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Adult Education and Literacy
Adult Diploma Program Pilot
Policy Manual Draft

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Definitions

- **Adult Diploma Program (ADP):** A program " . . .administered by the Agency through which any Vermont resident who is at least 16 years of age; who has not received a high school diploma; and who is not enrolled in a public or approved independent school, postsecondary institution, or home study program can receive a local high school diploma granted by one of the Program's participating high schools" ([H.883](#) (Act 113), page 206).
- **ADP Eligible Student:** Any Vermont resident may access the ADP who:
  - is at least 16 years of age;
  - has not received a high school diploma; and
- who is not enrolled in a public or approved independent school, postsecondary institution, or home study program.
- **Adult Learning Plan:** The plan every AEL student develops with the AEL provider to describe the learning activities they will engage in while participating in Adult Education and Literacy services. The plan may include a link to the ADP graduation agreement.
- **ADP Graduation Agreement:** The agreement between an Adult Diploma Program student, the AEL provider, and the ADP participating high school. It is developed by the ADP student and the AEL provider and describes the education activities that the student must engage in in order to meet the statewide proficiency-based graduation requirements of the ADP.
- **Enrollment in School:** Those taking one or more classes at a public or approved independent school are considered enrolled in school and are not eligible to participate in the Adult Diploma Program per § 945 of H.883.
- **General Educational Development (GED):** A high school equivalency that is available to Vermont residents who do not have a diploma. Obtaining a GED involves passing a series of four sub-tests: Math, Reasoning through Language Arts, Social Studies and Science.
- **High School Completion Program (HSCP):** Previously 16 V.S.A. § 943, this program gave both enrolled in school and unenrolled from school Vermont residents aged 16 and older access to a diploma by working with their local AEL provider and a school in their district of residence. The program was repealed in H.883 effective July 1, 2024.
- **Local Adult Education and Literacy (AEL) Provider:** An entity that is awarded Federal or State grant funds to conduct adult education and literacy activities ([Title 16 V.S.A., § 942](#)(6)).
- **National Reporting System (NRS) for Adult Education:** An outcome-based reporting system for the State-administered, federally funded Adult Education and Literacy program. The NRS has designated six skill levels for adult basic education learners and six skill levels for English Language Learners.

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- **Participating High School:** The local high school that agrees to grant a diploma as part of the ADP. Any Vermont public high school may participate in the ADP. Any Vermont Approved Independent School receiving district funds to serve students residing in districts that do not have a public high school may participate in the ADP.
- **Proficiency-Based Graduation Requirements (PBGRs):** "refers to systems of instruction, assessment, grading and academic reporting that are based on students demonstrating mastery of the knowledge and skills they are expected to learn before they progress to the next lesson, get promoted to the next grade level, or receive a diploma." (Education Quality Standards)
- **Test of Adult Basic Education (TABE):** A standardized assessment that evaluates an adult's basic skills in reading, language, and math.
- **Workforce Innovation and Opportunity Act (WIOA):** A federal law that replaced the previous Workforce Investment Act of 1998. Enacted in 2014, WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market.

Introduction and Background

The Vermont Adult Education and Literacy (AEL) program uses a combination of state and federal funding to provide distinct programs aimed at developing academic skills in students who are interested in completing their secondary education. For a secondary school equivalency diploma, AEL students can work toward achieving their GED. For high school diplomas, students previously had the option to participate in a school district flexible pathway called the High School Completion Program (HSCP). The HSCP under 16 V.S.A. § 943 was a school district program under the Flexible Pathways Initiative that provided access for those Vermonters 16 years of age and older who met eligibility requirements to earn a high school diploma. HSCP partnering high schools worked with local Adult Education and Literacy (AEL) providers and the student to create a personalized learning plan that described how they would meet their partnering high school's graduation requirements. This program was available to enrolled-in-school and unenrolled-from-school.

