



Act 176 High School Completion
Program Guidelines

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Division of Lifelong Learning
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Section I: Purpose and Structure of the High School Completion Program

The purpose of the High School Completion Program (HSCP) is to provide out of school youth, ages 16-21, with educational services of the scope and rigor needed for the attainment of a high school diploma. The challenge is to design individual graduation education plans that offer young people engaging and effective learning opportunities that fit the personal needs and interests of each student. These learning opportunities can be provided by a wide range of organizations, such as local high schools, adult education and literacy providers, and other approved providers. These providers include colleges and community agencies offering educational services such as community action programs, parent/child centers, teen parent education programs, technical training programs, homeless programs, youth employment programs and private schools.

The 2006 Vermont Legislature established the HSCP through 16 V.S.A. §1049. Requirements for the HSCP established under this statute include:

- A. Any person, ages 16-21 inclusive and not enrolled in school, is eligible to request an individual graduation education plan that defines the scope and rigor of alternative education services necessary to attain a high school diploma, and may describe educational services provided by a public/independent high school, an approved provider, or a combination of these.
- B. School districts shall award a high school diploma to persons who successfully complete their approved graduation education plans.
- C. The commissioner shall assign a student who wishes to work on a graduation education plan to a high school district, which will be the district of residence whenever possible.
- D. The assigned school district shall work with the statewide Adult Education & Literacy contractor and the student to develop an approved graduation education plan leading to a diploma.
- E. The commissioner shall reimburse school districts and net cash payments where possible to approved providers, for delivery of services and attainment of outcomes which have been agreed to in a graduation education plan. Such services may be delivered directly by the school district or purchased by the school district on behalf of the student from an approved provider. Reimbursement amounts will be established by the commissioner. Reimbursements will be paid from funds appropriated from the education fund.

Section II: Statute Creating the High School Completion Program

16 V.S.A. § 1049a is added to read:

§ 1049a. HIGH SCHOOL COMPLETION PROGRAM

(a) In this section:

(1) “Graduation education plan” means a written plan leading to a high school diploma for a person who is 16 to 22 years of age, has not received a high school diploma, and is not enrolled in a public school. The plan shall define the scope and rigor of services necessary for the student to attain a high school diploma, and may describe educational services to be provided by a public high school, an approved independent high school, an approved provider, or a combination of these.

(2) “Approved provider” means an agency approved by the commissioner to provide educational services which may be counted for credit toward a high school diploma.

(b) The commissioner shall assign a student who wishes to work on a graduation education plan to a high school district which shall be the district of residence whenever possible. Upon assignment, the school district shall work with an agency which has entered into contract with the department of education to provide adult education services in Vermont and the student to develop a graduation education plan. The school district shall award a high school diploma upon successful completion of the plan.

(c) The commissioner shall reimburse, and net cash payments where possible, a town school district, city school district, union school district, unified union school district, incorporated school district, or member school district of an interstate school district which has agreed to a graduation education plan in an amount:

(1) established by the commissioner for development of the graduation education plan and for other educational services typically provided by the district or an approved independent school pursuant to the plan, such as counseling, health services, participation in co curricular activities, and participation in academic or other courses; and

(2) negotiated by the commissioner and the agency which has entered into contract with the department of education to provide adult education services in Vermont, with the approved provider, for services and outcomes purchased from the approved provider on behalf of the student pursuant to the graduation education plan.

Section III: Procedures and Operation of the High School Completion Program

1. Who operates the High School Completion Program?

In partnership, local high schools and the Adult Education and Literacy (AEL) statewide contractor operate the High School Completion Program.

A. Local high schools:

- 1) Identify youth eligible for the program,
- 2) Participate in the development of each student's graduation education plan,
- 3) Make those services they typically provide available to youth no longer enrolled in school,
- 4) Determine the graduation requirements,
- 5) Assess satisfactory completion of student work,
- 6) Award the diploma, and
- 7) Maintain fiscal account records for the program's funding and expenditures.

