

Issue Date: March 1, 2024

The Vermont Agency of Education Seeks Public Comments on Proposed Revisions to its Perkins V State Plan

The Vermont Agency of Education is required to revise its [Perkins V State Plan](#) to update Vermont’s State Determined Performance Levels (SDPLs), using the two most recent years of data to set a baseline. The Agency of Education also proposes to revise some specific provisions in the State Perkins Plan. This document provides the full text for all proposed changes to Vermont’s Perkins V State Plan.

The period of public comment is from Friday, March 1, 2024, through Monday, April 1, 2024. Comments must be submitted in writing on this [Public Comment Form](#).

Proposed changes to Vermont’s Perkins Plan fall into three categories. First, Vermont will make select changes to our Accountability Measurements. Vermont seeks to delete some state performance measures from the State Plan. These state measures are not required by federal law, and while Vermont will still collect and analyze this data, Vermont will no longer detail that in the State Plan. Also in this category, Vermont has worked with Community College of Vermont to revise the numerator and denominator definitions for two required post-secondary performance indicators, with the goal of improving the timeliness and accuracy of the data collected and reported.

Next, Vermont is required to set new State Determined Performance Levels and to demonstrate that our process aligns with requirements set forth in law. These revisions will replace in full one section of the State Plan.

Finally, Vermont has identified other revisions that are technical corrections, clarifications, or reflect anticipated changes in practice beginning in the 2024 – 2025 school year. Those are set forth in a chart that indicates what is currently in place and then the planned revision.

The proposed changes include:

Accountability – Measurement Definitions

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64	The State Plan includes state indicators for VT-S1 Introductory Course Participation Rate, VT S2 – Introductory	Delete these state indicators. ¹



Page Number	Current State Plan	Proposed Revision
	course to CTE program continuation rate, VTS3, Program Participation Rate, VT2S1 ELA Participation Rate, and VT2S2 Mathematics Participation Rate	
65	<p>1P1 Numerator Definition: Of the cohort of CTE concentrators who completed their program during the program year [calculated as reporting year minus 2] and for whom 2nd quarter post-program completion retention and placement data could be collected: the number of CTE concentrators who either remain enrolled in post-secondary education, are in advanced training, military service, a service program, or are placed or retained in employment</p>	<p>1P1 Numerator Definition: The number of CTE concentrators completing within the program year, who in the six-month period after completion and for whom placement data could be collected, remain enrolled in postsecondary education, advanced training, military service, a service program (Americorps; Peace Corps); or are placed or retained in employment.</p>
65	<p>1P1 Denominator Definition: CTE concentrators who completed their program during the program year (calculated as the reporting year minus 2).</p>	<p>1P1 Denominator Definition: The number of CTE concentrators completing within the program year and for whom placement data can be collected in the six months following program completion.</p>
65 – 66	<p>2P1 Numerator Definition: Of the CTE concentrators for whom data could be collected, those who received a post-secondary credential either during their participation in the program year (calculated as the reporting year minus 2), or within 1 year after completing [meeting all graduation requirements and graduating], excluding programs that are ending or have ended.</p>	<p>2P1 Numerator Definition: The number of CTE concentrators who received a post-secondary credential either during their participation in the program year or within one year after completion.</p>
66	<p>2P1 Denominator Definition: CTE concentrators who completed their program in the program year (calculated as the program year minus 2) and excludes programs that are ending or have ended.</p>	<p>2P1 Denominator Definition: The number of CTE concentrators who completed their program in the program year.</p>
65 - 66	Rules/comments includes an explanation of the definitions.	Delete the Rules/Comments for the 1P1 and 2P1 indicators.
66	The State Plan includes state indicator VTP1 Pathway/Academic Momentum.	Delete this indicator.

State Determined Performance Levels

Pages 67 – 69 shall be replaced in whole to read:

Criteria 1: Describe the process for public comment under section 113(b)(3)(8) of Perkins V as part of the development of the State determined levels of performance.

The Agency of Education held a series of stakeholder engagement sessions with representatives of secondary CTE programs, including administrators, CTE school counseling coordinators, CTE special populations coordinators, and CTE work-based learning coordinators and post-secondary CTE program administrators and data specialists between November 2023 and February 2024.