Act 78 of 2023 created a committee to evaluate access to adult education and the HSCP in order to make recommendations to improve access and the quality of adult education. In response to the subsequent [legislative report from the Adult Education and Literacy Student Access Committee](#) submitted on January 18, 2024, [H.883 (now Act 113)](#) repealed HSCP and made changes to the ADP under [16 V.S.A. §945](#) which describes state components of adult education and literacy programs. The ADP is a program:

> ". . .administered by the Agency through which any Vermont resident who is at least 16 years of age; who has not received a high school diploma; and who is not enrolled in a public or approved independent school, postsecondary

institution, or home study program can receive a local high school diploma granted by one of the Program's participating high schools."

Any Vermont resident who meets the eligibility requirements for participation in the program, defined above, can pursue their high school diploma through this program. For more information about the differences between HSCP and ADP, please see the [HSCP vs ADP Comparison Chart](). ADP services will be provided by Adult Education and Literacy providers and participating high schools will verify that students have met requirements and issue the diploma. In order to earn their high school diploma through the ADP, students must meet all of the statewide Proficiency-Based Graduation Requirements (PBGRs) by demonstrating proficiency in the [College and Career Readiness Standards for Adult Education](). Currently, students can meet these PBGRs by receiving certain scores on any of the assessments listed on the Agency of Education's (AOE) approved ADP Assessment Menu (Appendix A).

The ADP is currently in a pilot phase. All information in this policy manual and other ADP documents is subject to change and additions will be made to the program as the AOE gathers information through feedback from stakeholders, evaluation, and monitoring.

Adult Diploma Program and Schools

As a program designed for adults, the Adult Diploma or GED programs should not be cited as "flexible pathways" to enrolled-in-school students or their parents/guardians. If a student has decided to unenroll from school, the school should contact the student and parent/guardian to refer them to the AEL provider in their county. The school must continue to provide services to their enrolled students, which includes the flexible pathways their district has developed and make every effort to keep students engaged and thriving academically and working towards college and career readiness. The ADP is not a drop-out program, but a program designed very specifically for adults not enrolled in school. Students and parents/guardians considering unenrolling from their high school should be made aware that they will lose access to extra curriculars (including drama and sports), school meals provided, the structure of attending classes five days a week, regular contact with multiple peers, and school health services. AEL services and the ADP, by contrast, focus on transitioning to college and/or career through flexible scheduling and student-directed educational activities.

Adult Diploma Program and Other Education Programs

ADP students cannot be enrolled in a public or approved independent school, postsecondary institution, or home study program, which means that they are ineligible for most other education programs that require such enrollment. This includes:

- the **Early College program**. For more information about the Early College Program and the ADP, please refer to the memo, [Adult Diploma Program and Early College Program Participation](#);
- anyone who has **enrolled in home study with the AOE**. To enroll in home study in Vermont, parents/guardians must submit the Notice of Intent form, and a Home Study Independent Professional Evidence form and/or the Annual Notice;
- those **enrolled in a secondary CTE program** for a full or half semester, even if they are not currently enrolled in a high school, have their tuition covered by their district of residence. These students are thus enrolled in the district that is paying tuition and are ineligible for AEL (and the ADP as part of the state AEL program); and
- those students **enrolled in any full-time postsecondary programs**.

Other education programs that are available to ADP students include:

- **Dual Enrollment** - [16 V.S.A. § 944](#) states that those eligible to participate in Dual Enrollment include "a student in the Adult Diploma Program under subsection 945(a) of this title."
- **courses from entities that are not public or approved independent schools**, such as [Vermont Virtual Learning Cooperative](#); and
- **a training course that is part of an Integrated Education and Training program,** whether that course is offered through Adult CTE, or a college or university.
  - **Adult CTE courses and other postsecondary technical skill credentialing programs** are allowable when the cost is not covered by a school district.

