (HBCUs) and other schools who graduate substantial numbers of historically marginalized candidates.

- Develop a pathway to licensure for educators working in regions of the state where there is specific need. This model would support paraeducators currently working in school settings who are interested in becoming fully licensed educators. Educators would complete a four-course sequence over 16 months (one course each Summer, Fall, Spring, Summer semesters) in the Core Teaching Competencies through the University of Vermont (UVM), Vermont State Colleges (VSC) and the Higher Education Collaborative (HEC) while working under a temporary license; acceptance into and enrollment in the preparation sequence would confer the temporary license.

To inform long-term policy in this area, the SEA will contract for a study of Vermont's educator pipeline to identify policy recommendations in the following areas:

- Licensing reciprocity with other states;
- Identifying regulatory policies from other states that could be adopted in Vermont;
- An examination of the New England educator pipeline dynamics since Vermont's labor market needs to be considered in the context of the region;
- A policy approach to licensing for designated shortage areas;
- How remote learning could be utilized to address teacher shortage areas and to enable the sharing of staff on a statewide basis; and
- An analysis of Vermont's higher education system relative to its teacher preparation capacity.

2. Staffing to Support Student Needs

States are required to describe the extent to which the SEA has developed or will develop strategies and will support its LEAs in increasing student access to key support staff within school buildings, including school counselors, special education personnel, nurses, social workers, and psychologists.

The SEA will adopt the following strategies to support its LEAs in increasing student access to key support staff:

- Continue to explore and support online access to support staff such as social workers and clinicians;
- Support community-based and interdisciplinary regional teams;
- Explore regional support staff shared between schools/districts as state level hires;
- Pursue "grow your own" options to incentivize leadership growth from within the school and district including expansion of the nurse leadership model;
- Support state campaign to "add an endorsement";
- Explore secondary version of "adjuncts" in specific areas such as clinicians, social workers, nurses, etc.; and
- Develop statewide platform to attract/recruit educators and staff for key shortage areas.

G. Monitoring and Measuring Progress

Transparency on how ARP ESSER funds are used and their impact on the Nation's education system is a fundamental responsibility of Federal, State, and local government. In this section, SEAs are required describe how they are building capacity at the SEA and LEA levels to ensure high-quality data collection and reporting and to safeguard funds for their intended purposes.

[Section G State Plan Template Questions \(page 16\)](#)

1. Capacity for Data Collection and Reporting:

In this section, States are required to describe how the SEA will ensure its capacity and the capacity of its LEAs to collect data on reporting requirements of ARP ESSER, including academic achievement data, fiscal data, engagement, program participation, etc.

The Safe and Healthy Schools (SHS) survey will remain a required collection through the end of SY21. If data such as these are required on an ongoing basis as a part of annual, required data reporting and/or at the verifiable student level, the AOE hopes to leverage stimulus dollars to build out data collection, management, and reporting infrastructure and staff training supports to accommodate a more durable, lower burden, closer to real-time, and long term means of gathering, managing, and reporting these data. In terms of recovery efforts, this means that both AOE and LEAs would benefit from: (1) staff augmentation to support needed adjustments to data and IT infrastructure for data collection, management, reporting, and use; (2) investment in staff professional development opportunities for LEA and school staff on effective data management and use of their Student Information System (SIS), as well as processes for submitting required data to the AOE; (3) investment in staff professional development opportunities for LEA and school staff on building a culture of data quality to support data literacy and data use.

Enrollment: Student enrollment for all students and disaggregated for each of the student groups described in A.3.i- viii for each mode of instruction; and Attendance: Student attendance for all students and disaggregated for each of the student groups described in A.3.i- viii for each mode of instruction.

The AOE collects data on attendance once per school year through an end-of-year, student-level data collection process called "DC04 Year End Official," details about which are available via AOE's fully searchable online data collection knowledge base. This means that while AOE does not have access to student-level attendance data by mode of instruction at this time, we can reasonably estimate that the SHS data show student participation in each type of learning modality throughout SY21.

2. Monitoring and Internal Controls

In this section SEAs are required to describe how they will implement appropriate fiscal monitoring of and internal controls for the ARP ESSER funds.