B. The AEL contractor:

- 1) Identifies youth eligible for the program,
- 2) Participates in the development of each student's graduation education plan,
- 3) Directly provides educational services,
- 4) Engages and contracts with other educational providers for delivery of services as appropriate for each student's graduation education plan,
- 5) Manages/coordinates implementation of graduation education plan for each student,
- 6) Provides student advocacy, support and guidance throughout the process,
- 7) Assesses satisfactory completion of student work,
- 8) Manages student records and data entry needed for calculating reimbursement payments, and
- 9) Is the primary communication liaison with the local high schools.

2. How do students enter the High School Completion Program?

Any person age 16-21, who is not enrolled in school, and who has not attained a high school diploma is eligible for the High School Completion Program. Eligible youth may enter the program through many doors. The high school may counsel a recent student to enter the high school completion program. The AEL contractor may counsel eligible youth that the HSCP might be the best alternative for their continued learning. In addition, a wide variety of community organizations that work with youth not enrolled in school can also be the student's first point of contact for the HSCP. For example, a homeless or pregnant youth might first contact a program for homeless youth or pregnant teens. Such community organizations already have a relationship with the young person and they can connect them to the HSCP by simply contacting their local AEL provider and requesting that an individual graduation education plan be initiated. Because such community organizations are important support for youth with special needs, often these community organizations will be contracted to deliver education services as part of the student's graduation education plan.

Once a young person who could benefit from the HSCP is identified, the AEL provider will facilitate development of the individual's graduation education plan. The AEL provider will meet with the student and identify which high school can act as the best partner and award the diploma. When possible, this should be the district of residence, but if AEL or the district of residence recognizes circumstances that warrant a high school other than the district of residence, then AEL will contact the Department of Education with a recommended high school and a request for the commissioner to assign the student to that high school. (See Appendix A) The assigned high school assumes the responsibilities defined in Section 1A above.

3. What is a graduation education plan?

A graduation education plan identifies the learning opportunities and assessments an individual student must complete to earn his/her high school diploma from the assigned high school. It is a written plan that becomes a signed agreement between the student, the high school, and the AEL provider. It should set clear learning objectives and include the scope and rigor of services and skill proficiency equivalent of a high school graduate. The graduation education plan will also identify the organization providing each of the identified services.

The graduation education plan will be recorded on a standard form (see Appendix B). This will ensure some statewide comparability while enabling individual creativity in shaping a plan that works best for the student. Each graduation education plan will include:

- A. Profile of current school transcript and basic skill proficiency in reading, writing and math.
- B. Identification of student goals beyond high school – career, educational, personal.
- C. Clear learning objectives that the student must accomplish to earn a diploma.
- D. Plan of services: learning opportunities and assessments with evidence and performance expectations for satisfactory completion.
- E. Identification of provider organizations responsible for delivery of specific services.
- F. Expected date of graduation.

Each graduation education plan must identify a challenging and engaging array of learning opportunities and assessments that align with the life goals of the student and increase student engagement and retention. These students have already disconnected from school, it will take creative approaches to learning to get them re-engaged with their education. The circumstances of each student will be quite different. Some may have left school with only a few credits short of graduation. Others may be so far from the required credits for graduation that an alternative to credit-based graduation will be necessary. Some of these students will have good skills but left school for social and behavioral reasons. Others may have very low skills and will need a lot of instructional support to bring their skills to an equivalency of your average high school graduate. Each graduation education plan will be unique to the student circumstances.

Once the graduation education plan is written and signed, the student can be enrolled in the HSCP and marked in the database as a student in the program. A graduation education plan is

active until the expected graduation date OR until a student has gone without services for 120 days. A graduation education plan may be updated/amended as needed over time, but reimbursement for development of a graduation education plan can occur only once. If a student leaves the High School Completion Program and returns in a subsequent year, the graduation education plan will be reviewed and adjusted as part of the case management services.

4. What services can be included in the graduation education plans?

The full array of educational services may be included in graduation education plans. All types of planned learning opportunities such as tutoring, courses, workshops, work-based and service learning projects, mentoring and internships that focus on secondary level academic and technical/occupational skill development can be included in a graduation education plan. Any learning activity that the assigned high school accepts as leading to attainment of graduation requirements can be included. High schools are encouraged to approve creative approaches to learning while maintaining the standards for rigor expected of their graduates. Any service traditionally provided by public high schools, including their alternative education programs, can be included in graduation education plans. Educational services purchased on behalf of the student from AEL and approved community education providers can be included in the graduation education plan. You may also include educational services available to the student at no cost or funded through an alternative source, for example, VSAC counseling or enrollment in a secondary technical education program.

