

Background on Adult Education and Literacy Programs and HSCP

**Presentation for the Adult Education and Literacy
HSCP Student Access Study Committee**

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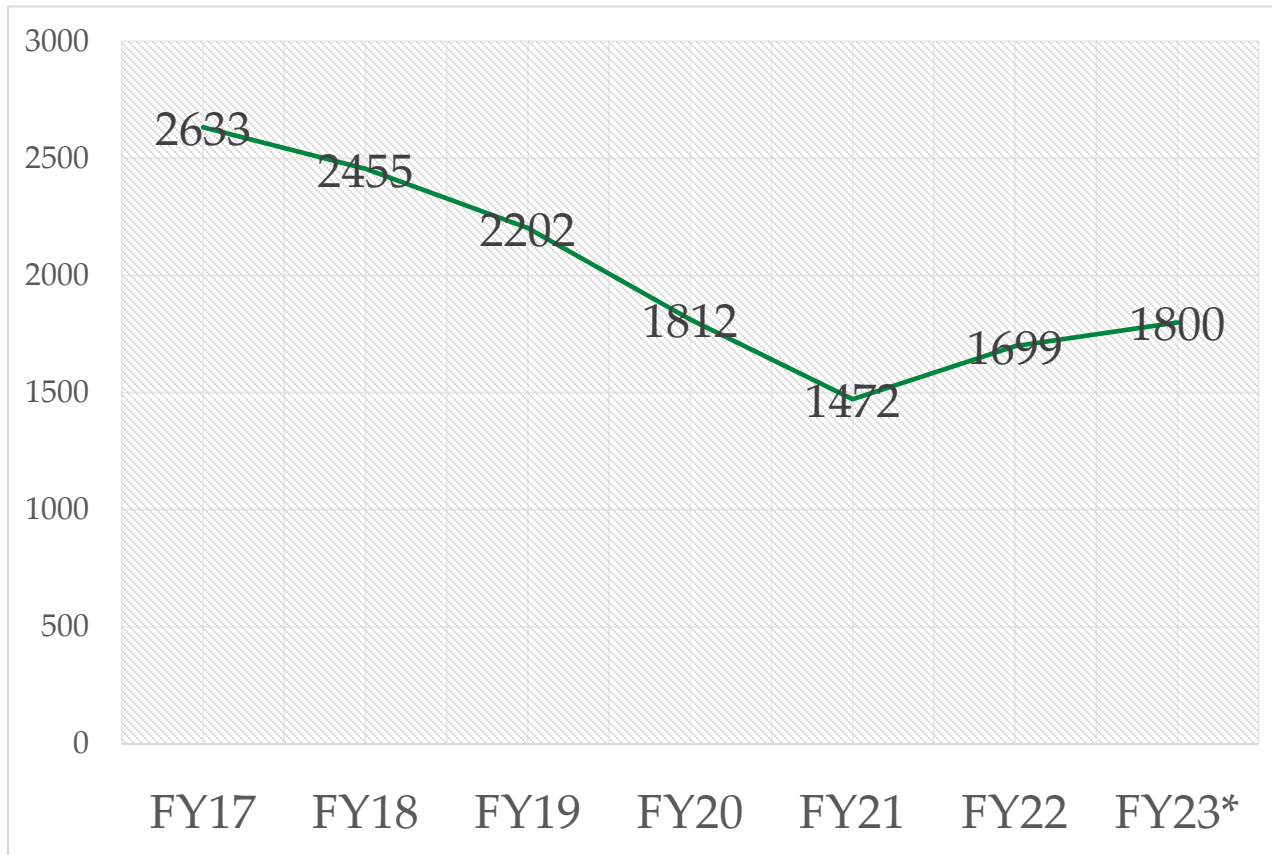
Student Pathways Division, Agency of Education

Act 78, Sec. E.504 ADULT BASIC EDUCATION AND LITERACY HSCP

Adult Education and Literacy HSCP Student Access Study Committee – Excerpt 1

The High School Completion Program (HSCP) is experiencing decreased enrollment due to the COVID-19 pandemic, policy changes within the program, and lower literacy skills that limit acceptance into the program. Adult basic education programs overall are experiencing funding reductions due to decreased enrollment.

