

High School Completion Program

Fiscal Year 2019

**Policy
Manual**
July 1, 2018

This document is developed pursuant to 16 V.S.A. § 941(b) to provide guidance, in the form of technical assistance, sharing of best practices and model documents, legal interpretations, and other support for the High School Completion Program (HSCP) as set forth in 16 V.S.A. § 943.

Adult Education and Literacy (AEL)



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Definitions

Approved Providers: an entity approved by the Secretary to provide educational services that may be awarded credits or used to determine proficiency necessary for a high school diploma. [NOTE: Approved Providers are subcontractors to the local Adult Education and Literacy provider].

Average Daily Membership (ADM): is a count of resident and state-placed students who receive an elementary or secondary education at public expense; data are listed by town according to a student's residence. Resident students are counted during the period from the 11th to the 30th day of the current school year, while state-placed students are counted for the school year prior to the current census period. Data are used in calculating equalized pupils, which are used to determine the homestead tax rates.

Graduation Plan (GP): a plan for students seeking a secondary diploma with high skills and low needs who would be well served by the existence of an accelerated program designed to enable minimal credit attainment, within a short period, and without the additional expectations of a Graduation Education Plan.

Graduation Education Plan (GEP): a graduation education plan that 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 local adult education and literacy provider.

High School Completion Program Plan Manager: the local adult education and literacy provider who has sole responsibility for leading the development, monitoring, and maintenance of the personalized learning plans (also known as Graduation Plan, Graduation Education Plan).

High School Plan Partner: the assigned district high school involved in developing the plan for students in the High School Completion Program, including both enrolled and unenrolled students.

Local Adult Education and Literacy (AEL) Provider: an entity that is awarded Federal or State grant funds to conduct adult education and literacy activities.

National Reporting System (NRS): an outcome-based reporting system for the State-administered, federally funded adult education program. The NRS has designated 6 skill levels for adult learners. Only students assessed at the NRS 5-6 levels are eligible for HSCP.

Reimbursable Expenses: services provided pursuant to the student’s approved plan and as defined by the *High School Completion Program Services and Outcomes Reimbursement Rates* as updated each year. Such expenses may include, but are not limited to, participation in co-curricular activities, participation in academic or other courses, plan development, and plan management.

Student Readiness and Eligibility to Draw Down HSCP Funds

Any Vermont resident who is aged 16 or older, who is enrolled or not enrolled in school, and who has not attained a high school diploma may, through their personalized learning plan, access the flexible pathway of the High School Completion Program. Students who would like to attain their diploma through the HSCP must be assessed through the National Reporting System (NRS). Services provided to students who assess at an NRS level 5 or above in core instructional areas are eligible for reimbursement through the HSCP appropriation (and as per the *Services and Outcomes Reimbursement Rates*). Students below that level may receive Adult Basic Education services as part of a plan toward meeting graduation requirements. ABE services are not reimbursable through the High School Completion Program appropriation.

It is incumbent on the plan partners to ensure that a student enrolled in the High School Completion Program is prepared to be a successful participant in their plan and all identified learning activities. For those students who may need basic skills instruction in order to access and subsequently meet [proficiency-based graduation requirements](#) (PBGRs), readiness may include an explicit conversation on what their program of learning will entail – including instructional content and rigor, progress assessments, and time commitment.

HSCP Participation and Prerequisite Skills

A certain initial skill level is necessary to indicate readiness for the High School Completion Program. As previously referenced, students assessed at NRS level 5 and above can be special group enrolled in the DataWorks system as an HSCP student. Below this level, only those students whose assessment demonstrates a minimum of NRS Level 4 in reading, writing and math may be enrolled in the HSCP special group type identified as *Below NRS 5* in DataWorks, and only when prior approval has been requested and granted using the prior approval form. Please refer to the *Services and Outcomes Reimbursement Rates* to identify acceptable services eligible for reimbursement through HSCP. Appropriate AEL services will be made available to students at Levels 1, 2 and 3 with the goal of skill improvement and, if appropriate/desired, eventual HSCP designation in the AEL data tracking system. At no time is it necessary to discuss funding streams with students. Rather, a transparent and explicit conversation with students who require basic skills instruction should occur so that students can make

informed decisions about their short and long-term plans. Any queries related to students assessing below level 4 may be sent to the AOE via a prior approval form. (Note: 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" and the CASAS "A" and "B" 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, responsibility for special education services remains with the school pursuant to 16 V.S.A. § 2941 and the Federal Individuals with Disabilities Education Act (IDEA). It is strongly encouraged that students protected under IDEA who access the HSCP remain enrolled in their secondary school in order to continue receiving special education services. It is equally encouraged that, whenever possible, an educator from the AEL provider participate in an IEP team meeting when considering HSCP as a flexible pathway to graduation to ensure that all parties make an informed decision.