Intake Process

Vermont uses a [standard Intake form](#) for all students who wish to access any AEL services, including enrollment in the ADP. AEL providers use this form to collect the information the state documents for federal reporting purposes. It is recommended that the intake form be done with students in person and at the time of registration. The intake process also informs the AEL provider of the supports, accommodations, and wrap-around services a student may need to be successful in achieving the program goals established in their Adult Learning Plans (ALPs). ALP goals vary depending on the individual and may include upskilling in order to become part of an apprenticeship program, improving English skills, acquiring the knowledge to obtain citizenship, and obtaining a high school equivalency such as the GED or ADP. Regardless of plans, assessing a student's skills is critical in establishing an appropriate pathway for goal attainment.

Knowing a student's skill level upon entry into any program will inform a realistic educational timeline from intake to the successful attainment of a student's goal(s). Establishing a skill baseline for learning is a requirement for all students receiving AEL

services. Per Vermont's Assessment Policy Manual, which is approved by the Office of Career Technical and Adult Education (OCTAE), every native English-speaking student receiving AEL services must establish an Educational Functioning Level (EFL) through assessments in Reading, Language, and Math using the TABE. English Language Learners must be assessed in speaking and listening and/or reading to set EFL. Assessment results are used to inform instruction and are tracked for purposes of performance accountability. Only assessments approved by the National Reporting System (NRS) can be used for this purpose. This is mandatory for every student served who has received at least 12 hours of service. More information on assessment requirements can be found in the [Adult Education & Literacy Assessment Manual with Distance Education Policy](#).

Providing Services to Meet Student Needs

AEL providers, with written approval from the AOE, may offer sub-granted services for students to provide flexibility and individualized activities that help students meet proficiencies. AEL providers need to send a written request to obtain permission from the AOE to subgrant any services. The request should include a basic description of the AEL services they wish to subgrant, the name of the entity to receive the sub-grant and the amount that will be sub-granted. Sub-granted services may include paying the Vermont Virtual Learning Cooperative for classes or other educational platform that provides standards-based instruction. Federal grant funds may not be used to pay for training (e.g., Adult CTE classes, online credentialing services, etc.) unless the training is part of an Integrated Education and Training program.

ADP Statewide Proficiency-Based Graduation Requirements (PBGRs) and Curriculum Requirements

Curriculum along with effective instructional practices with up-to-date and relevant classroom materials, are key elements in students being able to be proficient in the [College and Career Readiness Standards](#) (CCRS) for Adult Education ([Mathematics](#) and [English Language Arts](#)) and [Vermont Education Quality Standards (EQS).](#) The ADP is an AOE-administered statewide program and has its own statewide PBGRs that require rigorous instruction and robust curricula. Frameworks such as, but not limited to, [Teaching Skills That Matter](#) and [GED teaching resources](#) address the standards and required components to meet PBGRs. The PBGRs are selected to address the specific needs of adults as described in the [Workforce Innovation and Opportunity Act](#) (WIOA) and the [Vermont WIOA Combined State Plan](#).

When schools sign the MOU with the AOE to participate in the ADP, they agree to accept the statewide PBGRs as meeting requirements under the ADP. All students must meet all the ADP's statewide PBGRs to graduate through the ADP. The PBGRs for the ADP pilot are as follows:

- Mathematics
  - Including but not limited to Financial Literacy
- English Language Arts
  - Reading and Writing
- Social Studies
  - Including but not limited to Civics
- Science
  - Including but not limited to Health Literacy

Within each of the main PBGR content areas, digital literacy and other EQS transferable skills must be integrated. Additionally, reading and writing must be integrated with English Language Arts, civics education must be included with Social Studies and health literacy must be included with Science or as a stand-alone. Educational activities to meet other PBGRs qualify as AEL activities and EQS. [English Language Proficiency Standards for Adult Education](#) apply when instructing English Language Learners and must be integrated into all academic content areas.

AEL providers will use the Teaching Skills That Matter in Adult Education framework which includes the nine skills that matter which are aligned with EQS Transferable Skills.