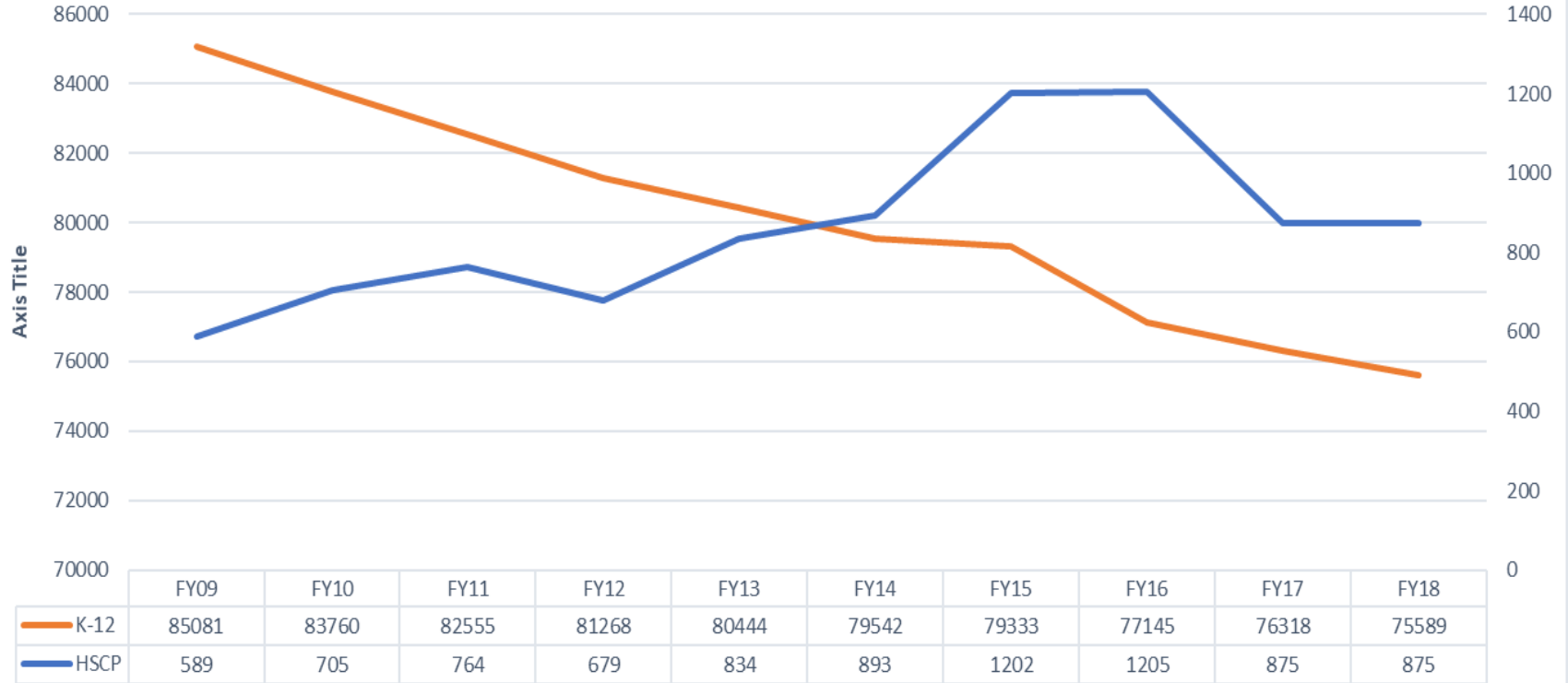
Total Students Served in AEL System



*Data for FY23 estimated.