5. What is the maximum amount that can be expended for services in a graduation education plan?

Though there is no cap at this time for the cost of services and outcomes connected to a student's graduation education plan, the commissioner reserves the right to implement a cap in the future based on costs. The commissioner and Department of Education staff will monitor costs periodically through the year to determine if a spending cap should be set in the future.

6. How will providers be reimbursed for services they provide under a graduation education plan?

The statute creating the High School Completion Program charged the commissioner of education to establish a list of services and outcomes and their reimbursement rates (See Appendix C). An initial list has been adopted to get the program started. Whenever there is a need to include a service in a student's graduation education plan that is not included in this list, AEL should contact the Department of Education to request an amendment to the list. The commissioner will review the request and render a decision. While we cannot have an infinite list of reimbursable services, every effort is being made to support unique approaches that work best for individual student circumstances. This amendment process might be especially active in the start-up year as we learn more about what works for students.

All reimbursable services and outcomes will be tracked by AEL and entered in the *Data Works* database. Documentation for services and outcomes entered into the database must be maintained in the student's file. There is no authorization for reimbursements for services delivered prior to the date of a signed graduation education plan as recorded in the database. Reimbursements under the High School Completion Program will be invoiced by school

district at the Department of Education and a fiscal accounting of same will be submitted to each school district with active graduation education plans. The school district must show all reimbursements as both revenue and expenditures in its accounts. Invoices for reimbursements rendered under the High School Completion Program will be issued in October, January, April and July for the proceeding three-month period. The Department of Education will make payments to the school district and make net cash payments to the AEL providers. Payments to the school district are for services they directly provided and their portion of the reimbursable student outcomes. Net cash payments are payments made on behalf of the school district to the AEL providers for services they directly provided or that they purchased from an approved provider and for reimbursable student outcomes.

Payments are drawn from the education fund amount appropriated for this purpose by the Legislature. Should the demand for reimbursements exceed the appropriation, further payments cannot be made. The Department of Education will report any shortfall to the Legislature during the next session for its consideration in the budget adjustment process.

7. Are students in the High School Completion Program also enrolled in their assigned high school?

No. Students in the High School Completion Program are not enrolled in a high school and cannot be counted in the school's Average Daily Membership (ADM) report. Students in the HSCP are encouraged to re-establish connections with the school and may decide to re-enroll. However, if a student chooses to re-enroll in a high school, he/she would no longer be part of the HSCP for out of school youth. Re-enrollment in high school is a successful outcome for the students in the HSCP. Schools should report graduates for the High School Completion Program on their school census report so they can be counted in the AYP graduation rate calculation.

8. Can home school students participate in the High School Completion Program?

No. Students who are following an approved home school curriculum are considered enrolled students; therefore, they are not eligible to participate in the HSCP.

9. Are students in the High School Completion program entitled to Special Education services?

No. Because students in the HSCP are not enrolled in school, they have no entitlement to special education services.

10. Who is an approved provider for the High School Completion Program?

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

All other organizations wishing to provide services under the HSCP as approved providers must apply for commissioner approval. To be approved, agencies must demonstrate they have:

- A. A primary mission of education and have conducted such work for a minimum of five years.
- B. The resources and capacity to provide stable and high quality instruction (e.g. monies; student learning materials; student record system; student assessments; facilities & equipment; trained teachers; information systems to report student outcomes and program performance).
- C. Educational programming aligned with *Vermont's Framework of Standards and Learning Opportunities* and of sufficient scope and sequence for high school completion

Community organizations who could be valuable and frequent providers of educational services under the HSCP must complete the *Approved Provider Application* form found in Appendix D and submit it to Kay Charron at the Department of Education, 120 State Street, Montpelier, VT 05620. A notification letter will be mailed to the organization within two weeks of application regarding action taken. If an organization is approved to provide services in the HSCP, an agreement and assurances will also be enclosed with the notification letter for signature.