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. When the student makes an informed decision to earn their high school diploma, a personalized learning plan (either GP or GEP) is developed and signed, and then the student may, depending on assessment scores, be enrolled in the HSCP special group as described above. 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 who are unenrolled from a high school and are assigned to a high school for the purposes of HSCP are not included in the school's Average Daily Membership (ADM) and, therefore their primary relationship and communication will be with the AEL provider.

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 previously been enrolled and been 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 or graduation 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 Adequate Yearly Progress (AYP) graduation rate calculations used in accountability under the Every Student Succeeds Act of 2015.

Students in the High School Completion Program who remain 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 (also known as a Personalized Learning Plan (PLP) in accordance with 16 V.S.A. §942) identifies the learning opportunities and assessments that an individual student must complete in order to demonstrate proficiency and 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 local adult education and literacy provider. The plan shall define the scope and rigor of academic and experiential opportunities necessary for a secondary student to complete secondary school successfully as defined by the assigned high school. It must set clear learning goals and include the scope and rigor of services and skill proficiency required to meet the high school's PBGRs. There is a myriad of ways that students can demonstrate proficiency, so the focus should not be on replicating the high school experience but rather on the pathway and evidence required to meet PBGRs. 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 as they work to meet the articulated PBGRs. It will be recorded on a standard form and at a minimum will include the:

- profile of current transcript and skill proficiency in reading, writing, and math;
- list of student's career, educational and personal goals;
- proficiency-based graduation requirements they must meet in order to earn diploma;
- description of learning activities and performance indicators;

- description of assessments, including planned assessments of both skill proficiency and growth in proficiency;
- 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 or older); and
- anticipated date of graduation.

Graduation Plan (as distinct from Graduation Education Plan)

The High School Completion Program was originally 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 addresses long-term student goals, skill improvement needs, and career exploration. Therefore, the use of HSCP 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 with high skills and low needs (credits and/or proficiencies) who would be well served by the existence of a program designed to (a) enable minimal credit attainment and/or (b) enable credit attainment within an accelerated period of time defined under the eligibility criteria below. Therefore, the following policy is established for the purpose of addressing the unique needs of such students, while protecting the integrity and funding of the High School Completion Program.

Using the reimbursement schedule, local adult education and literacy providers are authorized to draw upon High School Completion funds for services provided to students eligible for a Graduation Plan.

Eligible students must:

- be 16 or older;
- have low needs (e.g., do not require the services of other WIOA partners; do not require extensive counseling or transition services; can have the remaining services/instruction provided by AEL provider/assigned high school);
- be highly skilled - have a minimum of National Reporting System (NRS) 5 in all skill areas, using TABE D or A for reading, writing and math or the CASAS Life and Work reading and CASAS Life Skills math levels C or D; and
- have an anticipated graduation date within the quarter of entry to the program or the following quarter. 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.

All items in the current HSCP Services and Outcomes Reimbursement Rates will be available for invoicing for services rendered as part of the GP except plan development and the graduation outcome.

Baseline/Progress Assessment

In the High School Completion Program, baseline assessment is necessary in order to identify learning gaps, determine readiness, and provide appropriate services and instruction. There is also value to the student in seeing progress made relative to national standards. Progress assessment results provide evidence of student achievement that can demonstrate the value and meaning of a diploma earned through this program.

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 considers 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 the goal target date into *DataWorks*, the only date available for use is the final day of the fiscal year in which actual graduation is anticipated (June 30, Year). These two dates (the anticipated graduation date and the goal target date), serving two different purposes, may not agree. While June 30 is not necessarily the actual date of graduation (e.g., June 18th or September 30th, etc.), the date will allow for accurate reporting of students graduating by their anticipated graduation date and within the reporting period. Plan managers must revise graduation information in *DataWorks* after the end of the fiscal year in the event that a student's graduation is delayed until the next fiscal year.

Proficiency-Based Performance Projects

Proficiency-based performance projects, such as the Capstone and Challenge project process may be used and are encouraged as part of a HSCP graduation education plan.

Graduation Education Plan Jurisdiction

The issue of plan jurisdiction is not always clear and straightforward. To determine the assignment of plan management and high school partner responsibility, one must consider the student's district of residence and personal preferences, as well as other issues pertinent to the local adult education and literacy provider and high school plan partner. More often than not, this assignment will follow student residence. However, 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 local adult education and literacy provider. In order to reduce confusion, the following policy has been adopted.