The Vermont Agency of Education (AOE) divides the monitoring responsibilities of 2 CFR §200.332 into two components: (1) Programmatic monitoring and (2) Fiscal monitoring. The Regulatory Compliance Team conducts fiscal monitoring per the established plan on file with

the Vermont Department of Finance & Management. Fiscal monitoring covers all Federal and state grants during one review. ESSER I, ESSER II, and ARP-ESSER III will be included in the fiscal monitoring activities beginning in FY22. Below are the major steps of fiscal monitoring.

Single Audit Review: The first phase of fiscal monitoring includes the review of the single audits in accordance with 2 CFR §200.500 Subpart F and Vermont Bulletin 5. Single audits are reviewed using a checklist to insure a compliant and consistent review. The AOE follows up with subgrantees on all federal findings and the resulting corrective actions. The results of the single audit review are incorporated into the monitoring risk assessment (detailed below).

Desk or onsite review of subgrantees: Selection of subgrantees is based on an annual assessment of risk per 2 CFR §200.332(b). In certain instances, a subgrantee may be selected for fiscal monitoring due to special circumstances. Fiscal monitoring follows a consistent protocol to be sure all required areas of compliance are consistently reviewed. The documentation of the review is maintained in our files for five (5)+ years as appropriate. The scope of monitoring focuses on confirming the subgrantee's compliance with EDGAR, 2 CFR Part 200, Vermont Statute, and local policies and procedures. Reviews result in a report to the subgrantee that details any findings of non-compliance. Subgrantees are required to respond to any findings of non-compliance with corrective action plans that detail the corrective action, the position responsible for action and the implementation date of the action as well as evidence of implementation. The results of prior fiscal monitoring activities are used to inform the AOE's pre-award risk assessment of subgrantees and in the determination if additional requirements should be placed on the award. Fiscal monitoring data is also used to develop trainings and technical assistance for future years based on areas of non-compliance discovered during fiscal monitoring.

Appendix A: School Operating Status and Instructional Mode Data Template

These data were published as a standalone document: [ARP ESSER: Summary of Instructional Modalities for School Year 2020-21](#). The full document is enclosed below:

American Rescue Plan Act Elementary and Secondary School Emergency Relief Fund: Summary of Instructional Modalities for School Year 2020-21

Purpose

Per the requirements of the [American Rescue Plan Act Elementary and Secondary School Emergency Relief Fund](#):

“To facilitate consultation on an SEA’s ARP ESSER plan and ongoing communication with the public, under the requirement, an SEA must also make information publicly available on its website as soon as possible but no later than June 21, 2021, and regularly provide updated available information on its website, on the numbers of schools in the State providing each mode of instruction (i.e., fully remote or online-only instruction, both remote/online instruction and in-person instruction (hybrid model), and full-time in-person instruction). The SEA must also make publicly available student enrollment data and, to the extent available, student attendance data for all students and disaggregated by students from low-income families, students from each racial and ethnic group, gender, English learners, children with disabilities, children experiencing homelessness, children in foster care, and migratory students for each mode of instruction,”

The Vermont Agency of Education (AOE) is submitting the information posted below for public review and comment. To submit a public comment, email AOE.EdInfo@vermont.gov with the subject line “Public Comment: ARP ESSER Summary of Instruction Modalities”.

Description of Information

Throughout SY21, the AOE has conducted a survey activity that has played an active and ongoing role in Vermont’s COVID-19 response. The Strong and Healthy Schools Survey (SHS), first deployed in September 2020, is a monthly collection of Continuity of Operations questions and a twice-yearly extended collection comprised of both Continuity of Operations and Continuity of Learning questions.

The monthly collection questions that have centered on mode of instruction provide insight into: (1) mode of instruction reported across grade spans (elementary, middle high school), (2) the percent of students in each mode of instruction across grade levels in each school, (3) if students are in a hybrid model, the split of in-person/remote days, (4) the activities that occur in hybrid 1-day remote models, and (5) whether students/families could choose mode of instruction.

Survey results have and do inform current and future guidance, enable coordinated support efforts across the state, and meet federal reporting expectations for assessments such as NAEP. These data are shared with the Vermont Department of Financial Regulation, who has led the VT COVID-19 data modeling effort, the Vermont Department of Health, and the general public via an interactive dashboard. The SHS is deployed the last Friday of each month to LEA superintendents and is due the following Friday (i.e., a one-week timeframe to complete the response).