Appendix A: Waiver Request for Assigned High School

Student Name: _____

Town of Residence: _____

District of Residence: _____

Recommended Alternate Assigned District: _____

Reason for Requesting Assignment of Alternate School District: (check all that apply)

- € Student formerly attended the requested alternate district and prefers to obtain his/her diploma from this school.
- € Relationship between student and district of residence too damaged to work successfully.
- € Student has family or work responsibilities that require him/her to be in the alternate district.
- € District of residence unwilling to agree to student's proposed graduation education plan and alternate school district is willing to agree to the draft graduation education plan.
- € Other (Please describe reason for alternate school district).

Signatures:

I agree that our alternate district will assume responsibility for this student's participation in the High School Completion Program and will work to develop the graduation education plan and will award a high school diploma to the student upon completion of the graduation education plan.

Alternate District Representative: _____

Date: _____

I agree that it is in the best interest of this student to participate in the High School Completion Program at an alternate district.

District of Residence Representative: _____

Date: _____

Appendix B

High School Completion Program **Personal Graduation Education Plan**

Student Name:

Assigned High School:

School District:

AEL Manager of GEP:

Phone:

H.S. Representative:

Phone:

A. Student's Goals Beyond High School: (consider career, educational, personal)

Student's Assessment of what skills, knowledge and/or experiences will be necessary to achieve the goal:

Skills:

Knowledge:

Experience:

Student's Assessment of factors that may support success:

Student's Assessment of factors that may inhibit success:

B. Student high school achievement record summary: (e.g., credits; strengths; gaps)

Current HS transcript in student file? YES NO

Credits Earned _____ Credits Missing _____

Strengths

Gaps

Basic Skills Assessments:

Reading _____ grade level equivalent As assessed by _____

Writing _____ grade level equivalent As assessed by _____

Math _____ grade level equivalent As assessed by _____

Any Additional Comments:

C. Graduation Requirements for this Student:

D. With the student’s goals for beyond high school, achievements to date, the results of diagnostic assessments, and graduation requirements in mind, what will be the skills, knowledge and/or experiential gains that result in a high school diploma?

<u>Learning Objective:</u> What knowledge, skill or experience is to be gained?	<u>Services:</u> How will it be achieved?	Service Provider?	When?	Evidence of Achievement	How Assessed	By whom? When?
1.						
2.						
3.						

<u>Learning Objective:</u> What knowledge, skill or experience is to be gained?	<u>Services:</u> How will it be achieved?	Service Provider?	When?	Evidence of Achievement	How Assessed	By whom? When?
4.						
5.						
6.						

E. Expected Date of Graduation: _____

F. Who commits to this High School Completion Plan?

(Please sign and date below.)

Student: _____ Date: _____

Parent, guardian, or surrogate for minors: _____ Date: _____

High School Representative Authorized by School Board: _____

Position Title: _____ Date: _____

Adult Education & Literacy Representative: _____

Date: _____

Appendix C:
Act 176: High School Completion Program
Services and Outcomes Reimbursement Rates
All Rates are Flat Fees

Oversight	Total Reimbursement Rate	% of base education payment	Amount Credited to Provider Organization	
			High School	AEL Contractor
Develop graduation education plan (only once)	\$800	11%	\$400	\$400
Management of graduation education plan, including plan revisions student support, and service coordination	\$900 Annually (half paid at start and half paid at 6 months, dependent on student remaining active)	5.5%		\$900

Services ¹ (provided as often as necessary unless specified)	Total Reimbursement Rate	% of base education payment
Instructional Services		
Attend academic course @ high school	\$1,200	16%
Attend academic course with education provider for HS credit toward diploma	\$1,200	16%
Attend academic course with postsecondary institution for HS credit toward diploma	\$1,200	16%
Attend a 1-10 hour technical training program for occupational skill development	\$120	1.6%
Attend an 11-25 hour technical training program for occupational skill development	\$300	4%
Attend a 26-40 hour technical training program for occupational skill development	\$480	6.5%
Attend a 41+ hour technical training program for occupational skill development	\$700	9.5%
Career exploration services – at least 10 hours	\$300	4%
Develop a career plan (only once)	\$250	3.4%
Attend an Employability Skills Building Program (work readiness) – at least 40 hours	\$500	6.8%
Attend a College Readiness/transition Program – at least 40 hours	\$500	6.8%
Attend Life Skills Workshop – at least 20 hrs	\$250	3.4%
Complete 1-10 hours of Basic skills individual	\$300	4%