A Pre-Pandemic Look (FY09 – FY18)

K-12 vs HSCP population FY09-FY18



Axis Title

— K-12 — HSCP

Total AEL Grant Fund Distribution

Approximately 17% of funds awarded to AEL Providers were Federal and 83% were State in FY23

Fiscal year	Total Grant funds
20	\$4,427,172
21	\$4,322,582
22	\$4,706,210
23	\$5,054,235
24	\$5,331,662

- In **FY17**, state grant total was **\$3,291,955**; unique students were **2633**
- In **FY22**, state grant total was **\$3,846,850**; total unique students served **1699**

This excludes federal and HSCP

Adult Education and Literacy HSCP Student Access Study Committee – Excerpt 2

The Committee shall review and make recommendations to reduce barriers for vulnerable Vermonters, including English learner applicants to Adult Education Programs, including any discrepancies between admission and testing standards for English learner applicants and all other applicants. The Committee shall provide recommendations in its report to the Joint Fiscal Committee and the House and Senate Committees on Education on how to increase equity and education access to Adult Education Programs. The Committee shall include in its report any administrative changes that could be made to help achieve these goals.

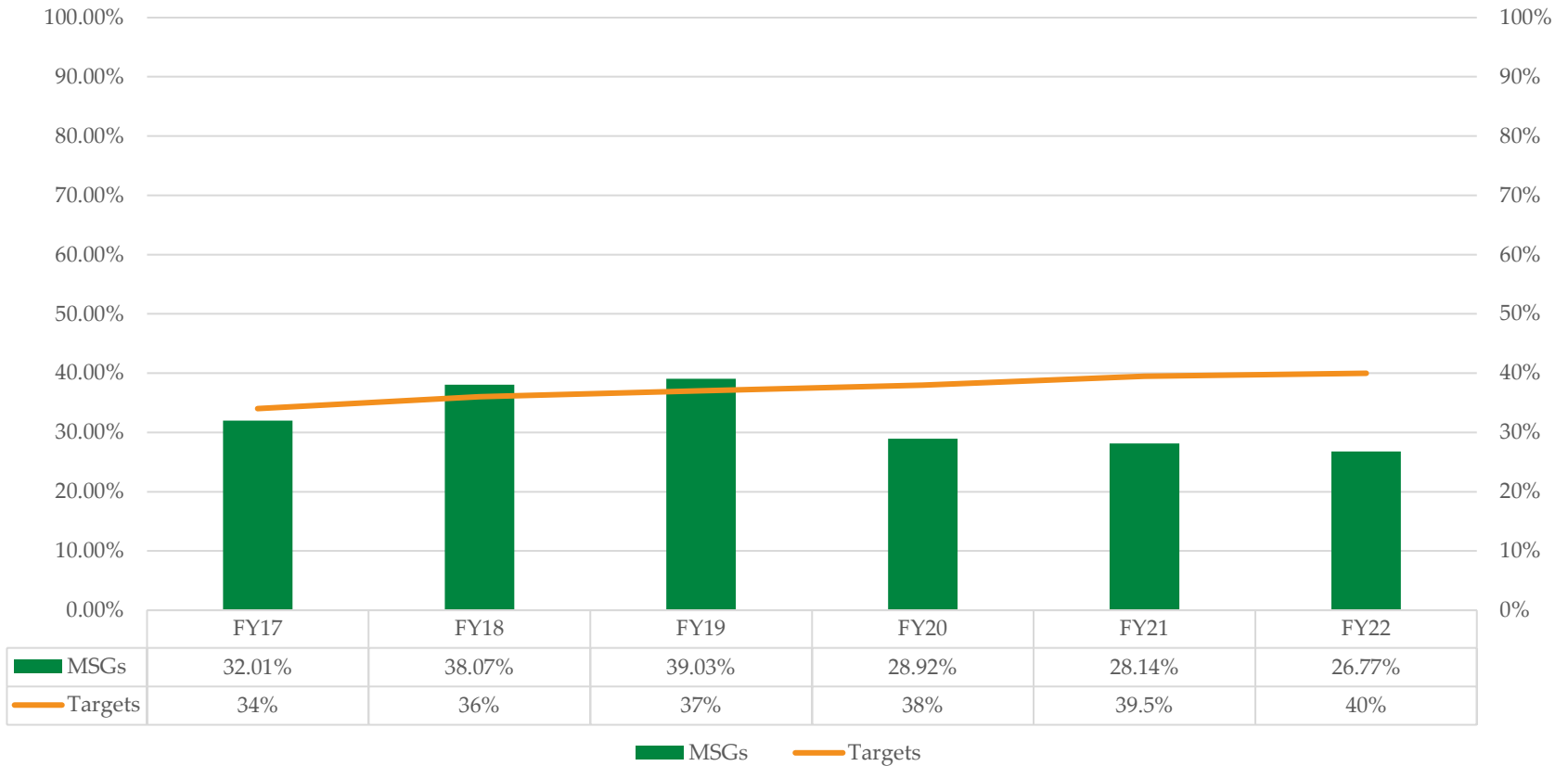
Adult Education and Literacy HSCP Student Access Study Committee – Excerpt 3