When Vermont's Perkins State Plan was submitted in 2020, work was done to identify accountability linkages between ESSA and Perkins V and opportunities for programmatic collaboration. The Vermont Department of Labor was also consulted about linkages between WIOA accountability systems and requirements of Perkins V, and internal conversations were held at the Agency regarding linkages to Title II of WIOA. The Agency of Education's CTE and Adult Education and Literacy staff now meet regularly with the Department of Labor's Workforce Development and Registered Apprenticeship staff to ensure ongoing collaboration and coordination.

[A summary of the public comment period and a response to comments received will be added here at the conclusion of the public comment period].

Criteria 2: Provide an explanation for the state determined levels of performance (SDPLs) in keeping with the requirements of section 113(b)(3)(A)(i)(III) of Perkins V:

In January 2024, the Agency began revisions to the state-determined levels of performance baseline targets. Perkins V requires that Vermont set performance levels that continually make meaningful progress toward improving the performance of all CTE students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of ESEA, and special populations, as defined in section 3(48) of Perkins V. Vermont must take into account how the levels of performance compare with the SDPLs for other states, considering factors including the characteristics of actual CTE concentrators when the CTE concentrators entered the program, and the services or instruction to be provided. Vermont's SDPLs must be higher than the average actual levels of performance of the two most recently completed program years, except in the case of unanticipated circumstances that require revisions in accordance with section 113(b)(3)(A)(iii). Vermont must also take into account the extent to which the SDPLs advance the Agency's goals, as set forth in this State Plan.

To meet these requirements, the Agency reviewed data from the 2021 – 2022 and 2022 – 2023 school years. The Agency also reviewed school year 2021 – 2022 indicator baselines from four other states to compare performance goals. Connecticut, Delaware, New Hampshire, and Wyoming were chosen as the states to review in the baseline comparison. These four states have similar CTE concentrator definitions and CTE

program structures to Vermont. Connecticut, Delaware, and New Hampshire share relative geographic locations, and Wyoming shares a similar population demographic. Additionally, Vermont, Delaware, New Hampshire, and Wyoming all receive less than \$7 million in Perkins funding and can thus be considered similar with regard to federal funding levels in support of CTE.

Generally, Vermont’s guidelines for “meaningful progress” are based on actual performance. Because of the relatively small numbers of students participating in CTE in Vermont, actual performance is differentiated by banding of the performance levels. The Agency bases growth targets on both meaningful improvement and what appears realistic in practical, programmatic terms. Accordingly, Vermont proposes higher rates of growth for those basic grant recipients that need the most improvement and lower rates of growth for those entities that are already close to the ceiling on performance. This model still requires growth for all entities. In reviewing our work to date and revising this plan, Vermont continued to reference the growth model established in the 2020 Perkins State Plan:

Baseline/Actual Performance Band	Negotiated Target Annual Growth
0% - 30%	+2%
30% - 50%	+4%
50% - 75%	+3%
75% - 95%	+2%
95% - 98%	+0.5%
98% - 99.9%	+0.3%

Secondary Indicators Performing Below 30%:

- Indicator 2S3: Academic Proficiency in Science two-year performance average is 25.02%. The Agency noted that CTE students tend to perform well on applied scientific knowledge related to their program of study, but content of the Vermont Science Assessment may not be aligned with the content covered in CTE. Despite this, student performance increased in the last two years by 4.5%. The State proposes a baseline 2% above the average, setting it at 25.52%. The proposed baseline is below the comparative states’ average baseline but continued steady growth is expected.
- Indicator 4S1: Non-traditional Program Concentration two-year performance average is 15.55% and has grown by 1.28%. The State attributes growth in non-traditional program concentration in large part to ongoing CTE educator professional development. The State proposes a 2% addition to the average to set the baseline at 15.86%. While the proposed baseline is below the comparative state average, as CTE professional development continues, the State should approach the average set forth in comparative states.

Secondary Indicators Performing in Range 30-50%:

- 2S1: Academic Proficiency in Reading/Language Arts is measured by CTE concentrator performance on the ACT WorkKeys Workplace Documents assessment. This assessment was adopted by Vermont in the 2020 State Plan. The two-year performance average for this measure is 40.43% and has grown by 5.58%. The Agency considered that more dedicated resources could be put into CTE center assessment goals, so performance does not plateau and thus proposes an increase of 4%, setting the baseline at 42.05%. This baseline is on par with the comparative states' average baseline.
- 5S1: Program Quality – Attained Recognized Postsecondary Credential two-year average is 44.53% and has increased by 26.96% in the last two years. Vermont has made this a priority focus of CTE teacher professional development in the past three years, expanded our state approved list of postsecondary credentials aligned to CTE programs of study, and increased the program quality requirements for state approved CTE programs of study. The large increase in performance can be attributed to these coordinated efforts. The Agency proposes an increase in performance of 4%, setting the baseline at 46.31%. The proposed baseline is higher than the average baseline and actual performance of Vermont plus Delaware and Wyoming, states in the comparison that use 5S1 as a program quality indicator.
- 5S2: Program Quality – Attained Postsecondary Credits has been a state measure under Vermont's 2020 Perkins State Plan. Vermont plans to make this an additional measure that we include in the Consolidated Annual Report as this revised State Plan takes effect. The two-year average for this measure is 38.65% and grew by 2.46%. Of our comparison states, Delaware is the only other state that reports CTE concentrators earning post-secondary credits. The Agency proposes a 2.5% increase, setting the baseline at 39.62% as Vermont continues to expand opportunities for students to earn postsecondary credits in CTE programs of study. The proposed baseline is in between the Delaware baseline and actual Vermont performance levels.
- 5S3: Program Quality – Participated in Work-Based Learning is an additional state measure. This measure has seen the greatest fluctuation in recent years, due in large part to the impact of the COVID-19 pandemic in the 2019 – 2020 and 2020 – 2021 school years, followed by increases in work-based learning placements as the impact of the pandemic mitigates. Vermont's two-year average for this measure is 37.49% and grew by 13.99% over the last two school years. While there has been significant year to year growth, the Agency considers the performance growth rate may begin to plateau. The Agency thus proposes a 3% increase to the baseline, setting it at 38.61%, in the higher range of states compared.

Indicators Performing in Range 50-75%:

- 2S2: Academic Proficiency in Mathematics is measured by CTE concentrator performance on the ACT WorkKeys Applied Mathematics assessment. This assessment was adopted by Vermont in the 2020 State Plan. The two-year average is 50.5% and has grown by 6.92%. Mathematics performance, like Reading and Language Arts and Science, may plateau until additional resources

can be provided at CTE centers in academic core subjects, including professional development for staff and curricular, instructional, and support resources for students. Math proficiency is on the cusp of 50%, and The State proposes a 4% addition to the average, setting the baseline at 52.02%. The proposed baseline is higher than the comparative states.

Indicators Performing in Range 75-95%:

- 3S1: Post-Program Placement two-year average is 92.55% and has increased by 7.61%. This has always been an area of high performance for Vermont, but it declined during the COVID-19 pandemic and is now rebounding. The Agency and CTE centers have also been actively working to improve Post-Program Placement survey response rates and data quality. The Agency proposes a baseline of 2% higher than the current average, setting the baseline at 94.40%. VT has done comparatively well with post-program placement and proposes a baseline higher than the current baseline of other states.

Indicators Performing in Range 95-98%:

- 1S1: Four-Year Graduation Rate two-year average is 95.88%, increasing 1.59% in the last two years. Graduation Rates for CTE programs have traditionally been very high. When considering reasons students do not graduate, Vermont considers this indicator to be approaching its ceiling. The Agency proposes a baseline of 0.5% higher than the current average, setting the baseline at 96.36%. The proposed baseline is 3.68% higher than the comparative states' baseline average, but very close to par with other states' actual performance in school year 2021-2022.

Summary Chart of Current and Proposed Indicator Baselines:

Performance Indicator	Comparative State Baseline Average (SY22)	Comparative State Actual Performance Average (SY22)	VT Baseline (SY22)	VT Two-Year Average (SY22, SY23)	VT Target Increase	VT Target for SY25	VT Target for SY26
1S1: Four-Year Graduation Rate	92.70%	96.35%	96%	95.88%	0.5%	96.36%	96.84%
2S1: Academic Proficiency in Reading Language Arts	44.10%	51.57%	4%	40.43%	4%	42.05%	43.73%
2S2: Academic Proficiency in Mathematics	30.10%	37.45%	4%	50.50%	3%	52.02%	53.58%
2S3: Academic Proficiency in Science	36.70%	39.50%	4%	25.02%	2%	25.52%	26.03%
3S1: Post-Program Placement	76.03%	72.22%	97.67%	92.55%	2%	94.40%	96.29%
4S1: Non-Traditional Program Concentration	26.34%	23.78%	12.18%	15.55%	2%	15.86%	16.18%
5S1: Program Quality – Attained Recognized Postsecondary Credential	17.57%	35.44%	23.21%	44.53%	4%	46.31%	48.16%
5S2: Program Quality – Attained Postsecondary Credits	25.33%	46.20%	20.66%	38.65%	2.5%	39.62%	40.61%
5S3: Program Quality – Participated in Work-Based Learning	31.06%	24.73%	48.22%	37.49%	3%	38.61%	39.77%