¹ There is a single reimbursement rate for each service. These reimbursement rates are applied to all providers. Schools, AEL organizations, approved community providers are paid the same rate for the same service.

tutoring		
Complete 1-10 hours of Basic skills group instruction	\$100	1.3%
Complete 11-25 hours of Basic skills individual tutoring	\$750	10.2%
Complete 11-25 hours of Basic skills group instruction	\$250	3.4%
Complete 26-40 hours of Basic skills individual tutoring	\$1,200	16%
Complete 26-40 hours of Basic skills group instruction	\$400	5.5%
Introduction to Computers class – at least 20 hours	\$350	4.8%
Complete an independent learning project – 20+ hrs	\$350	4.8%
Complete a Work-based learning or service learning project – at least 40 hours	\$500	6.8%
Work-based learning or service learning internship/ mentoring – at least 120 hours	\$1,200	16%
Employed student given OJT – at least 20 hrs	\$500	6.8%
Participation in HS extra-curricular activities	\$400	5.5%
Participation in HS sports or physical educ	\$730	10%
Attend HS driver’s education	\$730	10%
Attend Private Driver’s Education	\$730	10%
Assessment Services		
Administer an approved basic skills assessment in reading, writing, math OR a GED exam	\$150	2%
Administer an industry relevant occupational skills assessment linked to an Industry Recognized Credential	\$150	2%
Administer a standards-based performance project for proficiency demonstration of at least 3 standards	\$300	4%
Administer learning style/ learning needs survey (only once)	\$150	2%
Administer a career interest survey	\$150	2%
Miscellaneous Services		
HS counseling services – at least 10 hours	\$300	4%
HS Health services	\$100	1.3%
Student insurance for worksite or service learning experience	\$100	1.3%

Student transportation to and from learning site	Actual costs entered quarterly – maximum \$100 per quarter	1.3%
Textbooks and instructional materials	\$100	1.3%
Maintain HS transcript or other HS records (only once)	\$100	1.3%
Student stipend/incentive	\$200	2.7%

OUTCOMES²	Total Reimbursement Rate	% of base education payment
Obtain HS diploma	\$1500	20%
Obtain GED certificate with average score on 5 exams of 550 or higher	\$1000	13.6%
Gain an NRS skill level in reading, writing, math, or ESL ³	\$500	6.8%
Earn a “marketable” IRC ⁴	\$200	2.8%
Re-enroll in HS and continue for 1 year or until graduation	\$500	6.8%

² There is a single reimbursement rate for each outcome. Reimbursements for outcomes will be prorated based on the percent by provider of reimbursed service dollars from date of graduation education plan to end of quarter in which outcome occurs.

³ An NRS skill level gain is equivalent to 2 grade levels. Skill gains must be documented using scores from an approved standardized test such as TABE, CASAS, BEST.

⁴ A marketable IRC is an industry recognized credential that has value to the student when seeking employment. For example, an LNA certificate, a CDL, or an IC3 certificate are marketable IRC's. IRC's are earned through performance on industry relevant assessments in specific occupational areas.

**Appendix D:
Approved Provider Application Form
*High School Completion Program***

Name of Applicant Organization: _____

Mailing Address: _____

Contact Person: _____

Email: _____ **Phone:** _____

.....
Legal Structure of Organization: _____

Years in Operation: _____ **License/Certification:** _____

Organization's Mission:

Describe how providing educational services fits within your mission.

Years organization has provided educational services _____

Average # of students in attendance: _____ **annually** _____ **at one time**

Number of teachers: _____ **employed** _____ **volunteer**

Describe the preparation, training, and licensing of your teachers.

Describe the nature and extent of educational services the organization provides. (who is taught; what is taught; how is it taught; scope and sequence; intensity and duration)

Describe how you assess student progress and accomplishments. How are these related to the Vermont Framework of Standards? What do you maintain for student records of performance? Provide data on educational outcomes of your students.

Describe the instructional materials, equipment, and facilities the program has available to support your educational purposes.

Approximate annual budget for your educational program: _____

Do you have a certificate of occupancy from the Division of Fire Safety? _____