It is the intent of the General Assembly that the Committee report be used to inform fiscal year 2025 budget considerations and that the recommendations of the Committee be implemented to increase HSCP enrollment.

- The AOE is concerned as to the motivation to increase enrollment to a dropout program serving the K-12 system versus increasing adult learners to engage with AEL services
- The AOE is concerned that the focus is on increasing enrollment to HSCP as an avenue to increase funding for providers versus a focus on improving student outcomes.

Measurable Skill Gain Percentages Reported Federal Population 2017-2022

Federal MSGs Earned



Legislative and Regulatory Background

Adult Education in Vermont

16 V.S.A. §1049 formerly organized under Subchapter 6 – Adult Education and Literacy – and relating to the adult program and GED programs was redesignated in 2013, No. 77 under the [Adult Diploma Program](#)

SBE 2401 Statement of Purpose

[State Board Rule Series 2400](#)

The purpose of Adult Education programs is to offer adults the opportunity to acquire the level of education and technical training skills necessary for active participation as family members, citizens and learners, and for economic self-sufficiency. Adult Education programs seek to expand educational opportunities and enable eligible adults to continue their education to at least the level of secondary school completion.

High School Completion Program

HSCP was created through the passage of Act 176 (2006) and first initiated in 2006, it was to re-engage learners who had not completed secondary school; only those unenrolled from school could access the program.

With the passage of Act 44 (2009), the statute (formerly 16 V.S.A. §1049a now redesignated) was expanded to allow enrolled-in-school students to participate in the program to reduce interruptions in learning.

With the passage of Act 77 of 2013, the HSCP was redesignated as ([16 V.S.A. § 943](#)) under the Flexible Pathways Initiative.

16 V.S.A. § 941; Flexible Pathways Initiative

§ 941. Flexible Pathways Initiative

- (a) There is created within the Agency a Flexible Pathways Initiative:*
- (1) to encourage and support the creativity of school districts as they develop and expand high-quality educational experiences that are an integral part of secondary education in the evolving 21st Century classroom;*
 - (2) to promote opportunities for Vermont students to achieve postsecondary readiness through high-quality educational experiences that acknowledge individual goals, learning styles, and abilities; and*
 - (3) to increase the rates of secondary school completion and postsecondary continuation in Vermont.*

Chapter 133 : State Funding Of Public Education; 16

V.S.A. § 4025

(b) Monies in the Education Fund shall be used for the following:

*(1) To make payments to school districts and supervisory unions for the support of education in accordance with the provisions of section 4028 of this title, other provisions of this chapter, the provisions of 32 V.S.A. chapter 135, and the Flexible Pathways Initiative established by section 941 of this title, **but excluding adult education and literacy programs under section 945 of this title.***

(d) Upon withdrawal of funds from the Education Fund for any purpose other than those authorized by this section, 32 V.S.A. chapter 135 (education property tax) is repealed.