Teaching Skills That Matter and EQS Transferable Skills Alignment Chart

Teaching Skills That Matter	EQS Transferable Skills
Adaptability and Willingness to Learn	Creativity and Innovation
Communication	Communication
Critical Thinking	Inquiry
Interpersonal Skills	Collaboration
Problem Solving	Basic Academic Skills
Navigating Systems	Use of Technology, Understanding Systems
Processing and Analyzing Information	Basic Academic Skills
Respecting Differences and Diversity	Working Well with Others

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Teaching Skills That Matter	EQS Transferable Skills
Self-Awareness	Self-Management

Adult Diploma Program Graduation Agreement Development

The Graduation Agreement (GA) must be developed by the AEL provider and the student prior to their participation in the ADP. For minors, a parent or guardian may choose to participate in the process and will need to sign the final agreement documenting their approval. The GA identifies the learning opportunities and assessments that the individual student will complete to meet each of the statewide PBGRs and earn a high school diploma from the assigned participating high school. The AEL provider will review the following bulleted items with the student and select the option for each statewide PBGR that aligns best with the student's interests and goals.

- Federally required NRS assessment(s)
  - Since all students receiving AEL services are required to be assessed using an approved NRS assessment, has the student already achieved an NRS level on an NRS assessment that is considered to show proficiency in one or more of the statewide PBGRs?
- ADP Assessment Menu (See Appendix A)
  - Which one or more of the approved assessments would the student like to work toward achieving a score that meets the statewide PBGRs?
- Other learning opportunities to be explored during the pilot for future iterations of the ADP:
  - Transcript review/prior learning
    - Has the student already completed a class/classes at a high school that shows proficiency or could count toward proficiency in one or more of the statewide PBGRs?
  - Work experience review
    - Has the student obtained job training or certifications that show proficiency or could count toward proficiency in one or more of the statewide PBGRs?
  - Learning Opportunities
    - Projects
    - Papers

The AEL provider and the student must sign the ADP graduation agreement. The school does not need to review and sign. The school reviews the graduation agreement when the student has completed the ADP requirements for graduation.

Revisions to Graduation Agreements

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As revisions need to be made to a student's graduation agreement, it must be signed again by the student and AEL provider. The changes must be stated in the graduation agreement's change log.

Transitioning from HSCP Graduation Education Plans/ADP Graduation Agreements

Every Graduation Agreement is developed to show how students have met or will meet the statewide PBGRs. The process is the same for former HSCP students. The first step to transition students to ADP is to complete the Graduation Agreement. This can be done by transferring information from the HSCP Graduation Education Plan (GEP) with updates on progress that document the ADP PBGRs that the student has demonstrated proficiency in as well as those that still need to be achieved. The GA template provided will assist with the planning process.

Addressing Barriers to Education Through Student Support

AEL is required to provide services to all eligible students and to provide accommodations per the [AEL policy manual](#). All students must receive adequate intensity of instruction and high expectations must be maintained regardless of disability or barrier. English Language Learners must have access to content instruction as their English language skills allow. All ELL instructors and content area teachers must take the English Language Proficiency integration [modules offered through LINCS](#) and apply strategies to ensure access to instruction in content areas and to the ADP.

To ensure equitable access to a high school diploma, all AEL providers must instruct using the principles of [Universal Design for Learning (UDL)](#). From the Adult Education and Literacy Policy Manual:

> *"Both Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA) are concerned with protecting the rights of individuals with disabilities by ensuring that they have equal access to employment and educational opportunities. AEL learning centers must provide physically accessible spaces that comply with applicable physical accessibility standards, and must ensure communications with individuals with disabilities are as effective as communications with individuals without disabilities. The U. S. Department of Justice has provided a resource regarding effective communications under the ADA. Also, under the ADA, all programs are required to provide reasonable accommodations to learners with documentation of diagnosed disabilities."*

Transcript Development and Maintenance

Once the AEL provider and student determine that a student has met all elements of their graduation agreement, the participating high school must review and confirm. When the high school confirms that proficiencies have been demonstrated, the completion page must be signed by the student, AEL provider, and high school representatives. The high school will finalize the student's transcript and issue the student a diploma. Note that a transcript template for the ADP program is under development. In the meantime, schools may use their standard transcript.

The high school is required to maintain the student's transcript permanently per State Board Rule 2113.