The collection tool provided a means by which superintendents could direct how supervisory district/union questions were answered, while coordinating with their principals to answer school-specific questions all within one survey. LEAs were asked to answer questions to the best of their ability and in a manner that best reflects, when appropriate, a monthly average. This survey is a required activity, designed to ensure that Vermont can maintain a strong, coordinated, statewide response to the ongoing emergency.

To disaggregate the data based on the required demographic groups, the AOE cross-referenced available demographic data for each SU/SD with the information collected through the Strong and Healthy Schools Survey.

Students from Low-Income Families

Data source as of May 2021: DC06

Table 1: Students Identified as from Low-Income Families

	n	%
Not from Low-Income Family	51,587	65.36
From Low-Income Family	27,340	34.64
Total	78,927	100.00%

Table 2: Instruction Modality Estimated for Students Identified as from Low-Income Families

	In Person	Hybrid	Remote
Students from Low-Income Families	9,700	14,723	2,917

Students from Each Racial or Ethnic Background Used by the State for Reporting Purposes

Data source as of May 2021: DC06

Table 3: Students by Race/Ethnicity

Race/Ethnicity	n	%
White	70,023	88.72
Multiple race	2,724	3.45
Hispanic	2,081	2.64
African American, Black	2,005	2.54
Asian	1,755	2.22
American Indian, Alaska Native	238	0.3
Hawaiian, Pacific Islander	101	0.13
Total	78,927	100.00

Table 4: Instruction Modality Estimated by Student Race/Ethnicity

	In Person	Hybrid	Remote
White	24,844	37707	7471
Multiple race	966	1467	291
Hispanic	738	1121	222
African American, Black	711	1080	214
Asian	623	945	187
American Indian, Alaska Native	84	128	25
Hawaiian, Pacific Islander	36	54	11

Students by Gender

Data source as of May 2021: DC06

Table 5: Students by Gender

	n	%
Male	41,094	52.07
Female	37,833	47.93

English Learners

Data source as of May 2021: DC04. N=1,803.

Table 6: Instruction Modality by English Learner Status

	In Person	Hybrid	Remote
English Learners	640	971	192

Children with Disabilities

Data source as of May 2021: Child Count Data, December 2020. All ages included. N=16,085.

Table 7: Instruction Modality Estimated for Students with Disability

	In Person	Hybrid	Remote
Students with Disability	5,707	8,662	1,716

Students Experiencing Homelessness

Data source as of May 2021: DC06

Table 8: Students Experiencing Homelessness

	n	%
Student Experiencing Homelessness	568	0.72
Students Not Experiencing Homelessness	78,359	99.28

Table 9: Instruction Modality Estimated for Student Experiencing Homelessness

	In Person	Hybrid	Remote	Total
Students Experiencing Homelessness	202	306	61	569

Children and Youth in Foster Care

Data source as of May 2021: Students ages 3-19 in Department of Children and Families custody (aggregate). N=845

Table 10: Instruction Modality Estimated for Students in Foster Care

	In Person	Hybrid	Remote
Students in Foster Care	300	455	90

Migratory Students

Data source as of May 2021: DC04. N=109.

Table 11: Instruction Modality Estimated for Migratory Students

	In Person	Hybrid	Remote
Migratory Students	39	59	12

Other Groups of Students Identified by the State

Youth involved in the criminal justice system, students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years, students who did not consistently participate in remote instruction when offered during school building closures, LGBTQ+ students

Data source as of May 2021: Criminal Justice System (DOC / IS900) N=360; No data collection available for students who missed remote instruction or LGBTQ+ students.

Table 12: Instruction Modality Estimated for Students in Department of Corrections

	In Person	Hybrid	Remote
Students in Department of Corrections	128	194	38

Instruction Modalities by Schools

Data source as of May 2021: Strong and Healthy Schools Survey, March 2021 respondents. N=261.

Table 13: Learning Modality by School

Learning Modality (Note: Most schools operate more than one modality)	n	%
In person	157	60.15
Hybrid	145	55.56
Remote	248	95.02

Students by Instruction Modalities

Data source as of May 2021: Strong and Healthy Schools Survey, March 2021 respondents; these numbers would vary slightly month to month. N = 58,885.