16 V.S.A. § 4011

*(f) Annually, the Secretary shall pay to a department or agency that provides an adult diploma program an amount equal to 26 percent of the base education amount **for each student who completed the diagnostic portion of the program,** based on an average of the previous two years.*

Workforce Innovation Opportunity Act

WIOA is landmark legislation that is designed to strengthen and improve our nation's public workforce system and help get Americans, including youth and those with significant barriers to employment, into high-quality jobs and careers and help employers hire and retain skilled workers.

<https://www.dol.gov/agencies/eta/wioa>

WIOA in Vermont

The State of Vermont has developed a WIOA Combined State Plan, approved by the federal government, to meet the requirements of WIOA, Public Law No. 113–128. The Plan includes the four core WIOA programs:

- Youth, Adult, and Dislocated Worker Programs under Title I (VDOL)
- Adult Education and Literacy (AEL) Act Program under Title II (VAOE)
- Wagner-Peyser Act Program under Title III (VDOL)
- Vocational Rehabilitation Program under Title IV (AHS)

Integrated English Literacy and Civics Education (IELCE)

As part of WIOA, Vermont receives a “small state minimum” Federal award each year to:

- (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; []
- (2) integrate with the local workforce development system and its functions to carry out the activities of the program.

- **68%** (n=265) of the 390 ELLs served in FY22 **already had a minimum of a high school credential at entry**
- 34% held a postsecondary degree of Associate’s or higher.
- 83% (n=323) of ELL students in FY22 were non-white.

Relying solely on the small state minimum is insufficient to serve English language learners and is a requirement of the grant program as a basic expectation.

WIOA Administration in Vermont

Per WIOA, Section 203(3), the Eligible Agency is the sole agency in the State responsible for administering or supervising policy for adult education and literacy activities in the State, consistent with the law of the State. The Vermont Agency of Education (AOE) is the Eligible Agency in Vermont under Title II of WIOA.

- [Joint Rules](#): One-Stop System
- [FY23 Grant Application](#) (for FY24 – FY25)

AELN Report Corrections & Clarifications

Contracts versus Grants

AELN Report to Committee
(p.1)

The Vermont Agency of Education uses state and federal funds to contract with Vermont's four Adult Education & Literacy (AEL) service providers to provide the full range of adult education and literacy services across the State.

- The AOE is the recipient of federal and state funds;
- The AOE runs a **competitive grant program** in accordance with the [Workforce Innovation Opportunity Act](#), and state law and rules.
- Yes, there are performance measures.

Title II is not a Pass-Through Program

AELN Report to
Committee (p.1)

*Both WIOA Title II and
IELCE grant funding
from the federal
government passes
through the Agency of
Education to AEL service
providers.*

- These are not pass-through funds
- The AOE and the State is beholden to ensuring adherence to federal rules via executed grant agreements with providers.

Disentangling Funding

AELN Report to Committee (pp.1 and 3)

1. *AEL service providers also raise funds independently through other grants and private donations to help cover operational costs and address deficits. (p.1)*

2. *The Adult Basic Education grant program is funded with state general funds, and the Adult Diploma Program is funded out of the Ed Fund. Funding from these two programs totals around \$3,500,000 for Vermont's 4 AEL service providers and has been level funded since 1992, while the cost of delivering Adult Basic Education services in Vermont has increased significantly since that time. While the AELN considers this "base funding", there are performance targets attached to these monies. (p.1)*

3. *Federal AEL funding is not used for the HSCP. (p.1)*

Grant Funds Support Adult Education - including those with a goal of high school credential*

Provider	100- Salaries and 200- benefits	300- Purchased Professional and Technical Services	400- Purchased property services	500- Other purchased services	600- Supplies	Indirect (Federal rate of 5%)
	79.78%	2.33%	11.75%	4.15%	1.99%	0.00%
CVABE	91.03%	0.00%	7.18%	0.16%	0.73%	0.91%
NEKLS	82.29%	1.60%	9.07%	4.73%	1.41%	0.91%
TTC	89.14%	0.00%	8.39%	1.07%	0.41%	0.99%
VAL						
Average	85.56%	0.98%	9.10%	2.53%	1.14%	0.70%

Adult Education and Literacy

Grant Application FY23 (FY24-25)

Excerpt from grant application:

As part of the State's comprehensive AEL system, providers who are awarded this funding opportunity will serve as the lead organization for the High School Completion Program that districts will work with, per [16 V.S.A. § 943](#) and the High School Completion Program Policy Manual, to serve the respective counties in which the provider delivers AEL services.