AEL full-service centers and satellites (known here as local adult education and literacy providers) 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 local adult education and literacy 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 a waiver request process for high school reassignment should be followed (Waiver Request for Assigned High School form available in DataWorks.) Any further exceptions to this norm will be resolved by the High School Completion Plan Manager in cooperation with the Vermont Agency of Education if necessary. The decision-making process shall seek to increase students' likelihood of completing the program in a timely way.

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 can either remain with the original partners or transfer to new partners. 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 additional graduation requirements of the new partner high school. In the latter instance, every consideration will be given to the needs and expectations of the student. That said, students must be informed that a change of provider and/or partner high school may significantly disrupt a plan's scope and timeline for completion.

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

HSCP funding is not available for services that are funded and/or required under Adult Basic Education (ABE) grants. Learning activities outside of these ABE services may be funded under the HSCP reimbursement schedule with prior approval of the activity/expense by the AOE (to ensure student readiness and appropriateness of activity.)

In most circumstances, reimbursable services will be provided after the date of signature of a plan. However, there may be individual circumstances requiring the delivery of services prior to plan signing. Such services will be eligible for reimbursement if they appear in the plan, the plan is ultimately signed, and the necessary baseline assessments were completed prior to the date of any other reimbursable services. Reimbursements may also be requested (and approved) after the plan has been completed and graduation has occurred. Therefore, HSCP special group enrollment can only be closed by a person with “administrator” access to DataWorks.

Plan Development Reimbursement

Plan development reimbursement is not available for students below NRS level 5 as personalized learning plans are a funded requirement of the ABE grants.

For students who enter HSCP at or above NRS level 5, it is intended that plan development reimbursement be made only once during the life of a plan.

However, there may be limited 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 local adult education and literacy or a different high school plan partner, and then only if there is a convincing need for a new plan. In these rare instances, a written request must be submitted to the AOE in advance. 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 HSCP plan managers may submit a written request to the AOE for secondary plan development reimbursement. Such a request

must include a thorough explanation of the circumstances deemed to warrant such an exception. A determination on the request will be made by AOE/AEL staff.

AEL Technology funds are generated for each new graduation education plan on a provider basis. These funds are available to the generating provider for enriching the technology resources for High School Completion Program students. Documentation that justifies each purchase using AEL Technology funds must be maintained by providers and presented upon request by the Agency of Education.

Technical Center Reimbursement

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

Plan Management Reimbursement

Plan management reimbursement is not available for students below NRS level 5 as personalized learning plans are a funded requirement of the ABE grants. An exception may be made during FY19 with prior approval for students assessed at NRS 4 in all skill levels using the TABE 11/12. (See HSCP Prior Approval Form.)

For students who are at or above NRS level 5, plan management reimbursement should be made only during quarters in which meaningful management services have been provided. (See HSCP Plan Management Responsibilities Memo of 3/2/18.)

Therefore, it is established as policy that plan management reimbursement can be requested 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 requested 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 provided.

Local Adult Education and Literacy Provider

Title 16 V.S.A. §§ 941, 942, & 943 gives the Secretary of Education the authority to approve agencies to provide educational services under the High School Completion Program. A local adult education and literacy provider will receive the state-

approved reimbursement rate for services provided to HSCP students. The local adult education and literacy providers are approved as the lead providers. Public and independent high schools are approved as partner providers.

Approved HSCP Service Providers

Lack of local adult education and literacy 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 sub-contractual agreement with a local adult education and literacy provider for the purpose of providing specific services as part of a HSCP plan. In these instances, the adult education and literacy provider is the HSCP Plan Manager and is responsible for the development and management of the HSCP plan. Under these circumstances, the “approved provider” would be reimbursed for services at the negotiated rate included in the sub-contractual agreement, which may not be the same as the rate guaranteed to local adult education and literacy providers for similar services.

In order to clarify roles and responsibilities when AEL providers and approved providers collaboratively serve students in HSCP, it is strongly encouraged that a clear intake and communication process is established. A written process will help to ensure that AEL providers and their partners understand the various entry points for students into the HSCP, that students are fully informed of their options, and that all parties are informed, in advance, of reimbursable activities under the HSCP. Each student’s personalized learning plan (GEP or GP) identifies the *unique* combination of learning opportunities that he or she, as an individual, must complete in order to earn a high school diploma from the high school partner. For this reason, no sub-contractor may receive reimbursement for their entire program’s activities as the basis of an HSCP plan.

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 providers or contracted providers (now known as Local Adult Education and Literacy Providers) under the High School Completion Program. This policy is rendered in compliance with the ruling of the Vermont Supreme Court in *Chittenden Town School Dist. v. Dept. of Education*, 169 Vt. 310 (1999).