Table 14: Learning Modality by School

Learning Modality	n	%
In person	20,894	35.48
Hybrid	31,707	53.85
Remote	6,284	10.67

Appendix B: Reporting Language Included in the Grant Award Notification (“GAN”)

As described in the Grant Award Notification (“GAN”), the SEA will comply with, and ensure that its LEAs comply with, all reporting requirements at such time and in such manner and containing such information as the Secretary may reasonably require, including on matters such as:

- How the State is developing strategies and implementing public health protocols including, to the greatest extent practicable, policies and plans in line with the CDC guidance related to mitigating COVID-19 in schools;
- Overall plans and policies related to State support for return to in-person instruction and maximizing in-person instruction time, including how funds will support a return to and maximize in-person instruction time, and advance equity and inclusivity in participation in in-person instruction;
- Data on each school’s mode of instruction (fully in-person, hybrid, and fully remote) and conditions;
- SEA and LEA uses of funds to meet students’ social, emotional, and academic needs, including through summer enrichment programming and other evidence-based interventions, and how they advance equity for underserved students;
- SEA and LEA uses of funds to sustain and support access to early childhood education programs;
- Impacts and outcomes (disaggregated by student subgroup) through use of ARP ESSER funding (e.g., quantitative and qualitative results of ARP ESSER funding, including on personnel, student learning, and budgeting at the school and district level);
- Student data (disaggregated by student subgroup) related to how the COVID-19 pandemic has affected instruction and learning;
- Requirements under the Federal Financial Accountability Transparency Act (“FFATA”); and
- Additional reporting requirements as may be necessary to ensure accountability and transparency of ARP ESSER funds.

Appendix C: Assurances

By signing this document, the SEA assures all of the following:

- The SEA will conduct all its operations so that no person shall be excluded from participation in, be denied the benefits of, or be subject to discrimination under the ARP ESSER program or activity based on race, color, national origin, which includes a person's limited English proficiency or English learner status and a person's actual or perceived shared ancestry or ethnic characteristics; sex; age; or disability. These non-discrimination obligations arise under Federal civil rights laws, including but not limited to Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments Act of 1972, section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975. In addition, the SEA must comply with all regulations, guidelines, and standards issued by the Department under any of these statutes;
- The SEA will comply with all ARP Act and other ARP ESSER requirements and all requirements of its Grant Award Notification, including but not limited to:
 - Complying with the maintenance of effort provision in section 2004(a)(1) of the ARP Act, absent a waiver by the Secretary pursuant to section 2004(a)(2) of the ARP Act; and
 - Complying with the maintenance of equity provisions in section 2004(b) of the ARP Act, and ensuring its LEAs comply with the maintenance of equity provision in section 2004(c) of the ARP Act (please note that the Department will provide additional guidance on maintenance of equity shortly);
- The SEA will allocate ARP ESSER funds to LEAs in an expedited and timely manner and, to the extent practicable, not later than 60 days after the SEA receives ARP ESSER funds (i.e., 60 days from the date the SEA receives each portion of its ARP ESSER funds). An SEA that is not able to allocate such funds within 60 days because it is not practicable (e.g., because of pre-existing State board approval requirements) will provide an explanation to the Department within 30 days of receiving each portion of its ARP ESSER funds (submitted via email to your Program Officer at [State].OESE@ed.gov (e.g., Alabama.OESE@ed.gov)), including a description of specific actions the SEA is taking to provide ARP ESSER funds to LEAs in an expedited and timely manner and the SEA's expected timeline for doing so;
- The SEA will implement evidence-based interventions as required under section 2001(f) of the ARP Act and ensure its LEAs implement evidence-based interventions, as required by section 2001(e)(1) of the ARP Act;
- The SEA will address the disproportionate impact of the COVID-19 pandemic on underserved students (i.e., students from low-income families, students from racial or ethnic groups (e.g., identifying disparities and focusing on underserved student groups by race or ethnicity), gender (e.g., identifying disparities and focusing on underserved student groups by gender), English learners, children with disabilities, students experiencing homelessness, children and youth in foster care, and migratory students), as required under section 2001(f) of the ARP Act, and ensure its LEAs address the disproportionate impact of the COVID-19 pandemic on underserved students (i.e.,

students from low-income families, students from racial or ethnic groups, gender, English learners, children with disabilities, students experiencing homelessness, children and youth in foster care, and migratory students), as required by section 2001(e)(1) of the ARP Act; and