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Appendix A: ADP Assessment Menu

Acronym Key

- TABE – Tests of Adult Basic Education
- GED – General Educational Development
- NRS – National Reporting System

All students who have received 12 or more hours of AEL services are federally required to be assessed using a federally approved assessment. All ADP students must be assessed using the TABE or ESL assessment. These assessments can be used to meet the ADP PBGRs but are not the only assessments that can be used. Students must demonstrate proficiency in one or more assessments in each of the following content areas listed in the following tables.

English Language Arts

Assessment	Minimum Proficiency-Level Scores	Considerations
TABE 11/12 or 13/14 - Reading	NRS 5	The TABE assessments show level of proficiency in meeting standards.
TABE 11/12 or 13/14 - Language	NRS 5	The TABE assessments show level of proficiency in meeting standards.
GED – Reasoning Through Language Arts	Passing score	GED tests show level of proficiency in meeting standards. Test available in both English and Spanish.
WorkKeys – [Workplace Documents](#)	Level 5*	Test available in both English and Spanish.

Mathematics

Assessments	Minimum Proficiency Level	Considerations
TABE 11/12 or 13/14 – Math	NRS 5	The TABE assessments show level of proficiency in meeting standards.

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Assessments	Minimum Proficiency Level	Considerations
GED – Mathematical Reasoning	Passing score	GED tests show level of proficiency in meeting standards. Test available in both English and Spanish.
WorkKeys – Applied Math	Level 7*	Test available in both English and Spanish.

Social Studies

Assessment	Minimum Proficiency-Level Scores	Considerations
GED – Social Studies	Passing score	GED tests show level of proficiency in meeting standards. Test available in both English and Spanish.

Science

Assessment	Minimum Proficiency-Level Scores	Considerations
GED – Science	Passing score	GED tests show level of proficiency in meeting standards. Test available in both English and Spanish.

*See: ACT WorkKeys Scale Score Interpretation Guide and Assess and Measure Skills Gains with ACT WorkKeys (see NRS Educational Functioning Level Benchmarks table on page 3).

During the pilot, an advisory group will be convened to review and explore other recognized evidence for demonstration of proficiency in each content area. Any student not demonstrating proficiency in one or more content areas during the pilot may work with the AEL provider to send a written request (template to be developed) to the AOE and the participating high school to recognize other evidence of proficiency.

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Appendix B: Roles and Responsibilities

AEL Provider

- Provide intake with students including required AEL assessments (TABE or ESL assessment) to set Educational Functioning Level (EFL).
- Complete the ADP Graduation Agreement.
- Provide services outlined in the ADP Graduation Agreement.
- Oversee process of discovery and documentation of evidence of proficiency in each required content area (see "ADP Statewide Proficiency-Based Graduation Requirements (PBGRs) and Curriculum Requirements" on page 7).
- Provide all documentation that propose that the student has met the ADP PBGRs to the participating high school listed on the student's ADP graduation agreement.
- Transcript creation with the school using the AOE-provided transcript template (to be developed).

AOE

- Formally invite high schools to participate by entering into and signing an MOU.
- Provide training to stakeholders on program policies and procedures.
- Develop a transcript template for ADP graduates.
- Monitor ADP data entered in the AEL statewide database to ensure ADP policies are being followed.
- Communicate with stakeholders to receive program feedback.
- Facilitate changes to the ADP program.

Participating High Schools

- Review the ADP Graduation Agreement and other documentation submitted by AEL provider for each student candidate for graduation.
- Accept the fees for service outlined in Appendix E of the ADP Policy Manual.
- Verify that all the required documentation is present and only AOE approved methods, as stated in the ADP Policy Manual, were used to meet the ADP PBGRs.
- Enroll the student in school for a day to issue a valid diploma.
- Issue diploma to the student.
- Permit students to participate in the graduation ceremony held for all graduates of the participating high school.
- Create the ADP students' transcripts with the AEL provider.
- Maintain all transcripts per State Board Rule 2113.

