



Act 176
High School Completion Program
Policy Statements



Division of Integrated Support for Learning ♦ July, 2011

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(Items in red represent changes or additions relative to FY11 policy.)

Student Eligibility

Any Vermont resident ages 16 to 21 inclusive, who is enrolled or not enrolled in school, and who has not attained a high school diploma is eligible to seek admission to the High School Completion Program. This does not include home study students. Care must be taken to insure that a graduation plan can be completed before the student ages out of the program. While services may continue beyond the 22nd birthday, reimbursement will generally not follow for services rendered after that date.

HSCP Participation and Prerequisite Skills

A certain initial skill level is necessary in order to successfully participate in the High School Completion Program. Only those students whose assessment demonstrates a minimum of NRS Level 4 in reading, writing and math will be enrolled in the HSCP special group. Appropriate AEL services should be made available to students at Levels 1, 2 and 3 with the goal of skill improvement and eventual HSCP participation. (In the case of a student still enrolled in high school and requiring skill improvement in order to be eligible for HSCP, no services may be delivered by an AEL provider using AEL funds for that purpose. It is allowable for the AEL provider to deliver such services under contract with the student's high school.) **TABE "E" and "M" are not to be used for the purpose of determining HSCP readiness.**

Special Education Services

Those students in the High School Completion Program who are not enrolled in school, have no entitlement to special education services. For those students co-enrolled in school and the High School Completion Program, and with an IEP placement that includes the High School Completion Program, responsibility for special education services remains with the school.

Orientation and Enrollment

Students interested in the High School Completion Program should be introduced to the AEL system through the normal intake and enrollment process, and enrolled in the AEL system prior to the development of a graduation education plan. If student assessment scores meet eligibility criteria and the student makes an informed decision to enter the HSCP, then the student may be enrolled in the HSCP special group. Pre-plan assessment scores and learner goals must be entered, and the plan must be signed by all partners before special group enrollment can be completed. Upon special group enrollment, related services may be reimbursable.

High School/Student Relationship

Students in the High School Completion Program and not enrolled in the partnering high school during the period that plan services are being rendered, may have unenrolled from the school at a point that results in the student being counted in the school's Average Daily Membership (ADM) report. In this case, High School Plan Partners will not be reimbursed during any quarter for services rendered on behalf of a student who was enrolled in a Vermont high school and included in enrollment records for ADM purposes during the academic year including that quarter. Upon successful completion of a graduation education plan, such a student would then be enrolled in the partnering high school for the purpose of graduating. Therefore, schools should report graduates of the HSCP on the school census report so that they are included in the AYP graduation rate calculation.

Students in the High School Completion Program who are also enrolled in the partner high school shall continue to be counted in the school's ADM report. In this case, the partner high school will not be reimbursed for any services rendered under the student's graduation education plan.

Graduation Education Plan

A graduation education plan identifies the learning opportunities and assessments that an individual student must complete in order to earn a high school diploma from the assigned high school plan partner. It is a written plan that becomes a signed agreement between the student, the high school, and the AEL provider. It must set clear learning goals and include the scope and rigor of services and skill proficiency equivalent to a successful high school experience. The graduation education plan must identify a challenging and engaging array of learning activities and assessments that align with the life goals of the student and increase the student's persistence. It will be recorded on a standard form and at a minimum will include:

- profile of current transcript and skill proficiency in reading, writing, and math;
- list of student's career, educational and personal goals beyond high school;
- list of learning goals that must be accomplished in order to earn diploma;
- description of learning activities including performance expectations;
- description of assessments;
- list of providers responsible for delivery of specific services;
- signatures of high school representative, plan manager, student, and student's parent or legal guardian if available (Parental signature is not required, but recommended if student is 18.);
- anticipated date of graduation.

In 2009 statutory language was added to the section of law governing HSCP as follows.

- (a) The graduation education plan for each 16- and 17-year-old student shall include services relevant to the student's goals, such as:
 - (1) Career exploration.
 - (2) Workforce training.
 - (3) Workplace readiness training.
 - (4) Preparation for postsecondary training or education and transitioning assistance.
- (b) The graduation education plan for each student who is 18 years of age or older should include services relevant to the student's goals, such as those listed in subsection (a) of this section.

Therefore, it is established as policy that all plans written after June 30, 2009 shall conform to the statutory expectations described above.

Graduation Plan

The High School Completion Program is intended to provide a pathway to graduation for students who had unenrolled from school, or those who would benefit from participation in a flexible pathway to graduation. As is made explicit in the policy regarding the Graduation Education Plan, the program serves the purpose of providing flexibility and innovation in the pursuit of a diploma, and also addresses long-term student goals, skill improvement needs, and career exploration. Therefore, the use of this program for the purpose of what might be referred to as credit recovery is inappropriate within the context of the existing policy and reimbursement schedule.