Awarded entities must ensure program aligns with WIOA's assessment practices, academic rigor, transition services to postsecondary and/or employment, and access to a high school credential.

AELN Committee Report Assessment Concerns and Representations

In FY2019, the Agency adopted a revised federal standardized test that students are required to take before they can enter the HSCP. A student must take this standardized test in Reading, Math and Language and have a signed graduation plan with a school to qualify for HSCP. (p. 1)

AEL providers are not able to draw down full HSCP funding until a student shows skill gains in the three standardized assessments and/or successfully completes the program and graduates by fulfilling their graduation education plan and scoring at least a 5 in all three test areas - reading, math and language. (p. 2)

AELN Report to Committee (p.3)

It is a policy of the VT Agency of Education to apply this test to the HSCP and to require that students must score at least a “NRS 5” for all 3 test categories to drawdown full state funding for the HSCP. At the federal level, the TABE assessment is only related to Adult Basic Education, not the HSCP. There is no “testing floor” for drawing down federal AEL funding for Adult Basic Education services. Additionally, there is no cap for AEL grant funding for any particular student.

Legislatively Required Assessments

16 V.S.A. § 4011
(State)

16 V.S.A. § 945
(State)

WIOA (Federal)

- These assessment requirements are not new and unrelated to HSCP
- These assessments should not limit a student developing an HSCP plan
- It is true that student assessment not only informs instruction and learning paths but also AEL provider performance
- Assessment data informs source of funds to ensure compliance with grant agreements; federal rules including those that govern funds, state audit requirements – NOT pathway and goal-setting for students

Assessment Concerns and Representations

Excerpt Slide 2

AELN Report to Committee (p.2)

- *Students must score at least a 4 in all three areas in order for AEL providers to draw down any HSCP funds for a student (unless granted special permission by the AOE) and several of the most significant reimbursements are only available if a student scores 5 or higher in all three areas.*
- *Many of our students come to us with significant learning disabilities and other barriers [...] and getting to a level 5 score can be extremely burdensome both on the student and the teacher.*

AOE Data:

Requests to graduate
(below NRS 5) FY20-FY23:

- 36 unique students
- 23 approved (64%).
- 13 re-submitted and 11 of those approved.

Reasons provided from
the field for not
submitting more RTGs:

- It's a lot of work and
- the AOE usually denies them.

TABE 11/12 Federally-Approved Required Assessment

NRS Level	Grade Range Guidelines
1	K-1
2	2-3
3	4-5
4	6-8
5	9-10
6	11-12

Assessment Concerns and Representations

Excerpt Slide 3

AELN Report to Committee (p.2)

The **HSCP also requires a graduation plan** that is developed with the student's sending (local) high school and approved by a representative from that school, such as guidance counselor or principal. It can take years for a student to complete their graduation plan and get to a level 5 score, and that road is often too long and challenging for the population we serve. **As a result, many students choose to instead take the GED test, which is often a simpler and shorter route to a high school credential.** When a student makes that choice, we work with the student to prepare for the GED test and provide the test in-house, **but we do not access federal AEL funding for GED test administration.**

AOE Assessment Clarifications

- AEL providers are required to develop plans for any student entering the system through their grants; this also aligns with Act 77 PLP
- Improving intake processes and a holistic approach to designing student plans, especially with SLIFE students is essential – that includes identifying realistic timelines and milestones
- GED is a recognized secondary credential in both employment and post-secondary education – personalizing to student need and goals is an expectation and we caution against any suggestion of a diminished pathway or credential (however unintentionally)
- AEL providers use General Funds (including ADP funds) and Federal funds to support the costs of their GED testing centers (rent, utility costs, internet, computers, etc.)