- The SEA will provide to the Department: (1) the URL(s) where the public can readily find data on school operating status and (2) the URL(s) for the SEA and/or LEA websites where the public can find the LEA plans for a) the safe return to in-person instruction and continuity of services required under section 2001(i) of the ARP Act, and b) use of ARP ESSER funds. SEAs should consider ensuring a standardized URL format in all cases (e.g., xxx.gov/COVIDplan).

Appendix D: US Department of Education Notice to All Applicants

Vermont Agency of Education Statement regarding Section 427 of the General Education Provisions Act (GEPA)

Vermont remains committed to providing students equitable access to and participation in educational programs in accordance with state and federal civil rights protections, including section 427 of the General Education Provisions Act (GEPA). Section 427 of GEPA aligns with the AOE's commitment to ensure all students are provided a high-quality education.

In Vermont, all districts that carry out programs related to ESSER must also comply with 9 V.S.A. § 4502 (2017), Public Accommodations, which provides the following purpose; "(a) An owner or operator of a place of public accommodation or an agent or employee of such owner or operator shall not, because of the race, creed, color, national origin, marital status, sex, sexual orientation, or gender identity of any person, refuse, withhold from, or deny to that person any of the accommodations, advantages, facilities, and privileges of the place of public accommodation." Under 9 V.S.A § 4501(1), public schools are defined as a place of public accommodation. The Vermont Attorney General's Office interprets this statute to include private schools, as well.

Furthermore, 16 V.S.A § 165 codifies *Brigham v. State of Vermont* (1997) and requires that all Vermont children will be afforded equal educational opportunity and that Vermont must ensure that schools maintain a safe, orderly, civil and positive learning environment that is free from harassment, hazing, and bullying. Harassment is defined in 16 V.S.A § 11(a)(26) with reference to sexual harassment, racial harassment and conduct aimed at a student's (or student's family) actual or perceived creed, national origin, marital status, sex, sexual orientation, gender identity, or disability. Additionally, 16 V.S.A § 165 requires the Secretary to determine every 2 years whether students in each Vermont public school are provided educational opportunities substantially equal to those provided in other public schools. If the Secretary determines that a school is not meeting the education quality standards listed in §165, s/he must describe in writing what actions the district shall take.

Act 5 (2017) confirmed Vermont's commitment that Vermont residents be free from discrimination based on any of these characteristics. Article 1 of the Vermont Constitution enshrines the fundamental principal that all persons are born equally free and independent. The AOE will identify whether barriers may prevent students, teachers, etc. from such access or participation in, federally funded projects or activities and will take the necessary steps to overcome barriers to equitable access to all federally funded programs included here. Such steps will include, but are not limited to:

General Education Provisions Act

1. Ensuring LEA compliance with section 427 of the GEPA for all federally funded programs and with state regulations regarding equity (see above);
 2. Ensuring ESSER related educational materials are accessible to individuals with disabilities and English learners (including translating material, when appropriate);
- and

3. Providing guidance and technical assistance to ensure ARP ESSER project team members and LEAs elicit stakeholder input on student needs and federally funded programs to address those needs from traditionally underrepresented populations including parents and families of students with disabilities, English learners, and economically disadvantaged students.

In accordance with section 427 of the GEPA, the AOE will continue to ensure compliance with these regulations as it pertains to all state and locally developed educational programs, including those under all ESSER programs.

OMB Control No. 1894-0005 (Exp. 06/30/2023)

NOTICE TO ALL APPLICANTS

The purpose of this enclosure is to inform you about a new provision in the Department of Education's General Education Provisions Act ("GEPA") that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. **ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.**

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access to, or participation in, the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve

high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant may comply with Section 427.

- (1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.
- (2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.
- (3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.
- (4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concerns of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students.

We recognize that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 3 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382). Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC 20210-4537 or email ICDocketMgr@ed.gov and reference the OMB Control Number 1894-0005.