However, there are a number of students who would be well served by the existence of a program designed to enable minimal credit attainment, within a short period, and without the additional expectations of a Graduation Education Plan. Therefore, the following policy is established for the purpose of addressing the needs of such students, while protecting the integrity and funding of the High School Completion Program.

Using the reimbursement schedule and appropriation of the High School Completion Program, providers are authorized to make available to eligible students the Graduation Plan, as distinct from the Graduation Education Plan.

Eligible students will:

- be 16 to 21 years of age (inclusive);
- need no more than 2 credits toward graduation being provided by AEL;
- have a minimum of NRS 5 in all skill areas, using TABE D or A; and
- have an anticipated graduation date within the quarter of entry or the quarter following.

The Graduation Plan will describe the learning opportunities being used to gain

and demonstrate the knowledge and skill necessary to satisfy the graduation requirements of the high school partner, and will be recorded on a standard form. The Graduation Plan is not required to address skill development, long-term goals, or career exploration. All items in the current HSCP reimbursement schedule will be available for invoicing except:

- plan development; and
- graduation outcome.

Pre/Post Assessment

With few exceptions, pre- and post-assessment of adult learners is essential. In the case of the High School Completion Program, pre-assessment is necessary in order to determine eligibility. There is also value to the student in seeing progress made relative to national standards. Post-assessment results provide evidence of student achievement that can demonstrate the value and meaning of a diploma earned through this program. From a data reporting perspective, it is important that the percentage of valid post-assessments be increased.

Therefore, it is established as a requirement for successful completion, that every HSCP plan should include post-assessment in all skill areas for which pre-assessment results were at level 4 or 5. (While skill level advancement would not be a requirement for successful plan completion under this policy, a valid post-assessment in all relevant skill areas would be required.) Such post-assessment will be eligible for reimbursement only once during the life of the plan and should occur near the completion date. This policy is not intended to affect the use of assessments such as the GED as plan elements leading to the diploma. **Failure to comply with this requirement will not delay the student's graduation, but will preclude the award of graduation outcome reimbursement.**

Basic Skills Instruction and Assessment

For those students whose pre-assessment scores place them at level 4 in any area, it is expected that their plan will include learning activities specifically designed to improve basic skills and result in skill level advancement.

Therefore, it is established as policy that all plans showing level 4 baseline assessment, shall include activities designed to address such skill deficit. Such activities may be distinct from other coursework or imbedded. It is not necessary that skill advancement be identified as a requirement for earning a diploma, but it may be. When such activities are included in a plan, and when evidence of incremental advancement is needed to inform instructional decisions, then a reasonable number of post-assessments may be used and reimbursed. However, under no circumstances will assessments failing to meet the written post-assessment eligibility standards be reimbursed. (See AEL Policy regarding pre/post assessment.) **Failure to comply with this requirement will not delay**

the student's graduation, but will preclude the award of graduation outcome reimbursement.

Anticipated Graduation Date

Reporting on the High School Completion Program includes consideration of the number of students who graduate by the anticipated date of graduation, and looks at this information within the confines of the fiscal year reporting period. Therefore, the following policy is adopted.

For purposes of the graduation education plan, the anticipated graduation date may reflect the expectations of the student in consultation with the plan manager. For the purpose of entering this information in *Data Works*, the only date available for use is the final day (i.e. June 30) of the fiscal year in which actual graduation is anticipated. These two dates, serving two different purposes, may not agree. The latter, while not necessarily the actual date of graduation, will make possible the accurate reporting of students graduating by their anticipated graduation date and within the reporting period. Plan managers are expected to revise this information after the end of the fiscal year in the event that graduation will be delayed until the next fiscal year.

Standards-Based Performance Projects

Standards-based performance projects, such as those used in the Adult Diploma Program, may be used as part of a HSCP graduation education plan. As a general rule, if the plan includes only such projects, then consideration must be given to the possibility that the student may be better served by the ADP. However, as part of a plan including other learning activities, such projects are to be encouraged.

Graduation Education Plan Jurisdiction

The issue of plan jurisdiction is not always clear and straightforward. The question is, given the student's district of residence and personal preferences, and other considerations more pertinent to the AEL provider and high school plan partner, how to determine the assignment of plan management and high school partner responsibility. More often than not this assignment will follow student residence. But there are times when geographic barriers, school district anomalies, or student/school history require deviation from that norm. This can be further confused by student relocation after a plan has been initiated. The latter is especially problematic when relocation involves more than one AEL provider. In order to reduce the inherent confusion, the following policy (and potential exceptions) has been adopted.

