



State of Vermont
Vermont Department of Education
120 State Street
Montpelier, VT 05620-2501

June 6, 2011

Dr. Thelma Melendez
Assistant Secretary
Office of Elementary and Secondary Education
400 Maryland Avenue
Washington D.C. 20202

Re: Waiver Request for 2010 School Improvement Grant (SIG)

Dear Dr. Melendez,

As you know, the State of Vermont has a long standing commitment to providing high quality education for all Vermont learners. As a State Education Agency we are strongly committed to supporting our schools to improve outcomes for all students, particularly those who face the greatest economic and learning challenges. In fact, our belief in this is so strong that we have reorganized our department to better serve these students and worked this year with the new legislature, State Board of Education and new administration to prioritize this work in our focus on education across the state.

Vermont participated in the 2009 School Improvement Grant efforts and continue to support that first cohort of Tier I, II and III schools in raising achievement levels for all learners and closing the achievement gap. As we prepared for 2010 however, we faced significant challenges in using the approved ranking process to effectively identify a second cohort of Tier II schools that were in fact lowest achieving. Through technical assistance calls with your team in December and further research of our own, we identified several factors contributing to this including: 1) a preponderance of small schools (under 100 students in K-12 and 7-12 schools) in the state (the average district size in the state is 322 students), 2) certain parameters such as confidence intervals as defined by our current accountability system, and, in particular, 3) the number of secondary schools in the state that qualify for inclusion in the process. We recognize this necessitates rethinking some of the components of our current accountability system, which we are preparing to do in conjunction with our 2012-2014 timeline for implementing the Common Core state standards and related assessment systems. However for the fall 2010 ranking process, our data indicated we were not in fact identifying as "lowest achieving" those schools most in need of support. Also, limited resources and the requirement for replacing the principals in each of the four models presented real challenges in our having sufficient capacity as a state to support these efforts as defined by the grant.

For these reasons, I write to you today to request a waiver to 2010 School Improvement Grant requirements in two areas:

1. Carry over Vermont's 2010 SIG allocation and permit Vermont to apply for combined 2010 and 2011 funds in one application in the fall of 2011 in order to allow the State of Vermont to develop greater capacity to effectively serve a second cohort of lowest achieving schools.

Even with reorganization, state budget cuts and hiring freezes in the 2010/2011 fiscal year severely limited our capacity to support a second cohort of schools identified as "lowest achieving", and significantly reduced federal grant awards for 2010 over 2009 compounded this issue. Philosophically, we believe it is important to be able to support financially and technically - to the greatest degree possible - any schools that we publicly place in this category. Identifying the second cohort in the fall of 2011 is also more consistent with the timing of our own accountability system as Vermont operates on a fall testing cycle. This timeline should produce more reliable results for our Tier I and Tier III schools. Carrying over funds from 2010 and identifying the second cohort to be served by combined funds from 2010 and 2011 improves the likelihood of sustained implementation and achievement results.

2. When applying for 2010-2011 funds, waive the requirements for identifying a second cohort of Tier II schools.

We request this on the basis that due to small sample size, the requirements of identifying 10% of secondary schools as lowest achieving over two cohorts has already been met and exceeded in the first cohort where we were required to identify and are serving a minimum of five schools from an eligible pool of 28 secondary schools comprising a total of 18% of eligible lowest achieving secondary schools in Vermont. Additionally, identifying another cohort of five Tier II schools would now bring the cohort to represent 36% of eligible schools as lowest achieving and, because of the reasons mentioned earlier, now starts to identify higher performing schools. While we do not argue that these schools have room for improvement, we do not believe this is the group this effort is intended to address.

We appreciate your consideration in these matters and hope to be able to reconcile some degree of flexibility in this matter that will allow us to participate more effectively in the 2011 SIG award.

Sincerely,



Armando Vilaseca
Commissioner

- C: Carlas McCauley, Ed.D, Education Program Specialist, USED Office of Elementary and Secondary Education
 Dr. Fayneese Miller, Chair, State Board of Education
 Rae Ann Knopf, Deputy Commissioner, Education Transformation & Innovation
 John Fischer, Director, Integrated Support for Learning (Secondary-Adult)