Post-Secondary Indicators:

Through the 2022 – 2023 school year, Community College of Vermont and Vermont Technical College were both Post-secondary Perkins Grant recipients. As of July 1, 2023, Vermont Technical College merged with Castleton and Northern Vermont State Universities to create Vermont State University. Vermont amended its Perkins State Plan in May 2023 to reflect the merger, and as of the 2023 – 2024 school year, Community College of Vermont is the only eligible Perkins postsecondary recipient.

The Agency of Education and Community College of Vermont used the stakeholder engagement process in November and December 2023 to review and agree on proposed changes to the 1P1 and 2P1 numerator and denominator definitions.

To assist the Agency in calculating the new proposed baselines for 1P1 & 2P1, Community College of Vermont provided the Agency with revised data for School Years 2021-2022 and 2022-2023 using the proposed new definitions. While Vermont has included targets for two school years for secondary performance indicators, given the change in numerator and denominator definitions and the shift to just one postsecondary recipient, Vermont has only included targets for the 2024 – 2025 school year for post-secondary performance indicators. Vermont will set 2025 – 2026 targets next year.

Indicators Performing in Range 0-30%:

- 3P1: Non-traditional Program Concentration Community College of Vermont and Vermont Technical College combined two-year average is 19.84% and increased by 0.68%. Data for Community College of Vermont individually shows a two-year average of 24.92% and an increase of 1.83%. The State proposes increasing the achievement target by 2% for the next year, creating a target for school year 2024-2025 of 25.42%. A new target will be set in early 2025 for the 2025-2026 school year. The target is slightly higher than the comparative states' average performance.

Indicators Performing in Range 30-50%:

- 1P1: Postsecondary Placement two-year average for Community College of Vermont and Vermont Technical College combined is 47.15% and had a year-to-year decrease of –5.70%. Data for Community College of Vermont individually using the new numerator and denominator definitions has a two-year average of 94.08% and a decrease of –6.76%. The State proposes increasing the achievement target by 2% for the next year, creating a target for school year 2024-2025 of 95.96%. A new target will be set in early 2025 for the 2025-2026 school year. Connecticut, Delaware, and Wyoming define Postsecondary Placement in a similar way to Vermont's revised definitions and have lower baseline targets. The State notes that the performance level for this indicator may be approaching a ceiling.

Indicators Performing in Range 75-95%:

- 2P1: Earned Recognized Postsecondary Credential two-year average for Community College of Vermont and Vermont Technical College combined is 85.15% and increased by 1.44%. Data for Community College of Vermont individually using the new numerator and denominator definitions has reached 100%. The State proposes a baseline of 99% to account for special circumstances that may arise in the future. Given the number of students enrolled, if a handful of students did have special circumstances outside the scope of the program it could reduce the actual performance by ~1%. In comparison, New Hampshire and Wyoming have similar definitions for this indicator. The State performance under the new definitions is on par with Wyoming at 100%. The indicator target will be reviewed in early 2025 in preparation for the 2025-2026 school year.

Summary Chart of Current and Revised Post-Secondary Indicator Baselines:

Performance Indicator	Comparative State Baseline Average (SY22)	Comparative State Actual Performance Average (SY22)	VT Baseline (SY22)	CCV & VTC Combined Two-Year Average (SY22, SY23)	CCV Two-Year Average (SY22, SY23)	VT Target Increase	VT Target for SY25
1P1: Postsecondary Placement***	84.47%	65.23%	80.23%	47.15%	94.08%	2%	95.96%
2P1: Earned Recognized Postsecondary Credential***	80.17%	70.48%	75.51%	85.15%	100%	-1%	99.00%
3P1: Non-traditional Program Concentration	16.62%	23.51%	15.35%	19.84%	24.92%	2%	25.42%

***Community College of Vermont Two-Year Average was calculated using the new Numerator and Denominator Definitions

As part of the Comprehensive Local Needs Assessment, each Perkins recipient will review its progress every two years, and the State will negotiate performance targets on a two-year cycle, to ensure meaningful progress. To assist in this process, each year after the State has reviewed and verified each recipient's performance levels, the State will provide each recipient with a Perkins Accountability Data Report, which will provide performance data for each performance indicator disaggregated by CTE program/cluster, sex, race/ethnicity, and special populations status. These documents will be used by recipients in conducting an opportunity gap analysis to inform the CLNA and future Perkins investments of funds at the local level.