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Appendix C: District Reporting of ADP Student Status to AOE

Coding for the Statewide Longitudinal Data Submission (SLDS)

When a student exits the school (unenrolls) and expresses their intent to attend the Adult Education and Literacy program to pursue a GED or Adult Diploma Program, schools should use the following codes when reporting the student.

- Exit/Withdrawal (EXITTYPE): 18 - Transfer to GED program NOT operated by VT School District*
- Funding Source (FUNDSOURCE): 04 – VT State Agency

Once a student completes their ADP graduation requirements, they should be re-enrolled in high school for one day at the end of the school year for the school to issue a diploma. The school should use the following codes when reporting the student.

- Admission Status (ADMINSTAT): 09 – Status of HSCP Student**
- Entry/Reentry Type (ENTRYTYPE): 07 – Re-entry
- Funding Source (FUNDSOURCE): 04 – VT State Agency

*The AOE's Data Management and Analysis Division (DMAD) team will change this Ed-Fi codeValue to "Transfer to Adult Education and Literacy program - a student who has transferred to Adult Education and Literacy program (includes GED and Adult Diploma Program) not operated by a School District prior to completion of their secondary education" beginning school year 2025-2026 (SY26).

**The AOE's DMAD team will change this Ed-Fi codeValue to "Adult Diploma Program – receiving diploma through Adult Diploma Program" beginning school year 2025-2026.

Please see the AOE's website for more information about codesets and the SLDS.

Appendix D: AEL Provider Reporting of ADP Students in LACES (AEL Statewide Database)

When an ADP graduation agreement has been signed by an eligible student and an AEL provider staff member, the student's LACES record must be updated to reflect that they are now participating in the ADP. A staff member identified by the AEL provider must go into the student's LACES record and complete the following steps.

1. Under the "Key Data" panel, locate the "Program Tracking" field, select "AEL – ADP."
2. Select the "Save" button in the bottom right-hand corner of the panel.
3. Scroll down and expand the "Program Tracking" panel and select the "Add" button.
4. In the "Start Date" field, enter the date of the final required signature on the Graduation Agreement.
5. Select the "Save" button.

If the student exits from AEL services or decides to end their participation in the ADP, an AEL staff member must go into the student's record and do the following.

1. Deselect "AEL - ADP" in the "Program Tracking" field.
2. Open the active ADP record under the "Program Tracking" panel and enter the student's final date of participation in the ADP in the "End Date" field.

The AEL provider staff member must also upload a copy of the signed ADP graduation agreement under the "Student Data" tab, within the "Documents" panel. Select the "Add" button to open the upload pop up form. Select the following options from the choice lists.

- Document Category: "Adult Learning Plan"
- Document Type: "ADP Graduation Agreement"

Select the "Select files…" button and select the student's signed graduation agreement in the file explorer. Select the green "Upload" button to complete the action. Please note that as changes are made to the ADP graduation agreement (a staff member signs off that a student meets a PBGR or the student decides to meet a PBGR using a different AOE approved method), the ADP graduation agreement's change log must be updated, and the updated version of the graduation agreement must be uploaded to the student's LACES record. This version can replace the version of the graduation agreement that is currently in the student's LACES record. This can be done by deleting the version that is currently in the student's record and then following the above instructions to upload the updated version.

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Appendix E: ADP Funding

Funding for the ADP is awarded to the AEL providers through the grant process. Grant funds are subject to all the requirements under the Uniform Guidance: grant fund expenses must be allowable, reasonable and allocable.

Participating high schools may choose to use their available unrestricted funds to support staff and faculty time spent on the ADP. However, since ADP students are not enrolled in school and cannot be reported as such, the school may charge the AEL provider for services that lead to a student's graduation. These charges may be negotiated through an annual MOU between each school and the local AEL provider, but will not exceed the following rates listed below.

- Review of documentation of proficiency in each content area: $250 total
- Issuing the diploma: $100
- Charges related to graduation, e.g., cap and gown, diploma printing: $100
- Creation of the transcript in conjunction with the AEL provider: $300
- Permanent maintenance of transcript: $200

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