AEL full-service centers and satellites will develop working relationships with high schools within their proximate geographic regions. It is expected that when logical overlap exists, the relevant centers and/or satellites will resolve that overlap.

It is assumed that students will seek entry into the High School Completion Program through the AEL provider in closest proximity. When this results in the potential for a plan partnership with the student's former school, or the school serving the student's current town of residence, then such a partnership should be developed. In the event that such a partnership is deemed inappropriate, then the policy regarding high school reassignment should be followed. Any further exceptions to this norm are to be resolved by the High School Completion Plan Manager, in cooperation with the Department of Education if necessary.

In the event that a plan has been developed and initiated, and the student subsequently moves out of the plan partners' region and wishes to continue in the program, then responsibility for plan management and service provision may remain with the original partners, or may be transferred to the partners as determined above. If new plan partners are established, they will have the choice of adopting the plan as it exists, or revising the plan to meet any unique requirements of the new setting. In the latter instance, every consideration will be given to the needs and expectations of the student. But it must be understood that such a change of venue may significantly disrupt a plan's progress and scope. During the quarter of such transition, plan management reimbursement under the circumstances described in this paragraph will be paid to the partner under which the majority of services, as determined by service reimbursement totals, has been rendered. Even in the event that wholesale plan revisions are made, additional plan development reimbursement will not be made under these circumstances.

Reimbursable Services

In most circumstances, reimbursable services will be rendered after the date of signature of a plan. However, there may be circumstances requiring services prior to plan signing. Such services will be eligible for reimbursement if they appear in the plan, the plan is ultimately signed, and necessary baseline assessments were completed prior to the date of any other reimbursable services. Reimbursement may also be made after the plan has been completed and graduation has occurred. This is specifically true in the case of reimbursement for the graduation outcome. Therefore, HSCP special group enrollment can be closed only by a person with "administrator" access to Data Works.

Plan Development Reimbursement

It is intended that plan development reimbursement be made only once during the life of a plan. And because the data system does not allow the separation of a student except by a system administrator, plan development reimbursement will be triggered by the system only once. However, there may be legitimate circumstances under which plan development reimbursement should be allowed a second time. This would only be true if a student has transferred to a new AEL provider or plan partner, and then only if there is

a convincing need for a new plan. It is expected that under most circumstances the original plan will not only be forwarded but also revised as necessary.

Therefore it is established as policy that plan managers be allowed to request through the DOE, secondary plan development reimbursement. Such a request must be accompanied by a thorough explanation of the circumstances deemed to warrant such an exception. A determination on the request will be made by DOE/AEL staff.

Technical Center Reimbursement

Graduation Education Plans may include coursework offered through an area technical center. Some such coursework may include a fee for participation and therefore reimbursement would follow as with any other provider. This is specifically the case with evening adult technical education programs. Daytime technical center courses are available for plan inclusion. However, they are not reimbursed through the High School Completion Program, but rather through separate funding streams directly from DOE.

Plan Management Reimbursement

Plan management reimbursement should be made only during quarters in which meaningful management services have been provided.

Therefore, it is established as policy that plan management reimbursement will be made in any quarter during which plan-directed services have been provided, on the assumption that such services have been accompanied by management services (**note that plan development is not a plan-directed service**). Reimbursement may also be made during a quarter in which only management services are rendered, if not preceded by such a quarter. Plan management will be ineligible for reimbursement in a subsequent quarter during which no plan-directed services are rendered.

Approved Providers

Statute 16 V.S.A. § 1049a gives the commissioner of education the authority to approve agencies to provide educational services under the High School Completion Program. An approved provider will receive the state-approved reimbursement rate for services provided to HSCP students. The AEL statewide grantee and its sub-grantees are approved as the lead providers. Public and independent high schools are approved as key providers.

Contracted HSCP Service Providers

Lack of “approved provider” status does not preclude an organization **or individual** from providing services under the High School Completion Program. An organization **or individual** may enter into a contractual agreement with a regional AEL provider acting as a HSCP plan manager, for the purpose of providing specific services as part of a HSCP plan. Under these circumstances, the “contracted HSCP service provider” would be reimbursed for services at the negotiated rate included in the contractual agreement, which may not be the same as the rate guaranteed to approved providers for similar services.

Sectarian or Parochial Schools as Approved or Contracted Providers

Sectarian or parochial schools (i.e. those operated under the authority of a religious institution and in which secular and sectarian aspects of its educational program are intertwined) may not serve as approved or contracted providers under the High School Completion Program. This policy is rendered in compliance with the 1999 ruling of the Vermont Supreme Court in CHITTENDEN TOWN SCHOOL DISTRICT v. DEPARTMENT OF EDUCATION (No. 97-275).