In the event any Perkins grant recipient does not meet one or more of its negotiated performance measures, the recipient will be required to develop an improvement plan and dedicate appropriate and sufficient resources to improvement. If implementation of the improvement plan does not result in the anticipated improvement, the CTE center will be required to invest a percentage of its Perkins allocation, to be negotiated with and approved by the Agency of Education, toward improvement.

Additional Corrections and Revisions to the State Plan

Proposed revisions include:

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36	iii) Related to this work, the Agency will lead efforts to ensure the standards are consistently implemented and that the CTE programs are organized by explicit courses.	iii) Related to this work, the Agency will lead efforts to ensure the standards are consistently implemented.
48	Vermont also allows eligible students in the Early College program to simultaneously participate in CTE programs provided those programs are half-day or part-time, in order to ensure the student can manage the workload of two different programs.	Delete this sentence. ¹
53	The State will assign \$60,000 for services that prepare individuals for non-traditional fields. This activity will focus in part on sustained professional development related to reducing overt and implicit bias for all professionals across secondary education to post-secondary education and including those working in career technical education, in part on providing technical assistance to recipients of funds, and in part on supporting initiatives aimed at exposing young women to various non-traditional career and related post-secondary options.	The State will assign \$60,000 to build Vermont's CTE system's capacity to prepare individuals for non-traditional fields. Funds will support statewide professional learning through multi-year equity learning cohorts, CTE summer conference strands, teacher and administrator coaching, and facilitated data analysis.
53 – 54	The reserve fund amount of \$400,000 will be split 50/50 between "secondary reserve" and "post-secondary reserve." The grants from the reserve funds will be focused on important aspects of dual and concurrent enrollment programs for CTE students. Specifically, post-secondary	The reserve fund will be set at \$650,000, of which \$150,000 will be provided to Community College of Vermont to provide Fast Forward dual enrollment courses in CTE centers and online and to support shared professional learning for secondary and postsecondary CTE faculty, focused on improving the transition of secondary

¹ Vermont has determined that co-enrollment in Early College and CTE is not allowable under Vermont law, so co-enrollment will no longer be possible.

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	<p>partners identified updated post-secondary curriculum and delivery as a priority, and secondary partners identified as a priority ensuring equitable access and participation of vulnerable populations and historically marginalized students in dual/concurrent enrollment offerings, especially in rural areas.</p> <p>The reserve funds for secondary will be granted on a competitive basis and will be based in part on the criteria provided in the law and on the demonstration of need which will be in part based on the population of students enrolled in CTE provided by the eligible recipient.</p> <p>The reserve funds for post-secondary will be granted on a competitive basis and will focus on improving transition of secondary CTE students to post-secondary CTE through dual and concurrent enrollment, particularly in rural areas. The two eligible institutions in Vermont will use the funds to develop curricula that can be taught by secondary CTE teachers in their own classrooms or online. The courses will be designed to align with career pathways and programs of study that lead to high-skill, or high-wage, or in-demand occupations.</p>	<p>CTE students to post-secondary CTE. \$500,000 will be awarded by grant to eligible secondary recipients with high percentages of CTE concentrators or serving rural areas for local, regional, or statewide initiatives to strengthen students' academic readiness for college and careers, provide professional development to CTE teachers to further integrate rigorous academic content in CTE programs of study, coordinate statewide teacher professional development both for new and seasoned faculty, and build institutional and statewide capacity to close opportunity and achievement gaps.</p>
81	<p>Special populations coordinators and CTE school counseling coordinators frequently share the responsibility of supporting students in some centers. In other centers, the special populations coordinator seems to be focused on only supporting the needs of students with an IEP.</p>	<p>Special needs coordinators and CTE school counseling coordinators frequently share the responsibility of supporting students in some centers. In other centers, the special needs coordinators support students with an IEP, and other staff are responsible for supporting students in other special populations categories.</p>
82	<p>This effort combined with increased training and professional development of CTE personnel will ensure that</p>	<p>This effort combined with increased training and professional development of CTE personnel will ensure that each CTE</p>