Clarifying Purpose; Avoiding Generalizations

AELN Report excerpt, p. 2

{...} HSCP has unfortunately become the least flexible of Flexible Pathways. It also takes a longer time for our students to get there, which corresponds to longer teaching times and higher provider costs. Furthermore, the standardized testing for HSCP is more rigorous than the graduation requirements for our public school system, which causes a system where our most vulnerable Vermonters are actually held to a higher standard to earn their high school diploma than students in the public school system, who often do not face the same barriers to education.

Flexibility in pathways should not be equated to reduced rigor, quality of programs, or career/college readiness.

Length of time is not the metric by which we evaluate graduation readiness by rule and law but rather the demonstration of proficiency.

The comparison between proficiency-based graduation requirements as defined in Rule Series 2000 and AEL assessments is a reflection of program difference, not expectations of /or rigor.

Defining the Problem

One might theorize that at some time in the future, the HSCP will be truly successful if the numbers in the program actually decline[,] and it no longer exists in its current format. This would indicate that schools are indeed transforming and meeting the needs of all students.

*Vermont High School Completion Program
2006 – 2010 Evaluation Report, Executive Summary, July 2011
CESS, University of Vermont*

UVM Evaluation Report

- Contracted through AELN using Nellie Mae funding
- Completed by College of Education and Social Sciences
- Mixed methods evaluation design
- Evaluation of program between 2006 – 2010
- Completed in 2011

UVM Evaluation Report - Findings

What practices and policies have proven successful for program implementation?

- *Graduation Education Plans – Individualized and student focused learning contribute to student success.*
- *Flexibility – Accommodating student schedules rather than school schedules helps students complete HSCP.*
- *Scale – AEL programs were small enough so students received personal attention and made connections with adults and others.*

UVM Evaluation Report – Findings 2

What practices and policies have proven successful for program implementation?

- *Intake Process* – Common assessment process and standards assured that students had the right skills for the program.
- *Focus on Outcomes* – Focus on student demonstration of competency and requisite funding puts the emphasis on achievement and not seat time.
- *AEL and High School Partnering* – Joining two educational entities and requiring them to function together serves students well and has enhanced both types of organizations.

AOE Activities to Support AEL System - 1

- FY17 - ADP funds increase through work with legislature. Approved for additional \$50,000/year beginning in FY18 (from \$850,000 to \$900,000).
- FY17 Legislative language change to assure role of AEL in HSCP – beginning FY18. (Only AEL providers may work with high schools on HSCP.)
- FY18 - revenue neutral move of HSCP funds to AEL grants to provide additional resources to support basic skills instruction beginning in FY19: \$270,272.
- FY18 - Created Prior Approval Request form for some funding outside of policy
- FY18 - For AEL providers only, extended the practice of giving grant advances for one year.

AOE Activities to Support AEL System - 2

- Consistently advocated internally that AEL providers receive an advance in HSCP funds in the first quarter of the year.
- FY19 through present– allowed HSCP reimbursements for students at NRS 4. Previously reimbursements were allowed for only those at NRS 5 or 6.
- Raised HSCP skill gain outcome rates by \$500.
- FY20 - created [Request to Graduate form](#) for unusual circumstance of student unable to demonstrate a minimum NRS 5 (high school proficiency through NRS assessments in reading, language, and math).
- Beginning in FY20 – cost for AEL students to take Vermont Virtual Learning Cooperative courses covered under state grant.

AOE Activities to Support AEL System - 3

- FY20 – distributed additional HSCP funds as part of COVID response for tech support.
- FY21 - revised the assessment policy to decrease the required 45 days between assessments to 30 days.
- FY23 – all contact hours now count as instructional hours between assessments including career services provided, time spent taking assessments, time spent on goal setting and learning plans.
- FY24 – revised assessment policy to increase number of days that baseline assessments must be administered from 30 days to 45 days.
- Beginning in FY24, all assessments will be valid in the fiscal year in which they are administered and the following two fiscal years (rather than only one year).