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	special population coordinators have the time and knowledge/skills to focus on all special populations and not just students with an IEP.	center has staff with the knowledge and skills required to support all special populations students.
88	In keeping with the requirements and formulas described in Section 112 of the law, as of July 1, 2023, Vermont will annually designate 85% of its allocation to be distributed to eligible secondary and postsecondary recipients by processes described in Sections 131 and 132 of the law and addressed later in this section. Of the 85%, the budget will reserve \$400,000, with \$275,000 allocated to the “secondary reserve” and “\$125,000” allocated to the “postsecondary reserve.”	In keeping with the requirements and formulas described in Section 112 of the law, Vermont will annually designate 85% of its allocation to be distributed to eligible secondary and postsecondary recipients by processes described in Sections 131 and 132 of the law and addressed later in this section. Of the 85%, the budget will reserve \$650,000, with \$500,000 allocated to the “secondary reserve” and “\$150,000” allocated to the “postsecondary reserve.”
91 - 92	The eligible recipients in this region, Caledonia Central Supervisory Union (K-12), Kingdom East Supervisory District (K-8), and St. Johnsbury School District (K-8) will receive the funds. Due to restrictions in the law and in the state plan of how funds may be used, the K-8 district may only use Perkins funds on activities for 7 th and 8 th graders, though they may also use the funds to support the grade 9 – 12 population that the districts are tuitioning to either of the private schools in the region that offer CTE. The funds may be issued by contract or through some other means, but not via a sub-grant. Caledonia Central Supervisory Union (CCSU), the only K-12 district in this region also operates high schools, and the supervisory union splits CTE service regions between St. Johnsbury and Central Vermont Career Center’s region. CCSU may use its funds to support CTE programs and initiatives, as long as they meet the requirements for CTE established in	The eligible recipients in this region, Caledonia Central Supervisory Union (K-12), Kingdom East Supervisory District (K-8), and St. Johnsbury School District (K-8) have created the Northeast Kingdom Consortium, with Kingdom East Supervisory District as the lead LEA. They receive and pool the funds for this region and then contract with the two private schools, St. Johnsbury Academy and Lyndon Institute, that are designated to provide state approved CTE programs in the region. A Standard Operating Procedure is in place that articulates the processes to be followed to ensure compliance with all relevant federal laws and requirements. The region conducts a Comprehensive Local Needs Assessment that prioritizes the activities to be funded through the contracts with the two private schools.

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	<p>the law, in the high schools that it operates, and/or it may use funds to support students who wish to attend state approved CTE programs in a regional CTE center. The three entities may also enter into a collaborative agreement or a consortium to pool funds if the requirements of the law are met.</p>	
93	<p>For instance, Canaan Memorial High School, a comprehensive high school that is geographically remote, cannot directly receive funds due to the size of their allocation; however, because they are geographically remote and consistent with the criteria in the law, the Agency would allow an exception so that they could directly receive the grant. They are assigned to a larger region, and their Perkins allocation is sub-granted through the larger recipient, North Country Career Center.</p>	Delete this paragraph. ²
93 - 94	<p>In a final exception, addressed to some degree earlier in this section, one region of the state is served by two private schools that host state approved CTE programs. These private schools are ineligible to receive funds. The funds will be directed, based on the factors discussed above, to the local education agencies (LEAs) in the region that meet the requirements established in the Act:</p> <ul style="list-style-type: none"> • Section 131(c): minimum LEA allocation is \$15,000 unless the LEA is part of a consortium, discussed in subsection f, or unless the 	Delete these paragraphs.

² Canaan Memorial High School is eligible to directly receive grant funds, provided they, like all other recipients, maintain at least 3 state approved CTE programs of sufficient size, scope, and quality, as defined in the law and in Vermont’s State Perkins Plan.

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	<p>LEA is in a rural, sparsely populated area and demonstrates an inability to enter a consortium.</p> <ul style="list-style-type: none"> • Section 131 (d): only LEAs that provide secondary school services to secondary school students in the same attendance area may receive funds. • Parameters for use of funds by these LEAs are addressed in the Purpose and Interest section. <p>The three LEAs in this region of the state may all elect to form a consortium, or two of them may elect to form a consortium. The purpose of the consortia would be to focus on career counseling and advising or other purposes as described in the Act and as outlined in the PURPOSE and INTENT section of this state plan. The Agency will provide technical assistance to help these three LEAs move forward in the best way to serve students.</p>	

ⁱ This data and/or other relevant data will still be tracked and analyzed, but the State Plan will not include how this will be done.